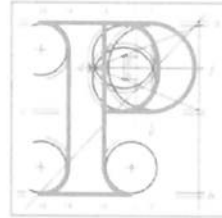


Our Case Number: ACP-323972-25



An
Coimisiún
Pleanála

Dermot Maguire
40 Cappocks Gate
Ardee
Co. Louth
A92K8H2

Date: 09 February 2026

Re: Public realm and community infrastructure project on lands in Ardee, Co. Louth
Ardee, Co. Louth

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

JA02

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Submission

ACP-323972-25 – Louth County Council Public realm and community infrastructure project on lands in Ardee, Co. Louth

From : Dermot Maguire,
40 Cappocks Gate,
Ardee,
Co.Louth
A92K8H2

AN COIMISIÚN PLEANÁLA	
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ACP-	
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By:	YGM

On Behalf of :Ardee Railway Walk Memorial Garden Committee

Character Area 2 : (Railway Memorial Park)

Introduction

I wish to make a formal objection to elements of the proposed Ardee 2040 Urban Regeneration scheme insofar as they relate to Character Area 2 - the Railway Memorial Park, Ardee.

This objection is grounded in material inconsistencies between:

- earlier public consultation outcomes and Louth county Council Involvement
- the proposals now being advanced,
- inaccuracies and omissions in the mapping and description of the existing site,
- reliance on outdated photographic material, and
- proposals to undertake works during the pendency of a live planning application.

Taken together, these issues raise serious concerns regarding procedural fairness, transparency, and the adequacy of the application before An Coimisiún Pleanála.

1. Community History of the Railway Walk & Remembrance Park, Ardee Referred to as Character Area 2.

The Railway Walk and Remembrance Park on Sean O'Garroll Street, Ardee, was not created as a planned civic development. It emerged gradually over more than a decade as a community-led transformation of a neglected former railway corridor into a peaceful public amenity.

For many years, this area was a dumping ground and overgrown wasteland along the disused railway line formerly owned by Iarnród Éireann. Local community schemes were encouraged to improve and maintain the area on the understanding that no commercial profit would be made from the land. The improvement and maintenance of the site was carried out through a combination of:

- Ardee Tidy Towns volunteers
- Community Employment (CE) Scheme participants
- Tús Scheme workers through Louth Local Development

- Local community members and families

This work began well before Louth County Council acquired the lands in 2022.

Development of the Walk and Park

Over a ten-year period, the site was steadily cleared, landscaped, and made accessible as a walking route. What had been a neglected strip of land gradually became a tranquil walkway used daily by people from Ardee and surrounding areas.

As the space became more welcoming, simple features were added:

- Benches for walkers and older visitors
- Stone pathways and seating areas
- A wishing well constructed from stonework
- A grotto area for quiet reflection
- Planting of hundreds of trees along the walk

Importantly, materials and equipment for some of these works were provided locally by Louth County Council staff in Ardee, including stone, cement, and benches. The wishing well and grotto were both constructed with assistance and materials supplied in this way. At no point did the community believe these materials were unauthorised; they were supplied openly and in good faith as part of the local improvement of the area.

The completed space was formally acknowledged when it was opened as a commemoration to 'those that died early' by the then Chair of Louth County Council, Dolores Minogue, further reinforcing the understanding that this was a supported community enhancement of the area.

The Remembrance Trees

During Covid-19, the walkway took on an even deeper meaning for the people of Ardee. Families who had lost loved ones began purchasing and planting remembrance trees along the walk as a tribute. This grew organically into a remembrance garden of significant emotional value to the town.

Today, 356 remembrance trees line the Railway Walk. These trees were purchased by members of the public, and each represents a personal memorial. They are not decorative landscaping but living memorials belonging emotionally and financially to local families.

Community Use and Care

For over a decade, the area has been maintained continuously by:

- Ardee Tidy Towns
- CE and Tús participants
- Volunteers from the local community

People travel from across the region to walk this route, particularly since Covid, where it became a place of peace, reflection, and gentle exercise for many.

Public Concern Regarding the Ardee 2040 Proposals

When the Ardee 2040 Regeneration Plan was made known to the public, significant concern arose regarding proposals affecting the Railway Walk area, including:

- The relocation of 122 of the 356 remembrance trees
- The removal of the wishing well
- The removal of the grotto
- Changes to the layout and character of the existing parkland

A public petition opposing these elements gathered over 1,000 signatures.

