

# STATEMENT OF RESPONSE TO PRE-APPLICATION CONSULTATION OPINION

LARGE SCALE RESIDENTIAL DEVELOPMENT PLANNING APPLICATION

LANDS TO THE EAST OF THE M1 MOTORWAY AND WEST OF THE RATHMULLAN ROAD, OLDBRIDGE, DROGHEDA, CO. MEATH

<u>SUBMITTED IN SEPTEMBER 2025 ON BEHALF OF:</u> Earlsfort Developments Drogheda Limited

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#### 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have prepared this Statement of Response to Meath County Council's Pre-application Consultation Opinion on behalf of our clients, Earlsfort Developments Drogheda Limited (the Applicant), to accompany this application to Meath County Council for a proposed Large-Scale Residential (LRD) development on Lands to the east of the M1 motorway and west of the Rathmullan Road, Oldbridge, Drogheda, Co. Meath.

Following a section 247 pre-planning consultation meeting with Meath County Council in respect of the subject lands and the proposed LRD scheme, on 6<sup>th</sup> November 2024, and our client's fulfilment of Stage 1 (Pre Application s.247 Consultation) of the LRD process pursuant to the provisions of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021, a request to enter into a formal LRD pre-planning consultation meeting with the Planning Authority was submitted in accordance with section 32B of the Planning and Development Act 2000 (as amended) (PDA, 2000). Subsequent to this submission, a formal LRD Stage 2 meeting was held between the Applicant, members of the Design Team, and representatives from the Planning Authority on 5<sup>th</sup> March 2025.

Further details on the main points of discussion relating to this formal meeting are comprised within the Planning Report and Statement of Consistency & Planning Report as prepared by Hughes Planning and Development Consultants, which is included with this application under a separate cover. Within 4-weeks of the formal LRD meeting, on 1<sup>st</sup> April 2025, Meath County Council issued a Large-Scale Residential Development Opinion under Ref. No. LRD0036, pursuant to Section 32(d) of the PDA, 2000 (as amended).

The opinion report outlines two issues which would need to be addressed for the documents submitted to which section 32B of the Act relates, to constitute a reasonable basis for an application for large-scale residential development. It was also requested that 43 no. items of specific information be provided within any application for permission that may follow, in order for the application to constitute a reasonable basis for an application for permission for a Large-Scale Residential Development. The following sections of this report will address the items raised by the Planning Authority and identify the documentation contained within the wider application pack which addresses each item.

## 2.0 Response to Issues Raised

As stated above, two issues were raised by the Planning Authority following review of the documentation submitted during the consultation process. We note and respond to this issue as follows:

1. The Applicant must provide a Screening for Appropriate Assessment and a Natura Impact Statement for the proposed development which is adjacent to the River Boyne and River Blackwater SAC 002299 and SPA 004232 and The Boyne Estuary SAC 001957 and SPA 004080 4.37km; and the North-West Irish Sea SPA 004236.

In response the applicant commissioned the preparation of an Appropriate Assessment Screening Report (AASR) and a Natura Impact Statement (NIS), prepared by Verdé Environmental Consultants. The conclusion of the NIS states as follows:

'On the basis of the content of this report, it is the considered view of the authors of this NIS that the competent authority is enabled to conduct an Appropriate Assessment and consider whether the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites conservation objectives, will adversely affect the integrity of any European site. is the considered view of the authors of this NIS that it can be lawfully concluded by Meath County Council that the Proposed Development will not, either alone or in-combination with other plans or projects, result in adverse effects to the integrity and conservation status of European Sites in view of their Conservation Objectives and, on the basis of best scientific evidence, there is no reasonable scientific doubt as to that conclusion.'

Accordingly, on the basis of the screening, assessment and conclusions of the Screening Statement and the Naura Impact Statement, the authority may lawfully conclude that there is no impediment to a grant of permission (subject to all other matters being satisfactory to the authority).

The applicant intends to provide an Environmental Impact Assessment Report (EIAR) for the
proposed development. EIAR is mandatory for the construction of more than 500 dwelling units;
and urban development which would involve an area greater than 10 hectares in the case of
other parts of a built-up area.

Having regard to the above, the application documentation shall address any aspect of the proposed development which may have likely significant effects on the environment or on European Sites/ Natura 2000 Sites, their habitat and species. In particular, the potential impact of the proposed development on the European Sites listed shall be fully assessed in accordance with, 'Guidance on Appropriate Assessment for Planning Authorities (2009/ 2010)', 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out EIA (2018)', or other guidelines including EPA (2022) Guidelines on EIAR, as appropriate.

In response to the above issue, the applicant has commissioned the preparation of a comprehensive Environmental Impact Assessment Report. prepared by DNV. Notwithstanding the fact that the proposed development of 249 no. residential units on a site of 9.2 hectares is sub-threshold for the mandatory preparation of an EIAR, the decision to prepare this assessment is considered appropriate in the context of demonstrating that there are no apparent characteristics or elements of the design of the scheme that are likely to cause any significant effects on the environment.

## 3.0 Response to Specific Information Requested

The following sections of this report detail how the Applicant and Design Team have addressed the 43 no. specific items raised in the Planning Authority's Large-Scale Residential Development Opinion to ensure the subject application constitutes a reasonable basis for a formal application.

## 3.1 Item No. 1 - Statement of Consistency

'A Statement of Consistency to demonstrate that the proposal accords with National, Regional and Local Policy including the objectives of the Meath County Development Plan 2021-2027 (as varied).'

## Applicant's Response to Item No. 1

In response to the above item, a Statement of Consistency & Planning Report has been prepared by Hughes Planning & Development Consultants. This Planning Report confirms that the subject proposal is consistent with national guidelines, all applicable regional and local policy guidance, and the Meath County Development Plan 2021-2027 (as varied).

## 3.2 Item No. 2 – Core Strategy

'Core Strategy - While there is current availability in the Core Strategy allocation for the Southern Environs of Drogheda as per the MCDP 2021-2027, the applicant is advised to consider any other planning applications/ permissions for residential development, which may be relevant, prior to lodging an application. Please refer to Variation no. 1 for text which may be relevant to your submission.'

#### Applicant's Response to Item No. 2

In response to the above item, we refer the Planning Authority to the enclosed Statement of Consistency & Planning Report as prepared by Hughes Planning & Development Consultants. It is noted that the Core Strategy is specifically discussed in Section 6.10.2 of the aforementioned report with a review of planning applications for residential development in Drogheda, within the jurisdiction of Meath County Council, having been undertaken.

This review has identified 662 no. residential units which have been permitted by Meath County Council in Drogheda with a further 95 no. units permitted by the Council but currently subject to appeal to An Coimisiún Pleanála. This total of 757 no. units represents less than half, or 46.4%, of the total allocation of 1,631 which Meath County Council has allocated Drogheda over the period of the extant Meath County Development Plan 2021-2027.

## 3.3 Item No. 3 – Zoning

'Zoning – The application must include a clear zoning overlay, and the applicant is advised to consult with the GIS Officer in MCC to ensure accuracy of the zoning and the application site (red line boundary).'

#### Applicant's Response to Item No. 3

In response to the above item, we refer the Planning Authority to the enclosed Architectural Design Statement, as prepared by NDBA Architects, which provides a clear overlay of the zoning map against the proposed development. The proposed residential, creche and open space uses are all permissible relative to the applicable A2 and F1 zoning objectives which govern the development of the subject site.

## 3.4 Item No. 4 – Social Infrastructure Assessment (SIA)

'A project specific Social Infrastructure Audit (SIA) to determine whether or not existing social and recreational facilities are sufficient to cater for the needs of the future residents of the development as per Objective SH OBJ 24 of the MCDP 2021-2027 (as varied) is required. A 1.5 - 2.5km zone is appropriate for this investigation. This should address cumulative impacts associated with other permitted/ proposed developments in the area. Proposals to address deficits should be included with any future application. A detailed assessment of childcare, school needs, healthcare, recreational facilities, etc. is required. Where relevant, the applicant may wish to liaise with the Dept. of Education and provide evidence of such engagement and responses.'

#### Applicant's Response to Item No. 4

We refer the Planning Authority to the enclosed Social Infrastructure Audit as prepared by Hughes Planning & Development Consultants. The audit has been prepared to illustrate compliance with Objective SH OBJ 24 of the Meath County Development Plan 2021-2027 (as varied) and demonstrates the strong availability of childcare, educational facilities, healthcare, and recreational facilities within close proximity of the subject site.

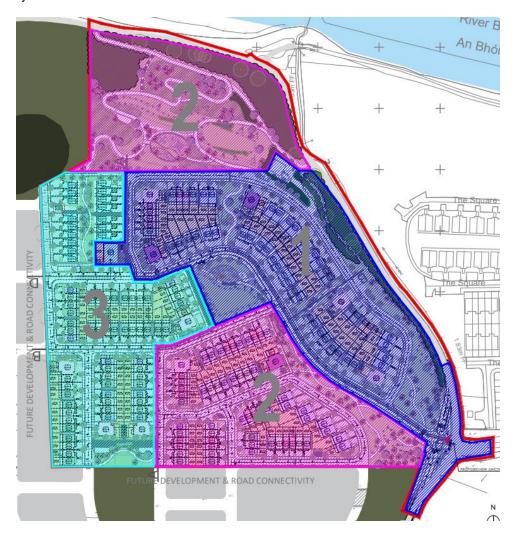
## 3.5 Item No. 5 - Phasing

Phasing proposal for the development as per Objective DM OBJ 23 of the Meath County Development Plan 2021-2027 (as varied) which demonstrates that the development would be delivered in a timely and orderly manner and include specific information on access, communications, EV charging infrastructure, public open space, childcare provision, etc. Services for the development should be installed concurrently (i.e. telecommunications, water and electricity).

The applicant shall demonstrate that all necessary infrastructure can be delivered as part of this application. This includes roads, water and wastewater, etc. A detailed breakdown of delivery of units and infrastructure within each phase should be provided. Bringing construction traffic through constructed and occupied sections should be avoided, wherever possible. The applicant will need to demonstrate that key infrastructure will be delivered early in the phasing including apartments. It is recommended that a mix of unit typologies/ sizes are provided for each sub-phase. In general, open spaces and key infrastructure, including crèche, playgrounds, roads, car-parking, etc. should also be included in an early phase and certain key infrastructure, with sufficient public open space constructed prior to the occupation of development.'

## Applicant's Response to Item No. 5

In response to the above item, we refer the Planning Authority to the enclosed Phasing Plan, as prepared by NDBA Architects.



## 1.0 Proposed phasing plan.

As illustrated, the phasing plan provides for the delivery of the proposed development under 3 no. phases with the principle works to be conducted in each phase as follows:

Phase 1 Rathmullan Road Works

Landscaping of Site Entrance & Adjoining Public Open Space

Provision of Central Access Road

Landscaping of Central Area of Public Open Space and 2 no. POS Throughways

Construction of Creche Facility
Construction of Pumping Station

Construction of 78 no. Residential Units (56 no. houses & 22 no. apartments)

Phase 2 Landscaping of Northern Area of Public Open Space

Construction of 67 no. Residential Units (58 no. houses & 9 no. apartments)

Phase 3 Provision of Remaining Hardstanding

Landscaping of Remaining Areas of Public Open Space

Construction of 104 no. Residential Units (56 no. houses & 48 no. apartments)

It is confirmed that the wider pack of documentation contained with this application provides all requisite information with regards to access, communications, EV charging infrastructure, public open space, childcare provision and construction management.

## 3.6 Item No. 6 - Density

'Density - Density must be consistent with 'Regional Growth Centre - Suburban/Urban Extension' area as defined by the 2024 Compact Settlement Guidelines which has a density range of 35 dph to 50 dph (net). The current proposal is 35.25 units/ ha which is within the target. The applicant should explore further opportunities to increase densities through apartments/ duplexes at key focal points within the development.'

#### Applicant's Response to Item No. 6

In response to the above item, we confirm that the final development proposal remains fully compliant with the density range guided by the Compact Settlement Guidelines of 2024 by achieving an increased density of 36dph. The increased density has been achieved through the provision of additional apartment blocks as part of the final site layout with the proposal now providing a total of 11 no. apartment blocks which are dispersed throughout the scheme.

It is considered that the final density is appropriate relative to the site's location effectively at the edge of the regional growth centre of Drogheda providing direct justification for providing a density at the lower end of the applicable range. The proposed density is at the lower end of the density range which is guided, but is considered to represent an appropriate balance between the need to ensure the efficient use of the subject land whilst preventing a scale of development which could appear overbearing relative to the comparatively lower density of development within the immediate area. In this regard, we would note the residential density of the immediately adjoining residential estates to the east at Riverbank, Oldbridge Manor and Highlands, as identified in Figure 1.0 of this report, range between 17.7-33.6 units per hectare as originally granted.

## 3.7 Item No. 7 – Childcare Facility

'Childcare Facility - Proposals for a Childcare Facility must meet the requirements of the 'Childcare Facilities Guidelines for Planning Authorities' (2001), 2016 Child Care Regulations and address the items listed in Objective DM OBJ 69 of the Meath County Development Plan 2021-2027 (as varied) are required. The facility shall be sized to accommodate the meet the needs of the development at a minimum.

