

# PLANNING STATEMENT

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LANDS AT  
DRUMLARK  
CAVAN TOWN

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# PLANNING STATEMENT

Residential development on lands at  
Drumlark  
Cavan Town

PREPARED BY:

Genesis Planning  
Planning and Urban Design

ON BEHALF OF:

Drumlark Investments LTD





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# 01 | Introduction

- 1.1 Overview
- 1.2 LRD Definition
- 1.3 Pre-Planning Discussions
- 1.4 Proposal Summary
- 1.5 Planning Statistics
- 1.6 Planning History
- 1.7 Existing Context
- 1.8 Site Description and Location



## 01 Introduction

### 1.1 Overview

1.1.1 This statement accompanies the application to the Planning Authority for the LRD proposal which is made pursuant to the provisions of Section 34 of the Planning and Development (Amendment) (Large Scale Residential Development) Act 2021.

1.1.2 Following pre-application consultation with the Planning Authority in December 2022 and August 2023 the development has been guided to fully address the relevant policy requirements and also have regard to section 247 pre-planning discussions.

1.1.3 This report includes a planning statement and statement of consistency setting out how the proposed development will be consistent with the objectives of the relevant section 28 Ministerial Guidelines and the Cavan County Development Plan (2022-2028).

1.1.5 This planning statement of consistency has been prepared by Genesis Planning on behalf of the client to accompany the planning proposals. This report should be read in conjunction with documentation as follows:

- Application Form;
- Part V Proposals;
- Statement on Housing Mix by Genesis Planning;
- Building Lifecycle Report by MF Architects;
- EIA Screening statement by Hydrec;
- Schools, childcare and social infrastructure assessment by Genesis Planning;
- Statement of response by Genesis Planning
- Architectural Drawings prepared by MF Architects;
- Housing Quality Assessment by MF Architects;
- Construction Environmental Management Plan by CS Consulting Engineers;
- Operational Waste Management Plan by Genesis Planning;
- Design Statement prepared by MF Architects & Genesis Planning;
- Engineering Services report & drawings prepared by CS Consulting Engineers;
- Letter of feasibility and Statement of Design Acceptance from Irish Water;
- DMURS Design Audit by CS Consulting Engineers;
- Traffic & Transport Assessment prepared by CS Consulting Engineers;
- Road Safety Audit and Quality Audit by Road Plan and CS Consulting Engineers;
- Flood Risk Assessment by CS Consulting Engineers;
- AA Stage 1 Screening Statement & NIS prepared by Hydrec;
- Ecological Impact Assessment prepared by Hydrec;
- Landscaping Proposals prepared by Parkhood;
- Daylight and Shadow Analysis by Chris Shackleton;
- Archaeological Assessment by ACS;
- Project CGI's by MF Architects.

1.1.6 This planning statement has been structured as follows:

- Introduction and background
- Local context
- The proposed development
- National and Regional Policy
- Local Policy
- Conclusion

### 1.2 Large-scale Residential Development (LRD) Definition

1.2.1 Section 2 of the 2021 Act defines 'large-scale residential development' as

'LRD' means large-scale residential development.....

- (a) the development of 100 or more houses
- (b) the development of student accommodation that includes 200 or more bed spaces
- (c) both the development of 100 or more houses and of student accommodation or
- (d) both the development of student accommodation that includes 200 or more bed spaces and of houses

where the LRD floor space of

- (i) in the case of paragraph (a), the buildings comprising the houses
- (ii) in the case of paragraph (b), the student accommodation;
- (iii) in the case of paragraphs (c) and (d) the buildings comprising the houses and the student accommodation, is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development.'

1.2.2 In summary the proposed development provides for 145 no. residential units and crèche on lands zoned 'Proposed Residential', 'Proposed Low Density Residential' and 'Residential Strategic Reserve' in the Cavan County Development Plan 2022-2028.

1.2.3 Accordingly the proposed development comes within the definition of LRD as provided in the 2021 Act, being 'development of 100 or more houses on lands zoned for residential use...'

### 1.3 Pre Planning Discussions

1.3.1 Section 247 pre-planning discussions were held with the Planning Authority on December 2022 and further formal LRD discussions were held on 23rd August 2023 pursuant to the requirements of the 2021 Act.

1.3.2 In response the project team took on-board comments from the Planning Authority and reviewed the layout and design options to find the optimum design response as now proposed.

1.3.3 Specifically the design proposals attached are considered to be an appropriate balance between density requirements and ensuring appropriate design specifics being proposed which are now considered to provide for a high-quality residential environment.

1.3.4 The design now incorporate in summary:

- net site density proposals of 32.6 units per hectare;
- overall residential unit numbers of 145no. proposed;
- a variety of residential types to include apartments and duplex units;
- a variety of building typologies, heights and finishes to ensure a high quality residential environment is provided;
- a strategically located community building which will incorporate provision of a crèche;
- open space provision to achieve 18% of the net site area (16% of the gross site area);
- a DMURS compliant road layout;
- provision of a centrally located Crèche;
- a layout that will deliver connectivity with adjacent lands;
- provision of associated services and site infrastructure works;
- communal space for apartment residents;

# 01 Introduction

## 1.4 Proposal summary

1.4.1 The development will consist of the provision of a total of 145no. dwellings including apartments and creche. Particulars of the development comprise as follows:

- (a) Site excavation works to facilitate the proposed development to include excavation and general site preparation works.
- (b) The reprofiling of ground levels within the site as required.
- (c) The provision of a total of 145no. residential dwellings which will consist of 15 no. 1bed units, 64no. 2 bed units, 55no. 3 bed units and 11no. 4 bed units. The dwellings range in height from single storey to two storey.
- (d) The provision of a total of 54no. duplex apartment units consisting of 15no.1 bed units and 39no. 2bed units. The duplex apartment blocks range in height from two storey to three storey in height.
- (e) Provision of a 2 storey creche with associated parking, bicycle and bin storage.
- (f) Provision of associated car parking at surface level via a combination of in-curtilage parking for dwellings and via on-street parking for the creche and duplex apartment units.
- (g) Provision of electric vehicle charge points with associated site infrastructure ducting to provide charge points for residents throughout the site.
- (h) Provision of associated bicycle storage facilities at surface level throughout the site and bin storage facilities.
- (i) Creation of a new access point from the public road with associated works to include for a connections to the existing public footpath along with provision of a pedestrian crossing point with a raised table.
- (i) The provision of a new shared cycleway and footpath to serve the site.
- (j) Provision of internal access roads and footpaths and associated works.
- (k) Provision of residential communal open space areas to include formal play areas along with all hard and soft landscape works with public lighting, planting and boundary treatments to include boundary walls, railings & fencing.
- (l) Internal site works and attenuation systems which will include for provision of a hydrocarbon and silt interceptor prior to discharge into the surface water network.
- (m) Installation of culverts and headwalls to facilitate crossing over the existing watercourse aligning the site boundary with associated works.
- (n) All ancillary site development/construction works to facilitate foul, water and service networks for connection to the existing foul, water and ESB networks.

## 1.5 Planning statistics

1.5.1 A summary overview of the key planning statistics for the proposed development is set out below in tabular format. Also a detailed Housing Quality Assessment and Schedule of Accommodation are provided under separate cover.

Net Site Area	4.44 ha (5.01ha gross)
Plot Ratio	0.26 plot ratio & 16% net site coverage
Density (units per ha)	32.6 p/ha based on net site area
Height	1-3 storey buildings
Public Open Space	18% of net site area (7,995.6m <sup>2</sup> ) or 16% of the gross site area
Communal Open Space	530.3m <sup>2</sup>
Parking provision	2 per dwelling, 1 per apartment and 1 per 4.5 visitor allocation. 273no. spaces in total with 6 creche spaces, 11 EV charge points and 3 disabled spaces
Bicycle provision	120 for apartments and 5 for creche
One bed units	15 (10%)
Two bed units	64 (44%)
Three bed units	55 (38%)
Four bed units	11 (8%)

Table 1 Summary of site statistics

## 1.6 Planning history

1.6.1 A review of the planning register identifies there is no relevant planning history submitted on these lands.





ROADSIDE AS EXISTING (NORTH-EAST)



SITE AS EXISTING (VIEW FROM SOUTH-EAST)



SITE AS EXISTING FROM ADJACENT DEVELOPMENT (EAST)



SITE AS EXISTING (VIEW FROM EAST)



## 01 Introduction

### 1.8 Site Location & Description

- 1.8.1 In terms of the locality the site is located at the northern environs of Cavan Town in a suburban location.
- 1.8.2 Building typology in the area ranges from 2-3 storey dwellings to 3storey apartment blocks.
- 1.8.3 Being accessed via the L1532 the site is highly accessible by foot, bicycle and car. A continuous footpath also connects the site and runs from the proposed site into Cavan town centre.
- 1.8.4 On lands to the east is a long-standing housing development which establishes the local context as suburban residential.