A public meeting was held in Ardee Parish Centre on 25 November 2024, attended by hundreds of local residents. A community committee was subsequently formed to engage with Louth County Council in a constructive manner.

This committee met with senior council officials at the Civic Buildings in Ardee on:

- 31 January 2025
- 20 February 2025
- 8 May 2025

During these meetings, community members believed that agreement had been reached to omit certain proposed elements from the Railway Walk area of the plan, including:

- A playground
- Community allotments
- A coffee kiosk
- Significant parking provision

However, these elements later appeared again in the submitted planning documentation.

The Importance of the Site Today

The Railway Walk and Remembrance Park is not simply open land. It is:

- A decade-long community project
- A maintained public amenity
- A remembrance garden created by local families
- A space developed with the knowledge and practical support of local council staff
- A site formally acknowledged by the Chair of Louth County Council

The character of the park as it exists today reflects years of voluntary labour, community care, and emotional investment by the people of Ardee. Any proposals affecting this area must be understood in the context of this history and the deep community connection to the space.

Conclusion

In the planning documentation for the Ardee 2040 Regeneration Project submitted by Louth County Council, there is little meaningful acknowledgement—whether in maps, photographs, or written description—of the existing wishing well, grotto, benches, pathways, and the 356 remembrance trees that define the present character of the Railway Walk.

The absence of these features from the visual and descriptive record does not reflect the lived reality of the site as it has existed for over a decade as a maintained community park and remembrance garden. By failing to accurately represent what is physically and socially present on the ground, the application presents the area as undeveloped or neutral land rather than a long-established community amenity shaped by sustained public effort and emotional investment. This omission risks materially misleading the assessment of the site and undermines the integrity and completeness of the planning application.

2. Legitimate expectation arising from that earlier consultation

Louth County Council engaged with residents and community representatives on multiple occasions in relation to the Railway Memorial Park, including meetings held on:

- 31 January 2025

- 20 February 2025

- **8 May 2025 (among other engagements).**

During these consultations, residents were informed that the following elements would be removed or substantially amended in response to community feedback:

- the playground would be removed from the scheme;

- community allotments would not form part of the final proposal;

- a proposed coffee kiosk would be removed; and

- parking provision would be limited from earlier iterations of the scheme.

These commitments were presented as settled outcomes arising directly from engagement with residents. On that basis, a legitimate expectation arose that these elements would not reappear in later proposals.

The subsequent reintroduction of removed elements, or further changes without renewed consultation, undermines the credibility of the consultation process and defeats the purpose of public participation.

The Application does not reference the proposed Memorial Garden yet we know from recent Louth County Council notices that this is going ahead. Which is it?

In essence, the drawings now relied upon in the planning application differ materially from those presented to the public during the September 2025 consultation process (see Appendix 2).

The earlier material depicted an open, permeable civic park landscape integrated with Memorial Park (Opportunity Area 2). The application drawings, by contrast, introduce extensive boundary enclosures, controlled access arrangements, vehicle access infrastructure, and a change in the functional use of key areas from reflective civic space to managed allotments.

This represents a substantive divergence in both the character and intended use of the site from that presented to the public. As a result, members of the public were not afforded a fair opportunity to consider or make submissions on the development as now proposed.

This discrepancy is material and goes to the validity of the application.

3. Reintroduction of removed elements without renewed consultation

The current proposals reinstate or materially alter elements that had previously been removed or amended following engagement, including:

- a playground;

- community allotments; and
- associated site uses.

This represents a material alteration to the scheme. Such changes should have triggered renewed public consultation and a clear explanation as to why previously accepted community concerns were reversed.

4. Memorial garden advertised but not included in the application

Public notices and communications now refer to the creation of a memorial garden at the Railway Memorial Park. (Appendix 2)

However, the memorial garden does not appear to be clearly identified, described, or assessed within the application documentation before the Board. Advertising development elements that are not included in the formal application undermines transparency and prevents informed public participation.

5. Inaccurate mapping and omission of existing commemorative features

The site maps and drawings accompanying the application do not show the existing well and grotto which are now in place within the Railway Memorial Park.

The well is an established commemorative feature and was formally opened by the then Chair of Louth County Council, Dolores Minogue. The omission of these features means the application does not accurately describe the existing condition or commemorative context of the site.

6. Request for retention of the well and grotto based on established community use

I formally request that the existing well and grotto be retained in situ as part of any future development of the Railway Memorial Park.