A 500 sqm childcare facility is currently proposed to accommodate the needs of 50 no. children. However, the applicant is invited to consider whether a larger facility could be provided to accommodate future development phases on the landholding.

All details are to be provided in accordance with the 2001 Childcare Guidelines and 2016 Regulations. The Planning Authority will not accept under provision. The applicant is required to follow the requirements of the Guidelines and Regulations, noting that one bed residential units can be discounted, and the minimum clear floor space requirements must be provided separately to furniture, fittings, equipment and ancillary areas. Storage must be inaccessible to children. Appropriate rest/ sleep facilities must be provided for children <1 year, etc. Please ensure the outdoor play space is of sufficient size for the development.

The applicant shall submit floor plans and elevations illustrating all minimum clear floorspace requirements, ancillary floorspace, outdoor play area; and any other details necessary to comply with the Section 28 Guidelines and Childcare Regulations including details of all outdoor play areas (fencing, surfaces, landscaping, play equipment, storage, etc.).

The applicant shall provide appropriate screening (boundary treatment) for the associated outdoor play area. The applicant shall submit advertisement signage

proposals for the creche and is requested to consult with the HSE (EHS) regarding food safety for the kitchen and layout of the kitchen/ staff areas within the childcare facility.

Due to the proximity of the application to the M1 and the noise zones associated with same, the applicant must carefully consider the location of the childcare facility and its outdoor play area. A Noise Impact Assessment must inform the proposed design and layout of the development.

Please refer to Crèche Design below.'

## Applicant's Response to Item No. 7

In response to the above item, we would note that the final creche facility extends to 411sq.m with this figure not including an adjoining dedicated external play area of 143sq.m. The creche facility has been designed to accommodate a total of 58 no. children as follows:

- 15 x 1-2 years
- 19 x 2-3 years
- 24 x 3-6 years

We would note the provisions of the Social Infrastructure Audit, as prepared by Hughes Planning & Development Consultants, which identifies a need for 50-53 no. childcare spaces as a result of the proposed scheme. The proposal includes the provision of a 411sq.m creche facility which will accommodate58 no. childcare spaces thus exceeding this identified need.

The floor plans and elevations for the crèche facility are included with this application, per the dedicated drawing prepared by NDBA Architects, whilst it would be requested that a condition relating to signage be added by way of condition as signage will not be agreed prior to arrangements being made in relation to the operation of the facility by an external operator. It is noted that the creche facility has been considered as part of the wider Noise Assessment prepared by DNV.

With regards to the request to consider providing a larger creche facility, we submit that the proposed facility is sufficient to provide for the needs of the subject scheme – as calculated in detail in the Social Infrastructure Audit - whilst also facilitating additional childcare spaces for the wider population. . Notwithstanding this position, we would confirm the applicant's willingness to provide a larger creche facility for the proposed development if deemed necessary by the Planning Authority.

Furthermore, subject to the wider landholding within the applicant's ownership being able to accommodate additional development phases in the future on the basis of existing white lands being rezoned to accommodate residential development, the Applicant would confirm their willingness to provide a larger creche facility to accommodate a larger residential scheme.

## 3.8 Item No. 8 - Connectivity/Permeability

'Connectivity/ Permeability - The applicant shall demonstrate that the proposal integrates with its surroundings and there is a high level of connectivity and permeability through and around the site to facilitate sustainable travel and movement. A clear interface must be presented between proposed development and adjoining lands within the applicant's landholding (which may be developed at a later stage). Pedestrian and cycle routes within the estate should join the Greenway to the north of the site.'

# Applicant's Response to Item No. 8

The submitted documentation clearly demonstrates that the proposal integrates with its surroundings and there is a high level of connectivity and permeability through and around the site to facilitate sustainable travel and movement.

The internal pedestrian and cycle routes within the proposed scheme facilitate connection from the residential areas to the landscaped public park to the north of the site with additional linkages between this area of public open space and the adjoining Greenway further north of

In addition, we note that the interface between the proposed development and adjoining lands within the Applicant's landholding definitively illustrates the ability for future pedestrian, cyclist and vehicular connections to the wider landholding.

## 3.9 Item No. 9 – Architectural Design Statement

'A Design Statement shall address the criteria in the Urban Design Manual in accordance with Objectives DM OBJ 13 and DM OBJ 40 of the Meath County Development Plan 2021-2027 (as varied). A high-quality design must be delivered on the application site.'

## Applicant's Response to Item No. 9

In response to the above item, we refer the Planning Authority to the enclosed Architectural Design Statement as prepared by NDBA Architects. The statement confirms that the proposed development is fully compliant with Obejctives DM OBJ 13 and DM OBJ 40 of the Meath County Development Plan 2021-2027 (as varied) and addresses the design criteria of the Urban Design Manual.

## 3.10 Item No. 10 - Visual Impact

'Visual Impact - The applicant is advised to address the visual impact of the proposed development on the area. The applicant is advised to provide several contiguous elevations and accurate CGIs for the development from viewpoints within the surrounding area, and within the site. A robust assessment of visual impact is required as urbanisation of this area will have a visual impact on/change the area. The visuals provided with viewpoints which are useful, though only provided from the entrance thus far. It is recommended that views are provided from the NE/SE and SW, within the central boulevard, central P.O.S. and the locations identified with the Planning Report lodged for the LRD Meeting, to facilitate public consultation. In this regard, you are also referred to section on Cultural Heritage below.'

## Applicant's Response to Item No. 10

In response to the above item, we refer the Planning Authority to the Landscape Visual Impact Assessment included within the EIAR prepared by DNV. This assessment considers the visual impact of the proposed development relative to the immediate and wider area with the selected viewpoints based upon the above guidance. Whilst each viewpoint is studied separately, we would note the following points of commentary from the LVIA which effectively summarise the visual analysis

- The site lands are not visible from any of the viewpoints assessed within the World Heritage Site (Brú na Bóinne) boundary.
- There are four receptors identified within the world heritage site buffer zone that will receive partial views of the development. The views of the development are in the opposite direction from the World Heritage Site. "These views do, however occur at a distance of over one kilometre, and given the backdrop of the existing suburbs, the impact of the proposal would be to extend the existing developed area rather than effecting a fundamental change in the character of the landscape. Views from the point have also previously been altered by the construction of the M1 motorway."
- The site lands are visible from close proximity albeit at speed when travelling south
  on the M1 motorway and from other localised views to the north (e.g. From
  Drybridge House).
- The lands are visible in close proximity, through well-established boundary vegetation from the adjacent housing areas to the east.
- The site lands are visible from residences to the north and NE on the opposite side of the valley.

In addition, we would note that additional computer-generated images showing the finish and aesthetic of the proposed development from within the scheme itself are presented within the enclosed Architectural Design Statement as prepared by NDBA Architects. We would ask the Planning Authority to have due regard for the extent of imagery which has been generated to assess the visual impact of the development, which we would consider to be unintrusive on the receiving environment based on upon the manner in which the site has been laid out and building heights have been considered.

## 3.11 Item No. 11 - Design and Layout

For ease of reference, noting the extent of subsections contained under Item 11, we have provided a direct response below to each subsection.

## Design and Layout -

(a) The proposed development must incorporate adequate visual interest through the provision of key focal points, character areas for placemaking/ providing a sense of place, etc. The proposed focal points, which include the use of apartments and the crèche) within the site are welcomed. A variety of building types and heights, hard/ soft landscaping finishes are required, and the massing, scale and form of the proposed development must be appropriate to the site. There must be a flexible mix of housing sizes, types and design. High quality designs with a mix of high-quality and durable finishes are required within the proposal. Open space must be useable and not limited to pocket parks and located where the maximum no, of residents can benefit from it.

In response to the above comments, we submit that the final design of the proposed development provides sufficient variety, with regards to building form, function, height and massing and that there is appropriate visual interest with defined character areas identified within the Architectural Design Statement, as prepared by NDBA Architects. The hard and soft landscaping elements, as designed by Cunnane Stratton Reynolds, is considered to further enhance the visual aesthetic of the scheme and create a pleasant environment for the residents which is conducive to creating a sense of community.

Furthermore, there is significant variety in terms of the areas of public open space which are located within easy walking distances of all residential units, if not directly adjacent. The quantum of public open spaceis further supplemented by the delivery of a large, landscaped park to the north of the site which will be ceded to Meath County Council in due course. The provision of this landscaped park will foster the creation of a direct link between the new residential scheme and adjoining schemes to the immediate east for the benefit of the wider long-standing community.

i. Enhancements to the entrance are required, particularly with House Types 3.1 and 4.1 and there should not be any blank walls. The finish to the house types at the entrance to the site is the only red brick area proposed within the development, with more variety in appearance, designs and finishes required throughout the scheme. A modified apartment could replace unit 3.1 (RHS) and more animation/ activation is required at 4.1 (LHS) of the entrance. The entrance area needs greater attention, at the arrival point for the scheme. It is advised that enhanced design elements are provided at this location to signify the entrance to the estate.

In response to the above item, and as guided, we would note that the referenced house types directly adjoining the central access road at the site entrance have been replaced with an apartment block to provide additional visual interest at the site entrance and to ensure that there is no blank wall adjoining the access road.

With regards to the design of the site entrance, it is considered that the final landscaping scheme has appropriately considered the importance of the site entrance as the main arrival point with the computer-generated imagery contained within the Architectural Design Statement demonstrating the unique visual aesthetic which has been developed over the course of the pre-planning consultation stages.

ii. Apartments are used as focal points and additional should be included in the development. More apartments could be included in the development. The design is acceptable; however, the privacy of balconies must be enhanced with activated corners. Floor to ceiling height could be increased to 3m.

In response to the above item, we would note that the final residential scheme provides for a total of 11 no. apartment blocks, relative to the 8 no. provided for at the section 32 LRD Consultation Meeting. The privacy of the balconies and the achieved floor to ceiling heights is considered to be appropriate whilst the general provision of private amenity space for the apartment units is compliant with the guidance provided in Section 3.8 'Private Amenity Space' of the 2025 Apartment Guidelines.

iii. The crèche is also a focal point, and it must have nearby access to open space.

In response to the above item, we would note that the creche facility is to be served by a large external private amenity space and is situated within easy walking distance (c. 100m) of both the central area of public open space and the northern parkland area.

iv. The applicant notes that a 6-metre wide 'alleyway' is proposed to 'break up' the length of the Boulevard and provide drainage facilities. The alleyway is not considered a sufficient 'break' within the Boulevard and should be omitted from the final design. The length of the units which extend along the Boulevard is excessive and three smaller cells must be introduced to break down the massing of structures within this area and provide for permeability. The applicant is referred to the Design Manual for Urban Roads and Streets which focuses on street design principles which promote pedestrian-friendly and safe environments.

The applicant is requested to explore the provision of a visual link between the central P.O.S. and the F1 lands to the north. There are limited changes between Unit Types 3.7 and 3.8 and this needs to be addressed to enhance legibility within the scheme. Activation of cell corners is required, and the applicant is requested to introduce bookends within the Boulevard to address this.

In response to the concern expressed on this issue, we note that the final development design has been amended and now provides for 2 no. pedestrian throughways to break up the boulevard into three smaller cells of residential units and provide for enhanced permeability within the site. In particular, the western throughway provides the requested direct visual link between the central area of public open space and the landscaped park to the north of the site. In addition, the enhanced activation of all corner cells has now been addressed and achieved with the updated proposal considered to provide for the enhanced visual interest and improved passive surveillance sought.

v. Private amenity spaces in the duplex apartments should be appropriately screened with functionality to be considered. Please provide part brick/rail/ glass surrounds to enhance their usability by occupants of the structures.

In response to the above item, we submit that the final duplex unit design provide for a sufficient quality of private amenity space and we would note that the brick/rail/glass surrounds have been included in the balcony design as requested.

vi. To enhance passive supervision and improve visual amenity, please avoid the placement of W.C. windows (i.e. obscure glass and ill proportioned fenestration) in the front elevation with alternative placement within the units required.

With the exception of the four-bedroom houses, all house types within the proposed scheme provide W.C. windows, serving ensuite bathrooms, in the front elevation. The architectural design of the front elevations is premised on the full height glazed screens to both the ground floor living rooms and first floor master bedrooms providing a greater proportion of glazing and visual openness to the house fronts reflecting a contemporary style of design. The larger glazed elements reflect the primary living spaces and afford more natural light in keeping with modern standards. The varied proportions provided with the smaller en-suite windows over the entrance doors provides visual variety and avoids repetition, again in keeping with contemporary architectural design. The house and site layout designs entirely avoid gable overlooking and generally all roads and streets are very well 'passively supervised' with large screens on both sides. Furthermore the en-suite windows do not require to be frosted or obscured thereby maintaining their capacity to contribute to this passive overlooking.

