

08 April 2024

Email and Hand Delivered

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Strategic Infrastructure Development
An Bord Pleanála
64 Marlborough Street
Dublin 1
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RE: ABP-318758-23 – WESTGATE 2040, DROGHEDA, CO. LOUTH – PUBLIC REALM REGENERATION WORKS

Dear Aisling,

This letter has been prepared by Turley Planning Ireland Ltd and members of the wider Westgate Design Team, on behalf of Louth County Council, in response to An Bord Pleanála's (hereafter 'the Board') recent request to make submissions or observations in relation to the 11 no. submissions received by the Board during the public consultation stage of the Westgate 2040 planning application process.

This response letter should be read in conjunction with all plans and reports/assessments submitted with the planning application which demonstrate that the proposed development complies with the relevant technical standards and planning objectives/policies.

Louth County Council (hereafter 'LCC') welcomes the engagement from those who have made submissions and thanks the Board for the opportunity to respond. LCC has reviewed all of the submissions received and notes that a number of comments within the submissions relate to areas/components outside the extent of the application site's redline boundary. No commentary is provided with respect to these items as they are considered to be outside the remit of this specific planning application.

This letter focuses on material planning considerations raised in the 11 no. submissions received by the Board. Comments have been grouped into the following themes and responses provided:

- (i) Engagement
- (ii) Design
- (iii) Daylight and Sunlight (Old Abbey Dance Studio)
- (iv) Old Abbey - Support Column for the Freestanding Canopy Structure
- (v) Cultural Heritage, Archaeology and Architectural Heritage
- (vi) Barlow House
- (vii) Road Safety Audit

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- (viii) Traffic, Transport and Parking
- (ix) Protected Views and Prospects
- (x) Public Toilets

(I) ENGAGEMENT

Louth County Council confirms that it will continue to liaise and engage with all relevant stakeholders, including those engaged in service delivery, such as An Post, during the detailed design, construction and implementation stages of the Westgate 2040 project to ensure that any potential construction or operation impacts are minimised.

(II) DESIGN

The Westgate 2040 planning application package is accompanied by a Design Statement which provides detail on the design process undertaken to develop and refine the proposed public realm regeneration works and interventions. Chapter 4 of the Environmental Impact Assessment Report (EIAR), entitled 'Consideration of Alternatives' also provides information on the alternative proposals considered for each of the project's character areas.

Importantly, the proposals have been carefully designed to provide enhanced functionality, amenity, connectivity and accessibility within the Westgate area while also respecting the rich built and natural heritage assets that exist.

The need for targeted intervention/recovery in the Westgate area was initially identified with the publication of the 'Urban Design Framework Plan for The Heritage Quarter, Drogheda' in May 2013 and later in the 'Westgate Vision - A Townscape Recovery Guide for Property Owners, Investors and Developers' in June 2018. The proposed development represents the next stage to deliver the 'Westgate Vision' and the proposals relate to 2 of the 3 areas identified, these being the 'Barlow' and 'Old Abbey' areas.

The proposals have been designed to positively respond to the unique challenges and opportunities of the application site and the feedback received during detailed consultation with stakeholders and the community. The proposals are also informed by national and international best practice and align with relevant national, regional and local planning policies and objectives.

The wider planning application package provides a detailed overview of the iterative design process, the proposed works/interventions and their intentions/aims, and any potential impacts arising as a result of the proposals. Notwithstanding, it is noted that a number of comments have been made in relation to design. Noting these comments, the following points are reaffirmed with respect to the Westgate 2040 proposals:

- **Gateway/Arrival:** A new high quality, multi-functional and multi-purpose arrival/gateway area will be created at George's Square and West Street. This area has been designed to create a clear sense of arrival to the Westgate area.
- **Riverfront Pavilion:** a new freestanding Corten steel pavilion will be erected along the River Boyne riverfront over a new hard landscaped promenade to provide a bespoke piece of urban architecture in the area and create a new covered and flexible outdoor space that can be used for a variety of social, community and cultural uses/events.
- **Active Travel:** The proposals have been designed to integrate with existing and planned active travel infrastructure, particularly LCC's plans to deliver active travel enhancements along the R132/George's Street to the north and south of the application site. Consultations were undertaken with the NTA and LCC's Active Travel team to ensure alignment between the projects.