These features are widely and regularly used by members of the community as places of quiet reflection and remembrance. Their continued use demonstrates an ongoing public function. Removal or relocation would represent the loss of an existing community amenity.

7. Inappropriate references to religion during engagement

During engagement with residents, comments were made to the effect that it was not the role of the planning authority to promote religion. This is a concerning characterisation of existing commemorative features which are widely used by the community and form part of the cultural and social fabric of the area.

Planning decisions should be based on land use, heritage, and community function, rather than subjective interpretations of belief or religious expression.

8. Use of outdated photographic material

The application relies on photographic material that is over four years old. These photographs do not accurately represent the site as it currently exists, particularly given the presence of the well, grotto, and ongoing community use.

The reliance on outdated imagery further undermines the accuracy of the baseline information provided to the Board.

9.. Council position on proposed tree relocation works during live application

Louth County Council has stated that the proposed relocation of a number of trees within the Railway Memorial Park is considered a separate process to the Ardee 2040 planning application and, in its view, does not constitute development requiring planning permission, having regard to the minor scale and nature of the works.

This position raises concerns for the purposes of the current application. The relocation of established trees within a memorial park constitutes physical intervention and results in permanent alteration of the site. In addition, public notices and communications have referred not only to tree relocation but also to the creation of a memorial garden, which does not appear to be included or assessed within the application documentation before the Board.

Given that the Railway Memorial Park forms part of the lands under consideration in a live application, proceeding with such works risks pre-empting or prejudicing the independent determination of An Coimisiún Pleanála.

11. Requirement for meaningful consultation

I respectfully request that Louth County Council be required to engage in genuine, meaningful, and transparent consultation with residents and stakeholders in relation to any future proposals affecting the Railway Memorial Park.

Consultation must involve:

- clear presentation of proposals;
- accurate and up-to-date information;
- responsiveness to community feedback; and
- respect for agreed outcomes.

Consultation should not be treated as a procedural formality, but as a substantive part of plan-making and decision-making.

12. Conclusion

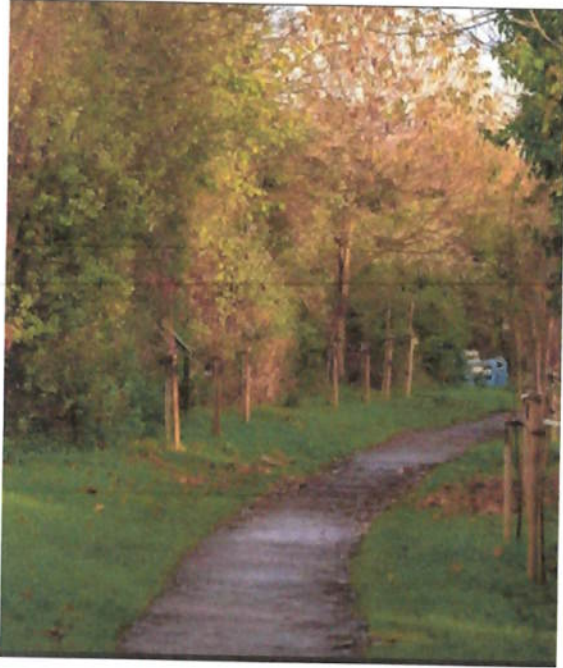
For the reasons set out above, I respectfully request that An Coimisiún Pleanála:

1. Give careful consideration to the procedural deficiencies arising from changes to the scheme following earlier consultation;
2. Treat the reintroduction of previously removed elements as material alterations requiring renewed public engagement;
3. Seek clarification as to whether the proposed memorial garden forms part of the application;
4. Require that all existing site features, including the well and grotto, be accurately shown and assessed;
5. Provide for the retention in situ of the well and grotto, recognising their established and widespread community use;
6. Reconsider the inclusion of Character Area 2, in the overall plan or subject to further public consultation impose clear safeguards to protect its commemorative function; and
7. Ensure that no works of a permanent or irreversible nature proceed on the lands pending

determination of the application.

