
Statement of Response to Pre-application Consultation Opinion

Residential Development

**Lands at Rathmullan Road, Rathmullan,
Drogheda, Co. Meath**

Trailford Ltd

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1.0 Introduction

Hughes Planning and Development Consultants, 70 Pearse Street, Dublin 2, have prepared this Statement of Response to Pre-application Consultation Opinion on behalf of our client, Trailford Ltd, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at Rathmullan Road, Rathmullan, Drogheda, Co. Meath. Following consultations with Meath County Council, a request to enter into pre-planning consultations with An Bord Pleanála was submitted and a pre-planning consultation meeting was facilitated on 20th February 2019.

An Bord Pleanála subsequently issued a Notice of Pre- Application Consultation Opinion on 11th March 2019, which identified 3 no. items to be addressed, in order for the application to constitute the reasonable basis for a Strategic Housing Application. These 3 no. items were as follows:

1. *Further consideration and/or justification of the documents as they relate to the development of Phase II residential lands as set out in the statutory county development plan and the possible prematurity of development at this location pending the completion of the review of both the Louth and Meath county development plan process and the more strategic planning policy context in particular the draft Regional Economic and Spatial Strategy which contains an objective RPO 4.8 relating to the preparation of a Joint Urban Plan for Drogheda.*
2. *Further consideration/justification of the documents as they relate to vehicular access, roads layout, and pedestrian and cycle connections, in particular:*
 - i. *The replacement of the proposed roundabout at the Rathmullan Road access with a signalised junction;*
 - ii. *The provision of a cycleway, footpath, public lighting and road drainage along Rathmullan / Sheephouse Road frontage of the site;*
 - iii. *The achievement of satisfactory vehicular, pedestrian and cycle access to creche and adequate cycle and car parking in neighbourhood centre;*
 - iv. *The achievement of satisfactory pedestrian and cycle access to Oldbridge Road and the Boyne River walkway from the proposed park at the northern end of the site, with due considerations to the changes in ground levels across this area, along with related landscaping measures;*
 - v. *The accessibility of the proposed pump station to HGVs with autotrack analysis.*
3. *Further consideration/justification of the documents as they relate to the design and layout of residential development. The proposed development shall have regard to the site's context and locational attributes including its elevated position overlooking the M1 and Boyne Bridge and adjacent UNESCO Bru na Boinne World Heritage Site. The prospective applicant should satisfy themselves that the proposed design and layout provide the optimal urban design and architectural solutions for the site and are of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for particular consideration of the need to create a strong urban frontage to the Rathmullan Road and Sheephouse Road the contribution of a quality public realm at this location, with integrated pedestrian and cycle facilities and landscaping.*

The Board also requested, pursuant to article 285(5)(b) of the Planning and Development Act 2000 (As amended by the Residential Tenancies Act 2016), the provision of the following specific information:

1. Landscape and Visual Impact assessment with photomontages, to include, inter alia, consideration of visual impacts on the M1, the Boyne Bridge and the UNESCO Bur na Boinne World Heritage Site and to have regard to relevant development plan landscape designations.
2. Landscaping proposals to include (i) Arboricultural Impact Assessment and details of measures to protect trees and hedgerows to be retained at the site; (ii) rationale for proposed public open space provision, to include an open space hierarchy and detailed layouts for the public open spaces.
3. Traffic and Transport Impact Analysis, to be prepared in consultation with Louth County Council.
4. Rationale for proposed parking provision with regard to development plan parking standards and to the 'Sustainable Urban Housing Design Standards for New Apartments-Guidelines for

- Planning Authorities' (2018), to include details of parking management for the apartments. The proposed car and cycle parking provision should include areas designated for parking or drop off purposes associated with the neighbourhood centre and childcare facility.
5. Detailed surface water drainage proposals to address issues raised in the submitted Opinion of Meath County Council dated 8th February 2019.
 6. Archaeological Impact Assessment to be prepared in consultation with the National Monuments Service.
 7. Topographical survey of the site and detailed cross sections to indicate existing and proposed ground levels across the site, proposed FFLs, road levels, open space levels, etc. relative to each other and relative to adjacent lands and structures including public roads, the M1 and the Boyne River.
 8. Map of area to be taken in charge.
 9. Assessment of potential impacts on residential amenities due to noise from the M1, along with related mitigation measures if necessary.
 10. Rationale for proposed childcare provision with regard to, inter alia, the 'Childcare Facilities Guidelines for Planning Authorities', circular letter PL 3/2016, and the 'Sustainable Urban Housing Design Standards for New Apartments – Guidelines for Planning Authorities' (2018), to provide details of existing childcare facilities in the area and demand for childcare provision within the proposed scheme. He applicant is advised to consult with the relevant Childcare Committee in relation to this matter prior to the submission of any application.
 11. Assessment of the capacity of schools in the area.