Further to the above, it is not considered that the removal of an obscure glassed bathroom window in the front elevation of houses at first floor level, would result in any meaningful enhancement of passive supervision. This position is based on the fact that, were the ensuite bathroom to be omitted and relocated, the ensuite bathroom footprint would be of insufficient size to accommodate any alternative individual room. Accordingly, the area would be best utilised as additional space within the bedroom it originally was intended to serve as an ensuite and would not result in any additional passive surveillance further to the primary bedroom window.

vii. A Statement of Residential Amenity must demonstrate how the proposal meets the requirements of the 2024 Compact Settlement Guidelines and 2023 Apartment Guidelines. Please address 'separation distances' in this statement.

Compliance with the requirements of the 2024 Compact Settlement Guidelines and the newly published Apartment Guidelines 2025 is demonstrated by sections 6.4 and 6.11 of the enclosed Statement of Consistency and Planning Report, as prepared by Hughes Planning & Development Consultants. We confirm that the proposed development is fully compliant with the 2024 Compact Settlement Guidelines and the 2025 Design Standards for Apartment, Guidelines for Planning Authorities, published by the Department of Housing on 8 July 2025.

viii. Passive supervision must be achieved with activation of corners/ frontage throughout the scheme.

We confirm that all residential units located on corners have been appropriately redesigned to provide dual frontages thus enhancing passive supervision and would note commentary in relation to passive surveillance within the enclosed Architectural Design Statement as prepared by NDBA Architects

ix. The prominence of the Pumping Station within the scheme including its boundary fencing (particularly if this is a 2.4m mesh fence) is a concern, in terms of its size and suitable screening, as well as separation distance to dwellings. The required separation distance must be illustrated. The applicant shall provide full details of same and suitable screening.

We would note that the pumping station has been relocated and is now situated in excess of 21m from the closest neighbouring residential dwelling. In this regard we note that the Irish Water 'Code of Practice for Wastewater Supply' states that a Type 3 pumping station, as is the type currently proposed, requires a minimum buffer zone of 15m from the nearest dwelling and, accordingly, the proposal is thus compliant with regards to separation distances. We would note that the pumping station is enclosed by a 2.4m plastic-coated welded mesh fence and, as illustrated on the Proposed Site Layout Plan and the Landscape Masterplan - prepared by NDBA Architects and Cunnane Stratton Reynolds respectively, the station is generally screened from public view by way of hedge, tree and general woodland planting between the boundary fence and the public realm.

x. The usability and functionality of Public Open Space must be clearly demonstrated as part of any future planning application, particularly the size and use, the impact of steep gradients and drainage features.

The usability, functionality and size of the public open space areas are clearly demonstrated in the enclosed Landscape Design Statement, as prepared by Cunnane Stratton Reynolds. Subsection 'Play Strategy' of Section 5.0 of the Design Statement details the function of each individual area of public open space whilst subsection 'Green Network' of Section 4.0 of the Design Statement details the size of each individual area of public open space. The various hard and soft landscaping materials are detailed on the Landscape Masterplan drawing prepared by Cunnane Stratton Reynolds.

xi. A mix of material finishes are required and must be robust within the scheme, particular along the main entrance and main access route, apartments and crèche.

The mix of material finishes is discussed in the enclosed Architectural Design Statement (page 24), as prepared by NDBA Architects.

xii. Bin/ cycle storage must feature robust finishes, and this should be addressed in the Building Lifecycle Report for apartments.

It is considered that the bin/bicycle storage structures are of appropriate finish with confirmation of such details provided within the enclosed Building Lifecycle Report, as prepared by Aramark. We note that the bicycle storage structures comprise corrugated metal sheets on galvanised steel frames whilst the bin structures comprise a concrete slab atop brick walls with doors made of timber slabs.

xiii. Please provide the required privacy strips along apartments.

In response to the above item, we confirm that landscaping privacy strips have been provided adjacent to the apartment buildings, where necessary, as illustrated on the Landscape Masterplan prepared by Cunnane Stratton Reynolds.

xiv. Please provide all elevations, sections, floor plans, layout plans, etc. and drawings to show left and right entry for all residential units, where appropriate.

All the requested elevations, sections, floor plans, layout plans, etc. together with drawings and commentary in relation to the above item are provided within the enclosed Architectural Design Statement, as prepared by NDBA Architects.

(b) While the Character Areas should have clear differences, there should be aspects of the design which link the houses, duplexes, apartments and the crèche so that there is an overall coherent development. Care is required to ensure that the proposal is legible for future occupants and visitors to the housing development. The applicant is advised to propose sub-character areas within the development, to enhance legibility within the scheme.

The applicant must differentiate between the phases of development and clearly establish what makes them distinctive and legible. Variety is required and the applicant must demonstrate that the proposal is creating a sense of place.

No details were provided and there is a clear need for distinctiveness within the development. Please provide a description of the character areas and show greater changes throughout the development, e.g. there are only red brick units at the entrance.

It is noted that the proposed scheme provides four distinctive character areas as follows:

- Boyne Valley Parklands
- The Green
- The West Field
- Central Park

The unique characteristics of each character area and the manner in which a sense of place has been created is discussed on page 23 of the enclosed Architectural Design Statement prepared by NDBA Architects.

(c) Unit Mix/ Type - The residential units should be designed to ensure there is a good mix of tenure. Please provide justification for the proposed unit mix in accordance with DM OBJ 13 of the MCDP, considering the tenure needs within the surrounding area, with respect to current market conditions and demands with reference to recent reports, etc. Sufficient variety is required, though the current proposal suggests a reasonable mix at 13% 1-bed, 27% 2-Bed, 50% 3-Bed and 10.2% 4-Bed.

In response to the above, we would note the following tables which present the mix of dwellings and unit types respectively.

Dwelling Type	No. Proposed	% of Total
1 Bedroom Apartment (Apartment Block)	22	8.8%
1 Bedroom Apartment (Duplex Building)	16	6.4%
2 Bedroom Apartment (Duplex Building)	16	6.4%
2 Bedroom Apartment (Apartment Block)	25	10%
2 Bedroom Mid-Terrace House	23	9.2%
2 Bedroom Semi-Detached House	14	5.6%
3 Bedroom Mid-Terrace House	38	15.3%
3 Bedroom Semi-Detached House	73	29.3%
4 Bedroom Semi-Detached House	22	8.8%
Total	249	100%

Figure 2.0 Table showing mix of dwelling types proposed.

Unit Type (No. of Bedrooms)	No. Proposed	% of Total
1 Bedroom	38	15.2%
2 Bedroom	78	31.3%
3 Bedroom	111	44.6%
4 Bedroom	22	8.9%
Total	249	100%

Figure 3.0 Table showing mix of unit sizes (by bedroom) proposed.

As presented above, the unit mix for the proposed scheme is appropriately balanced with no tenure typology exceeding half of the total units. The scheme provides sufficient variety to accommodate downsizing individuals, first-time buyers, young couples, young families and growing/large families. The provision of one-bedroom units is considered to be appropriate, given the limited provision of such residential stock within the area whilst the quantums of two, three and four bedroom units are considered appropriate in the context of the true housing demand which exists for such unit types in the immediate and wider area. Further to the above, the applicant has contacted relevant bodies, including estate agents, to assess the market demand for residential housing within the immediate and wider area with the provided mix designed accordingly.

(d) Dual aspect structures and Activated Frontage Design should be presented at junctions, with an avoidance of blank walls associated with private rear gardens at key locations so there is a strong roadside presence (road/ street frontage). Throughout the scheme, active frontage must be enhanced in the design of the residential (housing and apartments/ duplex units) units to support the ability for passive supervision of pathways at F.F. level, etc.

The residential scheme has been purposefully designed to provide active frontages and a strong roadside presence towards all public realm areas.

We would note that all residential units located on corners have been appropriately redesigned to provide dual frontages thus ensuring no undue extent of blank walls and enhancing passive supervision.

(e) Crèche Design – Internal layout should be designed with a view to the provision of crèche service rather than merely meet floorspace requirements. The applicant is advised to consult with the Meath County Childcare Committee regarding the childcare needs in the Southern Environs of Drogheda.

The applicant should also engage with a service provider(s) to ensure that the design of the structure addresses their requirements and a service can be made operational following completion of the structure/ phase of development. The applicant should advise whether a provider is involved and submit details with the application.

The applicant is requested to consider any potential overlooking of outdoor space from duplex units and appropriate separation distances.

We confirm that the internal layout of the creche has been designed to provide a functional and effective facility for the benefit of both future staff and children. The facility is appropriately separated from adjoining residential units so as to maintain the amenity of both adjoining residents and the facility itself. We would note that an operator has not yet been identified for the facility. No difficulties are anticipated in securing a provider to allow the service become operational on completion

(f) Separation Distances – Separation distances must be illustrated on a site layout drawing. The applicant is advised to consider the separation distances within the proposed housing cells and seek to minimise the impact on privacy, etc. The design must ensure that adjoining rear gardens are not directly overlooked to the detriment of the privacy of the occupants of adjoining residences.

The applicant is advised to ensure that required separation distances are adhered to in the final iteration of the site layout submitted with any future planning application as per the Compact Settlement Guidelines 2024.

Separation distances between units, particularly at the corner of each cell need to be re-examined (in the context of the 2024 Compact Settlement Guidelines). Some are below 8m, with a minimum of 16m required. Please consider opportunities for replacing bedrooms (first floor, rear elevation) which would be overlooking rear gardens of other dwellings, with bathrooms and/ or an alternative unit design at these locations.

Please demonstrate the required separation distances from residential units and the proposed Pumping Station.

All separation distances are duly illustrated on the various site plans prepared by NDBA Architects. Separation distances have been designed in accordance with the guidance provided within the Compact Settlement Guidelines 2024, with a minimum of 16m between opposing windows at first floor level achieved across the vast majority of the scheme.

We would acknowledge that, in some instances on corners of cells, that separation distances are below 16m. We would state that the redesign of the first floor levels of corner units to replace rear bedrooms on the rear elevations with bathrooms is not feasible due to the need to ensure that bedrooms are of adequate width and are directly served by a window. In such circumstances, the side elevations are relatively 'closed' with only a few small openings into non-habitable rooms provided.

We would note that a separation distance of 21.2m is achieved between the pumping station and the

We would note that a separation distance of 21.2m is achieved between the pumping station and the closest residential unit.

(g) Bin/Cycle Storage – Bin storage/cycle storage proposals are required to comply with Objective DM OBJ 52 of the Meath County Development Plan 2021-2027 (as varied) which states that "in residential schemes, appropriately sized bin

storage areas must be provided to the front of terraced dwellings in locations which are easily accessible by the householder. These areas shall be well screened and the design shall integrate with the dwelling".

Bin/ cycle storage access to private rear gardens or individual secure stores to the front of terraced housing units/ communal storage with the apartments will need to be provided. The creation of an unsightly row of bins and/ block pedestrian and cycling access along key access roads shall be avoided. Elevations and plans of bicycle and bin structures are to be provided and the structures must be secured, comprise good design, incorporate durable/ solid construction materials (e.g. brick, etc.), be covered and screened. This applies to domestic and commercial uses.

In response to the above item, we submit that all houses are to be provided with three domestic wheelie bins (for general waste, recycling materials and organic waste) to be stored externally. For houses with external access to the rear garden (Semi-detached and end-of-terrace dwellings), bins will be stored in the rear gardens. For mid-terrace houses, bins are to be stored in their front gardens, and they are provided with bin enclosures to store the bins securely and screen them from view, in compliance with DM OBJ 52. All houses will accommodate bicycle storage within their rear gardens, as permitted under the Compact Settlement Guidelines 2024. Each apartment block will be served by on-curtilage bin and bicycle stores.

Elevations and plans of all bin and bicycle store enclosures are contained within the suite of architectural drawings prepared by NDBA Architects.

(h) Boundary Treatment - Boundary treatment must be in accordance with MCDP Chapter 11 Boundary Treatments. Open plan layouts at the front of dwelling houses are not acceptable. The crèche must also have secure play areas.

Front boundaries (at the houses) shall be defined by walls or fences at least 0.5 metres high in keeping with the house design and to a uniform scheme design. Boundaries between the rear of proposed dwellings and boundaries within the development shall be a minimum of 1.8 metres high and shall be constructed as capped, rendered concrete block or brick walls, to ensure privacy, security and permanency. Note: Timber fencing is not permitted in rear gardens. To encourage the use of measures specifically designed to enhance wildlife in residential schemes such as gaps/holes, should be considered and incorporated into boundary treatments to allow for passage of all wildlife including hedgehogs, bat boxes and swift bricks/boxes.

All boundary treatments within the proposed development are to be high quality, durable and secure, in compliance with DM POL 8 and Chapter 11 Boundary Treatments of the Meath County Development Plan. Rear and side garden walls are to be constructed in rendered concrete block, and are to be a minimum of 1.8m high, in accordance with DM OBJ 29.