Appendix1. Photographs of The memorial Park (Character Area 2). as it now looks and not as presented in Louth County Councils Application





Dermot Maguire with Fergus O'Dowd TD, Dolores Minogue Cathaoirleach of county Louth, Leah Maguire, Patrick and Sandra Byrne from SAFE Suicide Awareness, Brendan Matthews and Maria Maguire at the Remberence Wishing Well in Railway Park Ardee. Photo: Colin Bell Photography

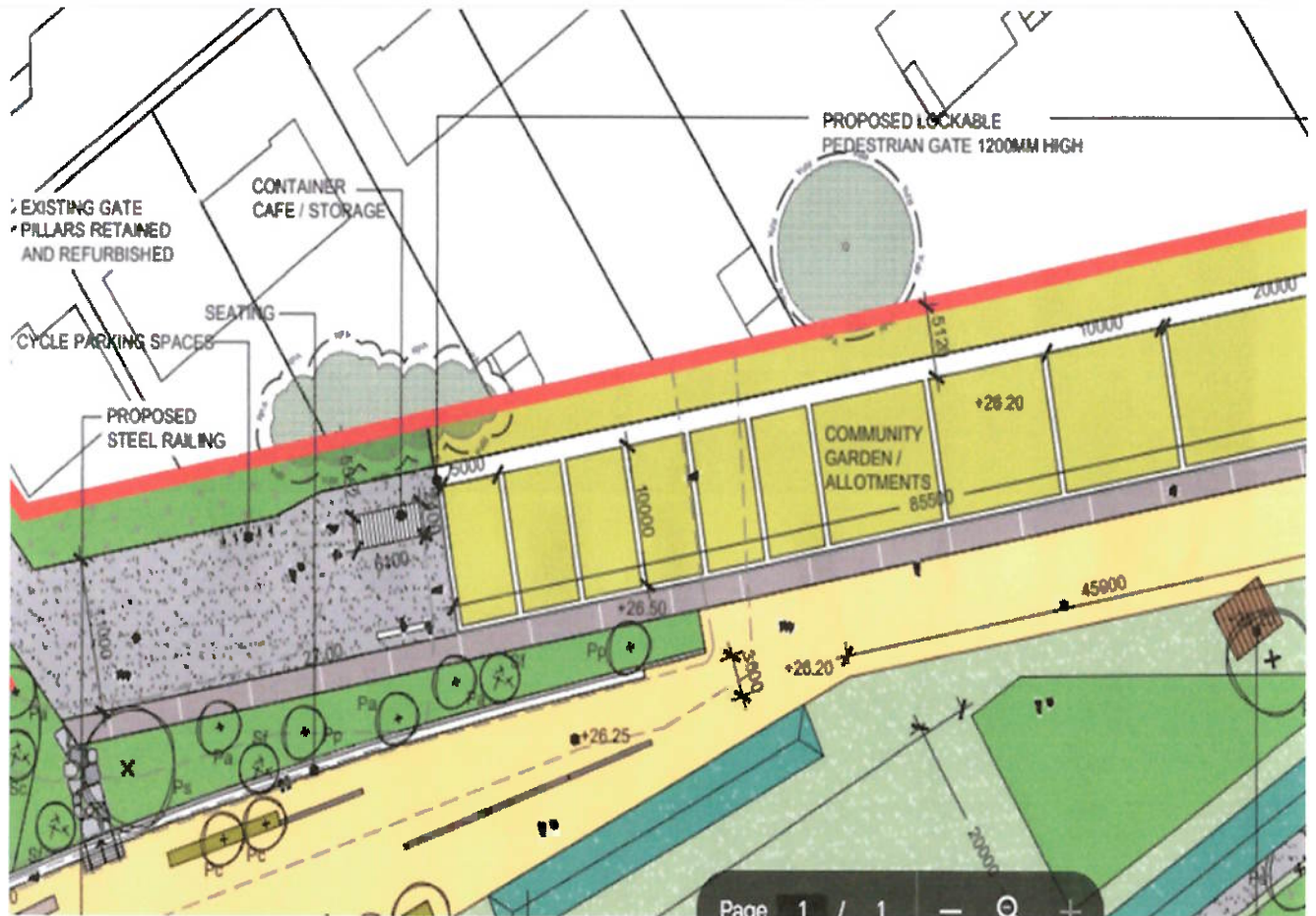


Appendix 2

Map of Character Area 2 as submitted by Louth County Council as part of the application

