

Response to Submissions / Observations

Ardee 2040 Regeneration Project

An Coimisiún Pleanála Reference: ACP-323972-25

April 2026

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Client

Louth County Council

Our reference

05416

April 2026

1. Introduction

- 1.1 This submission is made by Turley Planning Ireland¹ on behalf of the applicant, Louth County Council² (LCC), in response to the submissions / observations received in relation to LCC's planning application (An Coimisiún Pleanála (ACP) Ref: ACP-323972-25) for a public realm and community infrastructure project on lands in Ardee, Co. Louth.
- 1.2 This submission provides a response to the 15 no. submissions / observations received by ACP from the following parties:
- Transport Infrastructure Ireland
 - Michael O'Dowd and Others
 - Dermot Maguire
 - Sean O'Carroll Street Residents
 - Rachel Veenan Bucky
 - Mary Morgan and David Reid
 - Fintan Malone
 - Kevin and Elizabeth Flanagan
 - Inland Fisheries Ireland
 - Development Applications Unit
 - John King
 - Ardee Traders and Business Association
 - Cllr. Rachel Kerley
 - Cllr. Dolores Minogue
 - Damien Curran
- 1.3 The submissions / observations received relate to a number of points for ACP to consider, with the same / similar points being raised by multiple submissions. For ease of reading and to avoid duplication, we have grouped our response into themes within each of the four Character Areas of the project as follows. The location / extent of

¹ Turley Planning Ireland, 4 Pembroke Street Upper , Dublin D02 VN24

² County Hall, Millennium Centre, St Alphonsus Street, Dundalk, Co Louth

these character areas is identified on the Character Area Overview Plan (Drawing no. LOUB-3000) submitted as part of the planning application package.

- Character Area 1 – Main Street (including Ash Walk)
- Character Area 2 – Old Railway Lands
- Character Area 3 – Amenity Lands
- Character Area 4 – Woodland Walk

1.4 Comments in relation to observations received from Prescribed Bodies have been included in Section 6 of this response.

1.5 This submission is lodged within the four-week period (i.e. by the 20th April 2026) as confirmed by ACP in your email correspondence dated 1 April 2026. As requested in the correspondence from ACP on 3 March 2026, a copy of this response has been made available at the following offices of Louth County Council.

- County Hall, Millennium Centre, St Alphonsus Street, Dundalk, Co Louth.
- Mid Louth Civic Services Centre, Fair Green, Ardee, Co. Louth, A92 RYT2.

2. Character Area 1 – Main Street (including Ash Walk)

- 2.1 The following provides our response to submissions / observation that we consider are material to the decision making process for the proposed development at Character Area 1 - Main Street (including Ash Walk).

Response to Submissions / Observations

Ardee Car Parking Bye Laws

- 2.2 An objector has advised that there is no paid parking in Ardee and that car parking in Ardee is controlled by Ardee Town Parking Control (on Street) Byelaws 2014 and Ardee Town Parking Control (on Street) Byelaws (Amendment) 2024 which are, in the objectors words, 'loosely' enforced by Louth County Council. The objector goes on to advise that *"There is a two hour grace period for parking in the controlled area particularly on "Main Street" however as Ardee has no dedicated traffic wardens patrolling the area those wishing to park for the day without risk generally park on Sean O'Carroll Street (and neighbouring streets)"*.

LCC Response

- 2.3 As set out in the Car Parking Strategy submitted as part of the planning application package car parking in Ardee is controlled by Ardee Town Parking Control (on Street) Bye-Laws 2014 and Ardee Town Parking Control (on Street) Bye-Laws (Amendment) 2024 which are enforced by LCC. The 2024 amendment relates to the introduction of residents parking discs within the area of parking control. The bye-laws are active from 8.30am to 5.30pm Monday to Saturday where motorists can park for up to two hours for free within the restricted zones.
- 2.4 We would like to clarify an error included in the Car Parking Strategy which advises that payment is required for on-street car parking in Ardee. Currently, no payment is required with the public able to park in on-street car parking zones either for a maximum of 2 hours in restricted zones or all day in other zones. The restricted zones include Main Street and sections of the adjacent side streets (as identified by local signage).
- 2.5 LCC traffic wardens have been policing illegal parking, parking in disabled parking bays and loading bays, the non-display of a current tax disc and general traffic management within the restricted parking zone in Ardee since 21 August 2023.