- **Boyne Greenway:** The proposals have also been designed to enable future connections to the Boyne Greenway including along the northern bank of the River Boyne under the Bridge of Peace.
- **Cycle Routes:** The proposals have been designed to enable continuous, free flowing, safe and accessible cycle routes through the Westgate area including from/to Dominic's Bridge and the greenway on the south bank of the river.
- **Cycle Lanes:** The proposals incorporate dedicated cycle lanes, where possible. A dedicated cycle lane is not proposed along West Street or the northern section of Father Connolly Way noting the site constraints in these areas and the requirement to provide vehicular access to existing premises and car parks. However, a shared surface treatment is proposed to prioritise and enable better cycle and pedestrian movements when compared to the current arrangements.
- **Palate of Materials:** The proposed palette of materials and colours have been carefully selected to create a unique experience within the Westgate 2040 area while also ensuring a holistic design approach to deliver a consistent, complementary, functional and safe built environment with a harmonious look and feel, design language and treatment.
- **Consistent Materials:** The proposals have been designed to complement the recently installed Wayfinding project (delivered by LCC and Fáilte Ireland under the Drogheda Destination Towns, Visitor Wayfinding and Orientation Plan) and wider town centre lighting upgrades in terms of design, materials and colour palette.
- **Construction Materials:** The materials for the construction stage of the project will be required to satisfy all relevant health and safety requirements, including anti-slip surfacing.
- **Former West Gate:** The former 12th Century West Gate will be re-established in the urban landscape with the introduction of two bespoke freestanding Corten steel structures to mark its former location.
- **Per Cent for Art scheme:** The proposals include a number of bespoke architectural items as well as new placename signage to enhance wayfinding in the area; provide important reference points to lost heritage; and act as pieces of public art in accordance with the Per Cent for Art scheme.
- **Accessibility:** The proposals have been designed to ensure that universal (Part M) access, including for wheelchair users, will be provided within areas that are to be redesigned/will contain new interventions, such as George's Square.
- **Seating:** New seating and bench areas are proposed throughout the application site including Scholes Lane, West Street, Patrickswell Lane, Old Abbey Lane and along the riverfront and the new raised walkway area. George's Square is also designed to enable business to place seating outside of their premises. The proposals include a mix of seating and bench options to cater for a variety of user needs in accordance with universal design requirements.
- **Opportunities for Children to Play:** The proposals have been designed to incorporate a mix of hard and soft open space areas with playful and natural interventions to enable children to self-express, play, engage with and explore their environment and nature.
- **Shafts of light Sculpture:** The existing 'Shafts of Light' sculpture has been incorporated into the design of the proposals and will be retained at its current location.
- **Signage:** The proposals include new bespoke placename signage for the West Gate and Old Abbey areas.

- **Landscaping:** The proposals include a detailed landscape plan prepared by ParkHood Landscape Architects to ensure that the quantity and quality of soft landscaped areas are maximised as much as possible and include a healthy mix of plant types, including areas for wildflowers to promote biodiversity.
- **Landscaping and Built Heritage:** Landscape proposals have been carefully considered in the context of the site including the existing natural and built heritage assets.
- **Trees:** The proposals seek to introduce as many new trees as possible within the application site, including along Dominic Street and Narrow West Street. The location and quantum of new trees have been carefully considered to ensure that they: do not impede emergency access through streets/lanes, avoid the creation of any unintentional impacts with respect to road safety; do not interfere with proposed street lighting; and are located in areas wide enough to accommodate appropriate tree pits.
- **Tree Pits:** An appropriate urban tree pit detail has been produced by Arrow Architects and is submitted with the planning application package.
- **Lighting:** The proposals include a detailed lighting plan prepared by Metec Consulting Engineers and Urbis Schröder Limited to ensure that standard levels of lighting will be provided throughout the project area.

(III) DAYLIGHT AND SUNLIGHT (OLD ABBEY DANCE STUDIO)

The proposals for Old Abbey Lane have been designed to sensitively and respectfully celebrate the rich history in this area, such as the upstanding remains of the Old Abbey [Abbey of St Mary d'Urso (LH024-041011)] which includes part of the nave, chancel, the west gable of the north aisle and the central bell-tower.

A new freestanding Corten steel canopy will be constructed within, but offset from, the remains of the Old Abbey to re-instate the former roof in order to create a flexible and covered outdoor space. This new covered outdoor space will be a positive intervention and will also complement the Old Abbey Dance Studio by providing a performance space adjacent to its premises. Indeed, this space can also be used for a variety of other cultural, arts and community events which will provide positive regenerative benefits, such as additional footfall, which will be beneficial for the Old Abbey Dance Studio and help to attract new businesses into the area.