## 02 | Local Context

- 2.1 Site location
- 2.2 Locational context
- 2.3 Site Location: Local & Existing Context
- 2.4 Local socio-economic context
- 2.5 Rationale for the proposal
- 2.6 Social & community infrastructure
- 2.7 Schools and childcare
- 2.8 Local residential context



## 02 Local Context

### 2.1 Site location

- 2.1.1 The site area comprises a parcel of lands measuring 5.01 hectares (gross).
- 2.1.2 The site is strategically located at the northern environs of the Town and within walking distance of all local amenities.
- 2.1.3 Foul sewer and mains water infrastructure services are also existing with capacity to service the site.
- 2.1.4 Overall in terms of location the site is well-located for the residential development as proposed.





## 02 Local context

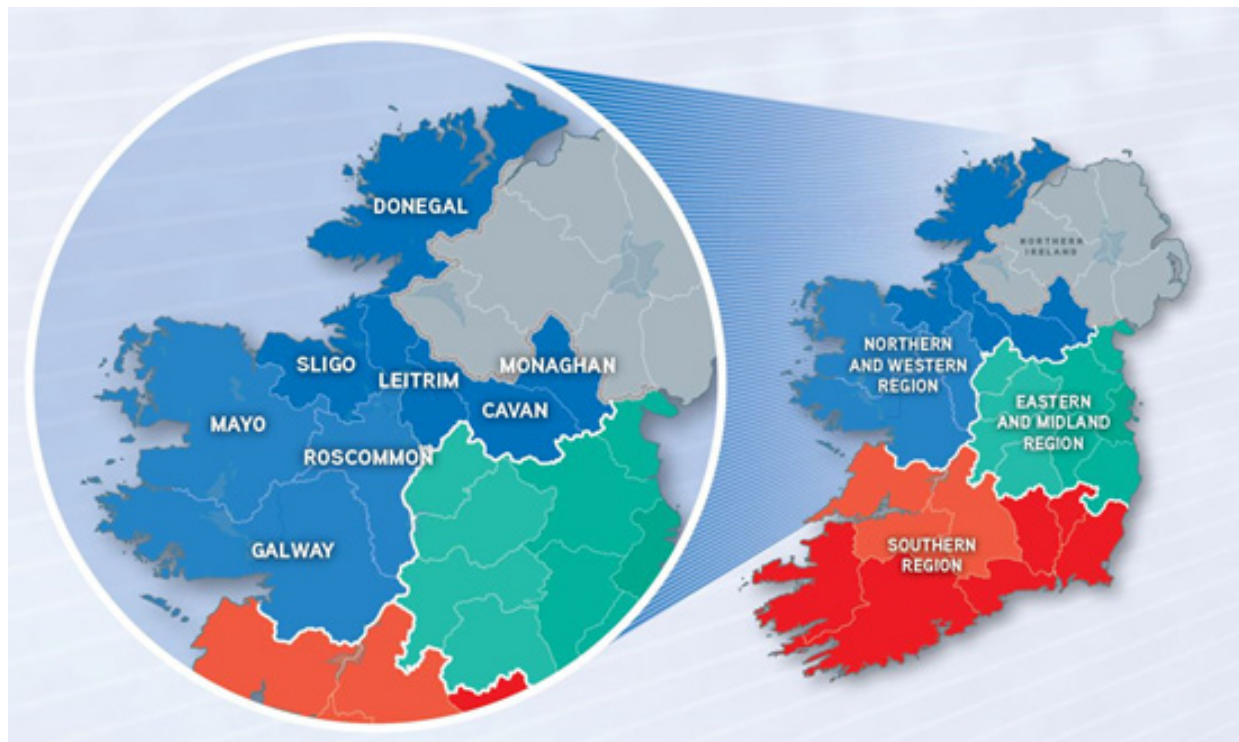
### 2.2 Locational context

2.2.1 Cavan Town is the largest town in the county with a population of 11,741 as per Census 2022.

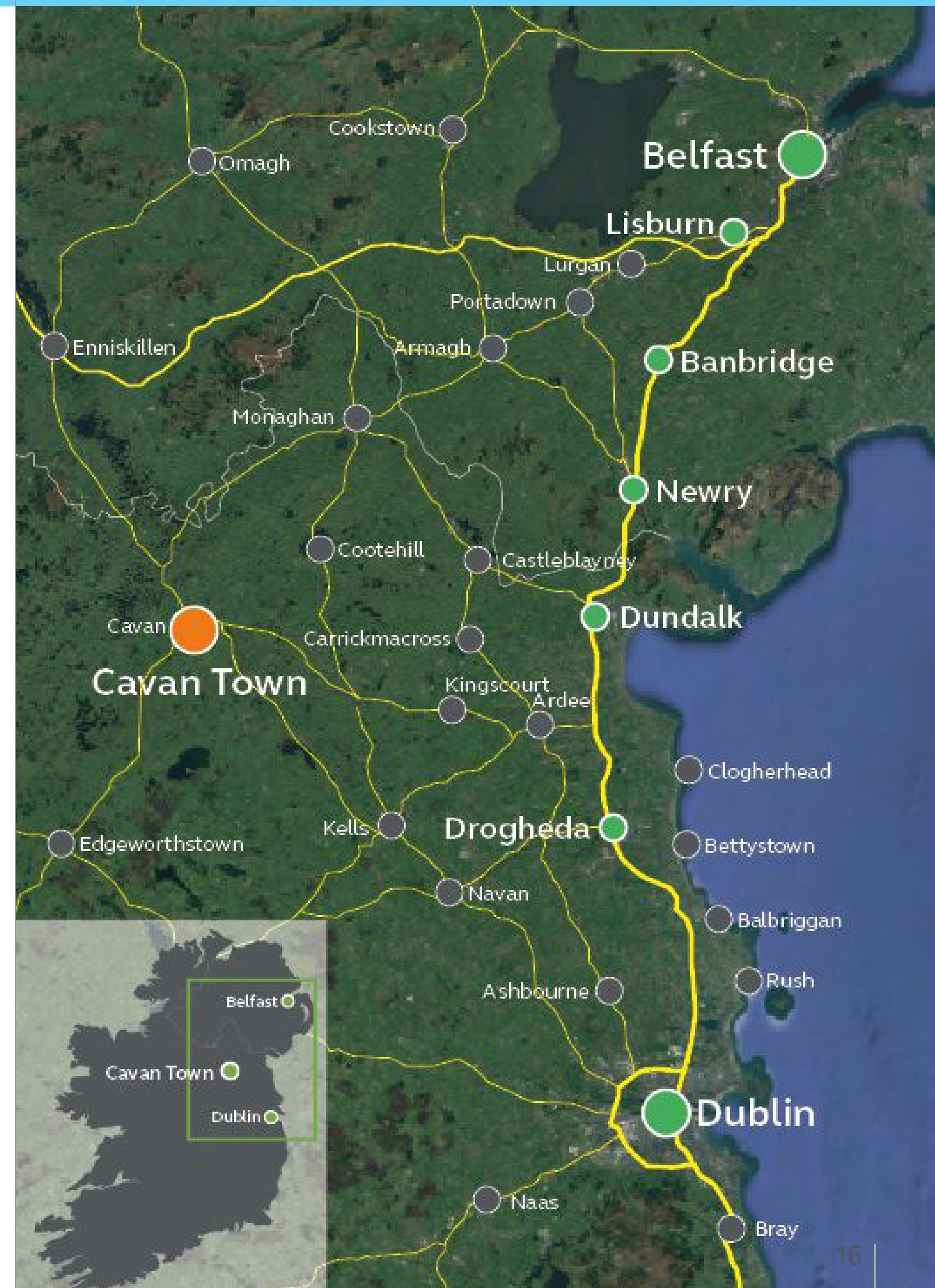
2.2.2 In terms of built context Cavan Town has a strong compact town core with an existing street pattern that lends itself well to further development at the periphery. The retail and service function of the town is mainly confined to the town core.

2.2.3 As set out in section 3.8.4 of the Regional Spatial Economic Strategy Cavan is a key town and future priorities include:

- Promote Cavan Town as an attractive investment location for the County, utilising Cavan County Economic Forum and building upon the towns proven track record as an excellent investment location, which is aided by the IDA business park in the town. Promote the delivery of third level education in the Cavan/Monaghan sub-region, building on the foundations and success of the Cavan Institute.
- Support the delivery of additional economic development lands in Cavan Town recognising the lack of suitably zoned lands.
- Support the actions set out in the Cavan Town Revitalisation Plan including the prioritization of projects having regard to Cavan being listed as an Urban Priority Region by the EPA.