Sections 2.0 and 3.0 overleaf provide a response to the above.

Further to the above, the Board's Notice of Pre-Application Consultation Opinion set out the statutory bodies to be notified of the making an application, pursuant to section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016. They are as follows:

1. Irish Water
2. National Transport Authority
3. Transport Infrastructure Ireland
4. Department of Culture, Heritage and the Gaeltacht
5. An Taisce
6. The Heritage Council
7. Fáilte Ireland
8. An Comhairle Ealaíonn
9. Meath and Louth County Childcare Committees
10. Louth County Council

A copy of the current application has been sent to the prescribed bodies identified by the Board. Copies of the applicable cover letters are enclosed with the application.

2.0 Response to Issues Raised

The following sets out how the applicant and design team have addressed the 3 no. issues raised in the Board's Notice of Pre-Application Consultation Opinion to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.1 Item No. 1 – Timing and Phasing of Development

The Board required the following in relation to the timing and phasing of the development:

1. *'Further consideration and/or justification of the documents as they relate to the development of phase II residential lands as set out in the statutory county development plan and the possible prematurity of development at this location pending the completion of the review of both the Louth and Meath county development plan process and the more strategic planning policy context in draft Regional Economic and Spatial Strategy which contains an objective RPO 4.8 relating to the preparation of a Joint Urban Plan for Drogheda.'*

An appropriate statement in relation to Section 8(1)(iv) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended by Section 53 of the Act 2018, that outlines consistency with the relevant development plan and that specifically address any a matter that maybe considered to materially contravene the said plan should be provided. In this context, reference should be made to the draft Regional Economic and Spatial Strategy and the Joint Urban Plan which will replace existing statutory plans for the area.

Further consideration for these issues may require an amendment to the documents and/or design proposal submitted.'

2.1.1 Applicants Response to Item No. 1

A Statement of Material Contravention, has been prepared by Hughes Planning and Development Consultants in response to Item No. 1 outlined above. This statement provides justification in relation to the development of Phase II Residential zoned lands as part of the subject proposal. This statement accompanies the subject application under a separate cover.

2.2 Item No. 2 – Vehicular Access, Roads Layout, Pedestrian and Cycle Connections

The Board required the following in relation to the proposed Vehicular Access, Roads Layout, Pedestrian and Cycle Connections:

2. *Further consideration and/or justification of the documents as they relate to Vehicular Access, Roads Layout, Pedestrian and Cycle Connections, in particular:*
 - i. *The replacement of the proposed roundabout at the Rathmullan Road access with a signalised junction;*
 - ii. *The provision of a cycleway, footpath, public lighting and road drainage along the Rathmullan Road/Sheephouse Road frontage of the site;*
 - iii. *The achievement of satisfactory vehicular, pedestrian and cycle access to the creche and adequate car and cycle parking provision at the neighbourhood centre;*
 - iv. *The achievement of satisfactory pedestrian and cycle connections to the Oldbridge Road and the Boyne Rover walkway from the proposed park at the northern end of the site, with due consideration to the changes in ground levels across this area, along with related landscaping measures;*
 - v. *The accessibility of the proposed pump station to HGVs with autotrack analysis.*

The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating to the design and layout of the proposed development.

2.2.1 Applicants Response to Item No. 2

Following receipt of the Boards Notice of Pre- Application Consultation Opinion on 11th March 2019, the design team re-examined the developments vehicular access, roads layout, pedestrian and cycle connections. Upon review, the following changes have been made to the design/layout of the proposed development:

- i. The previously proposed roundabout at the Rathmullan Road has been replaced with a with a signalised junction. The specific details of the replacement signalised junction are best illustrated in Drawing No. P006 and Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers, which accompany this application.
- ii. The shared cycleway and footpath previously proposed adjacent to the Rathmullan Road/Sheephouse Road site frontages has been replaced with a separate cycleway and footpath in a similar location. In addition to this, public lighting and road drainage has been introduced along the Rathmullan Road/Sheephouse Road site frontages. The specific details of these amendments are best illustrated in landscape drawing set/report, prepared by Cunnane Stratton Reynolds, Outdoor Lighting Report and associated drawings, prepared by Sabre Electrical Services Ltd.; and engineering drawing set/report, prepared by Waterman Moylan Consulting Engineers, all of which accompany this application.