With regards to front boundaries, we note that it is proposed to provide 'open plan front gardens' which generally do not feature boundary walls or fences in front of the building line. In this regard, we would note that DM OBJ 30 notes that 'open plan front gardens' are acceptable where a high level of safety is achieved, as is the case in the proposed development, where all front gardens and public paths/roads benefit from a high degree of passive surveillance. Please refer to Section 3.4 'Pedestrian Activity / Facilities' of the DMURS Statement prepared by Waterman Moylan Consulting Engineers for further details in relation to general pedestrian safety on site.

(i) Building Height - Please address all SPPR requirements of the Building Heights Guidelines. SPPR 1 and the MCDP identifies Drogheda as a location for increased building height. 2-3 storey buildings are currently proposed. The height of the structures at the end of some of the housing blocks can be raised to frame the cell and create greater visual interest in the scheme. Increased

density can be achieved through increased building height. The applicant should consider any other opportunities to deliver higher structures at key locations within the development to increase density.

In response to the above item, we would note that Section 6.3.1 of the Statement of Consistency & Planning Report prepared by Hughes Planning & Development Consultants provides a response to the Specific Planning Policy Requirements (SPPRs) of the Urban Development and Building Heights Guidelines for Planning Authorities. We would note that the final development provides for an appropriate mix of building heights relative to its outer suburban location at the edge of a Regional Centre. Furthermore, we would consider the proposal to align with the provisions of subsection b of subsection V 'Responsive Built Form' of Section 4.4 'Key Indicators of Quality Design and Placemaking' of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, the wording of which is as follows:

'New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces).'

The proposed development is considered to provide an appropriate and positive response to the established pattern and form of development and the wider scale of development in the surrounding area. The development provides a residential development which aligns with the predominant building heights within the immediate area whilst accommodating a subtle increase in building heights at appropriate locations and relative to the topography of the site.

(j) Daylight/ Sunlight Analysis - A Daylight/ Sunlight Analysis (as per BRE Guidelines Ed. 3 (BRE 209) June 2022) should be submitted which considers impact assessment and scheme performance. It is noted that the applicant states that the 'majority of units benefit from dual or triple aspects'. However, the full site should be analysed prior to lodging a planning application.

Consideration should be given to the areas of usable spaces in the rooms assessed. Non-compliance should be avoided where possible by a redesign of structures. If not possible, a detailed justification accompanied by suitable compensatory measures must be provided.

In response to the above item, we would ask the Planning Authority to have due regard for the enclosed Sunlight, Daylight & Shadow Assessment, as prepared by Chris Shackleton Consulting. We would note the following key points to consider in terms of the analysis findings:

#### Target Illuminance

- 92% (98% including marginals) of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested.
- Marginal GFL Living rooms in Duplexes, compensated by being oversized see commentary.
- The average compliant areas achieving the relevant target Lx for
- all bedrooms is 91% and
- all Living/Kitchen spaces 74%
- both are well in excess of the required 50%

#### Sunlight to rooms:

• 100% comply with the 1.5hr BRE test on the 21st March.

## Sunlight on the Ground SOG (Shadow)

- 92% of the provided shared amenity spaces pass the BRE requirement.
- 1x North facing space is marginal receiving 33% qualifying sunlight on the 21st March.
- The tested spaces generally comply with the requirements of the BRE Guidelines.

### Change/Impact to neighbouring buildings in the adjoining residential areas.

#### Skylight- VSC

- 100% of the tested windows comply with the 27%, 0.8 ratio requirements for habitable rooms.
- The average change ratio for VSC is 1.00

## Sunlight Annual Probably Sunlight Hours & Winter Probable Sunlight Hours

- 100% of tested windows comply with the annual APSH and
- 100% with the winter WPSH requirements for sunlight or overall requirement.
- The average change ratio for sunlight is APSH:1.00 and WPSH: 1.00

We would note that 92% of rooms comply with the BS/EN 17037 Annex NA room targets for 50% of the floor area tested with this percentage increasing to 98% if we marginal results are included.

We would note that compensatory measures are allowed for as discussed on page 23 of the Sunlight, Daylight & Shadow Assessment. A number of duplex units are provided with additional living space (35.2sq.m) relative to the minimum required floor area (23sq.m) whilst a number of apartment benefit from south/west facing balconies and are within 60m of 2 no. large public open space areas.

(k) Site Coverage and Plot Ratio details must demonstrate compliance with Objectives DM OBJ 15 and 16 of the Meath County Development Plan 2021-2027 (as varied). No details were submitted for the LRD Meeting.

The referenced objectives set out maximum plot ratio and site coverage figures of 1.0 and 80% respectively. The proposed development provides plot ratio and site coverage figures of 0.4 and 20% respectively and, accordingly, is fully compliant with the provisions of DM OBJ 15 and 16 of the Meath County Development Plan 2021-2027.

(I) A Housing Quality Assessment relating to the conventional housing units which demonstrates that a satisfactory standard of residential amenity in accordance with Quality Housing for Sustainable Communities 2007 and Compact Settlement Guidelines 2024 is required.

A Housing Quality Assessment which provides the specific information regarding the proposed apartments and duplex units is required as per the 'Sustainable Urban Housing: Design Standards for New Apartments' 2023 and 'Quality Housing for Sustainable Communities' 2007. The assessment should also demonstrate how the proposed apartments comply with the various requirements of those guidelines, including its specific planning policy requirements.

Please present the HQA in a spreadsheet, identify the required amount of area and the proposed, for ease of reference. Note that while storage in attic spaces is beneficial, this should not be used to calculate storage in the HQA. Storage should be easily accessed within the main structure.

Please ensure all private amenity and communal amenity space requirements are identified on the HQA.

The HQA should identify whether the unit is 1, 2, 3 storey, etc., the no. of persons that the unit will cater to. This is not currently provided in the HQA. Please clarify where any standards are not achieved and confirm that 10% safeguarding standards are met for apartments.

The applicant is advised that at least minimum floor areas/ standards should be adhered to in the final iteration of the design of the development, including the additional 10% for safeguarding standards and a minimum of 50% dual aspect development is required across the site. Apartment GF/ FF Floor to ceiling heights, stair/lift core ratios, minimum room floor areas, room widths, aggregate areas, storage areas, private amenity space, communal amenity space, children's play space to cater to a range of ages and mobilities, cycle/ car parking and other standards should be followed. Please review Appendix 1 of the

Apartment Guidelines including notes (e.g. exclusion of built in storage from minimum floor areas in bedrooms, etc.).

The application should address the following issues, inter alia:

- Apartments Bulky and separate cycling storage particularly where steps are proposed.
- Apartments Private and Communal Amenity Space.
- Apartments % of dual aspect units to be provided.
- Apartments Confirm 10% safeguarding standards are met, privacy strip, etc.
- Houses Min. main living room and bedroom widths.

Please address all requirements of the Apartment Guidelines 2023 including:

- No more than 50% of apartment units can be one-bedroom or studio units
- No more than 25% of the total development can be studio units
- Max 10% 2 bed (3 Persons) (only permitted in limited circumstances)
- Lift/ stairs core ratio (Max of 12 per floor per individual)
- Dual Aspect or any compensation detailed.
- 10% Safeguarding Standards
- Floor to ceiling height
- Private Open Space 1-bed =  $5m^2$ ; 2-bed (3P) =  $6m^2$  and 2-bed (4P) =  $7m^2$
- Communal Amenity Space 1-bed =  $5m^2$ ; 2-bed (3P) =  $6m^2$  and 2-bed (4P) =  $7m^2$
- Min Storage = 1-bed = 3 m<sup>2</sup>; 2-bed (3P) = 5 m<sup>2</sup>; 2-bed (4P) = 6m<sup>2</sup>
- Room widths
- Cycle Storage
- Bulky Storage secure, ground floor storage space should be allocated to individual apartments and located close to the entrance to the apartment block or building. This does not satisfy cycling storage.
- Bins External designs to be provided.

The subject application is accompanied by a Housing Quality Assessment, prepared by NDBA Architects, which illustrates the compliance of the proposed houses and apartments against the relevant provisions of the Quality Housing for Sustainable Communities 2007, the Compact Settlement Guidelines 2024 and the updated Design Standards for Apartments, Guidelines for Planning Authorities 2025, which guidelines have replaced the 'Sustainable Urban Housing: Design Standards for New Apartments' 2023, which were repealed on 8 July 2025, after the date the issue of the LRD Opinion. As a matter of law, it is the 'Design Standards for Apartment, Guidelines for Planning Authorities 2025' which are required to be considered.

Confirmation of compliance with the aforementioned documents and all issues/requirements referenced in the above item (save for the replacement 'Design Standards for Apartment, Guidelines for Planning Authorities 2025') is also demonstrated in the enclosed Architectural Design Statement, as prepared by NDBA Architects, and the enclosed Statement of Consistency and Planning Report, as prepared by Hughes Planning & Development Consultants.

(m) A Building Lifecycle Report for the proposed apartments shall be provided in accordance with section 6.13 of the 'Sustainable Urban Housing: Design Standards for New Apartments' (2023) Guidelines. Regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinct character for the development. The use of brick and robust/durable materials is required along public facing areas which should be addressed in the report (particularly in all public facing areas at the main entrance and main access route within the development, on the apartments and crèche and key focal points within the development) with plaster/render to be limited or avoided. This also applies to associated bin/ bicycle stores. A mix of materials will be required throughout the scheme. Please submit full details regarding finishes as part of the planning application.'

A Building Lifecycle Report, prepared by Aramark, is enclosed with the subject application. This report has been prepared in accordance with the provisions of the 'Design Standards for Apartment, Guidelines for Planning Authorities 2025' and provides full details with regards to finishing materials.

#### 3.12 Item No. 12 – Contiguous Elevations and Section Drawings

'Scheme drawings to include Contiguous Elevations and Section drawings.'

## Applicant's Response to Item No. 12

The enclosed Contiguous Elevations and Section drawings as contained within the suite of architectural drawings prepared by NDBA Architects, provide the detail requested.

## 3.13 Item No. 13 - Boundary Treatments

'Details of all site Boundary Treatments within the development. This should include details of existing boundaries which will be retained (as applicable). All boundary treatments to be consistent with the requirements of the MCDP 2021-2027 Chapter 11. Note that timber fencing in rear gardens is not permitted. Points of linkage to the adjoining landholding, greenway, etc. should be identified and existing hedgerows retained wherever possible.'

## Applicant's Response to Item No. 13

As stated previously, rear garden boundaries are to be constructed in rendered concrete block. With regards to the treatment of the site's boundaries, we enclose a Landscape Strategy and Design Report, as prepared by Cunnane Stratton Reynolds. All boundary treatments are consistent with the requirements of Section 11.5.13 'Boundary Treatments' of Chapter 11 of the Meath County Development Plan 2021-2027.

## 3.14 Item No. 14 - Landscaping

'A Landscape Strategy and Management Plan is required.'

#### Applicant's Response to Item No. 14

Please refer to the enclosed Landscape Management & Maintenance Plan, as prepared by Cunnane Stratton Reynolds.

# 3.15 Item No. 15 - Public Open Space

'A Public Open Space (POS) requirement of 15% is required. The applicant states that there is 16.77%, comprising areas at the entrance to the estate, which have a considerable gradient, a central area adjoining the main access, access off the main boulevard and which includes a bio-retention area (Mary McAleese Park) and 2 no. pocket parks and small extra landscaped areas. Another area extends along the east and is linked with a proposed new Boyne Valley Park linking with the F1 zoned lands. POS must not be limited to linear pockets/ stretches (particularly at edges) and must exclude F1 zoning lands in the calculation as per the MCDP. The areas included as public open space must be identified (including the size of the area) and addressed in the Landscape Strategy and Management Plan.

Public amenity space must be of a high standard. The use and function of each area of open space (including active and passive spaces) must be submitted with any future application. A robust justification and clear statement of methodology is required for the site. There is an emphasis on the value and function of the POS given that private amenity space has been significantly reduced in the Compact Settlement Guidelines 2024. Any future application must clearly distinguish between private, communal and public open space. Detention basins must not limit the use of POS. The applicant shall clarify the gradients on the public open space proposed. If areas are shown to have limited usability, alternative space should be provided.

It is noted that the applicant is proposing to provide a 'public park' to the north on F1 zoned lands. The extent of what is being proposed should be clearly outlined in a future LRD application, including phasing of same.'

## Applicant's Response to Item No. 15

In response to the above points, the proposal provides 16.9% of the A2 zoned lands as useable and functional public open space in addition to the delivery of the landscaped public park to the north of the site which will be delivered in Phase 2 of the development process. The landscaped public park is detailed in the enclosed Landscape Strategy and Design Report prepared by Cunnane Stratton Reynolds and is intended to be named Boyne Valley Park.

The application documentation clearly distinguishes between private amenity spaces serving houses, duplex units and individual apartments, communal amenity spaces serving apartment blocks and the public open spaces serving the wider scheme. A hierarchy of active and passive uses for the open spaces, and a detailed breakdown of the various public open spaces and their useability is provided in the Landscape Strategy and Design Report. No SUDs features affect the use of the public open spaces.

#### 3.16 Item No. 16 - Play

'The applicant is required to provide specific details for children's play (natural play and play equipment) and associated boundary treatment (for safety of such areas). The POS should seek to provide for age groups including teenagers, etc. There should be areas of sufficient scale for 'kick-about' activities.'