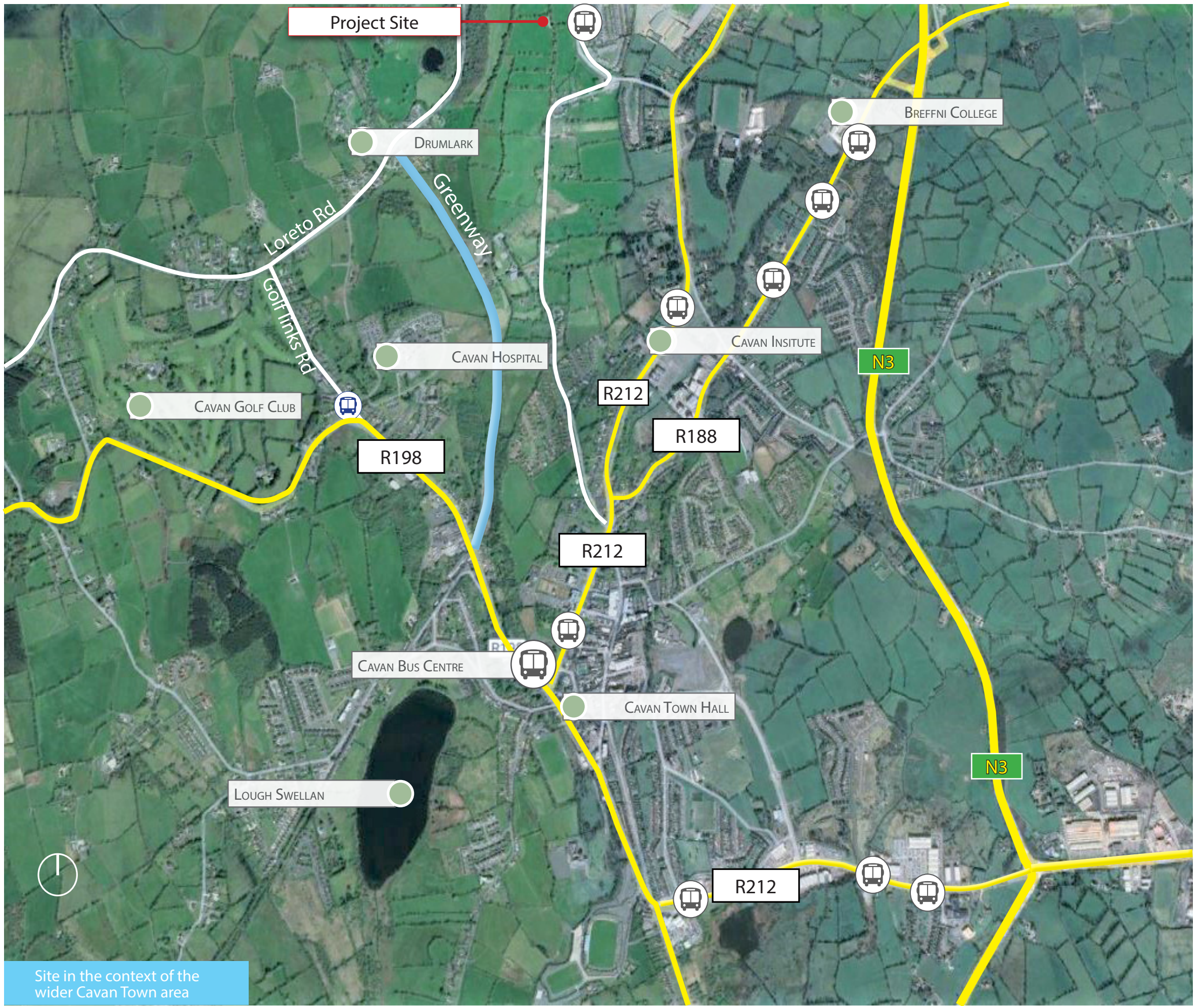
Cavan Town is recognised in the RSES 2018 as a key town





### 2.3 Site Location: Local & Existing Context

- 2.3.1 In terms of the locality the site is located in close proximity to Cavan town centre.
- 2.3.2 Being accessed via the the town centre the site is highly accessible by foot, bicycle and car.
- 2.3.3 Existing footpaths connect the site to the town centre and to nearby leisure and community facilities.
- 2.3.4 Building typology along this road varies from detached dwellings to typical suburban residential schemes.





2.4 Local socio-economic context

- 2.4.1 Cavan Town is the largest town in the county with a population of 11,741. The town has experienced overall growth of 51.4% since the 1996 census.
- 2.4.2 Historically Cavan Town is a market town, a commercial centre and the principal administrative centre for the county, at the junction of the N3 and N55 National Primary Routes. It is recognised as a gateway to and from Northern Ireland and as a pivotal point on the east-west route between Dundalk and Sligo.
- 2.4.3 The economic development and prosperity of this period is reflected in the intact and highly legible urban core of Cavan Town which is emphasised by the historic, architectural, industrial and natural heritage which the town possesses.
- 2.4.4 The post-war period saw the gradual development of low-density residential housing, expansion of which rapidly accelerated during the 1990's and 2000's, facilitated for the most part by the town's accessibility by both road and rail to the wider jobs market.
- 2.4.5 This position has only been reinforced with the opening of the upgraded N3 and the N55 motorway link. Cavan Town also boasts a young demographic profile with a vibrant and growing population, and provides an important local employment base for central county Cavan. Also Cavan Town retains a vital role as a local centre for jobs as well as retail, health and educational services for a wider rural hinterland.
- 2.4.6 In this context the aim of the proposal is to support this development of Cavan Town as a self-sustaining growth town and deliver a residential scheme centred around sustainable movement, high quality public realms and improved pedestrian and cycling access to the town centre.
- 2.4.7 We highlight the NPF recognises the need for towns such as Cavan Town to grow wherein it states:

'To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity.'

'Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.'

Population change

- 2.4.8 To provide an overview for the Planning Authority in terms of local population change and demand for housing this section provides a brief outline of the population growth of the State, the Greater Dublin Area (GDA), Co Cavan and also the settlement of Cavan Town according to the CSO census data.
- 2.4.9 As can be noted from table 2 below the population of County Cavan grew by 54.3% between 1996 and 2022. Also Cavan town grown substantially between 1996-2022, from 2957 in 1996 to 11741 in 2022, representing a population increase of 51.4% during this period.
- 2.4.10 On this basis the population growth experienced both at county level (54.3%), and at a local level in Cavan Town (51.4%) both exceed the growth rate in the state (41.69%) and the GDA (48.2%) during the same period (1996-2022).
- 2.4.11 We submit this historical context is important to note as establishing the long-term context of how Cavan Town has grown.
- 2.4.12 We submit this historical context is important to note in that despite growth of 7.6% between 2016-2022 there has been a severe shortage of new residential developments provided in the last 10 years due to scheme housing not being viable; discussed below.

Census Year	State	Greater Dublin Area	Co. Cavan	Cavan Town & Environs
1996	3,636,087	1,405,1451	52,944	7,757
2002	3,917,203	1,535,446	56,546	8,445
% Change	8.0%	9.2%	6.8%	8.9%
2006	4,239,848	1,662,536	64,003	7,883
% Change	8.2%	8.3%	13.2%	-6.7%
2011	4,588,252	1,804,156	73,183	10,205
% Change	8.2%	8.5%	14.3%	29.5%
2016	4,761,865	1,907,332	76,176	10,914
% Change	3.8%	5.7%	4.1%	6.9%
2022	5,149,139	2,082,605	81704	11,741
% Change	8.1%	9.2%	7.3%	7.6%
Total Change 1996-2022 (%)	41.6%	48.2%	54.3%	51.4%

Table 3 Population change of the State, the Greater Dublin Area, Cavan and Cavan Town & Environs between 1996 and 2022 as derived from the CSO statistics