- iii. The adequacy of car and cycle parking provision and pedestrian access at the neighbourhood centre is discussed in both the Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers, and the Statement of Consistency and Planning Report, prepared by Hughes Planning and Development Consultants, and illustrated in the architectural drawings set, prepared by NDBA Architects, engineering drawing set, prepared by Waterman Moylan Consulting Engineers, and the Landscape Masterplan, prepared by Cunnane Stratton Reynolds - all of which accompany this application. Further to this, Drawing No. P017, prepared by Waterman Moylan Consulting Engineers, includes auto tracking details illustrating that the car parking spaces in the neighbourhood centre can be appropriately accessed.
- iv. To achieve satisfactory pedestrian and cycle connections to the Oldbridge Road and the Boyne Rover walkway from the northern end of the site, as part of the road widening works along Rathmullan Road to the north towards the River Boyne a new 2 metre footpath has been provided on the opposite side of the road. This provides a pedestrian link between the site and the River Boyne Boardwalk whilst respecting the topography and existing trees/ecological features on the site. Please see Section A-A on Drawing No. P012, prepared by Waterman Moylan Consulting Engineers, for specific details.
- v. Appropriate access to the proposed pump station by HGVs is provided. This is confirmed with autotrack analysis, included in Drawing No. P014, prepared by Waterman Moylan Consulting Engineers, which accompanies this application.

The abovementioned changes to the design/layout of the proposed development have improved upon the vehicular access, roads layout, pedestrian and cycle connections featuring in the proposal considered at the pre-planning consultation meeting was facilitated on 20th February 2019.

We consider that the changes outlined above appropriately address the issues outlined in Item No. 2 of An Board Pleanála's Notice of Pre-Application Consultation Opinion.

2.3 Item No. 3 – Design and Layout of Residential Development

The Board required the following in relation to the proposed Design and Layout of Residential Development:

3. *Further consideration/justification of the documents as they relate to the design and layout of the residential development. The proposed development shall have regard to the site's context and locational attributes including its elevated position overlooking the M1 and the Boyne Bridge and adjacent to the UNESCO World Heritage Site. The prospective applicant should satisfy themselves that the proposed design and layout provide the optimal urban design and architectural solution for this site and are of sufficient quality to ensure that the proposed development makes a positive contribution to the character of the area over the long term. In this regard, the submitted documents should allow for particular consideration of the need to create a strong urban frontage to the Rathmullan Road and Sheephouse Road and the contribution of a high-quality public realm at this location, with integrated pedestrian and cycle facilities and landscaping. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted relating to the design and layout of the proposed development.*

2.3.1 Applicants Response to Item No. 3

Following receipt of the Boards Notice of Pre- Application Consultation Opinion on 11th March 2019, the design team re-examined the proposed development's design and layout. Upon review, the following main change was made to the design/layout of the proposed development - the massing, height and design of the apartments proposed to the south-east of the Mary McAleese Boyne Valley Bridge were reconsidered. The SHD pre-planning application featured 2 no. 6 storey apartments in this location. It is now proposed to introduce 3 no. 4-5 storey blocks in the same location. This change has been made to address the topography of the site and ensure an appropriate visual response to the immediately adjacent bridge as well as the UNESCO World Heritage Site and surrounding area. The Architectural Design Statement, prepared by NDBA Architects and Photomontages, prepared by Chris Shackleton

Consulting, which are provided under a separate cover, as well as the Landscape and Visual Amenity Chapter included in the Environmental Impact Assessment Report accompanying this application provide further discussion on/illustration of the proposed design and layout.

Additional information regarding the proposed character areas, proposed landscaping details and materials and finishes feature in the architectural drawing set and Architectural Design Statement, prepared by NDBA Architects, and Landscape Strategy + Design Report, prepared by Cunnane Stratton Reynolds, which accompany the application. This information illustrates the quality of the proposed development and the positive contribution it will make to the area in the longer term as well as the quality landscaping and pedestrian/cycle facilities proposed as part of the development.

3.0 Statement of Response to Specific Information Required

The following sets out how the applicant has addressed the Board's request for additional specific information in respect of the proposed development.

3.1 Landscape and Visual Impact Assessment

The application is required to be accompanied by additional landscape and visual impact assessment with photomontages having regard to the visual impacts on the M1, the Boyne Bridge and the UNESCO Bru na Boinne World Heritage Site. A Landscape and Visual Impact Assessment has been prepared by Cunnane Stratton Reynolds as part of the Environmental Impact Assessment Report. It is accompanied by Photomontages, prepared by Chris Shackleton Consulting. Both items accompany this application under a separate cover.

3.2 Landscaping Proposals

The application is required to be accompanied by landscaping proposals which include an Arboricultural Impact Assessment/details of measures to protect trees and hedgerows to be retained on and rationale for the proposed public open space provision. These items have been addressed in the Landscape Strategy and Design Report and Tree Survey Report, both prepared by Cunnane Stratton Reynolds. These documents are provided under separate covers.