Loss of Car Parking

- 2.6 The following summarises the objections received in relation to the proposed reduction of car parking in the Main Street area.
- Loss of 150 no. car parking spaces on Main Street will increase car parking on side streets.
 - No economic impact assessment has been prepared to assess what impact the loss of car parking will have on Ardee businesses.

LCC Response

- 2.7 A key objective of the Ardee 2040 Regeneration Project is to bring forward proposals which meet the design principles of national & international best practices whilst creating quality gateways, public spaces, recreational areas, sporting areas and public realm. As identified in Chapter 4 – Consideration of Alternatives of the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application package LCC have carefully considered the options available with regards to road design and car parking, taking into account their responsibility to contribute towards encouraging transport modal shift to create greater transport sustainability, prior to deciding to bring forward the current proposal. As set out in Chapter 4, the alternative design options were discounted as it was decided that they didn't go far enough to improve the public realm and encourage alternative modes of sustainable transport as set out in national, regional and local policy (as set out in the following paragraphs), therefore the options would not deliver on the vision or objectives of the project.
- 2.8 The National Sustainable Mobility Policy (NSMP) sets out Government's strategic policy framework for supporting walking, cycling and public transport use in Ireland to 2030, laying the foundations for the required system change in transport that will help achieve net-zero emissions by 2050 and contribute towards Ireland's commitment to a 51% reduction in carbon emissions by 2030. The NSMP advises that *'To garner permanent reductions in our emissions we must make changes in our everyday life to sustainable behaviours'* and goes on to advise that *'This Policy has been developed to help us make those changes and, alongside the Climate Action Plan, **will put in place measures to enable and encourage greater use of sustainable mobility and reduce private car journeys**'* (our emphasis).
- 2.9 Climate Action Plan 25 notes the critical role of local authorities with respect to decarbonising transport, stating that *'Local authorities have an integral and critical role in decarbonising transport, **through the spatial and land-use planning system, promoting public transport-oriented development, ensuring permeability for active modes, implementing and requiring sustainable parking policies, delivering public realm improvements, developing appropriate demand management measures, and provision of EV charging and alternative fuels infrastructure**'* (our emphasis).
- 2.10 Sustainable Transport Policy MOV 2 of the Louth County Development Plan 2021-2027 states that it's a policy of LCC to *'support the implementation of the 'National Climate Action Plan' 2019, and any subsequent plans, and in particular the measures included that will assist in achieving the target of CO₂ emissions reduction by 2030 in the transport sector as set out in Section 10.2 of the 'Climate Action Plan'*.
- 2.11 From a design perspective, the varied orientation of existing car parking along the Main Street gives rise to unsafe vehicle manoeuvres into and out of many of the parking spaces i.e. vehicles tend to drive into the saw-toothed car parking spaces and reverse blind into the national road when exiting. The removal of this parking approach was welcomed by TII during pre-application consultation through the Departures process. The extent of existing car parking along Main Street also gives rise to negative public realm outcomes including an unsightly and unorganised appearance to car parking along the street. As part of the proposed design the re-orientation of these spaces was necessary to deliver an improved public realm, more high visibility / toucan crossings,

speed control features to reduce traffic speed, a safer on street car parking design and a dedicated two way cycle lane. In addition to this the proposal has, where possible, improved visibility splays for all road users at junction and entrance along the Main Street, in line with DMURS standards, improving road safety. This design approach resulted in a reduction in the number of spaces provided on Main Street, however provides a significant improvement to the streetscape.