Noting the comments made by the Old Abbey Dance Studio in relation to potential obstruction of light on the quality of dance studio space, a Daylight and Sunlight report has been prepared by GIA and is submitted along with this letter. The report provides a comprehensive technical analysis on daylight and sunlight and finds that the proposed freestanding canopy will not give rise to an unacceptable loss of daylight and sunlight.

(IV) OLD ABBEY - SUPPORT COLUMN FOR THE FREESTANDING CANOPY STRUCTURE

The Old Abbey Dance Studio notes that one of the proposed support columns for the freestanding canopy structure within the Old Abbey is located in front of the main entrance to the dance studio. Arrow Architects have confirmed that this support column will be located to ensure that it does not restrict access to/from the dance studio. LCC would welcome a condition to be attached to the grant of planning requiring same.

(V) CULTURAL HERITAGE, ARCHAEOLOGY AND ARCHITECTURAL HERITAGE

As noted in the planning application package, the Westgate 2040 project has been informed by inputs from an expert multi-disciplinary design team, including a Grade 1 Conservation Architect (Tom McGimsey of Mesh Architects) and an Archaeologist (Faith Bailey of IAC Archaeology).

The evolution of the proposals from concept development to concept refinement and submission of the planning application have been reviewed, informed and assessed by all members of the Westgate Design Team to ensure that the Westgate 2040 proposals represent a heritage-led approach to regeneration.

Indeed, an EIAR was also prepared and submitted with the planning application to ensure that all potential impacts associated with the proposals were appropriately assessed and relevant mitigation measures identified to address any potential impacts. The EIAR contains specific chapters dealing with cultural heritage, archaeology and architectural heritage (see Chapters 16 and 17 of the EIAR).

Chapter 16 of the EIAR, entitled 'Cultural Heritage and Archaeology' assesses any adverse impacts, if any, of the proposed project on the archaeological and cultural heritage resource within and in the vicinity of the application site. It also contains a mitigation strategy which is designed to avoid, reduce, or offset any such adverse impacts.

Chapter 16 concludes, subject to the successful application of the recommended mitigation and monitoring measures, that there will be no predicted significant negative residual impacts on the archaeological and cultural heritage of the proposed development area. Indeed, IAC Archaeology find that there will be residual significant positive impacts on the site of the Old Abbey and the medieval town walls due to the fact that the monuments will form part of publicly accessible townscape.

Chapter 17 of the EIAR, entitled 'Architectural Heritage' assesses any adverse impacts, if any, of the proposed project on the architectural and townscape heritage that exists within, and in the vicinity of, the application site. It also contains a mitigation strategy which is designed to avoid, reduce, or offset any such adverse impacts.

Chapter 17 concludes, subject to the successful application of the recommended mitigation and monitoring measures, that there will be no predicted significant negative residual impacts on architectural heritage assets of the proposed development area.

Notwithstanding the above, it is noted that a number of specific comments have been made in relation to Cultural Heritage, Archaeology and Architectural Heritage. These are addressed below:

Underwater Archaeology/Cultural Heritage

The application site does not extend into the River Boyne area and the proposals do not relate to, nor will they affect, any existing ship wrecks or underwater archaeology located within the River Boyne.

The Westgate 2040 proposals will not preclude opportunities in the future to highlight underwater cultural heritage or implement further interpretation strategies. Indeed, the proposals will complement and even help to support these types of initiatives in the future by enhancing connectivity with the River Boyne.

Further Archaeological and Heritage Assessment

As set out above, Chapters 16 and 17 of the EIAR assess the potential impacts of the Westgate 2040 proposals with respect to cultural heritage, archaeology and architectural heritage. The assessments contained in these Chapters are based on field inspections of the application site and on desk-based analysis of all available historical and cartographic sources, including the Conservation Plan for the Town Walls and Other Defences of Drogheda.

These chapters identify relevant mitigation and monitoring measures which are designed to avoid, reduce, or offset the creation of any potential significant effects with respect to heritage assets in the area during the construction and operations stages of the proposals. Mitigation and monitoring measures recommended in the EIAR include detailed measured photogrammetry surveys, production of detailed construction method statements, archaeological monitoring during excavation and construction work stages and production of Conservation Management Plans.