## 02 Local Context

### 2.4 Local socio-economic context (contd.)

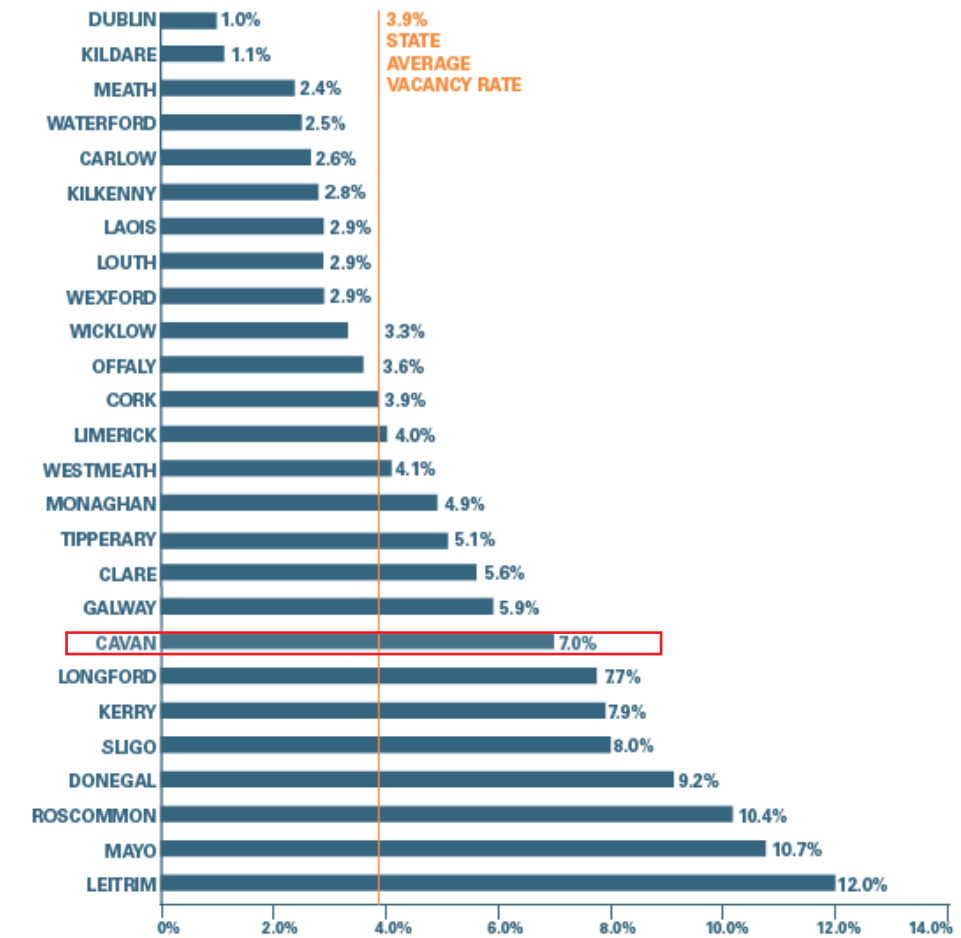
#### Housing market

- 2.4.13 As the Planning Authority will note the housing market in Cavan has shown significant growth in recent years, influenced by its own population, economic growth and also by the overall demands being exerted for housing units both in County Cavan and in the Greater Dublin Area.
- 2.4.14 On review we consider it is reasonable to assume this represents the natural growth of the Cavan population and the ongoing demand to both live within the county.
- 2.4.15 Also as is evident in relevant publications and statistics there remains significant pressure on the housing market in the town, with Cavan being a more affordable and accessible alternative to living in urban areas along the eastern economic corridor.
- 2.4.16 However on review of CSO data for new dwelling completions it is noted that units constructed in recent years within County Cavan still remains low, particularly for apartment unit provision as shown below.

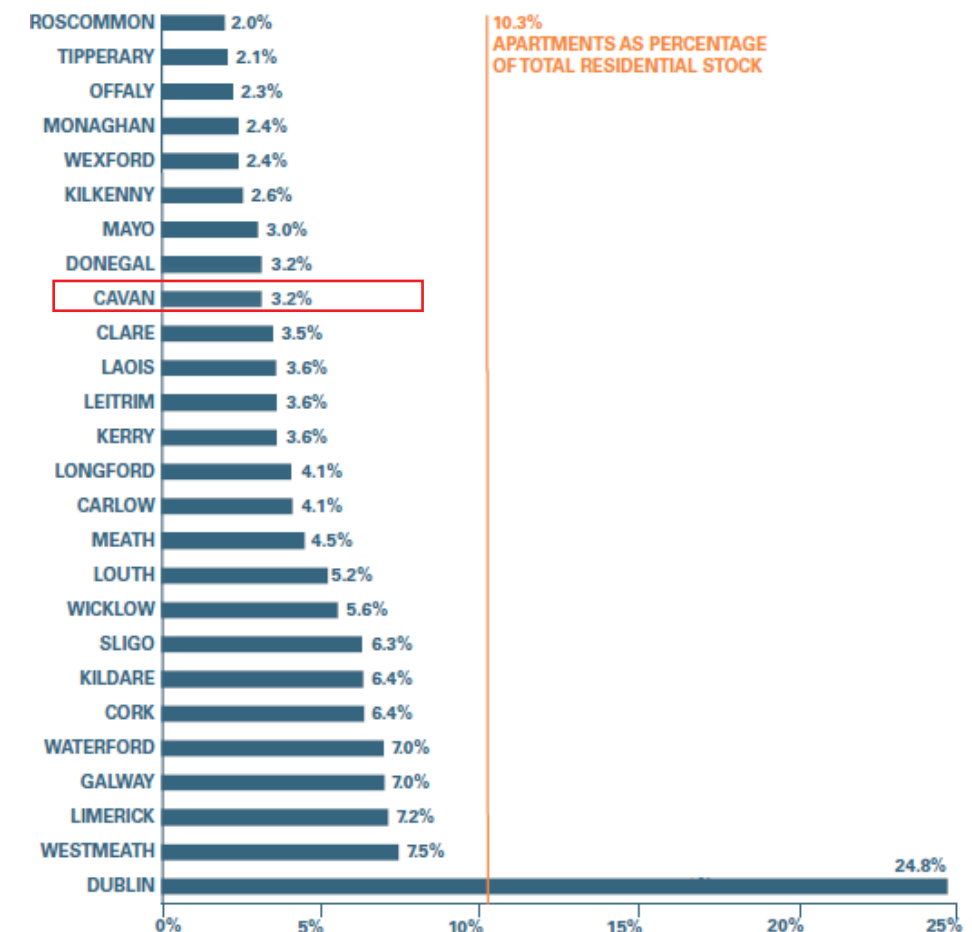
Cavan	2020 Q2	2020 Q3	2020 Q4	2021 Q1	2021 Q2	2021 Q3	2021 Q4	2022 Q1	2022 Q2	2022 Q3	2022 Q4	2023 Q1	2023 Q2	2023 Q3	2023 Q4
Single House	23	41	24	28	41	27	32	27	28	37	25	24	37	34	35
Scheme House	7	18	36	8	13	15	11	18	45	15	36	24	4	57	30
Apartment	0	4	5	9	3	3	1	0	6	5	20	7	4	1	5
Total	30	63	65	45	57	45	44	45	79	57	29	55	45	92	70

Table 4 New dwelling completions in Cavan, Type of Unit and Quarter (source: CSO)

- 2.4.17 Specifically as per table 4 above our analysis finds that only 73 apartments and 351 scheme housing units have been constructed in Cavan County since q1 2020 (at time of writing February 2024). Comparing this against what the Core Strategy under both the current and previous CDP seeks to deliver this is less than 50% per annum of required housing units.
- 2.4.18 We submit this is a low rate of apartments being constructed and not sustainable.
- 2.4.19 In this context we submit this acutely low rate of residential units being delivered in Cavan County as a whole needs addressed, specifically by the planning process delivery strategically well located lands such as the application site which is to be developed in accordance with wider planning objectives.
- 2.4.20 Further our analysis has found that In terms of existing apartment numbers it is noted that apartments form a low overall percentage of the housing mix within the county at only 3.2% of the total residential stock.
- 2.4.21 On the basis of the above it is clear there is a need for more residential units to be provided to accommodate the growing population within County Cavan and in central urban locations such as the project site.



Vacancy rates by County (Source Geodirectory Q4 2023)