- 2.12 The proposed design approach was informed by extensive data gathering carried out prior to development of the design proposals. Following a review of this data, and as set out in the Car Parking Strategy submitted as part of the planning application package, it was determined that a reduction in car parking in the proposed development and improvement of facilities for alternative modes of transport (i.e. new bus shelters and cycle lanes), in line with the objectives of national, regional and local policy, could be sustained whilst still providing an adequate level of car parking to serve the needs of the community and businesses along Main Street.
- 2.13 The Car Parking Strategy has also taken into account the impacts that more rigorous enforcement of the Ardee Town Parking Control (on Street) Byelaws 2014 by LCC have had on parking in the town. The Bye Laws allow for 2 hours of free car parking in restricted areas. This approach is designed to ensure that the spaces along Main Street and the adjacent side streets are used on a short term basis by local people using facilities / businesses along Main Street and discourage commuters from using the spaces for all day parking whilst commuting to other towns / cities. More rigorous enforcement of the Bye Laws has reduced the potential for all day parking in the town resulting in a higher turnover of car parking spaces, therefore it is not anticipated that there will be an unmanageable demand for car parking in Ardee as a result of the proposed development.
- 2.14 We consider that an appropriate quantum of car parking is proposed along Main Street to serve people looking to avail of the 2 hour free car parking and, taking into account the improvements to the streetscape and public realm along Main Street, we do not consider that the proposal will not have a detrimental impact on local businesses. For this reason, we do not consider it necessary to provide an Economic Impact Assessment for the planning application.

Negative Impact on Historic and Vibrant Town Centre

- 2.15 With respect to tourism and the image of Ardee, one observation has stated that accessible parking combined with green streets encourages visitors to stay longer and increases spending and that they have concern that the proposed changes could negatively affect Ardee's historic and vibrant town centre.

LCC Response

- 2.16 The Ardee 2040 Regeneration Vision comprises a series of development proposals designed to revitalise Ardee and the surrounding area, generate positive effects for local expenditure, enhance footfall levels and the vitality of the town in line with the objectives of the Louth County Development Plan 2021 - 2027. High quality materials and finishes have been proposed throughout the four Character Areas to improve the public realm within the town and deliver much needed community facilities.

- 2.17 We consider that the public realm works and reduction of car parking spaces, which result in a car dominated Main Street, will significantly improve the appeal of the town centre to tourists / visitors in the long term whilst respecting the historic assets of Ardee. The community infrastructure proposed will also be an asset to the town which will encourage a healthy and active lifestyle and provide valuable recreational amenities for the wider community and attract visitors to the town.

Footpath Widths / Upgrades to Existing Footbridge

- 2.18 Observations were submitted demonstrating support in relation to wider footpath widths for customers, mass goers and in relation to encouraging safer routes to school and pedestrian / cyclist movements amongst the students and staff of a local school.

LCC Response

- 2.19 LCC welcome support for the proposed development. The overall scheme enhancements result in wider footpath where possible throughout the scheme along with enhanced cycle facilities, in particular along the Main Street. The route from the existing foot bridge (to the east of Bridge Street bridge) through the wooded area will be upgraded to improve accessibility and lighting in this area.

Loss of Existing Trees

- 2.20 An observation advises that *'The mature trees enhance the streetscape, provide shade, improve air quality, support biodiversity, and contribute to residents' well-being. Their removal would diminish the appeal and character of Main Street'*.

LCC Response

- 2.21 The Arboricultural Report submitted with the planning application advises that *'Trees on the Main Street are much younger or of lower quality, with many having been heavily pruned in the past with small compact canopies that provide little in terms of visual amenity or ecosystem services that are commonly associated with trees in the built environment. It is proposed to replace many of these trees with new better quality planting that will increase species diversity, quality of canopy cover and the amenity and character of the streetscape'*. The report goes on to advise that the trees to be removed (no's 662, 663, 664, 665, 659, 660, 661, 669, 673, 674, 675, 676 & 677 as identified on the Tree Schedule submitted as part of the planning application) are considered as category C1 - low value and conservation. These are trees of low arboricultural quality and value currently in fair / adequate condition and able to remain until new planting is established with a minimum useful life expectancy of 10 years, or trees with a stem diameter of <150mm.
- 2.22 As these trees are considered of low arboricultural quality and value and have been the victim of heavy pruning in recent years it is proposed that they are removed and replaced with new trees (112 no. trees in this Character Area) with a longer useful life expectancy. We consider this is a robust approach to improving the future appeal and image of Main Street whilst supporting biodiversity in the area.

Loss of Commemorative Plaques on Existing Trees

- 2.23 One observation has sought clarification as to what will happen to 7 no. commemorative plaques and tree guards that were erected on Main Street by Louth County Council to commemorate the signatories of the 1916 Proclamation.

