

**Bennettstown Residents,  
Bennettstown,  
Dunboyne  
Co Meath**

Care of [REDACTED]

**9<sup>th</sup> May 2024**

Planning Department  
Meath County Council  
Buvinda House  
Dublin Road  
Navan  
County Meath  
C15 Y291  
[planning@meathcoco.ie](mailto:planning@meathcoco.ie)

**Re: Observations on Further Information request for Planning Application Ref 2360290**

*Permission for Large-Scale Residential Development comprising 267 no. residential units and all associated ancillary / infrastructure works on lands principally located in Bennetstown (townland) to the south of the M3 Parkway park and ride and rail station, and also extending into Pace & Dunboyne (townlands), Dunboyne North, Co. Meath*

Dear Sirs,

We have reviewed the significant volumes of additional information lodged with Meath Co. Council in response to the Planning Authority's (PA) request for Further Information (FI) from Messrs Marina Quarter Ltd in connection with the above referenced application.

In the table below we have endeavoured to summarise our initial observations (23-10-23), the FI Responses submitted to the PA and our summary **observations** in respect of same.

No.	Observation / concern summary (23-10-23)	FI Response summary (Appendix B of IE Consulting response)	Observations on FI responses
	<b><u>A. Flood risk to existing dwellings</u></b>		
1	Proposed berm relocation	No longer proposed to move existing berm	We acknowledge berm no longer required to move
2	New body of water closer to existing residences - uninsurable	No longer proposed to move existing berm	We acknowledge berm no longer required to move
3	Proven defence removed in favour of unproven - flood protection during construction	No longer proposed to move existing berm	We acknowledge berm no longer required to move
4	New development resulting in additional surface water to a river already beyond capacity	Sustainable Urban Drainage System to be implemented with source control and infiltration of surface water promoted	We can only trust that this has been suitably interrogated by Meath Co. Council
5	Effects of climate change / inadequacy of designing to 1/100 year event	Design accommodates OPW Climate Change Sectoral Adaption Plan (2015-2019)	We would have serious reservations about reliance on a report which is already 5 years out of date particularly in light of the ever increasing impacts of climate change and would question if A) a 20% overdesign is in fact sufficient given the results of more recent surveys such as that published by the Irish Climate Analysis and Research UnitS (ICARUS) a part of the Department of

			Geography at Maynooth University and B) reliance on designing to a 1 in 100 year event when we have demonstrated in our submission (and can further demonstrate with multiple occurrences in the intervening period) that the alleged 1 in 100 year extent of flooding is already occurring multiple times a year.
6	Current application accommodates future adjacent commercial developments - not accounted for in SSFRA	Future developments will be subject to their own SSFRA	We contend these future developments must be accounted for now in light of the fact the access roads / infrastructure for such future developments actually forms part of THIS application
7	Risk of drowning to small children	No longer proposed to move existing berm	We acknowledge berm no longer required to move
	<b><u>B. Proposed link road to Old Navan Road</u></b>	No flood risk concerns	Our legitimate concerns as outlined in our original submissions on 23/10/23 regarding the Proposed link to Old Navan Road have not been acknowledged nor addressed. The FI response simply noted "No flood risk concern" however Meath Co. Co. need to address these concerns if they are not within the remit of Marina Quarter.
1	Proposed link road contravenes Dunboyne North Masterplan MP22	No flood risk concerns	
2	Introduction of T-Junction on Old Navan Rd and associated concerns	No flood risk concerns	
	• Increased noise	No flood risk concerns	
	• Increased accident risk (incorrect road hierarchy)	No flood risk concerns	
	• Light pollution from nighttime traffic	No flood risk concerns	Our concerns in this regard were never flood related. It would seem that IE Consulting's remit for Marina Quarter did not extend beyond answering flood related observations. Accordingly, our concerns have not been addressed by Meath Co. Co. and remain
	• Risk to local residents / children	No flood risk concerns	
	<b><u>C. Pedestrian connection to Dunboyne Village</u></b>	No flood risk concerns	Our legitimate concerns as outlined in our original submissions on 23/10/23 regarding the Pedestrian connection to Dunboyne Village have not been acknowledged nor addressed. The FI response simply noted "No flood risk concern" however Meath Co. Co. need to address these concerns if they are not within the remit of Marina Quarter.
1	Reopening of cul-de-sac increasing risk of accident & removal of busy local amenity	No flood risk concerns	
2	No pedestrian walkways connecting Dunboyne	No flood risk concerns	
3	Dunboyne North must have pedestrian and cycle links to Dunboyne so as not to contravene MP22	No flood risk concerns	
4	Subject application identifies discontinuity of footpaths as a problem yet makes no provision for rectifying same	No flood risk concerns	
5	Existing road bridge incapable of accommodating proper cycle and pedestrian links	No flood risk concerns	Our concerns in this regard were never flood related. It would seem that IE Consulting's remit for Marina Quarter did not extend beyond answering flood related observations. Accordingly, our concerns have not been addressed and remain
11	<b><u>D. Combined environmental impact of this and future development</u></b>	No flood risk concerns	Our legitimate concerns as outlined in our original submissions on 23/10/23 regarding the Combined Environmental

	Subject application includes works for future commercial / residential development yet Environmental Impact Assessment does not account for this development	No flood risk concerns	Impact of this and future developments facilitated and accounted for within this application have not been acknowledged nor addressed. The FI response simply noted "No flood risk concern" however Meath Co. Co. need to address these concerns if they are not within the remit of Marina Quarter. Our concerns in this regard were never flood related. It would seem that IE Consulting's remit for Marina Quarter did not extend beyond answering flood related observations. Accordingly, our concerns have not been addressed and remain
	<b><u>E. Future maintenance / taking in charge</u></b>	No flood risk concerns	Our legitimate concerns as outlined in our original submissions on 23/10/23 regarding the Future Maintenance and Taking in Charge have not been acknowledged nor addressed. The FI response simply noted "No flood risk concern" however Meath Co. Co. need to address these concerns if they are not within the remit of Marina Quarter.
	• Public amenity space not being taken in charge by developer	No flood risk concerns	
	• Space shown as parkland (to satisfy public amenity requirements) floods	No flood risk concerns	We do not understand how areas clearly shown as flooding within the subject application can also be shown as public amenity space for the proposed development. In periods of anything heavier than moderate rainfall these amenity spaces will be underwater and dangerous to occupiers of the newly developed houses

While encouraged by the fact that the FI response concedes that relocation of the berm on Eastern bank of the River Tolka is no longer necessary, we are frustrated to find that the vast majority of the remaining observations (B-E above) were not subject to FI request (other than in a flooding context)

Apart from those directly connected to relocation of the berm all other legitimate and documented concerns highlighted in our correspondence of 23<sup>rd</sup> October last remain unresolved and we would again contend this application should be refused until such time as there is proper engagement with the developers, Meath Co. Co Planning Authority and ourselves to work through these issues.

Yours faithfully

Peter Moran

On behalf of the below Bennettstown residents

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