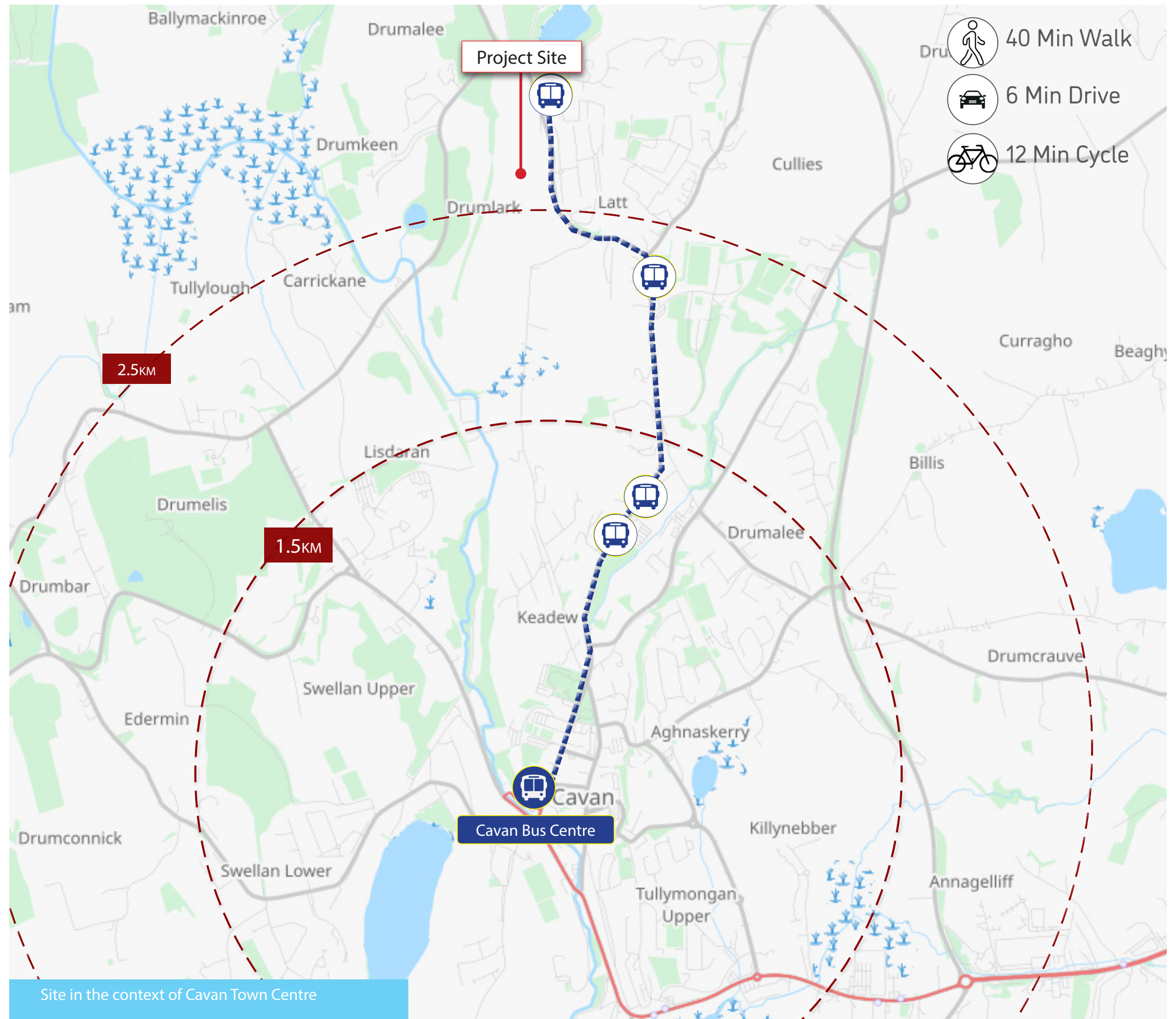
Apartment % by County (Source Geodirectory Q4, 2023)



## 02 Local Context

### 2.5 Rationale for the proposal: Proximity to the town centre and connectivity

- 2.5.1 Also of relevance in terms of connectivity we highlight the site is within walking and cycling distance of Cavan Town centre lands, with the existing road infrastructure providing a designated cycle lane and footpath.
- 2.5.2 We also highlight Cavan Town bus station is only 2.7km from the site.
- 2.5.3 The site can also be served by local bus services passing along the R212 before stopping at William Street in the town centre.
- 2.5.4 As well as local road connections there is good connectivity provided to the wider area by the National road network.
- 2.5.5 Therefore in terms of connectivity to the town centre and wider area the site is strategically located to road, cycle and pedestrian routes all of which provide an ideal location for this residential scheme to promote more sustainable travel modes as part of the growth of the town.





## 02 Local Context

### 2.6 Social & community infrastructure

- 2.6.1 Chapter 4 of the Cavan County Development Plan 2022-2028 sets out the policy basis for the co-ordination of local delivery of community infrastructure and services, whereby the Council will seek the provision of and access to services and facilities to meet the needs of the town's growing population.
- 2.6.2 For reference we detail in this section how the site is well provided for in terms of social and community infrastructure within the town. We submit this existing local context also clearly demonstrates how the proposal is well catered for in terms of social and community infrastructure.
- 2.6.3 As can be noted from the map opposite the proposal will be located in a residential neighbourhood and within a short distance of a wide range of services for future residents. In this context the residential scheme is clearly in a location that is appropriately provided for in terms of social and community infrastructure and the proposal will further support the existing services in the area.
- 2.6.4 Further discussion is also set out in the accompanying Schools and Childcare Assessment.

#### Shopping & Community

- 1 Cavan Town Hall
- 2 Cavan County Council
- 3 St Patricks Cathedral
- 4 Cavan Hospital
- 5 Breffni College
- 6 St Clares Cavan
- 7 Cavan Post Office
- 8 Gaelscoil Bhreifne

#### Sports & Recreation Facilities

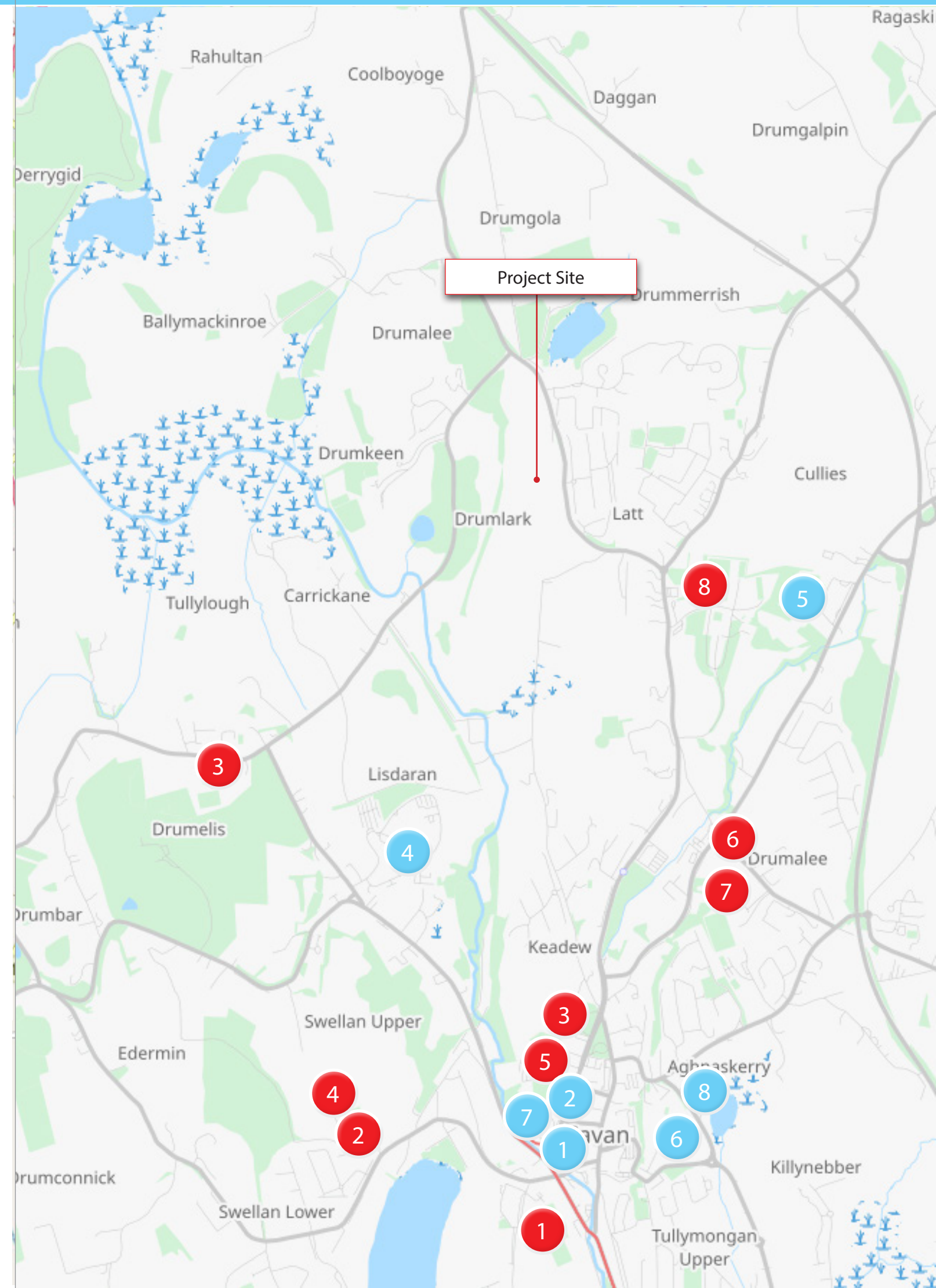
- 1 Cavan Gaels GAA
- 2 Cavan Town Rugby Club
- 3 Cavan Town Golf Club
- 4 Cavan Town Cricket Club
- 5 Cavan Town Tennis Club
- 6 Cavan Town Swimming Pool
- 7 Drumalee GAA Club
- 8 St Patricks Handball

Sample of Social Infrastructure within a 3km radius of the site

### 2.7 Schools and childcare

2.7.1 To demonstrate the proposal is well catered for in terms of existing childcare and schools an audit has also been undertaken by this practice. In summary we have identified a total of 12no. childcare facilities within a 6km radius and 10no. primary and 3no. post primary schools identified within the town. We highlight our assessment demonstrates in summary:

- Childcare/crèche provision: There is adequate childcare provision within the Cavan Town area to cater for the proposed development, as well as any existing surplus demand outside of the site area itself.
- There is adequate capacity in the Cavan Town area going forward to cater for the proposed development in terms of both primary and post primary school provision.