Chapters 16 and 17 of the EIAR also confirm that further approval will be required post planning under Ministerial Consent noting that some of the Westgate 2040 proposals relate to National Monuments which are subject to statutory protection in the Record of Monuments and Places, established under Section 12 of the National Monuments (Amendment) Act 1994. LCC is familiar with this process having recently secured consent (Ref. no. C001203) in July 2023 for public realm works within Old Abbey Lane from the Minister¹ for Housing, Local Government and Heritage. Indeed, these works were successfully delivered in full compliance with all relevant conditions.

LCC welcomes the submission from the DHLGH and confirms that it is committed to liaising with the DHLGH and the National Monuments Service (NMS) post planning and prior to the construction of the Westgate 2040 works to agree relevant details. Noting this, LCC requests that the additional work outlined in the DHLGH's submission is reworded by the Board from 'prior to any grant of planning' to 'prior to construction'.

It is considered that the information provided as part of the planning application package and the willingness of LCC to accept all relevant 'prior to construction' planning conditions and to engage fully with DHLGH and NMS will enable the Board to determine the planning application as submitted.

Corten Steel – Old Abbey Lane

Comments received, including from the DHLGH, made reference to the use of Corten steel as a material with respect to the proposed free standing Corten steel canopy within the Old Abbey structure.

As set out in the submitted Design Statement, the Westgate 2040 vision seeks to combine contemporary architecture and pioneering urban design to transform the area and create a multi-functional, innovative and welcoming destination of choice, which celebrates and capitalises on the area's rich natural and built heritage assets and acts as a catalyst to support positive regeneration, compact growth and sustainable development in the area.

The design intention for the Old Abbey structure is to create a covered outdoor space that is flexible and which can accommodate a variety of cultural, arts and community events/performances within the footprint of the currently roofless chapel by constructing a new freestanding Corten steel canopy within, but offset from, the remains of the Old Abbey.

The proposed roof structure to the Old Abbey is intended as a contemporary intervention that is respectful and clearly distinguishable from the historic fabric of the existing Abbey structure. The proposed roof canopy seeks to follow the form and profile of the original chapel roof, but expressed in a contemporary way, to provide a respectful and clear distinction between historic elements and the newly designed intervention in the Old Abbey lane heritage area.

Corten steel, which is a widely accepted material for contemporary and historic architectural and engineering structures, was carefully considered and selected by the members of the Westgate Design Team, including the project's Grade 1 Conservation Architect, as the preferred material for the proposed freestanding roof.

Corten steel was selected as the preferred material noting its dark reddish-brown colour which provides a warm and respectful contrast with the heritage assets to avoid any potential pastiche issues arising while also sitting comfortably in the context of the grey Irish limestone of the historic Old Abbey.

¹ Under Section 14 of the National Monuments Act 1930 as amended by Section 5 of the National Monuments (Amendment) Act 2004.

The use of Corten steel is considered appropriate for the Westgate 2040 project area and the below national and international examples provide helpful precedents to demonstrate the special qualities of Corten steel as an appropriate material for heritage assets:

- Szatmáry Palace, Hungary – one of Hungary’s most valuable protected monuments².
- Doria Castle, in Dolceacqua, in the Province of Imperia, in Liguria, Italy³.
- King Johns Castle in Carlingford, Co Louth – OPW project⁴.
- Viewing platform at Blasket Centre, Dingle, Kerry – OPW project⁵

The abovementioned precedents are reinforced in the local context with the use of Corten steel evident in recent works undertaken by the OPW for its building along Old Abbey Lane and in a piece of Corten steel artwork at the Drogheda Garda Station gates (also an OPW project), see **Appendix 1** for photos.

The use of stainless steel and glass was considered by the Design Team, and other similar schemes were discussed, including the glass and steel roof at Kilfenora Cathedral in County Clare, the use of timber and glass in the side aisle at Boyle Abbey, in Boyle, County Roscommon, and the use of lead sheet cladding to cover the rebuilt portion of St. Mary’s Church, in Kilkenny City. Glass was discounted due to durability, maintenance, potential for glare and local topography issues in this specific urban location.

Corten steel has been selected as the preferred material for the freestanding canopy structure and as a consistent material throughout the wider application site, particularly noting the above-mentioned qualities and precedents and noting that it is a material that is flexible, requires low maintenance and is 100% recyclable.

From an architectural perspective, the Corten steel will ensure a respectful distinction between the heritage assets and the contemporary interventions and its warm tonality and high tactility will also ensure a complementary relationship with, and visual dialogue between, the historical stone structures and the contemporary additions. All of the new interventions proposed are legible as being from the same family of materials which will help to create a consistent and complementary built environment with a harmonious look and feel, design language and treatment.