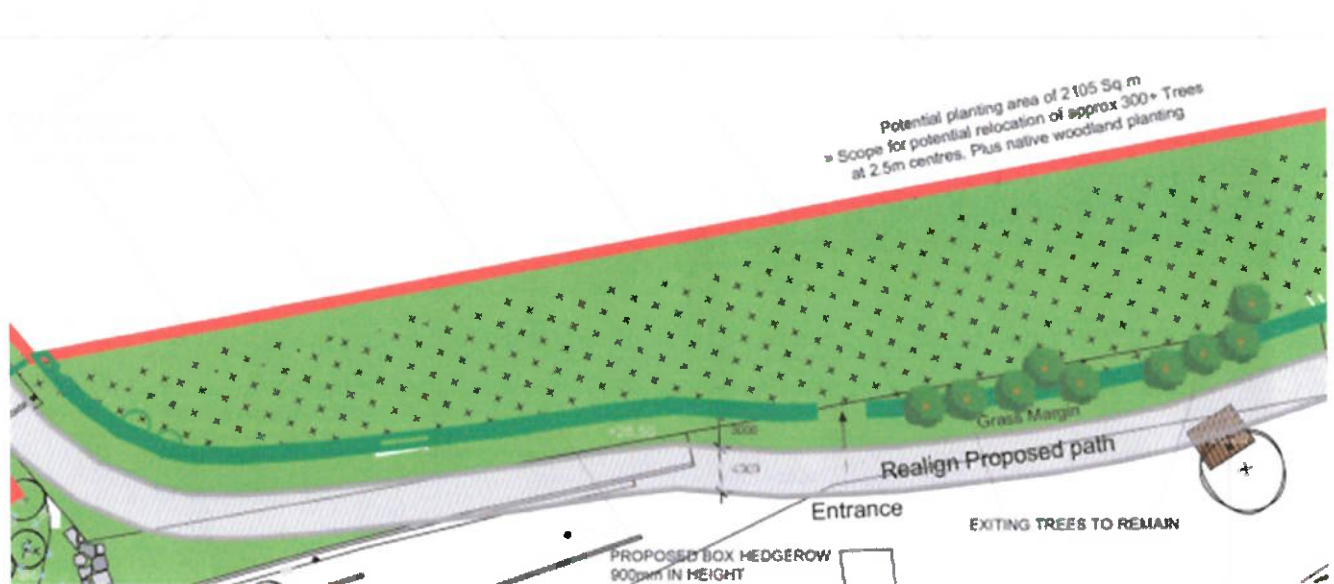
Appendix 2

Map of Character Area 2 as submitted by Louth County Council as part of the application



Map of character Area 2 as part of the Consultation in September 2025.

<https://consult.louthcoco.ie/en/consultation/ardee-railway-lands-memorial-trees>



Screenshot of the Consultation page:

Home > Consultations > Ardee Railway Lands Memorial Trees

Ardee Railway Lands Memorial Trees

CLOSED 7 Oct, 2025, 09:30 - 11 Nov, 2025, 12:00

Louth County Council would like to engage with members of the public who have memorial trees planted at the Railway Lands Ardee.

Ardee Railway lands were acquired by Louth County Council in 2022 to preserve them for use under the Ardee 2040 plan. For a number of years prior to this the lands have been operating as a public open space managed by the Ardee Tidy Towns group supported by a CE scheme. In recent years a memorial initiative was established by a member of the public the planting of trees with plaques as memorials for deceased members of the community.

In recognition of the community investment in the area and to honour the personal nature of the trees, the council is proposing to create a dedicated memorial woodland area within the Railway Lands.

Share

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Materials

- Tree Relocation Plan.pdf 1.48 MB
- Memorial Garden Proposed Plan.pdf 2.85 MB
- Ardee 2040 Railway Lands Plan.pdf 1.01 MB

Appendix 3. Why Allotments should not proceed:

Given the site's history as former railway lands at **Ardee Railway Station**, and the findings of the **Ardee 2040 Environmental Impact Assessment Report (EIAR)**, it would be inappropriate to permit in-ground community allotments at this location without further investigation. The EIAR acknowledges that parts of the site comprise **made ground** and refers to the "**contamination of soils ... and made ground**" where the area is to be surfaced or disturbed (EIAR Volume 2 – Main Text, *Land, Soils & Geology*). Allotments represent a particularly sensitive land use because they involve direct contact with soil and the growing of food for consumption, creating a clear soil-to-mouth exposure pathway. In the absence of published Phase 2 soil testing demonstrating that the underlying soils are free from contaminants commonly associated with historic railway activity, allowing food production directly in the existing ground would present an avoidable and unnecessary risk. Any consideration of community growing at this site would therefore need to be limited to raised beds using certified clean imported soil, physically separated from the native ground.