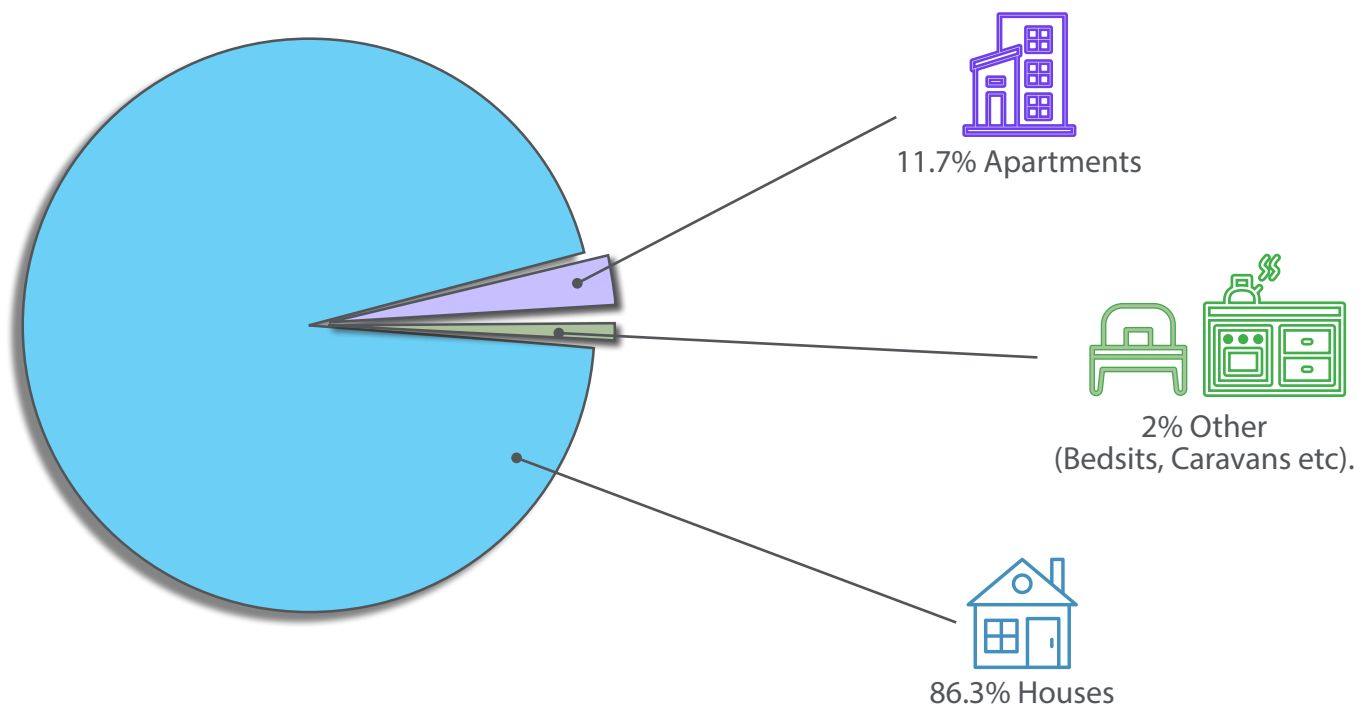




## 02 Local Context

### 2.8 Local residential context

- 2.8.1 On review of housing mix in the area we note the latest CSO data details that in Cavan Town 94.1% are own-door houses, which includes bungalows, terrace dwellings, semi-detached and detached dwellings.
- 2.8.2 This composition of the local housing mix is defined by typically detached dwellings on large plots, with more recent developments in the area also providing for typical outer-suburban residential developments.
- 2.8.3 Having regard to the existing context of the area we note the recently adopted Section 28 Guidelines 'Sustainable Residential Development and Compact Settlements' set out the need for a thorough assessment of site context as a starting point in the design process for any new development. In this policy context an integral part of the design process has involved a thorough analysis of the local environment.
- 2.8.4 In this regard the local context includes existing residential development with densities as low as 5.6 units per hectare (Chanterlands area). In response and in order to meet the context requirements of both the Compact Settlement Guidelines and also respond to relevant policy as per the Apartment Guidelines, which seeks to deliver increased provision of apartment living in urban area, the design approach has been to deliver a balanced residential scheme which is sensitive to the existing context and yet also appropriate in terms of density and overall scale.
- 2.8.5 As we set out in this statement and the accompanying urban design statement the proposed density of 32.6 units per hectare is therefore considered to be an appropriate density for the site and will assist in delivering more apartment units for the Town.



Breakdown of house type mix in Cavan



The Willows




Lake View



Sean Bhóthar



An architectural rendering of a residential development. The scene shows a paved road with white directional arrows pointing towards the viewer. To the left of the road is a concrete sidewalk where a man and a child are walking away from the camera. Further left are several young trees. In the background, there is a row of modern, two-story townhouses with light-colored facades and dark roofs. A white car is parked on the left side of the road, and a dark car is parked on the right. The sky is a clear, bright blue with some light clouds.

## 03 | The proposed development

- 3.1 Layout & design rationale
- 3.2 Proposed accommodation
- 3.3 Open space & landscaping
- 3.4 Height
- 3.5 Materials
- 3.6 Access & parking
- 3.7 Site services
- 3.8 Taking in charge
- 3.9 Part V
- 3.10 Phasing



## 03 The Proposed Development

### 3.1 Layout & design rationale

3.1.1 The layout has been primarily informed by context, policies and objectives as defined in the Cavan County Development Plan 2022-2028 and relevant Section 28 Guidelines. The design rationale includes:

- The context of neighbouring developments already established being respected, whilst also achieving an appropriate increase in density levels.
- A site layout that provides for active frontages incorporating public open space and communal spaces.
- Responding to the constraints within the site in terms of levels/
- Ensuring a buffer zone is retained proximate to the Ringfort.
- The internal road incorporated into the site layout as per DMURS standards.
- A variety of unit types to cater for a range of demographic and household sizes.
- A variety of open space and communal spaces for residents.
- Compliance with the relevant policy requirements.
- Creating a permeable layout, particularly for pedestrians.

3.1.2 The orientation and layout of buildings within the proposed development is also designed to create a balance between scale, active streetscapes and also providing a sense of place.

### 3.2 Proposed accommodation

3.2.1 We refer to the attached statement of housing mix which demonstrates how the mix of units is appropriate to the area in terms of demographic profile.

Description	Number	Percentage
1 Bed Units (Apartments)	15	10%
2 Bed Unit (Apartments & Dwellings)	64	44%
3 Bed Unit (Dwellings)	55	38%
4 Bed Unit (Dwellings)	11	8%
<b>Total</b>	<b>145</b>	<b>100%</b>

Table 4 Unit mix summary

3.2.2 All apartment units have been designed to fully accord with the guidelines 'Sustainable Urban Housing: Design Standards for New Apartments' (2020-2023) with housing units designed to comply with the Quality Housing for Sustainable Communities Guidelines.

3.2.3 Also the majority of apartment units have been designed to incorporate a minimum 10% uplift in minimum floor areas as specified under the Guidelines. We refer to the accompanying Housing Quality Assessment for reference.



Extract from proposed site layout



## 03 The Proposed Development

### 3.3 Open space & landscaping

- 3.3.1 Detailed consideration has been given to the provision of communal open spaces and landscaping treatments within the development. The landscaping master plan for the site has incorporated a number of different landscaped areas, such as courtyards, play areas and walkways.
- 3.3.2 The proposed landscaping significantly enhances the overall quality of the site, improving the natural environment. In terms of particulars we highlight:
- Public open space provided across the site along with play areas.
  - Provision of passive and active recreational spaces.
  - Provision of a hierarchy of connections with associated pedestrian links throughout the site.
  - Provision of landscaped belts/privacy areas at various intervals to ensure excessive hard landscaping works are avoided.
  - A detailed landscape plan has been prepared and details of how the site is utilised in terms of communal space provision, landscaping and planting.
  - Overall the open space areas will benefit from passive surveillance from the surrounding dwellings with the layouts designed to provide a series of social spaces/meeting points for residents.
  - Landscape treatments also increase permeability of the development, providing residents alternative travel routes within the site.