Medieval Town Wall

In accordance with the recommendations contained in the ‘Conservation Plan – Town Walls and Other Defences of Drogheda’, the Westgate 2040 proposals, including the proposals for the former medieval town wall, have been designed to improve the presentation, urban integration and cohesion of the built heritage assets in the area.

It is important to note that the area of the former medieval town wall has been incredibly challenging from a design perspective noting the difficult topography levels and that the site is constrained by the former medieval town wall to the east and the road/bridge infrastructure including its retaining wall and embankment to the west. The area is also ‘cut off’ from general public access and has become overgrown and a location for antisocial behaviour with the former medieval wall being subjected to graffiti, as illustrated in the photo below.

² Further information is available here: <https://www.archdaily.com/272346/szatmary-palace-marp>

³ Further information is available here: <https://www.archdaily.com/934655/restoration-of-castello-dei-doria-a-dolceacqua-id-plus-sr-architetti>

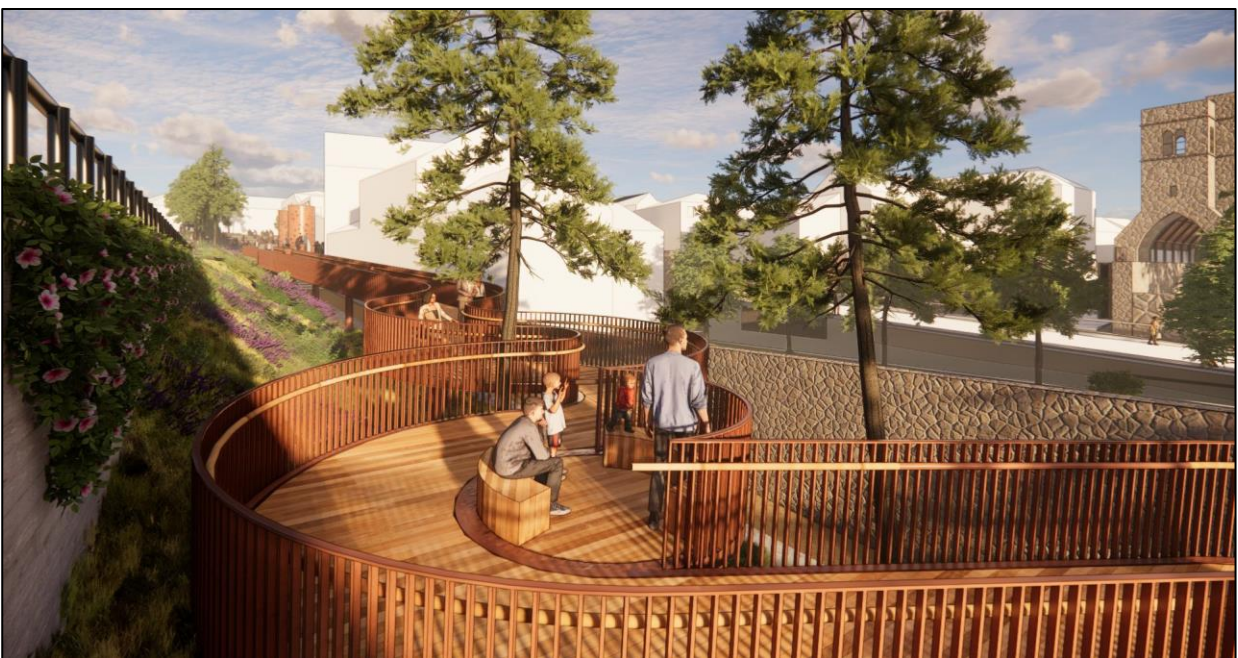
⁴ Further information is available here: <https://www.hcarchitecture.ie/projects/carlingford-castle>

⁵ Further information is available here: <https://awards.irishsteel.ie/shortlist/omc-technologies-blasket-centre-viewing-platform-dingle-co-kerry/>



As outlined in Chapter 4 of the EIAR, entitled ‘Consideration of Alternatives’, a total of three design options were considered for the former medieval wall area. The preferred design option, i.e. the proposals submitted to the Board, represents the softest and least dominating design solution which can also achieve universal (Part M) access through the area.

The proposals have been designed to provide a renewed focus on, and better present and integrate, the upstanding remains of the former medieval town wall by ‘opening’ the area up to allow the public to access and better experience the town wall. The proposals will also deliver a mix of high quality soft and hard landscaping interventions to deliver a medieval garden feel and an enhanced user experience. The new raised walkway will contain seating opportunities for users to stop and relax, to view the former medieval wall and also to view the Old Abbey structure, as illustrated in the computer-generated artistic impression below.



