

Planning Department
Meath County Council
Buvinda House
Dublin Road
Navan,
Co. Meath, C15 Y291

Dunshaughlin Post
Office
Co Meath
J. Lacey

Date: September 2023
Via email: planning@meathcoco.ie

Re: Proposed Development Dunshaughlin Public Realm Scheme
The Provision of Public Realm Upgrade works along the Main Street (R147) from its junction with Supple Hall to its junction with the Bungalows, and along The Dales from its junction with Main St to a point 200m west, Dunshaughlin, Co. Meath.

Dear Sir / Madam,

On review of the documents provided on the Meath County Council consultation portal, we wish to submit an observation in relation to the proposed scheme as outlined above.

We, the Dunshaughlin residents / business owners have concerns regarding the above proposed Public Realm and associated works. The primary areas of serious concern are as follows;

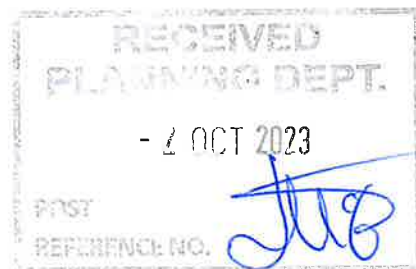
1. Construction Phase
2. On Completion of Works
3. Dunshaughlin Outer Relief Road

1. Construction Phase

Environmental Impact

It has been concluded by Meath County Council that there will be 'no real likelihood of significant effects arising from the proposed development and that an Environmental Impact Assessment is not required'.

The means by which the above conclusion was reached in the screening process is a matter of concern as there appears to be a lack of a deliberation process for both 'traffic impact' and



'noise impact' in the screening reports, together with a lack of associated mitigation measures.

Traffic Impact

Section 4.3.9 'Traffic Control' of the AA screening report states:

'Traffic management will be required and it is likely that the R147 will be reduced to two-way lanes where possible, or have single lane traffic with traffic control in place. It is envisaged that this will be required for the duration of the works'.

There does not appear to be a Traffic Management Plan in place based on the undetermined wording style of the above, which is the only reference to traffic management in the screening report.

Given the expected time period proposed for the works, i.e. 12-16 weeks, we would request that a detailed Traffic Management Plan (TMP) is prepared, as well as a Temporary Management Layout Drawing (TMLD), which clearly indicates the proposed management measures to be put in place at each phase of the works in order to facilitate dialogue and discussion with the affected parties in Dunshaughlin.

Finally, we request that a definitive phased timeline (12-16 weeks is non-definitive) and TMLD are circulated to all members of the community to be affected by the proposed works, again to facilitate dialogue and discussion with the affected parties in Dunshaughlin.

Noise Impact

Section 6.1.5 'Disturbance Noise and Lighting' of the AA screening report states;

'The proposed construction works will result in an increase in noise levels during the construction phase, as well as an increase in personnel and traffic movement to and from the site. It should be noted that no rock breaking or blasting will be required during the construction works. Due to the proposed development site being located within an urban area, the noise levels during the proposed development works period are not expected to differ significantly from the local baseline levels. Therefore, no significant impact due to the temporary rise of local noise levels is expected'.

It is unclear in the report as to how the above determination was reached. Whilst no 'rock breaking or blasting' will be undertaken, there will be a requirement for jackhammers to be used, which will result in significant noise levels and vibrations within the small built up area. It is considered that this aspect should not have been omitted from the AA screening report. The report goes on further to state that any noise levels will be alleviated by 'mitigation measures outlined above' however no such measures have been specified above or elsewhere in the report. This suggests that the report has perhaps been overwritten, or has neglected to include the mitigation measures referred to.

Previous roadworks carried out in Dunshaughlin over the last year or so proved that noise levels differ very significantly from local baseline levels and most, if not all, interested parties to our observation can attest to this matter. The noise levels were such that it was not possible to conduct a phone conversation in nearby buildings, normal work / recreation activities were disrupted, and substantial stress occurred in the community as a whole thereby impacting on well-being.