### 3.4 Height

- 3.4.1 In terms of how the proposed height(s) appear relative to the context we highlight the prevailing height in the area is typically suburban; ranging from one-three storey buildings.
- 3.4.2 In respect of the proposal building heights are one to three storeys. The height and massing of the development has been given careful consideration and is considered appropriate having regard to the site's urban location whilst also respecting the local context.
- 3.4.3 Careful consideration has been given to the scale, bulk, massing and siting of the residential units. This design approach now also ensures a reduced level of engineering and site works required to accommodate the development.

### 3.5 Materials

- 3.5.1 A variety of materials are proposed within the development to provide visual interest and to create a distinct sense of place. The overall aesthetic concept is one of coherence and quality, balancing integration with the surrounding context and also providing for a unique and modern identity.
- 3.5.2 We refer to accompanying drawings prepared by Michael Fitzpatrick Architects which detail proposed elevations and finishes.

### 3.6 Access & parking

- 3.6.1 As with any suburban location it is appropriate for a restriction on car parking to be provided, in accordance with both the Cavan CDP and the Apartment Guidelines.
- 3.6.2 In summary 2 spaces per dwelling are proposed, 1 space per duplex apartment and provision made for 1 visitor space per 4.5 apartment units. The creche is also to be provided with 6 car parking spaces and a drop-off layby. Given the suburban location and the nature of the development as a residential scheme then the proposed car parking provision is appropriate in this instance.
- 3.6.3 The proposed development will also provide for bicycle storage spaces along with designated storage bays. It is submitted that the level of bicycle storage provided is sufficient to serve the proposed development. Local journeys will be encouraged to be under-taken via walking or cycling where practical with all units incorporating or having immediate access to storage space for bicycles.
- 3.6.4 With several bus stops located adjacent to the site then appropriate pedestrian connections within the site will ensure use is made of the public transport as available.
- 3.6.5 Further discussion on the parking rationale is set out in sections 4 & 5 of this statement below.



## 03 The Proposed Development

### 3.7 Site services

3.7.1 The site is to be serviced via the existing Irish Water foul and water networks which pass along the site frontage. Further details regarding site services are provided in a separate report by Alan Traynor Consulting Engineers. Irish Water have also confirmed via a pre-connection inquiry that they have no objections to connections being made to serve the proposed development.

### 3.8 Taking in charge

3.8.1 In accordance with taking in charge procedures in Cavan the development has been designed in such a manner as to allow for same. A condition pertaining to same is considered acceptable providing for specific agreements with the Planning Authority prior to occupation of any units within the site.

3.8.2 For reference we refer to the accompanying drawing sheet 508 by MF Architects which sets out this specific layout. Going forward we submit this can be addressed by planning condition and subsequent agreement with the Planning Authority.

### 3.9 Part V

3.9.1 Section 96(3) of the Act sets out the 5 types of part V agreements that may be made.

- i. Transfer to the ownership of the local authority of a part or parts of the lands.
- ii. Build and transfer to the ownership of the local authority, or persons nominated by the authority, of a number of housing units on the site.
- iii. Transfer to the ownership of the local authority, or persons nominated by the authority, of housing units on any other land in the functional area of the local authority.
- iv. Grant a lease of housing units to the local authority, either on the site subject to the planning application or on any other land within the functional area of the local authority.
- v. A combination of the transfer of the ownership of land under paragraph (a) of section 96(3) and one or more of the options of section 96(3).

3.9.2 In addition to the above Section 3 of the Housing Circular 28/2021 on Affordable Housing Section 2021- Amendments to Part V of the Planning and Development Act 2000 states that:

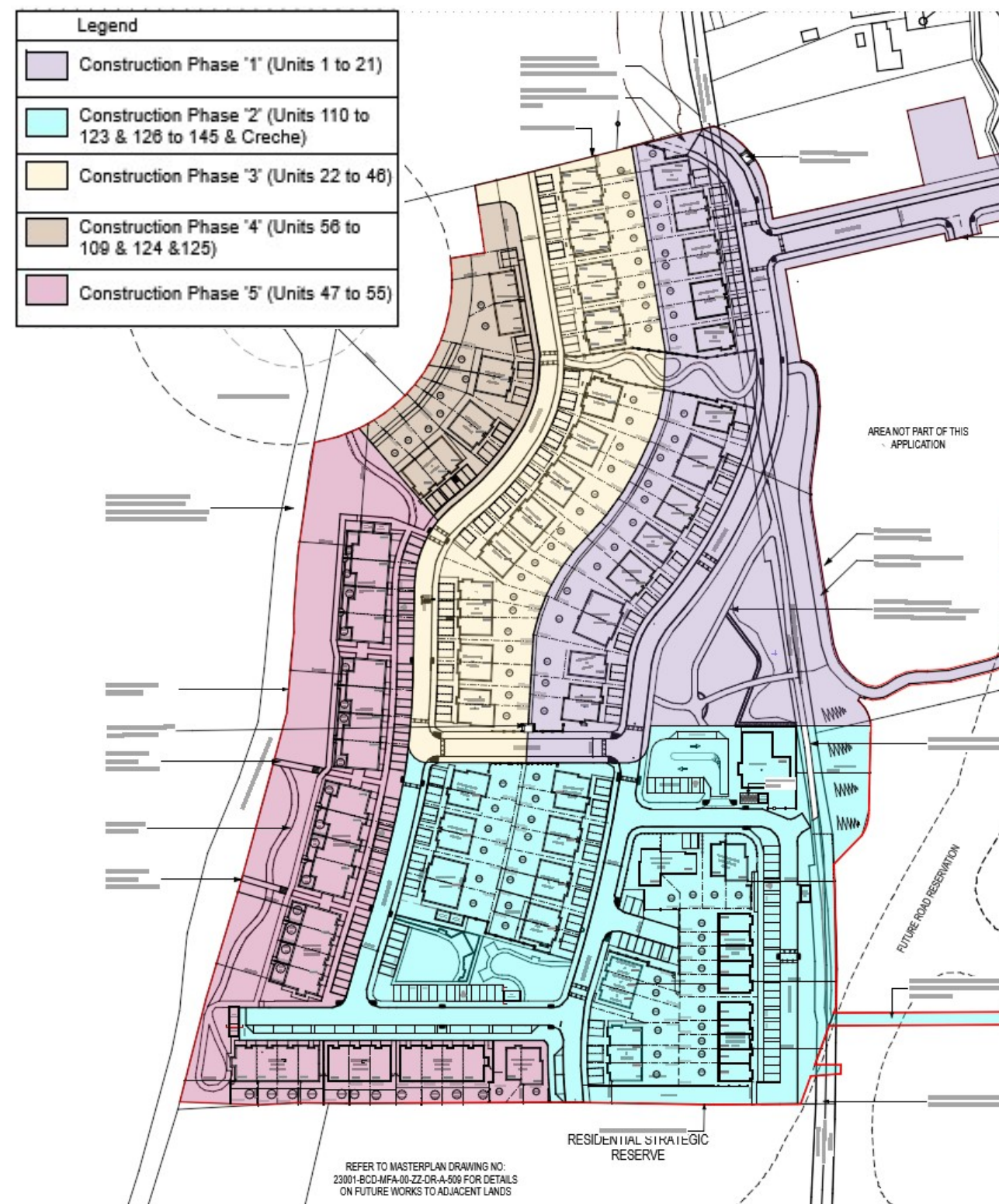
'The increase in the Part V contribution from 'up to 10% for social housing purposes to a mandatory 20%, of which at least half must be for social housing purposes and the balance can be applied to affordable and/or cost rental housing purposes, will immediately affect only new grants of planning permission in respect of sites purchased before 1st September 2015 or after 31st July 2021.'

3.9.3 In summary the lands were acquired within the above dates therefore a 10% contribution is required for Part V compliance.

3.9.4 In response the proposed development will provide for 10% of units (15 units under part V). It is proposed the 15 units will be provided as 'build and transfer' as shown on the attached drawings. This can be addressed by planning condition.