#### Applicant's Response to Item No. 16

Please refer to Sections 4.0 and 5.0 of the enclosed Landscape Design Statement, as prepared by Cunnane Stratton Reynolds, which provides the requested details in relation to the provision of play equipment and the useability of public open space for various age groups.

#### 3.17 Item No. 17 - Planting Schedule

'The detailed site-specific Planting Schedule shall use native species of local provenance as per the All-Ireland Pollinator Plan.'

## Applicant's Response to Item No. 17

The landscaping and intended planting of the proposed development has been prepared in accordance with the provisions of the All-Ireland Pollinator Plan. Please refer to the enclosed Landscape Strategy and Design Report, as prepared by Cunnane Stratton Reynolds.

### 3.18 Item No. 18 - Public Artwork

'A Public Artwork should be proposed in the Public Open Space, unless other arrangements are agreed. The applicant is invited to consult with the Arts Office of Meath County Council in this regard.'

#### Applicant's Response to Item No. 18

We would note that DM OBJ 38 of the Meath County Development Plan 2021-2027 (as varied) requires that all residential developments above 75 units shall 'incorporate works of public art into the overall scheme <u>or</u> make a financial contribution to the Council to provide the piece of art in order to enhance the amenities of the local environment'.

The Applicant is willing to provide a piece of public art or to provide a financial contribution in lieu of this provision and would welcome a condition to be attached in this regard in the event of a grant of permission.

#### 3.19 Item No. 19 - Tree and Hedgerow Survey and Arboricultural Impact Assessment

'Full Tree and Hedgerow Survey and Arboricultural Impact Assessment to be submitted with Tree Protection Measures.'

## Applicant's Response to Item No. 19

Please refer to the enclosed Tree Survey Report and associated drawings as prepared by Cunnane Stratton Reynolds.

#### 3.20 Item No. 20 - Part V

'Part V - Proposals in respect of Part V of the Planning and Development Act 2000-2023. The applicant should liaise with the Housing Section of Meath County Council in this respect prior to submission of the application. The applicant states that lands were purchased in 2017.

The Housing Dept. has noted that the Part V obligation of 10% or 20% must first be established. If 10% obligation is being asserted, it must be confirmed by written verification from legal representatives of the owners setting the date of land purchase

Given the numbers of the development (244) and the draft Part V proposal submitted (24) it appears the 10% obligation is being asserted.

It must be noted that that the 10% or 20% requirement does not directly relate to the number of units on a development, it relates to the acquisition 10% or 20% of this land at existing use value and 10% or 20% equivalent of the plot size of all the residential properties.

A draft Part V proposal has been submitted as part of the LRD process. It comprises of 11 no. 1-Bed Apartments, 10 no. 2-Bed Apartments, and 4 no. 3-Bed mid terrace houses, totaling 25 Units (as per Drawing No. PI-SP-05 – Proposed Site Plan – Part V).

If a 20% obligation is determined, a minimum of 10% is required to be made available for Social Housing and the remainder will be made available as affordable units to be purchased by persons nominated by Meath County Council directly from the developer. Further information will issue once the Part V obligation is clarified. Please note the type of unit required as affordable units will differ slightly from Social Housing needs. Primarily a mix of 2 & 3-bedroom properties dispersed throughout the development would be appropriate.

The Applicant will be required to submit a complete Part V proposal prior to commencement (if planning permission is granted) to be considered by Meath County Council. To finalize the Part V proposal the following needs to be submitted as may have changed from the original proposal.

i. A copy of the unit floor plans, sections, elevations for the proposed Part V units.

- ii. Full addresses for the proposed units.
- iii. Indicative completion for proposed units.
- iv. Site layout plan with the proposed Part V units identified thereon, this site layout plan will also need to show the overall floor area of the total units in the development and the area of the development site.
- v. Letter from your solicitor confirming the date the lands were acquired to confirm Part V obligation.
- vi. To calculate the Net Monetary Value of the site, the Developer is required to submit a Certificate from an Estate Agent or Valuer confirming Development value and Existing Use value of this portion of the site on the date of Grant of Planning Permission.
- vii. Outline specification regarding building materials, finishes and fittings to be supplied.
- viii. Complete the cost template in the format as set out below in Table A. (Available in electronic format).

For further general information on Part V please go to <a href="https://www.housingagency.ie/news-events/part-v-information-and-resources">https://www.housingagency.ie/news-events/part-v-information-and-resources</a>

Any queries/submissions/proposals on Part V please contact via email partv@meathcoco.ie.'

#### Applicant's Response to Item No. 20

It is confirmed that the development will provide 25 no. residential units for the purposes of Part V as per the following mix:

- 11 no. one-bedroom apartment
- 10 no. two-bedroom house
- 4 no. three-bedroom house

Please refer to the enclosed Part V Drawings, as prepared by NDBA Architects, and the enclosed Part V Validation Letter already received from Meath County Council.

Furthermore, the applicant is aware of the additional documentation required to finalise the Part V process, which will be provided by way of compliance submission in the event that planning permission is granted.

## 3.21 Item No. 21 - Universal Design

'Universal Design - Details of 15-30% universally designed units in accordance with Objective SH OBJ 22 of the Meath County Development Plan 2021-2027 (as varied). A Universal Access Statement must be provided in the applicant's Design Statement. The applicant's attention is also drawn to Variation No. 3 to the Development Plan. Details submitted for the LRD Meeting are noted, including the proposed level access entrances, independent access for 1-bed units, convertible bathrooms, variations in door colours and entrance porches, etc.'

## Applicant's Response to Item No. 21

Please refer to the enclosed Architectural Design Statement, as prepared by NDBA Architects which illustrates the compliance of the proposal with Universal Design requirements.

We would note that 38 no. dwellings, or 15.25% of the entire residential development, are designed as Universal Design Homes thus illustrate accordance with Objective SH OBJ 22 of the Meath County Development Plan 2021-2027 (as varied).

## 3.22 Item No. 22 – Community Safety Strategy

'To accompany the LRD application. The applicant is referred to Secure by Design (UK Guidance) in this regard. The applicant should consider the principles of security in estate design, including appropriate lighting, passive surveillance of the public realm, activation street frontage, defensible spaces, etc.'

## Applicant's Response to Item No. 22

In response to the above item, we would note that the Meath County Development Plan does not contain any guidance or parameters with regards to the preparation of a Community Safety Strategy. Moreover, the parameters for preparation of such a strategy, as it relates to a residential development, are not clearly identifiable on the referenced UK website. The principles of security/safety are illustrated in the final development proposal with the scheme providing appropriate lighting, passive surveillance of the public realm, activation street frontage and defensible spaces.

## 3.23 Item No. 23 – Traffic and Transport

For ease of reference, noting the extent of subsections contained under Item 23, we have provided a direct response below to each subsection.

'The applicant is requested to address the following:

(a) The existing L-16015 is narrow and will need to be widened. The existing boundary on the west of the L16015 will have to be removed and set back to provide for a 6-metre-wide road plus a verge, cyclepath and footpath along the eastern boundary of the site.

The existing L-16015 will be upgraded and widened as requested. A 6 metre wide road will be provided along the eastern site with 2m width cycle path, 1.8m footpath and 0.5m grass verge. Please refer to enclosed Drawing No. RAT-WMX-PH2-00-DR-C-P412 'Proposed Road Upgrade Works' as prepared by Waterman Moylan Consulting Engineers for further details.

(b) The signalised junction shall be designed to provide a Protected Junction as per the Cycle Design Manual.

A protected junction with full signal control, also known as TL503 per the Cycle Design manual, is proposed. The protected junction includes the indication of the two-way cycle path through the internal main link road and the shared surface area when joining to the existing Rathmullan Road. The upgrade of road including the 0.5m verge, 2m cycle path and 1.8m footpath along the eastern boundary of the site is also indicated and coloured on Drawing No. RAT-WMX-PH2-00-DR-C-P416 'Future Travel Measures' as prepared by Waterman Moylan Consulting Engineers.

(c) The applicant has submitted a Proposed Roads Hierarchy drawing showing a Link Street running from entrance to the western boundary, with all other streets being Local Streets. The streets have not been numbered, which would assist in referencing various parts of the development.

The Proposed Roads Hierarchy drawing now shows the street numbers for Link Street and Local Streets for reference purposes. Please see attached Waterman Moylan Drawing No. RAT-WMX-PH2-00-DR-C-P402 - Proposed Roads Hierarchy- Rev A for indication.

(d) A two-way cycle path has been proposed along the southern side of the Link Street initially and then along the Local Street. This cycle path should follow the Link Street, which will then provide cycle facilities for the adjacent lands should it be developed in the future. The design shall comply with the Cycle Design Manual.

The updated drawing now has the two-way cycle path travelling along the internal link street, starting from the existing Rathmullan road junction and travelling internally on site to the central green area.. From this point, the route towards the western future development is a shared surface. This will provide cycle and pedestrian facilities linkage for the future development to the west of the proposed site. We can confirm that the two-way cycle path complies with the Cycle Design Manual, TL107 or similar approach.

(e) The applicant shall submit a "Master Plan" drawing demonstrating that the proposed road layout of the application site is compatible with the road layout for the overall development. The roads layout should be the same in all documents.

Please refer to the enclosed Drawing No. PL-SP-12 'Masterplan Roads Drawing' as prepared by NDBA Architects. This masterplan shows the potential connection points to future development areas to the south and west of the subject site and illustrates an indicative road layout for the wider landholding.

Also, please refer to the enclosed Drawing No. RAT-WMX-PH2-00-DR-C-P402 'Proposed Roads Hierarchy' as prepared by Waterman Moylan Consulting Engineers. On the drawing, arrows showing the linkage to the future development as part of the overall development are listed. Local street, link street and arterial route are also highlighted and labelled in the drawing. The road located on the boundary of the proposed development ties in with future development road works as shown in the drawing.

The internal road system, which is the same in all drawings and documents included with the application, for the proposed development clearly provides tie-in points to the wider landholding in the event that it is rezoned to provide residential development in the future.

(f) The proposed bicycle lane, on the east side of the L-16014 heading north to the Drogheda to Oldbridge Greenway, is unacceptable as the gradient would exceed the design standard limits. An alternative pedestrian and cycle route from within the development shall be provided. Ideally the pedestrian and cycle route should join the Greenway at the north-east of the site.

An alternative pedestrian and cyclist route, of 3m width, from within the development has been provided as part of the subject application to connect the north-eastern section of the site to the Drogheda to Oldbridge Greenway. Please see enclosed Waterman Moylan Drawing No. RAT-WMX-PH2-00-DR-C-P405 - P406 Proposed Road Layout & Levels for proposed pedestrian and cycle shared route layout.

(g) All roads within the development should be numbered for ease of reference.

The roads within the development are numbered for ease of reference. Please refer also to the Master Plan road layout document, as identified above in response to item (e).

(h) Corner radii should be in accordance with DMURS.

Corner radii have been designed in accordance with the provisions of Section 4.3.3 'Corner Radii' of the Design Manual for Urban Roads and Streets (DMURS).

(i) Cycle storage should be in accordance with the Design Standards for New Apartments and should be within the footprint of the building with CCTV, lighting and electronic locks. The storage should be capable of facilitating cargo bicycles and bicycles with trailers.

Bicycle storage has been provided in accordance with the Design Standards for New Apartments.

(j) Bicycle parking shall be provided at the Creche.

Bicycle storage has been provided for the creche facility.

(k) Accessible car parking shall be in accordance with Part M of the Building Regulations and include a 1200 mm wide access zone on both sides and at the rear of each designated parking bay.

At least one accessible space is provided for the creche and for each apartment block. Where accessible spaces are provided, they are located proximate to the building entrances. Accessible spaces comply with the relevant provisions of Part M of the Building Regulations.

(I) Car parking should be in groups of no more than 6, as per DMURS.

Where car parking bays are provided, there is no group of spaces exceeding a total of 6 no. spaces.

(m) Footpaths shall be a minimum of 1.8 metres in width and where adjacent to perpendicular parking should have an additional verge of at least 0.3 metres.

All footpaths within the scheme comply with the above design guidance.

(n) The proposed alley between the dwellings at the north of the site is undesirable and should be omitted.'

As stated previously, in response to Item No. 11, we would note that the final development design provides for 2 no. pedestrian throughways to break up the northern boulevard into three smaller cells of residential units and provide for enhanced permeability within the site.

## 3.24 Item No. 24 – Pumping Station Access

'The applicant is required to demonstrate that there is sufficient turning space for a tanker to access the proposed Pumping Station.'

## Applicant's Response to Item No. 24

The location of the pumping station has been updated in order for a tanker to turn into the proposed Pumping Station. Furthermore, we can confirm Foul Pumping Station access will be in line with Uisce Eireann Standards, in accordance with Drawing No. STD-WW-26A in the Irish Water Wastewater Stander Details documentPlease refer to the enclosed Waterman Moylan Drawing no. RAT-WMX-PH2-00-DR-C-P415 - Autotrack Swept Path Analysis – Tanker demonstrating the availability of turning and the location of the updated pumping station.