LCC Response

2.24 We can advise that 5 no. trees with commemorative plaques will be retained as part of the proposed development and 2 no. trees will be removed. The trees to be removed are:

- Tree no. 677 located north of the junction O'Carroll Street and Main Street and considered to be a Category C1 - low value and conservation tree. This tree is being removed to facilitate the inclusion of the cycle path.
- Tree no. 665 located outside no. 5 Castle Street (Leinster Property Consultants) and considered to be a Category C1 - low value and conservation tree. This tree is being removed to facilitate the inclusion of the cycle path.

2.25 LCC can confirm that the commemorative plaques and surrounding tree guards will be retained and reused on proposed trees in a similar location along Main Street.

Existing Red Brick Wall

2.26 An observation has made a recommendation that the existing red brick wall to the south west wall of Bridge Street bridge is removed to provide better access to the riverside walk.

LCC Response

2.27 LCC can confirm that removal of the red brick wall to provide better access is included as part of the proposed works.

3. Character Area 2 – Old Railway Lands

- 3.1 The following provides our response to submissions / observation that we consider are material to the decision making process for the proposed development at Character Area 2 – Old Railway Lands.

Response to Observations / Submissions

Loss of Memorial Trees and Well / Grotto

- 3.2 The following summarises the main points identified in the submissions relating to the loss of existing memorial trees and a well / grotto.

- No reference to the existing trees or their relocation in the planning proposal.
- Claim that the existing trees / well / grotto were constructed prior to the acquisition of the land by LCC in 2022.
- General opposition to the removal of the existing memorial trees, well and grotto and the replanting of 122 no. trees in the area identified as an allotment in the planning proposed drawings.
- Concern over the proposed relocation of a number of trees within the Railway Lands is considered a separate process to the Ardee 2040 planning.

LCC Response

- 3.3 The Arboricultural Report for the project was completed in March 2023, with amendments in January 2024 and May 2025. As set out in Appendix 1 of this report, the assessment of the trees was carried out in accordance with the guidance provided in Annexe C of BS5837, which requires that any tree on or influencing distance of the site with a stem diameter of over 75mm at 1.5m above ground level be recorded. Stem diameter measurements were taken using a girthing tape or Biltmore stick, and in accordance with Annexe D of BS5837. We consider that all qualifying trees at the time of the survey have been considered in the proposed plans for this Character Area.
- 3.4 The grotto was built post June 2023, which is evidenced in the Ardee 2040 Verified Views document (Baseline photo VVM 9 dated 20 06 2023) submitted as part of the planning application package which shows the well structure under construction and the grotto not built or commenced on that date. This demonstrates that the works were not carried out prior to the acquisition of the land by LCC in 2022. LCC consider the memorial trees and grotto / well have been planted / constructed in Character Area 2 - Old Railway Lands without permission and unauthorised, and without consideration of the ongoing design proposals for the space at that time. The tree species planted in this area are unsuitable / unfit for public space as they are non-native species with a low canopy, poor growth habit, unsuitable spacing and with invasive roots that would lead to problems with the future function and maintenance of the Railway lands as public open space.
- 3.5 In an attempt to reach compromise, LCC had discussions with the Memorial Committee to create a dedicated memorial space for 122 out of 364 trees by omitting the

proposed community gardens / allotment proposal in the Railway lands proposals. However, LCC did not formally agree to omit the proposed playground, coffee kiosk and small number of proposed parking spaces (6 spaces plus 1 wheelchair accessible space) in the scheme. The proposed compromise by LCC was for the creation of a dedicated Memorial Space, however this did not find a favourable conclusion with the Memorial Committee who retained the requirement for LCC to keep the unauthorised planted trees insitu and omit the proposed playground, coffee kiosk, small parking area and the allotment space. This approach would preclude the development of the park for any of the active recreation uses suggested during the initial public consultation in June / July 2021 for the Ardee 2040 project.

3.6 Further to the engagement with the Memorial Committee, the Council relocated 122 no. trees in March 2026 to another location within the Old Railway Lands park (i.e. the space where the allotments are proposed) to a space where the trees could be better managed without a long term impact on the objectives of the Ardee 2040 project i.e. delivering useable community spaces. As a compromise, LCC wish to consider the retention of the 122 no. relocated small trees in this space, resulting in the omission of the allotments from the proposed scheme, if ACP consider this an acceptable design approach in this part of the proposed development.

