

LDG-086407-26



An
Coimisiún
Pleanála

Large-scale Residential Development Appeal Observation

Online Reference
LRD-OBS-006399

Online Observation Details

Contact Name
Brendan Ryan

Lodgement Date
19/01/2026 09:13:31

Case Number / Description
323966

Payment Details

Payment Method
Online Payment

Cardholder Name
Brendan Ryan

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

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_3SrEWdB1CW0EN5FC07hTOdZg

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

An Dion
Birch's Lane
Blackrock
Co. Louth
A91 HT6X

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Ref: An Coimisiún Pleanála case number 323966

Re: Louth Co Co Planning Application Ref No **2560319** – Large Scale Residential Development at Haggardstown, Blackrock, Dundalk, Co Louth
Applicant - Marina Quarter Limited

Dear Sir/Madam,

We wish to lodge a formal observation for Planning Application Ref No 2560319 (Ref: An Coimisiún Pleanála case number 323966) proposing a Large-Scale Residential Development at Haggardstown, Blackrock, Dundalk, Co Louth, as lodged by Marina Quarter Limited.

The scale of this planning application is extreme and beyond what the local area and parish is equipped to support. This development does not take into consideration, the immediate area where amenities, shopping facilities and schools are limited or at maximum capacity. The local area does not have the necessary facilities, infrastructure, or amenities to satisfy the requirements that a development of this scale will require.

The local village already has limited parking and with approximately 500 families moving in on top off the existing residents, the infrastructure is not at a sufficient level to cope and has limited area to expand.

The R172 road is already over used at present. This proposed development will potentially create over 4,000 additional journeys per day. At present there are already a number of junctions along the R172 that have issues with line of sight where a number of accidents have happened. Birch's Lane and The Square in particular. Additional cars on this road will see the accident levels increase. Safety of residents, and visitors is a significant concern.

There are parts of the roadway into Blackrock village, local amenities and schools where footpaths are not properly constructed and are not lit at night time. Turning the other direction towards Dundalk there is no street lighting posing a safety risk.

The application plans include storm drainage flowing out into Dundalk Bay which is a bird sanctuary area (SPA 004026) and a marine conservation area (SAC 000455). These salt marshes are considered very rare which are home to many endangered species and wildlife.

Finally, by approving this Large-Scale Residential Development it will set the precedent for another large scale development in the land south of this site which is currently held as strategic reserve. That could culminate in an additional 500 units. Given the above observations, the local area is not equipped to cope with an additional 1,000 residential units, let alone 500.

I hope that this submission will be considered as per our highlighted concerns and consider the significant impact this development would have on our community.

The population of Blackrock and Haggardstown has grown significantly in recent years. Planning permission has been approved for large developments without consideration of civil necessities such as schools, infrastructure, public outdoor spaces, public lighting, footpaths, child care and shopping to name a few.

Schools

There are three primary schools in the area. All are at capacity and all have extensive waiting lists. Access to two of these schools, both in Blackrock, by foot or by bicycle is dangerous due to the lack of footpaths and proper infrastructure. Suggest investment in providing proper infrastructure, pathways and public lighting.

Sporting Facilities

The sports clubs in the area are at maximum capacity and need additional sporting facilities. Due to the growth in population the area is in need for new/additional football and GAA pitches. In addition to this tennis and badminton courts, a running track for athletics. At present children are being driven outside the local area to pitches closer to Dundalk. This is impacting society on many levels – sustainability, pollution and carbon footprint. Suggest rezoning some of the land identified for development which is easily accessible for most in the community.

Development of green areas & planning

The development plan map illustrates Dundalk Golf Club as a green area, this is a private members club. This should not be illustrated in the same shade of green to public green areas. The only public area in Blackrock Haggardstown is Blackrock Park. Other green areas shown are attached to housing estates. What is existing needs to be protected and where lands are under development a developer must adhere to planning permission and not encroach on specific green areas.

With extant planning permissions it is incumbent on this plan to ensure what is given permission for is built. For example Raynoldstown has no community centre, no shop units, no commercial centre and no childcare facilities and no local bus route but all granted permission. There was a lack of thought and joined up thinking when developments like this were permitted. Permissions such as these do not consider the community and inhabitants.

A community centre in Rayoldstown is vital for the community living there. Not everyone can travel to Blackrock Community Centre at night and in the winter, especially without local bus service such as local link. Social activities such as bridge, diet and fitness classes, men's sheds etc., all groups are necessary and should be accessible to all.

There are so many conflicting issues at stake here, environmental, social, housing and community.

Fundamentally Blackrock is now the most densely populated area within the Dundalk locality and the infrastructure issues that are **local to the area** are now being compounded. A *low density development* outlook is required going forward for our community and the wider county with regard to planning, in the same vein the local needs rule needs to be challenged.

The unsuitability of this site, also known as site 16, for dense housing, has been a newsworthy topic of conversation within the community, (going back to when it was considered for SHD, a strategic housing development, which meant no local permission was required to LCC , ABP sanctioned it), in the wider media and at council level, with the result seeing the land zoned back to strategic reserve by councillors November 2024.

Post that rezoning vote, Glenveagh have launched a High Court Judicial Review against Louth County Council in April/May 2025 to challenge the councillors' decision arguing the change threatens housing supply and benefits. The council is defending its decision to de-zone the land, citing environmental concerns, flood risks, and insufficient infrastructure, despite planning regulator advice and Glenveagh's previous planning permission. That JR is ongoing. And an appeal being granted whilst that is ongoing is unlikely.

The complexities and impossibilities facing this site from a planning perspective are still

- It's close proximity and potential associated risks to a NATURA 2000 site
 - It is proposed to have the exit/entry on the section of the regional road (R172) known locally as the "bad bends", a series of four bends as you approach / leave Blackrock and includes Bóthar Maol. At present there is no entrance, the site is landlocked.
- There is no space on the road for a cycle lane, hard shoulder or bus stop facility.
- There is no existing sewage connection
 - All land to the east of the site along the R172 is located within flood zone A and flood zone B.
 - Storm water run off is not evident in the application.

We are a car centric community, to work, school, college, shopping, social and especially to sports facilities and events. And high density development is not conducive to an environmental socially sound community.

Blackrock Waste Water Treatment Plant has a max capacity for 9200 PE - from Uisce Eireann's 2023 annual report. It is currently at max capacity and the precedent has been set with Louth Co Co rejecting a number of residential applications due to the lack of services. It also highlights that Haggardstown and Blackrock infra-structurally are maxed out with all the building works and **still without** the required schools, sports pitches, surgeries and transport options etc to accommodate the new recent influx of residents.

We have just seen the extensive tidal flooding that took place in the lands at the Loakers and Blackrock on the 9th December 2025, making the national news (www.rte.ie/video/id/29607/). The Dundalk Area Flood plan including Dundalk is at the development design and consent phase and the timeframe is completion in 2034. Blackrock is identified as having a significant risk of flooding for future events. yet 502 units are granted permission on a floodplain.

The proper application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009) by the planning authorities is essential to avoid inappropriate development in flood prone areas, and hence avoid unnecessary increases in flood risk into the future. The Flood Maps produced by OPW provide planning authorities with an even greater evidential basis for their sustainable planning decisions.

We hope you will consider all the above points when making your decision. Blackrock and its surroundings with lack of infrastructure, schools, parklands, lack of sewage, streetlighting, footpaths is not ready for a development of this size.

Regards

Brendan Ryan and Anne McCabe