# 3.25 Item No. 25 - Road Hierarchy

'The Applicant is requested to provide a clear diagrammatic breakdown of the internal road hierarchy.'

#### Applicant's Response to Item No. 25

Please refer to the enclosed Drawing entitled 'Proposed Road Hierarchy', as prepared by Waterman Moylan Consulting Engineers. The aforementioned drawing clearly presents the internal road hierarchy with the various roads labelled as local streets and link streets relative to Rathmullan Road which is identified as an arterial route. For cross section detail for various street/route type, please refer to Drawing No. RAT-WMX-PH2-00-DR-C-P403 'Proposed Roads Hierarchy Cross Sections Details' as prepared by Waterman Moylan Consulting Engineers. Also, please refer to the enclosed Drawing No. PL-SP-12 'Masterplan Roads Drawing' as prepared by NDBA Architects.

#### 3.26 Item No. 26 - Road Safety Audit

'The Applicant is requested to ensure that all the problems listed within any Road Safety Audit and Quality Audit are addressed in the planning application.'

## Applicant's Response to Item No. 26

Please refer to the enclosed Quality Audit, as prepared by Traffico Road Safety Engineering. This report includes an Audit Feedback form within which the design engineer, Waterman Moylan Consulting Engineers, has addressed the recommended measures contained within the Quality Audit as requested.

#### 3.27 Item No. 27 – EV Charging

'Electric Vehicle parking and charging points should be provided in accordance with the requirements of the Meath County Development Plan 2021-2027 (as varied). The applicant is urged to consult with the ESB early to determine design requirements.'

#### Applicant's Response to Item No. 27

In response to the above item, we confirm that Electric Vehicle parking and charging points are provided in accordance with the requirements of the Meath County Development Plan 2021-2027 (as varied) which requires that 20% of total parking space numbers are designed with the provision of the necessary wiring and ducting to be capable of accommodating future Electric Vehicle charging points.

We would note that every house is provided with an external wall mounted EV charging point, to serve their in-curtilage car parking space(s) whilst parking areas associated with the duplexes, apartment blocks and the creche will be provided with the necessary wiring and ducting to be capable of accommodating future conversion to EV charging spaces, at a rate of at least 20% of the total no. of spaces.

## 3.28 Item No. 28 - Cycle Storage Areas

'Details of Cycle Storage areas. These should be sheltered, secure and accessible for all users and located in overlooked locations conveniently in apartments or close to duplex entrances. The Applicant should provide details including plan, elevation and section drawings and demonstrate safe access. Proposals must be consistent with the requirements of the Apartment Guidelines 2023.'

## Applicant's Response to Item No. 28

We confirm that the proposed development is fully compliant with the 2025 Design Standards for Apartments, Guidelines for Planning Authorities, published by the Department of Housing on 8 July 2025, We note that the Apartment Guidelines 2023 were repealed on that same date and accordingly, this request is considered by reference to the 2025 guidelines. In this regard, we confirm that the bicycle storage areas are appropriately sheltered, secure and accessible for all users and located in overlooked locations conveniently in apartments or close to duplex entrances. The application pack provides plan, elevation and section drawings of the bicycle stores as requested.

#### 3.29 Item No. 29 - Water & Wastewater

'The applicant is required to provide a Confirmation of Feasibility (COF) and Statement of Design Acceptance (SODA) and details in accordance with Uisce Éireann's Standard Details and Codes of Practice for water and/or wastewater infrastructure proposals.

Pre-Connection Enquiry (PCE) - Uisce Éireann (UÉ) (05/03/2025) noted that a Pre-Connection Enquiry (PCE) application was lodged in November 2024, was being assessed, and a Confirmation of Feasibility will be issued to the applicant, shortly.

UÉ notes that 2 no. separate Confirmation of Feasibility (COFs) letters were issued in August 2024, for two separate phases of residential development on the site, amounting to 99 no. units each. Both of those COFs confirmed the developments were feasible, subject to upgrades. However, the current development proposal is for a total of 243 no

units and will include for/incorporate the 2 x 99 no. unit proposals, that have been previously issued COFs. All COF letters are usually valid for a period of c.12 months from date of issue. After this period, it is expected for the applicant to submit a new PCE to obtain an updated COF letter.

UÉ does not permit any build over of its assets and separation distances as per UÉ Standards Codes and Practices shall be achieved. Any proposals by the applicant to build over/near or divert existing water or wastewater services subsequently occurs, the applicant shall submit details to UÉ for assessment of feasibility and have written confirmation of feasibility of diversion(s) from UÉ prior to formal planning application lodgement.

Statement of Design Acceptance (SODA) - Please note that a SODA is recommended to be in place and submitted at full LRD planning application stage.

Environmental Impact Assessment Report (EIAR) - If an EIAR is required to be submitted by the applicant, Uisce Éireann is requested to be consulted via an EIAR Scoping letter c. 6 months prior to the completion of the planning application. All scoping letters can be forwarded to our planning administration email address planning @water.ie.'

## Applicant's Response to Item No. 29

In response to the above item, we would ask the Planning Authority to have due regard for the enclosed Confirmation of Feasibility and Statement of Design Acceptance from Uisce Éireann as required.

## 3.30 Item No. 30 - Flood Risk Management

'From a Flood Risk Management perspective and with reference to the DOEHLG / OPW publication 'The Planning System and Flood Risk Management, Guidelines for Planning Authorities':

The applicant is requesting permission for the construction of a housing development which is classified as a 'highly vulnerable development'.

With reference to Meath County Council's Map Info flood mapping and the OPW CFRAMS and NIFM flood mapping for the relevant area, the development site is mostly situated in Flood Zone C for fluvial flooding i.e. the probability of flooding is less than 0.1% and therefore at low risk of flooding. However, some of the northern section of the site is in a Flood Zone A.

The applicant shall address the below items which are to be agreed with the Environment department:

- (a) The applicant shall submit a revised Site-Specific Flood Risk Assessment for the full red line boundary. Parts of the site are in Flood Zones A & B and the Justification Test is to be applied.
- (b) The applicant shall carry out an assessment on the catchment area of the 1200mm culvert which is located on the eastside of the Rathmullan road. The applicant shall provide confirmation that there is sufficient capacity in the 1200mm culvert to accommodate critical flows.
- (c) The applicant shall submit a flood management response plan for the potential flooding of the Rathmullan road.
- (d) The applicant shall use up to date hydrology and provide detail cross sections of any watercourses or drainage ditches modelled.

- (e) The applicant shall assess potential flows from the surrounding zoned lands.
- (f) The flood consultant shall provide confirmation that the proposed surface water system does not increase flood risk for the proposed development or the surrounding areas.
- (g) Detail overland flow plans to be provided for assessment.
- (h) The applicant shall submit a revised SSFRA to address the above-mentioned issues.

The applicant shall contact dobrien @meathcoco.ie to discuss the above issues prior to submitting a planning application.'

#### Applicant's Response to Item No. 30

Please refer to the enclosed Flood Risk Assessment, as prepared by JBA Consulting. The assessment is based on the flood mapping/modelling studies as available within the Catchment Flood Risk Assessment (OPW) and Management and the Meath County Council Strategic Flood Risk Assessment.

The assessment has duly addressed the items listed within the various subsections of the above item with subsections b-h addressed on the following pages of the Flood Risk Assessment: subsection b – pages xxiii - xxiv, subsection c – page 1, subsection d - page vii, subsection e – pages xxvi-xxvii and subsection f – page 1.

## 3.31 Item No. 31 - Surface Water Management

For ease of reference, noting the extent of subsections contained under Item 31, we have provided a direct response below to each subsection.

'The development as proposed broadly meets the requirements of Meath County Council Environment Flooding-Surface Water Section with respect to the orderly collection, treatment and disposal of surface water. The applicant shall address the below items which are to be agreed with the Environment department:

(a) The proposed surface water layout is acceptable in principle. The applicant shall revise the location of the northern catchment attenuation system or agree a suitable alternative due to potential maintenance issues associated with he steep embankments.

The location of the northern attenuation system has been revised having regard for the topography of the site.

(b) The proposed foul pumping station underground tanks clash with the proposed northern catchment attenuation system. Sufficient separation distances shall be implemented.

Both the detention basin and the foul pumping station have been relocated. We can confirm that a minimum of 15m separation distance is provided between the edge of the detention basin and the edge of the retaining wall surrounding the pumping station. Please refer to Drawing No. RAT-WMX-PH2-00-DR-C-P451 - P452 'Proposed Drainage Layout' as prepared by Waterman Moylan Consulting Engineers.

(c) The applicant shall submit road longitudinal sections so road gradients can be assessed for drainage purposes.

Please see enclosed Drawing No. RAT-WMX-PH2-00-DR-C-P440 - P441 'Proposed Roads Longsection', as prepared by Waterman Moylan Consulting Engineers, for drainage assessment purposes.

(d) The principles of the SuDS 'Management Train' has been applied to the design for the surface water management scheme which has been proposed for the subject development. The planning authority would like to see greater use of larger scale source control measures within a more compliant design. The planning authority would like to see more SuDS/Nature Based Solutions implemented into the proposed development where applicable. Details to be agreed with Environment section.

We confirm that the principles of the SuDS management train were taken into consideration whilst designing the over site drainage. The use of source control measures was explored and now can be seen in permeable paving and water buckets. The use of swales andoverground basins has been maximised as part of nature-based/planted solution for the development.

Please refer to Drawing No. RAT-WMX-PH2-00-DR-C-P451 - P452 'Proposed Drainage Layout' as prepared by Waterman Moylan Consulting Engineers for location of SuDS elements. Please refer to Section Nos. 3.4 and 3.8 of the enclosed Engineering Assessment Report, also prepared by Waterman Moylan, for SuDS selection criteria and SuDS maintenance details.

(e) The applicant shall provide a breakdown of the impermeable areas/contributing areas for each surface water network/attenuation system.

Please see table below with breakdown areas for the proposed development, divided into catchments.

	Area (m2)	CV	Factored Area (m2)	
CATCHMENT 01 (North Catchment)				
Roofs	8317.82	1	8317.82	
Roads and Footpaths	7336.24	0.90	6602.61	
Driveways	4817	0.70	3371.90	
Green areas	9661.03	0.10	966.10	
TOTAL	30132.09		19258.43	
CATCHMENT 02 (South Catchment)				
Roofs	9467.66	1	9467.66	
Roads and Footpaths	9768.20	0.90	8791.38	
Driveways	4253.35	0.70	2977.34	
Green Areas	7318	0.10	731.80	
TOTAL	31526.82		22687.79	

Details of the attenuation system for both catchment areas can be seen in the Waterman Moylan Drawing no. RAT-WMX-PH2-00-DR-C-P451 - P452 Proposed Drainage Layout.

(f) The maximum depth of water the planning authority will except in a proposed detention basin system is 300mm, if it is located in a public open green area. The applicant shall revise the design where the proposed depths exceed 300mm for the 1% AEP plus climate change.

The design was reviewed and both basins will have a maximum of 300mm depth. Both basins are designed to cater for the 1–100-year storm (1% AEP) plus 20% of climate change. Please refer to the revised Waterman Moylan drawing no. RAT-WMX-PH2-00-DR-C-P451 - P452 Proposed Drainage Layout

(g) The functionality of any public open space shall not be impacted by any proposed detention basins. All detention basins shall be positively drained to avoid a constantly saturated green area. All rainfall events for the 1 in 30 year

or below shall be stored underground if available green open space is restricted.

The basins have been redesigned so as not to impact the public open spaces. Both basins are designed to ensure sufficient storage capacity is provided to store water from the critical 100-year storm for the subject site with 20 percent climate change allowed for in the calculations to facilitate climate change. Noted that both of the attenuation systems are designed to cater the 1 in 30-year storm in the underground attenuation. In the case where the storm degree exceeds the 1 in 30-year storm, the above ground detention basin will be filled up slowly and dissipate over the time while the storm passes. The purpose of it is to ensure the above ground grass detention basin is dry for majority of time. For details of detention basin and overall surface water strategy, please refer to Section 3 of the Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers. Please also refer to Drawing No. RAT-WMX-PH2-00-DR-C-P451 - P452 'Proposed Drainage Layout', also prepared by Waterman Moylan, for location of 2 no. detention basins.

(h) The applicant shall submit an overland flow route plan for the proposed development and identify areas where temporary ponding can occur in the event of the surface water system surcharging.

Please refer to Drawing no. RAT-WMX-PH2-00-DR-C-P490 'Overland Flow Routes', as prepared by Waterman Moylan Consulting Engineers, as required. The model for surface water design shows no ponding for the network, this model is included within Appendix B of the Engineering Assessment Report prepared by Waterman Moylan Consulting Engineers.

(i) The applicant shall ensure that minimum cover on the surface water pipeline is in accordance with the below mentioned guidelines.

We can confirm that the minimum cover for the surface water pipeline is in accordance with the guidelines mentioned in the following items.