The Environmental Noise Regulations 2006 give effect to EU Directive 2002/49/EC on the assessment and management of environmental noise.

Environmental noise means *'unwanted or harmful outdoor sound created by human activities, including noise from transport, road traffic, rail traffic, air traffic, and from sites of industrial activity. The Directive applies to noise to which humans are exposed, particularly in built-up areas, public parks or other quiet areas within built-up areas, and in quiet areas in open country, near schools, hospitals and other noise-sensitive buildings and areas'*.

Under the Directive, *'local authorities are required to make action plans to reduce ambient noise. The EPA exercises general supervision over the functions and actions of the local authorities in this aspect of their work'*.

We request therefore that a project specific Action Plan with definitive phased timeline is circulated to all members of the community to be affected by the proposed works, detailing how the expected noise levels can or will be mitigated during the daily hours of business in Dunshaughlin. The plan should include for accommodating interim meetings with representatives of stakeholders / interested parties to address any issues that may occur both prior to and during construction.

This submission is driven by previous management of roadworks undertaken in Dunshaughlin to-date, which were not managed in a manner that considered the welfare of the community, resulting in a significant impact on the local businesses and residents.

Thus, we strongly request that the proposed works are designed and managed for 'on-the-ground engagement' with all affected parties by the implementation of a TMP, TMLD, and Noise Action Plan to help mitigate what we assert, will be an extremely disruptive, lengthy and potentially damaging construction process for the residents and business owners of Dunshaughlin if the works proceed.

2. On Completion of Works

It is anticipated that on completion of the new Public Realm, there is very little planning gain evident based on the consultation documents, particularly when taking into account the huge level of disruption involved. There is no designated cycle lane being incorporated onto Main Street, with one lane being proposed to accommodate both pedestrians and cyclists. We consider this to be a token 'tick box' inclusion that is not in the spirit of the Design Manual for Urban Roads & Streets. It is anticipated that to correct this, the roads will need to be dug up again in the near future and thus we strongly object to shared pedestrian / cyclist route on Main Street as part of the proposed Public Realm.

3. Dunshaughlin Outer Relief Road



Figure 1: Unfinished Outer Relief Road



Figure 2: Unfinished outer relief road

Finally, we note that the Public Realm works are being proposed ahead of any movement by Meath County Council, to instigate a Part 8 for the Dunshaughlin Outer Relief Road (DOOR) to the east. This road has already been commenced by Rocktore 1 Ltd and now lies unfinished (see Figures 1, 2 & 3).

We request that serious consideration is given to postponing the proposed Public Realm proposed in favour of enacting a Part 8 for continuation of the outer relief road. This is a logical approach as it would facilitate a smoother construction phase process for the Public Realm works.

Signed:

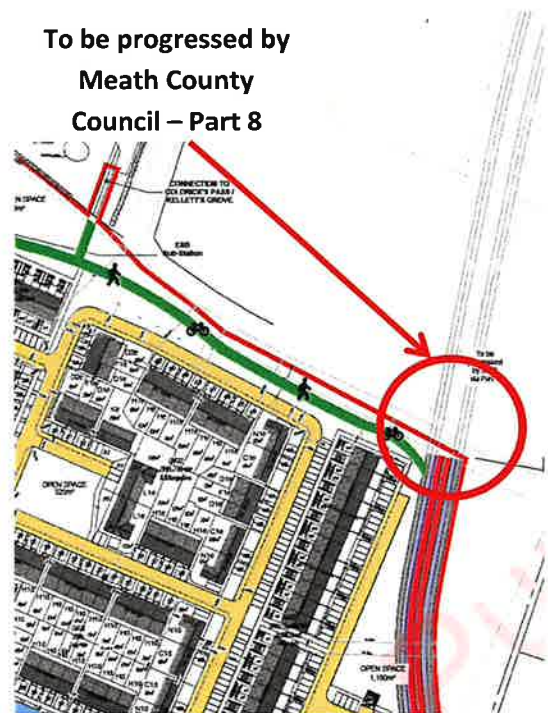


Figure 3: Unfinished outer relief road