The proposed bespoke universally accessible (Part M compliant) raised walkway will provide a seamless connection between, George's Square, West Street and the Riverfront character areas. A more direct ground level pedestrian path is also proposed as a secondary route through the area and to provide a more intimate experience and interaction with the wall.

The proposals have carefully considered the recommendations in the 'Conservation Plan – Town Walls and Other Defences of Drogheda' and are considered to be acceptable and appropriate for this area, noting the challenging constraints of this area, the feedback received during the preliminary consultation and engagement stage and that the proposals achieve a difficult balance between enhancing amenity, accessibility, connectivity and functionality in this area while also respecting and celebrating the former medieval town wall and ensuring a complimentary relationship with the specific features of the wall.

It is noted that the proposals include a range of interventions, such as the ground inserts (as recommended in the 'Conservation Plan – Town Walls and Other Defences of Drogheda') delineating the location of the former medieval town wall, which will further complement and highlight the cultural heritage in this area. It is further noted that one of the submissions received refers to the raised walkway as *"The most exciting part of the design"* and states *"I can see this being a vital part of the plan"*.

Preservation of Street Furniture

The Westgate 2040 proposals seek to retain and celebrate as much of the heritage features within the area. The feasibility of retaining the cast iron drain grates made by and inscribed 'Drogheda Ironworks' will be reviewed as part of the detailed construction stage.

Demolition of Wall between Father Connolly Way and Old Abbey Lane

The demolition of the section of wall located between Father Connolly Way and Old Abbey Lane has been assessed in the EIAR and no adverse effects with respect to cultural heritage, archaeology or architectural heritage have been identified as a result of the proposed demolition.

The proposed demolition seeks to create a new direct physical and visual link to/from West Street/Father Connolly Way/Old Abbey Lane to provide enhanced connectivity between these areas and invite people from West Street down to the new public realm areas and interventions within Old Abbey Lane and onwards towards the riverfront area. The proposed demolition will also help to create a stronger context connecting the Abbey structure to its surroundings streets and laneways and alleviate concerns surrounding anti-social town centre spaces.

(VI) BARLOW HOUSE

LCC has engaged with the Droichead Arts Centre in respect of their emerging redevelopment proposals for Barlow House and the Westgate 2040 proposals have been designed to ensure that they do not impede or prevent Droichead Arts Centre from progressing with their emerging redevelopment proposals.

It is noted that a pre-planning request has recently been submitted by Droichead Arts Centre to LCC with respect to Barlow House and proposals will be assessed to ensure that they satisfy all relevant planning and technical standards/requirements, including providing safe and efficient access and ensuring no adverse heritage impacts noting that Barlow House is recorded as a nationally important Protected Structure (RPS DB-232) and listed in the National Inventory of Architectural Heritage (NIAH 13618010).

The Westgate 2040 project will provide vehicular access to Barlow House via the existing access from West Street. It is noted that the current proposals identify a tree within the existing access, however, this proposed tree will not be included in the final scheme. LCC would welcome a condition to be attached to the grant of planning requiring same.

The proposed new shared surface treatment along West Street will also provide ample space for performers/etc to move sets, equipment, supplies into Barlow House. Furthermore, the new shared surface treatment area to the front of Barlow House has been designed with a level profile to provide a flexible space that can act as a new 'cultural' square and accommodate evening and/or weekend events which will complement the Droichead Arts Centre and its emerging proposals.

It is noted that the roll door access off George's Street/George's Square has not been used for many years and there is currently no vehicular access at this location. This area is currently a wide pedestrian pavement/plaza and a bus stop area with a raised kerb treatment.

The roll door area may provide a complimentary function such as pedestrian access between the proposed plaza at George's Square and the emerging Barlow House proposals to facilitate much needed regeneration in the area. The roll door area is not considered to be a suitable location for vehicular access/egress noting the current arrangement as outlined above; the complexities of the junction network at this location; the potential risk for road safety issues; and the new proposed arrival/gateway area for George's Square which is critical for the wider Westgate 2040 regeneration project. The requirement for a new arrival/gateway area at George's Square responds to feedback received during the preliminary consultation/engagement stage undertaken in 2021.

(VII) ROAD SAFETY AUDIT

It is noted that there are six specific Road Safety Audit stages undertaken at different stages of a development/project including at preliminary design stage (Stage 1), prior to construction, upon completion of construction and into the early operation stage of the project.