3.7 It is the aspiration of LCC to create a space that meets the needs of the wider community proposing a mix of active recreation uses with appropriate landscaping and consider that the proposed development will deliver this.

Community History of the Railway Walk & Remembrance Park

3.8 The point is made that the Railway Walk and Remembrance Park was not created as a planned civic development but emerged gradually over more than a decade as a community-led transformation of a neglected former railway corridor into a peaceful public amenity. There is concern over the proposed changes to the layout of the space.

LCC Response

3.9 LCC's position on the unauthorized planting of non-native trees, of inappropriate habitat for public spaces throughout the open space, was to put forward a suitable dedicated memorial space as an accommodation or compromise solution. Further issues on the unauthorized use of the space have been discussed in earlier paragraphs.

3.10 The proposed park has been designed to retain the existing main pedestrian routes through the site including 2 no. accesses onto Sean O'Carroll Street, 1 no access to Tierney Street and 1 no. access to the existing railway walk, whilst complementing its existing function with a mixture of other active recreation uses including a flexible hard landscaped space and play park. This has been achieved whilst respecting the historic character of the existing former railway platform and acknowledging the route of the historic Ardee walls through demarcations on the ground. It is the Councils opinion that the proposed design will offer improved infrastructure for the wider community and provide an attractive, active space between Sean O'Carroll Street and the existing railway walk.

Accuracy of Proposed Plans

3.11 A submission states that the site maps and drawings accompanying the application do not show the existing well and grotto which are now in place within the Railway

Memorial Park and that the omission of these features means the application does not accurately describe the existing condition or commemorative context of the site.

LCC Response

- 3.12 As previously outlined, the existing grotto and well were constructed after the baseline surveys for the site were carried out. These structures were constructed without permission from LCC and considered as unauthorised development. For this reason they were not included within the existing / proposed drawings package for the Character Area.

Consultation

- 3.13 The submissions advise that a community committee was formed for the Old Railway Lands space and this committee met with LCC prior to the submission of the planning application. The submissions advise that it was the Committees understanding that the following elements of the Old Railway Lands proposal were to be omitted:

- A playground
- Community allotments
- A coffee kiosk
- Significant parking provision

LCC Response

- 3.14 As previously outlined, LCC can confirm that they met with the Memorial Garden Committee to discuss the proposals for Character Area 2, however LCC did not formally agree the omission of these uses. The proposal includes a mixture of active recreational uses and associated infrastructure and LCC would request that ACP assess these uses in the context of the overall aspirations of the Ardee 2040 proposal to deliver new community infrastructure for Ardee.
- 3.15 As previously set out at paragraph 3.6, as a compromise, LCC wish to consider the retention of the 122 no. relocated small trees in this space, resulting in the omission of the allotments from the proposed scheme, if ACP consider this an acceptable design approach in this part of the proposed development.

Allotments

- 3.16 One submission states that given the site's history as former railway lands at Ardee Railway Station, and the findings of the Ardee 2040 Environmental Impact Assessment Report (EIAR), it would be inappropriate to permit in-ground community allotments at this location without further investigation.

LCC Response

- 3.17 Paragraph 9.45 of Chapter 9 – Land, Soils & Geology of the EIAR concludes that *“The operational stage of the Development consists of the current use and activities in the area and will not involve further significant disturbance to the topsoil, subsoils and geology of the area”*. With regards to further assessment, paragraph 9.47 goes on to advise that *“To determine if there is any historic ground pollution throughout the Site area from previous land use practices, intrusive ground investigations are*

recommended". The EIAR does not preclude the development of allotments at this location and recommends further investigation. We consider that it would be appropriate in any forthcoming permission to include a condition that requires the results of the intrusive ground investigations to be submitted to and agreed with ACP prior to the operation of the allotments to demonstrate that the proposed use does not pose any risk to public health.

Impact on Safety / Anti-social behaviour

- 3.18 A number of observations have raised concern relating to the potential for antisocial behaviour in the proposed park at Character Area 2 – Old Railway Lands. Clarification was requested as to whether the allotments will be locked at night.