(j) The applicant shall provide clarification of the soil values and SAAR values used in the surface water design.

Soil type 3 (Stiff to firm) was considered for the drainage calculations. As soil type 1 is the offers higher infiltration rates and type 5 is offers the lowest infiltration rates (rocks and minerals on ground), type 3 was selected. Onsite inspections identified that topsoil for the region is clay and in depths of c. 1.20m and deeper, Glacial Till and boulder clay were found. It is expected that in depths between 5.80-8.50m, a local bedrock horizon is present (not confirmed as would require core drilling). Infiltration rates results are typical of low-permeability glacial till deposition, but not as impermeable as expected for a soil type 4 or 5, and so the soil was considered to have a permeability rate closer to type 3 soil.

For the SAAR value the updated 1991-2020 Annual Average Rainfall Grid was used, from the MET Eireann website. The Irish National Grid Coordinates for the site are E306198 and N275302. The new SAAR values document from Met Eireann states that the SAAR is the 5<sup>th</sup> to last item on the list from the file.

(k) The applicant shall provide road long sections for the proposed site showing proposed road gradients and ensuring no ponding of surface water will occur on the proposed roads.

Please refer to Drawing no. RAT-WMX-PH2-00-DR-C-P440 – P441 'Proposed Road Longsections', as prepared by Waterman Moylan Consulting Engineers, which indicate road gradients as required. The model for surface water design shows no ponding for the network, this model is included within Appendix B of the Engineering Assessment Report as prepared by Waterman Moylan Consulting Engineers.

(I) The applicant shall provide details of the driveway drainage infiltration blanket.

Driveway drainage for the proposed development consists of permeable paving, with partial infiltration (where a perforated pipe will drain the excess water that cannot infiltrate into the soil). Please refer to Drawing No. RAT-WM-PH2-00-DR-C-P410 'Typical Road Construction Details Section A-A', as prepared by Waterman Moylan Consulting Engineers, for details of same.

(m) The applicant shall locate Class 1 petrol/oil separators upstream of the proposed attenuation systems.

Please refer to Drawing No. RAT-WMX-PH2-00-DR-C-P451 - P452 'Proposed Drainage Layout', as prepared by Waterman Moylan Consulting Engineers, for the amended location of the Class 1 Petrol Interceptor, now upstream of the attenuation system as required.

Please refer to Waterman Moylan drawing no. RAT-WMX-PH2-00-DR-C-P460 'Typical Hydrobrake and Petrol Interceptor Details' for details of same and Section 3 of the Engineering Assessment Report also prepared by Waterman Moylan, for information in relation to maintenance for the petrol interceptor.

(n) All surface water design/work shall comply fully with the Greater Dublin Strategic Drainage Study (GDSDS) Regional Drainage Policies Volume 2, for New Developments.

We can confirm that all surface water design/work comply fully with the Greater Dublin Strategic Drainage Study (GDSDS) Regional Drainage Policies Volume 2, for New Developments.

(o) All surface water design/work shall comply fully with the Greater Dublin Regional Code of Practice for Drainage Works Volume 6.

We can confirm that all surface water design/work shall comply fully with the Greater Dublin Regional Code of Practice for Drainage Works Volume 6.

## 3.32 Item No. 32 – Architectural Heritage

'The application site is adjacent to Oldbridge Estate and Brú na Bóinne Buffer Zone.

The Conservation Officer has stated that the scheme may be visible from the sites of Olbridge Estate, the Battle of the Boyne Site and Brú na Bóinne. However, there is no Visual Impact Assessment provided with the application to rule out any visual interference or negative impact that this proposal would have on the setting and context of this historic protected sites. Therefore, a Visual Impact Assessment (VIA) is required to evaluate the potential visual effects of a proposed development on the landscape and visual environment of Recorded Protected Structures/National Monuments:

- a) Oldbridge Estate
- b) Battle of the Boyne Site
- c) Brú na Bóinne

The VIA should include the following:

- 1. Baseline Study: Gathering detailed information about the existing visual environment, including landscape features, key viewpoints, and the visual quality of the area. Photographs, maps, and descriptive text used to document the baseline conditions.
- 2. Impact Prediction: Creating visualizations such as photomontages, 3D models, or simulations to illustrate the changes from various viewpoints. A cross-section drawing illustrating the proposal in relation to the existing sites identified.

- 3. Impact Evaluation: Evaluate the visual changes in terms of their significance. Assessing factors like the scale of the change, the sensitivity of the landscape and viewers, and the duration and permanence of the visual impact.
- 4. Mitigation Measures: Strategies to mitigate any impacts found. Mitigation measures might include design modifications, landscaping, screening, or other methods to reduce visual intrusion.

Relevant policies and objectives in the Meath County Development Plan 2021-2027 – HER POL 1, HER POL 2, HER POL 4, HER POL 5, HER OBJ 2, HER OBJ 3 and HER OBJ 4.'

#### Applicant's Response to Item No. 32

In response to the above item, we would ask the Planning Authority to have due regard for Chapter 11 'Landscape and Visual Impact Assessment' of the enclosed EIAR, as prepared by DNV. The LVIA has been prepared as guided and concludes that the design process has incorporated measures that integrate the proposed development into its setting and have contributed towards a broadly benign assessment with no significant effects identified.

## 3.33 Item No. 33 - Archaeology

'The site is adjacent to the recorded monuments including:

- o ME020-072 Enclosure
- o ME020-088 Enclosure (large Bronze-Age enclosure)
- o ME020-034 Excavation Miscellaneous
- o ME020-054 Excavation Miscellaneous
- o ME020-063 Kiln
- o ME020-036 Enclosure
- o ME020-049 Excavation Miscellaneous
- o ME020-036001 Cremation Pit
- o ME020-008 Enclosure

The Conservation Officer has noted that the likelihood of archaeological material found in the subject site is high; please be guided by the National Monuments Service and the Department of Housing, Local Government and Heritage's comments.

MCC's Archaeologist stated that following on from the previous Local Authority Heritage review of October 2024, further documents were submitted in February 2025. These included a detailed archaeological report:

o Archaeology & Heritage Consultancy Ltd, February 2025, 'Archaeological Impact Assessment & Method Statement for Residential development at Rathmullan Road, Drogheda Co Meath'.

This document gives excellent background information and proposes mitigations. The authors state they met with National Monuments Service in 2019 to discuss this project and at that time, noting that "the recommended strategy was deemed to be appropriate" (Para 2.5).

It is recognised that:

1. The site is around 6ha in extent, but around 0.75ha is woodland to be retained and around 0.60 ha is green field to be retained as green space (albeit partially developed with footpaths, a playground and a bio-retention area). This leaves approximately 4.5 ha for the proposed development area.

- 2. The previous geophysical survey was for sample areas only and covers around 1.9 ha.
- 3. The previous trial trenching amounted to approx. 7.25% of the 4.5 had development area, but this only revealed:
  - a. a ditch terminus or elongated pit that contained a fragment of burnt bone and was sealed beneath a layer of non-natural subsoil,
  - b. a metalled surface and adjacent undated posthole, however a small sherd of pottery was retrieved from the surface which was of potentially prehistoric date.
  - c. a series of undated ditches, which were not noted to match any previous maps but were considered by the excavator of probable Post-Medieval date.

The amount of archaeological remains found indicated that construction phase archaeological monitoring of the topsoil strip under archaeological supervision could be an adequate mitigation. The topsoil would be stripped in advance of actual construction work in any particular area. The stripping would be by an archaeologically supervised backactor fitted with a flat bladed ditching bucket and should archaeological remains be uncovered, then these would be fenced off and rescue excavated (preserved by record) before actual construction works could occur in that area. Further mitigation proposed (in summary):

- o metal detecting topsoil for Battle of the Boyne evidence
- o having the availability of an archaeologist with battlefield archaeology experience
- o recording the early 19th century building remains in the SE corner of the site trial trenching in and around the SE farm area to examine the possibility that the cluster extends beyond the buildings currently upstanding and to record the full extent and layout of the buildings.

## Comments of red line boundary application

- 1. The above mitigations seem adequate given the limited nature of the known or presumed archaeological remains. However, there are many untested blocks c.40m x 40m all over the site which could contain clusters of archaeological remains. The developer should be aware that unknown archaeological remains of a higher significance could potentially cause delays and disruptions should they be discovered using this monitoring methodology.
- 2. Topsoil strip monitoring should ensure that the topsoil stripping includes any 'non-natural subsoil' (possible hill wash) to ensure any potential archaeological features are exposed by this process.
- 3. Construction works in the northern green zone, which is archaeologically untested, also need specific monitoring or advance archaeological works. Ideally this area would be tested to a sufficient level to determine if archaeological remains are there (and these can then be dealt with) or whether the construction can continue without further archaeological input. The path down the slope to the River Boyne may require more terracing into the slope than is apparent on the drawings.

#### Blue line discussion of Enclosure ME020-088

To the NW, there is discussion of the Enclosure ME020-088. This seems to be within the lands owned by the developer (blue line) and outside the area of the current planning application (red line). The enclosure was partly exposed and tested in 2008. Current knowledge is summarised:

- Features appear to be limited to a ditch defining the southern part of a possibly ovalor 'D' shaped enclosure that is 60m 70m (two sizes are given) from E to W. So far, nothing has been noted in the interior. No entrance known yet. The enclosure ditch contains prehistoric pottery possibly in substantial amounts but there is no mention regarding the environmental potential of the ditch fills.
- The enclosure ditch lies below topsoil that is 0.50m deep.
- The enclosure area did not form part of the 2007 geophysical survey.

Regarding the proposed preservation in situ proposals:

- Para 5.1.10 states there will be a 10m buffer zone left around the feature. But
   Para 6.1.13 says the buffer zone will only be 5m.
- The proposed 'archaeological area' of the landscape masterplan has it separate from the housing development with a post-and-rail fence 1.20m high.
- Proposed works comprise:
  - o A further two trenches to find and define the northern extent of the site. The extent of the site will then be staked out.
  - o Geotextile will be placed directly on present ground level and covered in topsoil.
  - o The imported topsoil will form a low embankment defining the line of the enclosure ditch. The embankment will have slopes of 1:4.
  - o The area will then become a green space which will limit further development.
  - o A looping path will be laid with benches and signage to inform visitors of the archaeological remains beneath.

The Local Authority typically takes housing estate green areas in charge following their completion and the long-term preservation of areas containing archaeological remains can cause long-term issues. From a Local Authority perspective, some further details would be required:

- The applicant should clarify if the preservation in situ of this ME020-088

  Enclosure monument is to form part of application for LRD0036. The landscape design masterplan shows no access between the enclosure area and the proposed development (detail above). Please clarify.
- It is common for 'red line developments' to have construction and storage compounds set up in any associated 'blue line' areas. Clarification of where the proposed red line compounds and storage areas is required since these areas are often also stripped of topsoil. The ME020-088 area should be avoided.
- Some form of protection during construction works will probably be required for Enclosure ME020-088. Please clarify the detail of the proposed works if construction works are to be confined to the 'red line' area. Please clarify the size of the proposed buffer area.

- It is unlikely that only two additional trenches will be sufficient to fully understand the ME020-088 enclosure site. In order to preserve a site in situ it must be fully understood. This is of prime importance from a Local Authority perspective if the Local Authority is to take charge and manage the monument into the future. For example, it is not known if there are human remains inside the enclosure. Also, we do not have an environmental assessment or a discussion as to whether any environmental remains would be affected by the proposed preservation works. Sufficient trenching and hand excavation should be completed to fully understand archaeological potential of the site (stratigraphy, artefacts and environmental).
- Clarify the extent of the proposed geotextile covering. Is this to cover the whole site or just the enclosure ditch?
- For the Local Authority to adequately allow for possible future limited works such as potential footpath lighting or perhaps further planting the whole site (including the buffer zones) should be buried to a depth of at least 0.75m 0.95m. This includes the existing topsoil. If an enclosing bank is to be built around the ditch areas, then this would be additional to this depth.
- All imported topsoil covering the monument ME020-088 must be free from general builder's waste.
- All the ME020-088 preservation in situ works need to go into a separate longterm preservation in situ and future management needs report - presumably under a separate Licence. This is so that the details do not get lost or mixed up with other, nearby archaeological works. This ME020-088 Licence will be on the basis of a separate Method Statement which will be agreed with the National Monuments Service and the Local Authority.'

## Applicant's Response to Item No. 33

In response to the above item, we would ask the Planning Authority to have due regard for the enclosed Archaeological Impact Assessment as prepared by Archaeology and Heritage Consultancy Limited. The AIA provides information consistent with the above guidance and we note that the queries which are underlined above are directly addressed in Appendix 5 of the assessment report.

In short, we would note the following in relation to the stated queries as underlined above, the monument ME020-088, lies outside the boundaries of the proposed development (see paragraphs 3.10, 5.1.1, 5.1.6 and 5.1.13 of AIA) so issues associated with preservation *in situ* do not arise. It is proposed to resurvey the location of the enclosure MH020-088---, as defined by the 2008 archaeological investigations and establish a 10 m buffer zone around this area. This buffer zone will be protected with harras fencing or similar, erected before any ground works commence and will stay in place until construction is completed, so as to avoid any accidental incursions onto the site of the monument or incursions by construction or storage compounds (see para 5.1.10 of AIA).