A Stage 1 Road Safety Audit (RSA) was carried out by Road Safety Matters Ltd on the Westgate 2040 proposals in May 2023. The terms of reference of this Road Safety Audit are as described in Transport Infrastructure Ireland's (TII) publication 'GE-STY-01024 – Road Safety Audit' and the 'Design Manual for Urban Roads and Streets'⁶ (DMURS).

The Stage 1 RSA identified potential issues of road safety and set out a number of recommendations. The findings of the Stage 1 RSA were reviewed in detail by the Design Team and the drawings/reports were then amended to address the issues raised and take account of the recommendations. Importantly, the proposals submitted to the Board in December 2023 represent an amended scheme which has been modified to respond to the Stage 1 RSA findings provided by Road Safety Matters Ltd in May 2023.

As required, the Design Team completed the RSA Feedback Form confirming acceptance of the issues and recommendations contained within the stage 1 RSA. The RSA Feedback Form was then signed off by the relevant parties including the Auditor (Road Safety Matters Ltd) and is compliant with the Road Safety Audit process. This sign off stage confirms that the issues/recommendations have either been addressed by the amended proposals or can be addressed during the subsequent RSA stages post planning.

In accordance with 'GE-STY-01024 – Road Safety /audit' and 'DMURS', the Westgate 2040 proposals will be subject to further RSA stages post planning to ensure that the implementation of the scheme is in full accordance with all relevant road safety standards and requirements. Furthermore, the Board, if it considers necessary, may apply planning conditions to the grant of planning permission with respect to future Road Safety Audit stages to ensure compliance with all relevant road safety standards and requirements.

⁶ Prepared for the Department of Transport, Tourism and Sport and the Department of Housing, Planning and Local Government.

(VIII) TRAFFIC, TRANSPORT AND PARKING

The Westgate 2040 planning application package contains a number of technical reports which demonstrate the project's compliance with relevant standards and national, regional and local planning policies/objectives relating to traffic, transport and parking matters. These technical reports include the EIAR and the Access & Active Travel Management Strategy, prepared by Hegsons Design Consultancy Ltd, and the Planning Statement, prepared by Turley.

Chapter 14 of the EIAR, entitled Material Assets (Traffic and Transportation), identifies and assesses any potential traffic, transportation and parking related impacts associated with the proposed project. Chapter 14 concludes that the proposals, subject to the mitigation measures outlined, will not result in any adverse impacts with respect to traffic, parking and transportation.

It is further noted that the Design Team undertook consultations with TII, NTA and LCC's Active Travel team to ensure that proposals have been designed to integrate with wider active travel infrastructure projects and to ensure that the proposals were aligned with relevant national, regional and local policy with respect to traffic, transport and parking, such as the need to promote and enable a shift towards more sustainable modes of travel.

Notwithstanding, it is noted that a number of comments have been made in relation to traffic, transport, parking, cycling and etc. Noting these comments, the following points are reaffirmed with respect to the Westgate 2040 proposals:

- **HGVs and Other Service Vehicles:** in accordance with national, regional and local policy, the Westgate 2040 proposals have been designed to encourage a modal shift towards more sustainable modes of transport and to prioritise pedestrian and cyclist movements within the area. The proposals have also been designed to enable HGVs, other service vehicles and emergency vehicles to move through the area following implementation, if required.
- **Coach Parking:** The proposals will retain an existing coach parking/set down area along Dominic Street which will enable touring/tourism coaches to pull in and for passengers to disembark in close proximity to the Town Centre area. Coaches can then return/pick up passengers at a specified time. LCC will also continue to monitor tourism coach parking services within the wider Drogheda Town Centre context and appropriate measures will be implemented, if required.
- **Bus Shelter – George's Square:** the Westgate 2040 proposals do not currently incorporate bus shelters. However, the proposals have been designed in a manner to enable a bus shelter to be provided on the eastern side of George's Street adjacent George's Square. LCC will undertake further consultations with the NTA and local bus operators following implementation of the Westgate 2040 proposals to determine the need for a bus shelter at this location and secure relevant funding, if required. Bus shelters cannot be accommodated on the western side of George's Street due to limited footpath widths in this area.
- **Car Parking:** it is considered that the car parking provision proposed as part of the Westgate 2040 proposals is adequate to serve the needs of the wider community and visitors to the town whilst encouraging sustainable modes of transport in compliance with national, regional and local policy and the objectives of the Climate Action Plan. Please refer to Chapter 14 of the EIAR and the Access & Active Travel Management Strategy which provide further detail on car parking requirements.
- **Cycle Connectivity:** The Westgate 2040 proposals have been designed to integrate with wider active travel infrastructure improvements and to prioritise cyclist and pedestrian movements within the area. Dedicated cycle lanes are proposed where there is sufficient room to incorporate these. Shared surface treatments are proposed along streets/lanes which are not wide enough to accommodate a dedicated cycle lane, such