LCC Response

- 3.19 As per LCC's general approach to the management of their open spaces and parks, pedestrian accesses to the proposed park and allotments will not be locked at night however vehicle access will be restricted. LCC are not aware of any significant complaints of anti-social behaviour in their other parks in Ardee (Fair Green to the north of Golf Links Road & the Riverside Walk accessed from Bridge Street) which provide similar facilities / activities as those proposed at the Old Railway Lands, therefore they do not anticipate that anti-social behaviour will be an issue at this location.

Traffic Congestion / Loss of Car Parking

- 3.20 Concerns have been raised that the proposal will create traffic congestion on Sean O'Carroll Street with the main concerns being children's safety and impacts on the elderly residents of St. Johns of Gods. In addition to this, observations raised the perceived issue that the removal of 150 no. spaces from Main Street will result in the subsequent relocation of parked vehicles onto the adjoining local road network.

LCC Response

- 3.21 The narrow street nature of Sean O'Carroll Street is typical in such market towns across Ireland and is a feature of the town. No alteration to the characteristics of the public road network is proposed and the current layout, including speed control features, encourages slower vehicle speed which acts positively towards traffic demand management for the town centre, creating a safer environment for pedestrians.
- 3.22 A design principle of the proposed project is to improve connectivity between the town centre and other parts of Ardee through the provision of better walking and cycle routes. It is anticipated that the majority of people using the Old Railway Lands park are unlikely to travel to it by car. However it's acknowledged that the need to include an appropriate car parking strategy is also a requirement of the project. Informed by extensive data gathering carried out at the time when the project commenced it was determined that a reduction in car parking in the proposed development, in line with the objectives of national, regional and local policy, could be sustained whilst still providing an adequate level of car parking to serve the needs of the community.
- 3.23 Alterations to the existing parking arrangement along Sean O'Carroll Street are limited. A small area of parking is provided at Character Area 2 – Old Railway Lands for users of the park only. In addition to this, a large car park is proposed at Character Area 3 – Amenity Lands which is connected to Character Area 2 by the existing Railway Walk. It

is anticipated that visitors that do travel to the site by car will combine their visit to Character Areas 2 & 3 to make use of the variety of recreational facilities available and mainly utilise the dedicated car parking available at Character Area 3.

- 3.24 As outlined in Section 2 of this response, more rigorous enforcement of the Bye Laws will reduce the potential for all day parking in the town resulting in a higher turnover of car parking spaces, therefore it is not anticipated that there will be an unmanageable demand for car parking either on Main Street or the adjacent streets as a result of the proposed development.

Structural Impact on Dwellings

- 3.25 Concern has been raised about the potential impact of additional traffic on the structure of dwellings in Sean O'Carroll Street.

LCC Response

- 3.26 Traffic characteristics along Sean O'Carroll Street are not proposed to change significantly as a result of the proposed development in this location. The enforcement of weight restriction is a matter for the road enforcement department, however given the nature and scale of the vehicular movements and limited works to the public road associated with the proposed development we do not consider that they will add to / or create an issue with the structure of dwellings.

Traffic Survey

- 3.27 An observation has raised concern about the lack of a recent peak time traffic survey to inform the proposed development.

LCC Response

- 3.28 Traffic counts and parking surveys were undertaken in March 2022 in order to provide the study with a snapshot of the traffic characteristics of the town and surrounding areas – traffic and car parking behaviour on any particular day or time is always subject to local factors and change and no two days will be the very same. The surveys were undertaken in a neutral month for traffic data collection considering the characteristics of Ardee town centre and surrounding area.

- 3.29 Changes to the traffic volumes, in particular on the N2 from the TII traffic counters, were monitored through the study period and the traffic volumes increased at a similar rate to the traffic growth factors set out in the National Road Authority's Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections October 2021 which envisages that car and light vehicle volumes on national roads would increase over time. This has been taken into consideration in the development of the proposals for Ardee.

Road Safety Audit

- 3.30 An observation states that the Road Safety Audit *'confirms that the following essential design elements were not provided to the Audit Team (Drainage design, Cross sections, Kerb heights, Elements of road markings, Signage proposals, Utility diversion details, Swept path analysis for treatment plant traffic). These are fundamental safety inputs required for a meaningful RSA. Without them, the auditors could not fully assess wet-weather risks, pedestrian and accessibility interfaces, lane geometry, vehicle containment, driver guidance, surface hazards, or the ability of heavy vehicles to safely*

manoeuvre within the scheme. It is therefore inappropriate for this RSA to be relied upon for approval'.