3.3 Traffic and Transport Impact Analysis

The application is required to be accompanied by a Traffic and Transport Impact prepared in consultation with Louth County Council. A Traffic and Transport Assessment, prepared by Waterman Moylan Consulting Engineers, accompanies the subject application under a separate cover. This report has been prepared in consultation with both Louth and Meath County Councils. This report is accompanied by a letter from Louth County Council, dated 26th June 2019, which confirms general acceptance of the junction upgrades proposed at the Rathmullan Road/Marleys Lane junction and the Rathmullan Road/R132 junction.

3.4 Parking Provision

The application is required to be accompanied by a rationale of proposed parking provision and parking management at the proposed apartments, having regard to the development plan parking standards and to the 'Sustainable Urban Housing Design Standards for New Apartments-Guidelines for Planning Authorities (2018)'. Such a rationale has been included in the Planning Report and Statement of Consistency, prepared by Hughes Planning and Development Consultants, and in the Traffic and Transport Assessment, prepared by Waterman Moylan Consulting Engineers, accompany the subject application. Further to this, the architectural drawings, prepared by NDBA Architects, which accompany the application include designated parking and drop-off areas for the proposed neighbourhood centre and childcare facility.

3.5 Surface Water Drainage

The application is required to be accompanied by detailed surface water drainage proposals to address the issues raised by Meath County Council, in their opinion dated 8th February 2019. An Engineering Assessment Report and Drawing Nos. P020, P021, P022, P023, P024, P027, P028 and P029, prepared

by Waterman Moylan Consulting Engineers accompanies the subject application and is provided under a separate cover. The surface water drainage proposals contained therein have responded to the opinion of Meath County Council, Meath County Council and Louth County Council having been consulted during their preparation.

3.6 Archaeological Impact Assessment

The application is required to be accompanied by an Archaeological Impact Assessment. AHC Ltd have Carried out a detailed Archaeological Impact Assessment in preparing the Archaeology, Architectural and Cultural Heritage Chapter (Chapter 11.0) of the EIAR which accompanies the subject application. The National Monuments Service and Development Applications Unit of Department of Culture, Heritage and the Gaeltacht have been consulted during its preparation, as discussed in Section 11.2 of the chapter.

3.7. Topographical Survey

The application is required to be accompanied by a topographical survey and detailed cross sections to indicate proposed and existing ground levels across the site. The Existing Site Plan, prepared by NDBA Architects, which accompanies the application includes topographical survey details. Further to this, the architectural drawing set, prepared by NDBA Architects, and the landscape drawing set, prepared by Cunnane Stratton Reynolds, which accompany the application include the requested cross sections across the site.

3.8 Taken in Charge Lands

The application is required to be accompanied by a map of areas to be taken in charge. The architectural drawing set, prepared by NDBA Architects, which accompanies the subject application, includes this information in Drawing No. PP-S-02.1.

3.9 Noise Impact Assessment

The application is required to be accompanied by an assessment of potential impacts on residential amenities due to noise from the M1, along with related mitigation measures if necessary. Potential noise impacts have been assessed by AWN in their preparation of the Noise and Vibration Chapter featuring in the Environmental Impact Assessment Report which accompanies the application. Further to this, AWN Consulting Ltd. have contributed to the preparation of the layout/design of residential units as well as landscaping proposals for the proposed development, more specifically in relation to potential mitigation measures regarding noise.

3.10 Childcare Provision

The application is required to be accompanied by a rationale for proposed childcare provision with regard to the 'Childcare Facilities Guidelines for Planning Authorities' and the 'Sustainable Urban Housing Design Standards for New Apartments-Guidelines for Planning Authorities (2018)' and having regard to existing childcare facilities as well as existing demand. Such a rationale is included in Section 7.0 of the Statement of Consistency and Planning Report, prepared by Hughes Planning and Development Consultants, which accompanies the subject application under a separate cover. Both the Louth and Meath Childcare Committees were consulted in advance of the subject application being lodged to An Bord Pleanála. Their feedback is discussed in the Statement of Consistency and Planning Report, prepared by Hughes Planning and Development Consultants, which accompanies the subject application.

3.11 School Capacity Assessment

The application is required to be accompanied by an assessment of the capacity of schools in the area. A School Capacity Assessment has been prepared, by Hughes Planning and Development Consultants, and is provided under a separate cover.

4.0 Conclusion

This report sets out how the various issues raised by An Board Pleanala, in their Notice of Pre-Application Consultation Opinion, in relation to the proposed residential development at Rathmullan Road, Rathmullan, Drogheda, Co. Meath, have been addressed.

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

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



Kevin Hughes MIPI MRTPI
Director
for HPDC.