as Father Connolly Way and West Street. The proposals include a combination of interventions which together will provide safer and lower traffic routes and enhanced connectivity for cyclists through the Westgate 2040 area, including shared surfaces, level road/kerb profiles, narrowing of carriageways, new soft landscaping and trees.

- **Covered Bike Shelters:** The Westgate 2040 proposals do not currently propose covered bike shelters. However, LCC will monitor the operation of the area following implementation of the proposed works and any requirement for covered bike shelters can be reviewed.
- **Cycle Access:** Westgate 2040 will be linking in with proposed LCC active travel schemes to provide linkages on both side of Dominics bridge, linking cyclists to the town centre, the Dublin Road and to the river Boyne greenway.
- **Uncontrolled Pedestrian Crossings:** Uncontrolled crossing points are proposed along streets/lanes within the application site with lower traffic volumes and lower speed limits. Uncontrolled crossing points are currently being encouraged by the NTA as an appropriate crossing solution to prioritise pedestrian movement in urban areas. It is noted that all pedestrian crossing points along George's Street/R132 will be controlled crossing points.
- **Traffic Lights – George's Street:** the section of George's Street located within the application site has been designed to integrate with LCC's wider active travel proposals along the R132/George's Street as noted in Chapter 14 - Material Assets (Traffic & Transportation) of the EIAR and in the Access & Active Travel Management Strategy, which accompany the planning application package. The synchronisation of traffic signals along George's Street will be undertaken as part of the wider active travel infrastructure upgrades when they are delivered to ensure that traffic lights and vehicular/cycle movements along this route are designed and managed holistically and in compliance with the relevant standards.

(IX) PROTECTED VIEWS AND PROSPECTS

A Landscape Visual Impact Assessment (LVIA) has been prepared by Park Hood Chartered Landscape Architects with respect to the Westgate 2040 proposals (see Chapter 18 – Landscape and Visual of the EIAR). A total of 15 no. verified views were also prepared to inform the visual assessment process.

The LVIA concludes that the proposed development is not likely to create any significant effects with respect to visual amenity, townscape/landscape character or protected views and prospects. Please refer to Chapter 18 of the EIAR for further detailed commentary and analysis.

(X) PUBLIC TOILETS

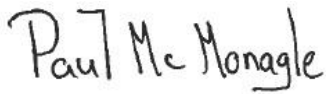
The existing public toilet block located within George's Square were closed c. 2019 due to safety, repeated anti-social behaviour and maintenance issues. The Design Team reviewed the potential to retain the toilet block, however, this was not possible noting the difficult topography levels within George's Square, the large footprint of the toilet block, the requirement to deliver a high-quality arrival/gateway area within George's Square, the requirement to provide universal (Part M) access within George's Square and the requirement to enhance functionality of the areas located adjacent to the existing businesses/building line.

It is further noted that more modern, safe and accessible public convenience solutions with smaller footprints are available which could be installed at a suitable location in the future, if required. Louth County Council will continue to monitor public conveniences available within the Westgate area and wider Drogheda Town Centre following implementation of the proposals.

It should also be noted that when the Westgate 2040 regeneration works are delivered, Louth County Council, as the administrative authority for the area, will continue to monitor and review the operation and evolution of the new public realm regeneration works in the interest of the public and further enhancements and/or amendments may be made in the future, if required.

We trust the above responses address the queries and comments raised in the representations received, but please do not hesitate to contact me should you require any further clarifications.

Yours faithfully,

A handwritten signature in black ink that reads "Paul McMonagle". The signature is written in a cursive, slightly informal style.

Paul McMonagle
Associate Director

paul.mcmonagle@turleyplanning.ie

Appendix 1 – Photos Showing Local Examples of Corten Steel

Photos 1 and 2 show Corten steel fenestration inserts completed recently by the OPW along Old Abbey Lane



Photo 3 shows an example of a Corten steel artwork at the Drogheda Garda Station with the Abbey tower in the background.