LCC Response

- 3.31 The Stage 1 Road Safety Audit for Character Areas 2, 3 and 4 was undertaken in the context of the procedures provided in the relevant sections of the TII Road Safety Audit GE-STY-01024 and TII Road Safety Audit Guidelines GE-STY-01027; and in accordance with the DoT Design Manual for Urban Roads and Streets (DMURS). A Stage 1 Road Safety Audit is undertaken at the completion of preliminary design and normally before planning consent is sought. Not all the details of the scheme might be available at this stage, and Stage 2, 3 and 4 Audit are required at later stages in the design and implementation stages of a project. The auditor has made observations on the proposed scheme from a vehicular / pedestrian safety point of view and the recommendations of the Audit have been incorporated into the final design submitted as part of the planning application. We consider the level of information provided to be appropriate to the complexity of the proposed works in these areas. This is confirmed by the auditors acceptance of the points included in the Feedback Form included at Appendix C of the Stage 1 Road Safety Audit for Character Area's 2, 3 and 4.
- 3.32 The information mentioned in the observation was provided to the auditor for a Stage 2 Road Safety Audit prepared for Character Area 1 – Main Street and Ash Walk as significant alterations have been made to the public road and footpath for this area. This information was required to form part of a Departures application to Transport for Ireland (TII) due to amendments to the national road. As per the Road Safety Audit for the other Character Areas, the auditor accepted the points provided in the feedback form by the client and design team.

Landscape / Play Park Proposal

- 3.33 The following general points relating to the proposed landscaping and play park have been raised in the submissions.
- Impact of proposed trees on proposed solar panels of a dwelling.
 - Impact of proposed trees on house insurance (storm damage).
 - Objection to proposed play area to rear of dwelling due to noise and disturbance.

LCC Response

- 3.34 An objector has advised that they are planning on getting solar panels on the rear roof of their house facing southwards which enjoys sun light all day and the planting of trees would jeopardize the efficiency of these proposed panels as the trees grow higher. The point was also made that their house insurance stipulates that there should be no trees in proximity to their house and that they would be concerned about the planting of trees near their boundary, especially after the impact of storm Eowyn causing major damage to homes throughout the country.
- 3.35 The landscape architect has specified proposed trees that are suitable for a park land setting and have positioned these trees to ensure that they will not create an unacceptable overshadowing impact or have the potential to cause damage to

residents property. In addition to this, LCC Parks Department will be responsible for the ongoing management and maintenance of the park and will ensure that trees are properly maintained (i.e. crown reduction, thinning, pollarding) as required to avoid impacts on adjoining residents.

- 3.36 An objector has raised concern that the proposed play park will cause an unacceptable noise level, impacting their residential amenity. Chapter 12 of the EIAR submitted as part of the planning application has assessed the recreational noise associated with the proposed new amenity / recreational areas. This assessment has concluded that the noise impact of the proposed development at Character Area 2 – Old Railway Lands is not expected to be significant, given the distance to nearby dwellings and expected use and that no further noise mitigation measures are considered necessary.

4. Character Area 3 – Amenity Lands

- 4.1 The following provides our response to submissions / observation that we consider are material to the decision making process for the proposed development at Character Area 3 – Amenity Lands.

Submissions / Observations

Additional Car Parking

- 4.2 An observation was received which suggested that a new car park should be located at the amenity lands waste water treatment area. The observation identified an area on a marked up plan where they consider that a new car park should be located to serve the railway walk.

LCC Response

- 4.3 The suggested location is in close proximity to car parking spaces proposed as part of the development in this area. A total of 45 no. spaces will be provided within the site boundary of Character Area 3 – Amenity Lands, which includes 4 no. accessible car parking spaces and 9 no. Electric Vehicle car parking spaces. Pedestrian access from this Character Area to the existing Railway Walk is provided at 2 no. separate locations, which will provide access from Character Area 3 – Amenity Lands for people using the proposed amenity facilities in Character Area 2 – Old Railway Lands as well as the existing railway walk.

