



Planning Section,  
Louth County Council,  
Town Hall,  
Crowe St,  
Dundalk  
Co Louth

By email to [planninggroup@louthcoco.ie](mailto:planninggroup@louthcoco.ie)

15<sup>th</sup> October 2020

**Re: 20/704 – Proposal for demolition of an existing Coast Guard Lifeboat house and replacement with a new Lifeboat house**

Sir/Madam,

The Heritage Council is a prescribed body under S.I. No. 600/2001 Planning and Development Regulations, section 28 inter alia.

A recent application for demolition of an existing Coast Guard Lifeboat house and replacement with a new Lifeboat house has come to our attention.

**1 This building is situated in an ACA in close proximity to a group of Protected Structures**

We note that the building is referred to in the description of the nearby Coast Guard House. (*Louth County Development Plan 2015 – 2021: Volume 2c Appendix 18 - Record of Protected Structures* p. 27, at LHS009-038. NIAH ref. 13831038)

*“End-of-terrace two-bay two-storey former coastguard house, built c. 1870, now in private domestic use. This structure terminates the terrace of coastguard houses built as a direct result of the busy Port of Greenore, which was completed in 1873. The attractive structure with its oriel windows, creates a significant architectural building that was also occupied in the early-twentieth century by British Troops during the Irish Civil War. This building, together with the other houses **and the boathouse to the north**, form an attractive significant group of structures with importance to the built heritage of Greenore.”* (Emphasis added)

We note that the site of the proposed development is within the Greenore Architectural Conservation Area (volume 2b, Appendix 5, Map 5.5).

We note that the *Louth County Development Plan 2015-21*, (volume 2b, Appendix 4) contains Development Management Guidelines for ACAs. These are as follows

**“1.9 Demolition or Alteration**

*The Council will not permit the demolition or alteration of buildings within designated ACAs unless it can be demonstrated that all of the below criteria is applicable:*

Baill na Comhairle | Council Members

Michael Parsons  
Cathaoirleach | Chairman

Dr. Marie Bourke  
Kieran Coughlan  
Miriam Fitzpatrick  
Mary Gallagher  
Sinéad McCartan  
Jane Maxwell  
Fionnuala May  
Prof. Muiris O'Sullivan  
Ivor McElveen  
Brian Walsh

- *All efforts have been made to sustain existing uses or find new ones, and these efforts have failed;*

- *Redevelopment of the site would greatly benefit the community and would outweigh the loss of the building/structure resulting from demolition;*

- *The building is unsafe and cannot be made safe.”*

We also note the policies about skylines and rooflines and the appropriate choice of material.

We also note in Volume 2b, Appendix 5: **“5.5 Objectives for Greenore ACA**

*1. To preserve the special character of the village and its setting through positive management of changes to the built environment, in particular, by requiring that the height, scale, design and materials of any proposed development within the village and in the surrounding area should complement the character of the village and not diminish its distinctiveness of place.*

*2. To protect the landscape setting of the village and the views outwards.*

*3. To preserve the historic street pattern and character of the village, by the retention of buildings and materials as described above, and the retention of existing boundary features, walls, and railings.*

*4. To require the preservation and re-instatement of traditional details and materials on existing buildings and in the streetscape where improvements or maintenance works are being carried out.*

*5. To use appropriate materials, street furniture and lighting in any public development of the area.”*

We also note policies set out in volume 1, written statement HER 45-51, specifically HER 47:

*“To retain any building in an ACA that makes a positive contribution to the character or appearance of the area. Demolition will only be considered in exceptional circumstances. Applications for demolition shall be accompanied by a measured and photographic survey, condition report and architectural heritage assessment. An assessment of the impact of the replacement building on the character of the ACA will be required.”*

We comment as follows:

The case for ‘exceptional circumstances’ for the demolition of the nineteenth century Lifeboat house has not been made. The policies put in place by Louth County Council to protect the architectural character of Greenore require a detailed survey, condition report and heritage assessment. These have not been provided by the applicant.

The proposed replacement is not in keeping with the objectives of the Greenore ACA in terms of appropriate materials, height, scale and design, i.e. it is not in keeping with the character of the ACA or the character of the adjacent Protected Structures.

We are also of the view that none of Louth County Council’s own criteria for demolition of a building within an ACA have been addressed.

It is noteworthy that the boathouse is within the curtilage of a terrace of five historic and architecturally significant Coast Guard Cottages (including:- the boathouse, utility sheds (originally 'out houses/lavatories), perimeter boundary walls, pillars, gates, communal yards, gardens and allotments. Each of the five Coast Guard Cottages has a designated Protected Structure and National Inventory of Architectural Heritage reference number, and, the boathouse is referenced in each of the five descriptions/appraisals of the Coast Guard Cottages in the NIAH ref. **13831038**. This complex has a regional rating in the NIAH. Accordingly, the boathouse should be considered as an integral element of the coastguard complex (as stated in the narrative for the RPS, see above) and consideration should be given to adding it to the Record of Protected Structures.

We also draw to your attention that the Planning and Development Act 2000 states the definition of a Protected Structure in Section 2:

*“protected structure” means—*

*(a) a structure, or*

*(b) a specified part of a structure,*

*which is included in a record of protected structures, and, where that record so indicates, includes **any specified feature which is within the attendant grounds of the structure and which would not otherwise be included in this definition...**”*

(Emphasis added). Accordingly, a case can be made that the boathouse should be considered as a specified part of a Protected Structure.

In the light of the above, we recommend **refusal** of this application.

**2 Administrative provisions to provide adequate public service in relation to the architectural heritage**

Finally, we respectfully suggest that the employment of an Architectural Conservation Officer by Louth County Council to assist in the implementation of the Council’s policies for the care of architectural heritage should be considered a matter of priority.

Yours sincerely

A handwritten signature in black ink that reads "Ian Doyle". The signature is written in a cursive style with a large initial 'I'.

Ian Doyle  
Head of Conservation  
(idoyle@heritagecouncil.ie)