## 3.34 Item No. 34 – Environmental Assessments

For ease of reference, noting the extent of subsections contained under Item 34, we have provided a direct response below to each subsection.

'All relevant Environmental Assessments (EIA, AA, Flood Risk Assessment, Ecological Impact Assessment etc.) to be carried out and submitted with the application.

(a) An EIAR will be submitted as part of the application.

Please refer to the enclosed Environmental Impact Assessment Report, as prepared by DNV.

(b) A Screening for AA and where relevant a Natura Impact Statement should be submitted. The applicant is requested to ensure that the full red line boundary is assessed in the AA documentation, that the ZOI is clearly outlined and mapped and details such as watercourse crossing methodology (method statement, etc.) are provided in a NIS (if so required).

Please refer to the enclosed Appropriate Assessment Screening Report (AASR) with progression to Natura Impact Statement (NIS), as prepared by Verdé Environmental Consultants.

(c) The design and location of development must be informed by the environmental assessments with mitigation incorporated into the final proposal. These reports are distinct and follow separate legislative requirements/guidelines, however they should be consistent with each other.

The subject proposal has been designed with due regard for the receiving environment and has considered the findings of the suite of ecological and environmental based documentation prepared in respect of the proposal. The reports are consistent with legislation and with each other.

(d) Details regarding the author(s) should be presented, outlining their qualifications and relevant experience, in addition to the length of experience. Where relevant, input from a range of authors with appropriate expertise may be required for the aspects of EIA, EcIA, AA, Hedgerow Survey, etc. A Strategy for dealing with Invasive Species onsite or import of same is also required.

All documentation included with the application clearly presents the authors' qualifications and experience and the documentation has been inter-referred between the project consultants to ensure consistency .

(e) The applicant is advised to ensure that surveys are conducted in appropriate seasons and consider the need for Bat, other Mammal Surveys, Bird Surveys, Tree Survey/ Report, etc. and consider the objectives in the MCDP that trees be preserved, retention of hedgerows and promote the All-Ireland Pollinator Plan. Surface water drainage and landscaping proposals should also be assessed. Cumulative impacts of the proposed development alongside proposals within the Masterplan area should be assessed.

We refer the Planning Authority to the Bat Surveys and Bird Surveys set out in the accompanying NIS which show no impact of the proposed design on bats or protected bird species. All other requested assessments have been carried out and are included in the EIAR.

(f) Hedgerows should be assessed in accordance with the Hedgerow Appraisal System – Best Practice Guidance on Hedgerow Survey, Data Collection and Appraisal and that the applicants should have regard to Article 10 of the Habitats Directive and HER OBJ 60 Meath County Development Plan 2021-2027.

We ask the Planning Authority to have regard for the enclosed Arboricultural Report, which includes a Hedgerow appraisal, as prepared by Cunnane Stratton Reynolds.

We confirm that the subject proposal has been designed with due regard for the receiving environment and has considered the findings of the suite of ecological and environmental based documentation prepared in respect of the proposal. All such documentation included with the application clearly presents the authors' qualifications and experience and the documentation has been inter-referred between the project consultants to ensure consistency. All surveys have been conducted within the appropriate seasons and tree/hedgerow removal has been limited to the extent necessary to facilitate the primary site entrance and the secondary entrances via the parkland area to the north following consultation with the Planning Authority.

#### 3.35 Item No. 35 - Noise

'Noise – This should be addressed in the context of appropriate noise insulation as the site is located in DAA LDEN 45.'

#### Applicant's Response to Item No. 35

In response to the above item, we would ask the Planning Authority to have due regard for Chapter 10 'Noise and Vibration' of the enclosed EIAR, as prepared by DNV. We would note that façade wall construction has been assumed to achieve a minimum sound insulation performance of 56dB RW whilst roof construction assumed to achieve a minimum sound insulation performance of 50dB RW. The design has considered the effect of adverse consequences, mitigation has been provided by specification of the sound insulation and ventilation requirements.

## 3.36 Item No. 36 – Management Plans

- 'A Resource and Waste Management Plan, Construction and Environmental Management Plan and an Operational Waste Management Plan are required.

  Construction Phase
- (a) The applicant has obligations under the Waste Management Act, 1996, as amended (WMA), to ensure the control of waste and that it is not transferred to an inappropriate person. Measures must be in place and managed to ensure compliance with the WMA and account for movement and end destination of all waste streams generated by the project, this also includes management of waste by any contractors and sub-contractors. In addition to this the importation of any soils that may be required by the proposed project will be subject to the aforementioned obligations as specified in the WMA. Any requirement for same can be included in the CEMP.
- (b) The Construction Environmental Management Plan (CEMP) should also address extreme of weather (drought, wind, precipitation, temperature extremes) and the possible impacts on receptors and mitigation of same. The CEMP should be treated as a live document and communicated to all relevant personnel on site.
- (c) Any activities that require Article 28 or Article 27 needs to be addressed.

## Operational Phase

- (d) An Operational Waste Management Plan needs to be provided for housing, apartments and commercial units onsite. This needs to include an initial waste management plant for the site.
- (e) The Commercial unit for the Creche must contain a bin storage area.
- (f) Apartments/ Duplexes –. The applicant needs to ensure that sufficient space is provided for 3 bin separation system. Details on lighting, surfaces, facility hosing down, gullies for wastewater, security, ventilation, odour and vermin control etc. need to be provided.

Please contact Helen McDonnell Executive Scientist Environment Waste Section, Meath County Council for queries in relation to this request.'

#### Applicant's Response to Item No. 36

In response to the above item, we confirm that the Applicant is aware of the relevant obligations with regards to waste management. We note that a Construction Environmental Management Plan (CEMP), as prepared by Waterman Moylan Consulting Engineers, considers weather impacts as guided.

An Operational Waste Management Plan, as prepared by Synergy Environmental Limited, contains a waste management plan for the site and provides reference to Article 27. A Resource and Waste Management Plan, as prepared by DNV, is also included as part of the application. We would note that the creche is served by a dedicated bin storage area. Details with regards to bin storage for the apartments and duplexes is contained within the Building Lifecycle Report, as prepared by Aramark.

On the basis of the above, we would confirm that all items requested under Item No. 36 have been addressed.

## 3.37 Item No. 37 – Energy Efficiency

'Energy Efficiency - Details to address Section 10.5.6, Section 11.4.1 and associated policies and objectives in the MCDP 2021-2027 (as varied).'

#### Applicant's Response to Item No. 37

Please refer to the enclosed Energy Report prepared by McElligott Consulting Engineers. The proposed public lighting is to be installed as per "Meath County Council's: Public Lighting Technical Specifications & Requirements and is fully compliant with Section 10.5.6 and Section 11.4.1 and associated policies and objectives in the MCDP 2021-2027.

#### 3.38 Item No. 38 - Broadband/Electrical Infrastructure

'Broadband/ Electrical Infrastructure: Telecommunications Services should be installed concurrently with all other services (water & electricity) for the development.

Broadband and telecommunication networks have not been designed for this development. All units must be serviced in compliance with the County Development Plan guidance and the EU Gigabit Infrastructure Act. Plans should be provided to MCC prior to commencement.

The developer should ensure that all telecom infrastructure providers (principally SIRO, Virgin Media Ireland and Open eir) should be engaged at an early stage to ensure that adequate infrastructure is provided and that plans are submitted prior to commencement. The development and specifically apartment blocks will need to comply with the In-Building Telecoms Infrastructure Regulations and the requirements of Gigabit Infrastructure Act.

Maps should be provided showing details of all ducting and access chambers to facilitate all operators interested in providing services in this area. In common with all housing estate developments the developer is required to supply plans of the telecommunications networks with adequate provision for all telecommunications network suppliers. The plans supplied should indicate how the telecoms duct network will link with services installed outside of this development.

Electrical Infrastructure: The proposed development should not interfere with existing electricity infrastructure, and it is advised that the applicant consults directly with ESB Networks, etc. As previously noted, the applicant is advised to liaise with ESB Networks regarding the proposed EV charging layout design.'

## Applicant's Response to Item No. 38

Please refer to the enclosed Energy, Utilities and Telecommunications Statement, as prepared by McElligott Consulting Engineers, for information in relation to broadband, electrical and telecommunications infrastructure. The statement confirms that one ESB substation is required to facilitate the proposed development based on ESB requirements. The development has been designed in accordance with the provisions of the Meath County Development Plan 2021-2027 and the EU Gigabit Infrastructure Act.

## 3.39 Item No. 39 – Taking in Charge/Management Company

'Taking in Charge/ Management Company: The prospective applicant is requested to ensure that the materials specified within areas to be Taking in Charge are in accordance with Meath County Council's Taking In Charge Policy document. The prospective applicant should liaise with the local authority in this regard. A Management Company will be required for apartments and duplex units and associated bicycle/ bin storage structures, etc.'

## Applicant's Response to Item No. 39

Please refer to the enclosed Taking In Charge Plan as prepared by NDBA Architects. It is confirmed that all proposed materials are in accordance with Meath County Council's Taking In Charge policy document and a management company will be appointed in due course, on foot of a grant of permission, to operate the apartment units and maintain shared spaces as necessary.

## 3.40 Item No. 40 - Public Lighting

'A Public Lighting design which shall provide for lighting to all public spaces within the confines of the development (including road frontage) is required. Public lighting shall be designed and installed as per "Meath County Council's: Public Lighting Technical Specifications & Requirements" document with lighting considerations incorporated into the landscaping scheme. The lighting design must also address any impacts on bats.'

## Applicant's Response to Item No. 40

Please refer to the enclosed Public Lighting Report and associated drawings prepared by McElligott Consulting Engineers. The proposed public lighting is to be installed as per "Meath County Council's: Public Lighting Technical Specifications & Requirements.

In addition, we note that the lighting works have considered the manner in which the site has been laid out in respect of landscaping and the lighting works have been guided by the ecological assessment of the site to ensure no undue impacts on bats.

#### 3.41 Item No. 41 – Fire Safety/Estate Names

'Fire Safety, Estate Names details to be provided.'

#### Applicant's Response to Item No. 41

In response to the above item, we confirm that the subject proposal has been designed with due regard for the fire safety regulations. We would note that specific fire safety/estate names have not been provided at this juncture, it is expected that such names will be agreed by way of condition in the event of a grant of permission.

Further, we would note that a Fire Safety Certificate (FSC) for the proposed development will be sought in the event of a grant of permission.

### 3.42 Item No. 42 – Development Management Standards/ Ministerial Guidelines

'Development Management Standards/ Ministerial Guidelines & Final Design. Application documentation should be updated to take account of any changes, standards in the Meath County Development Plan 2021-2027, Ministerial Guidelines, etc. The applicant is advised to ensure all standards are maintained or where relevant revised in the final iteration of a development proposal in the event of any future planning application.'

## Applicant's Response to Item No. 42

In response to the above item, we confirm that all application documentation has been updated to take account of the most up to date version of the Meath County Development Plan 2021-2027, the 2025 Apartment Guidelines and all up to date national policy documentation including Ministerial Guidelines.

#### 3.43 Item No. 43 – Procedural Comments

- '(a) All documents must be updated to reflect final design proposals, development descriptions and same red line boundary throughout the documents.
- (b) Any mitigation associated with environmental impacts or best practice must be incorporated into the design of the development.
- (c) The applicant is also advised to consider the minutes of Section 247 and LRD meetings to ensure all points have been considered in the application, where not already done.
- (d) Please reference all relevant planning permissions (applications) which will be altered by the proposed development in public notices.
- (e) Planning Documents The applicant is requested to provide 1 no. printed copy of all documents as part of the LRD planning application, even if it is lodged as an electronic application.'

## Applicant's Response to Item No. 43

We confirm that all documentation contained within the enclosed application pack has been reviewed to ensure consistency both with regard to the red line boundary and the presentation of the final design proposal.

All mitigation measures referenced within the suite of environmental related documentation has been incorporated into the design of the development.

The minutes of both the section 247 and section 32 meetings have been addressed in the enclosed Statement of Consistency & Planning Report prepared by Hughes Planning & Development Consultants.

We confirm that no former historical planning applications will be altered by the proposed development and, accordingly, no former applications are referred to in the public notices.

One printed copy of the application pack has been issued to Meath County Council for assessment alongside the electronic application.

#### 4.0 Conclusion

This report sets out how the various issues raised by Meath County Council, in their Large-scale Residential Development Opinion (Ref. No. LRD0036), relating to the proposed development at Lands to the east of the M1 motorway and west of the Rathmullan Road, Oldbridge, Drogheda, Co. Meath have been addressed by the Applicant.

The layout and design changes incorporated into the final scheme are considered to result in improvements to the overall development and ensure that a high-quality mixed-use development will be provided.

It is therefore submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.

Kevin Hughes MIPI MRTPI Director for HPDC Ltd.