5. Character Area 4 – Woodland Walk

- 5.1 Our review of the submissions / observation did not identify any specific comments in relation to the proposed development at Character Area 4 – Woodland Walk except for 1 no. reference to the area in the Development Applications Unit (DAU) response. Section 6 of this document provides our comments in relation to the DAU observations.

6. Responses from Prescribed Bodies

6.1 The following provides our comments in relation to submissions / observations received from prescribed bodies.

Development Applications Unit

Nature Conservation

6.2 The DAU advise that *“The Department observes that the landscaping proposals for the new community park to be established on the Old Railway Lands off O’Carroll Street as part of this proposed project include the sowing of yellow rattle and other wildflower seeds, with the aim of enhancing biodiversity. It being intended that the semi-parasitic yellow rattle will reduce the dominance of grass species in the vegetation presently occurring in this area and allow a wildflower meadow to become established from the other seeds to be sown in the area from a commercially sourced seed mixture. But it should be noted that the All-Ireland Pollinator Plan advises against planting wildflower seed outside a garden setting”*.

6.3 The response then goes on to clarify the following points, which are taken from the Position Paper by the Dublin Naturalists’ Field Club entitled ‘The case against ‘Wildflower’ seed mixtures’ which is endorsed by the All-Ireland Pollinator Plan and reproduced on their website:

- Seeds of non-local origin – even if the species are native – introduce new genetic strains which may displace or compromise the local, naturally-occurring flora,
- Local, native species do not need to be sown. Native plants colonise suitable habitats by natural means

LCC Response

6.4 LCC acknowledge the response received from DAU and are willing to amend the proposed inclusion of yellow rattle and other wildflower seeds if DAU consider this the most sustainable approach to encourage a natural habitat of native species in the area.

Archaeology

6.5 The DAU have responded with 2 no. conditions in relation to archaeology.

LCC Response

6.6 LCC has no objection to the inclusion of archaeological conditions if permission is forthcoming.

Inland Fisheries Ireland (IFI)

6.7 In summary, IFI have made the following comments:

- **Character Area 3 – Amenity Lands** - IFI welcomes the incorporation of a riparian zone along the river at the Amenity Lands site and recommends that the zone should be designed in accordance with IFI's guidance document Planning for watercourses in the urban environment.

- **Surface Water Management** – it's IFI understanding that surface water from the development will be discharged into the nearby watercourses. On this basis they recommend that storm water management should be designed in accordance with the Department of Housing, Local Government and Heritage guidance document Nature- based solutions for the management of rainwater and surface water run -off in urban areas.
- **Instream and/or bankside works** – IFI should be consulted regarding detailed design and construction methodology of all instream or bankside works along all watercourses in the project area
- **Surface water management during construction phase** – IFI have recommend that suitable mitigation measures are incorporated to protect water quality and the aquatic habitat both during and following construction.

6.8 In conclusion, IFI have no objection to the proposal subject to the works being carried out in line with published guidance.

LCC Response

6.9 LCC welcome the IFI response and are content that appropriate conditions are attached to any forthcoming permission to ensure that the works are carried out in accordance with IFI's guidance documents and that a Construction Environmental Management Plan is prepared prior to the commencement of works on the development.

Transport Infrastructure Ireland

6.10 TII have advised that they have no observations in relation to the proposed development.

LCC Response

6.11 LCC welcome this response. LCC undertook extensive engagement with TII permission for the proposed design through their Departures process prior to submitting this planning application. This ensures that the proposed amendments to the National Road (N52) will result in a safe environment for both pedestrians and vehicular traffic.

7. Summary

- 7.1 LCC has carefully reviewed and addressed all relevant submissions received in relation to the Ardee 2040 Regeneration Project and considers that the proposed scheme has been developed in accordance with national, regional and local policy objectives, supported by robust technical assessments, and informed by extensive data collection and design evaluation.
- 7.2 While acknowledging the concerns raised by residents, community groups and stakeholders, the Council considers that the proposed interventions represent a balanced and forward-looking approach that will enhance the public realm, improve accessibility and safety, support sustainable mobility, and deliver high-quality community infrastructure for the benefit of the wider population.
- 7.3 The Council is confident that the project, as submitted, will contribute positively to the long-term social, environmental and economic vitality of Ardee and respectfully requests that An Coimisiún Pleanála give favourable consideration to the application.

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