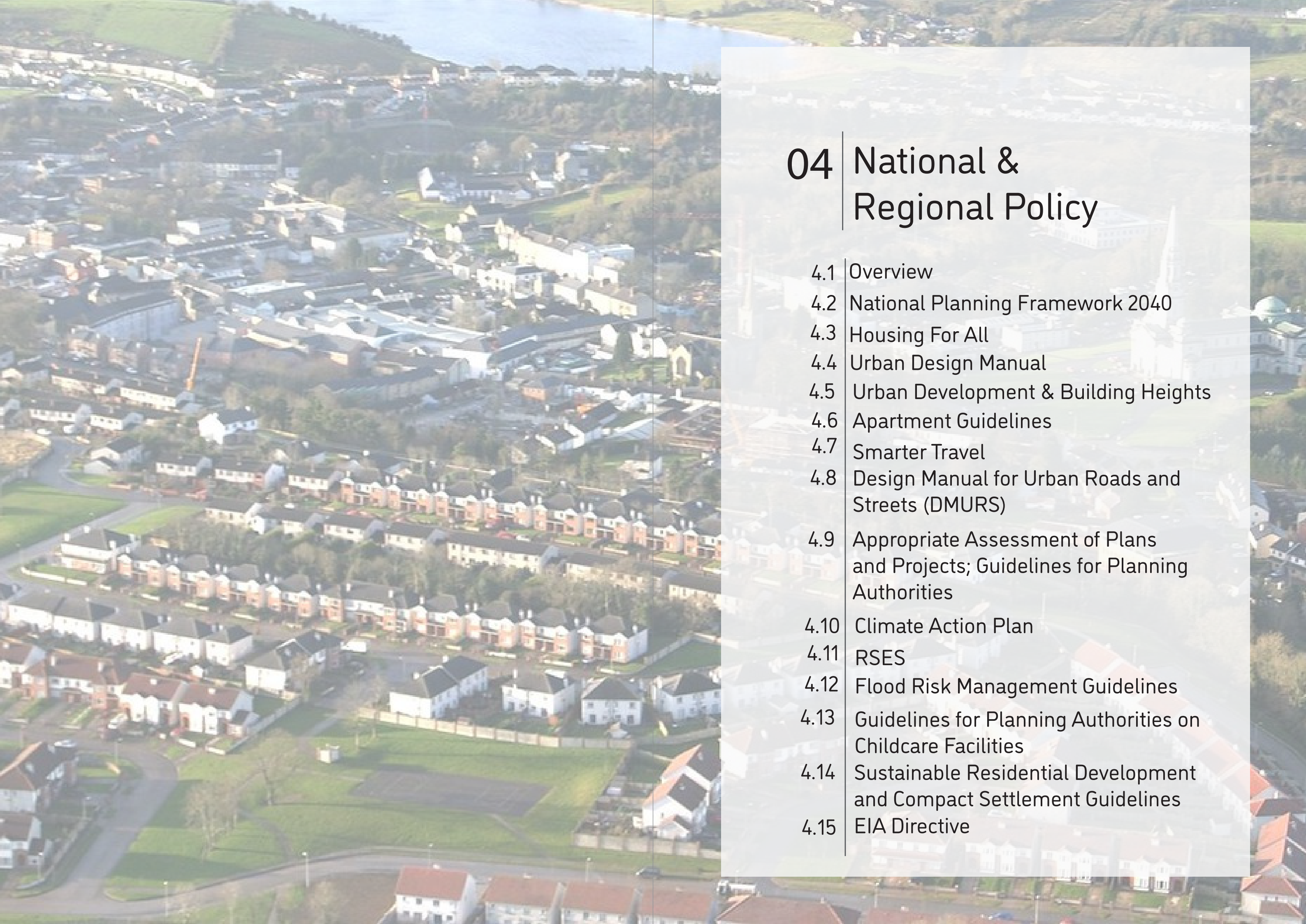
### 3.10 Phasing

3.10.1 The proposed development will be carried out in 5no. phases as per the accompanying phasing drawing by MF Architects. The phasing approach will ensure completion of car parking and open space/site works in totality prior to the occupancy of the development.



Extract from proposed phasing plan





## 04 National & Regional Policy

- 4.1 Overview
- 4.2 National Planning Framework 2040
- 4.3 Housing For All
- 4.4 Urban Design Manual
- 4.5 Urban Development & Building Heights
- 4.6 Apartment Guidelines
- 4.7 Smarter Travel
- 4.8 Design Manual for Urban Roads and Streets (DMURS)
- 4.9 Appropriate Assessment of Plans and Projects; Guidelines for Planning Authorities
- 4.10 Climate Action Plan
- 4.11 RSES
- 4.12 Flood Risk Management Guidelines
- 4.13 Guidelines for Planning Authorities on Childcare Facilities
- 4.14 Sustainable Residential Development and Compact Settlement Guidelines
- 4.15 EIA Directive



## 04 National & Regional Policy

### 4 National & Regional Policy Context

#### 4.1 Overview

4.1.1 The key planning policy, section 28 guidelines and regional planning policy relative to the proposal are as follows:

- National Planning Framework 2040
- Housing for All
- Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities
- Urban Design Manual
- Urban Development and Building Heights
- Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2020-2023
- Smarter Travel - A Sustainable Transport Future
- Design Manual for Urban Roads and Streets
- Flood Risk Management Guidelines
- Habitats Directive – Appropriate Assessment
- Climate Action Plan
- Regional and Spatial Strategy for the Northern and Western Region

#### 4.2 National Planning Framework 2040

4.2.1 The National Planning Framework 2040 sets out the importance of development within existing urban areas and sets out strategic objectives which Planning Authorities are to have regard to.

For reference we highlight a number of objectives contained within the NPF which specifically relate to Cavan Town such as:

- Objective 3a 'To deliver at least 40% of all homes Nationally within the built-up footprint of existing urban settlements.'
- Objective 3c 'Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.'
- Objective 4 states to 'ensure the creation of attractive, livable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well being.'
- Objective 5 'To develop cities and towns of sufficient scale and quality to compete internationally and be drivers of national and regional growth, investment and prosperity.'
- Objective 6 'Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.'
- Objective 7 'Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities'; and

'Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth' and

'In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.'

- Objective 18a states 'To support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.'
- Objective 30 states 'Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.'
- Objective 35 states 'Increase residential density in settlements through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.'

4.2.5 In response we submit that the proposal in a growth town is wholly consistent with the strategy and objectives as set out in the NPF to increase residential development at appropriate locations, within the settlement boundary and proximate to the town centre of Cavan Town.

#### 4.3 Housing For All

4.3.1 Housing For All was launched in 2021 with the objective that everybody should have access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard and located close to essential services, offering a high quality of life.

4.3.2 Housing for All is set around 4 no. pillars of proposed actions summarised as follows:

- Increasing New Housing Supply
- Addressing vacancy and efficient use of existing stock
- Supporting home ownership and increasing affordability
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion

4.3.3 In response we submit the proposed development is consistent with pillars 1-4 above in that it will improve the supply of residential units for Cavan town in a sustainable manner.



## 04 National & Regional Policy

### 4.4 Urban Design Manual

4.4.1 The manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications. The 12 no. criteria are assessed as set out below.

#### Context: How does the development respond to it's surroundings?

4.4.2 The subject site is a suburban site located within an existing residential urban area and in close proximity to a number of public transport nodes. The proposed development has been designed to respond to the existing character of the area and the specific site constraints. A variety of building types are proposed with an emphasis on creating active frontages and streetscapes.

4.4.3 Further the proposed height and form of the overall development relates to the existing urban context in a positive manner stepping down in height at appropriate locations to make a more appropriate transition to the site.

4.4.4 In terms of architectural detailing the layout of the proposal links the streets and spaces through the architectural design and landscaping of the development. The development also provides for suitable separation distances and provides appropriate boundary treatments to protect the landscape character of the area.

4.4.5 Also the development will be finished in materials of a high quality design to ensure it represents it's own character while at the same time integrates with the existing local character of the area.

#### Connections: How well is the new neighbourhood / site connected?

4.4.6 The layout of the development will also provide for several connection points. The internal network of the development will consist of a series of internal roads, shared surfaces, footpaths and cycle routes which will connect the proposal with the surrounding area.

4.4.7 Overall the proposed development will open up the site in terms of accessibility and connectivity within the area and will increase permeability.

#### Inclusivity: How easily can people use and access the development?

4.4.8 The proposal will include for a new purpose-built access off L1532 which will include pedestrian and cycle linkage to connect with the wider area. The internal road network will provide for a clear route throughout the development with a series of cycle paths (on-street) and footpaths to increase the overall level of connectivity and permeability for future residents.

4.4.9 Furthermore all communal areas and dwelling units are designed to be accessible to all.

#### Variety: How does the development promote a good mix of activities?

4.4.10 The proposed development provides for a sustainable mix of residential types which will attract a range of occupants of different life cycle stages.

#### Efficiency: How does the development make appropriate use of resources, including land?

4.4.11 The proposed development is a suburban site in an existing urban area. The proposed density of the site is 32.6 units per hectare makes efficient use of these valuable zoned lands and includes an appropriate quantum of public open space and connectivity to the existing high quality public transport network. The proposed density is therefore considered appropriate due to the context of the site.

4.4.12 The overall architectural style is contemporary and reflects the modern requirements to balance design with the need to satisfy energy reducing objectives.

#### Layout- How does the proposal create people friendly streets and spaces?

4.4.13 Response: DMURS sets out 4no. core design principles which designers must have regard to in the design of roads and streets. These four core principals are summarised as:

- Design Principle 1: Connected networks
- Design Principle 2: Multi-functional streets
- Design principle 3: Pedestrian focus
- Design principle 4: Multi-disciplinary approach

4.4.14 Overall the existing site layout encourages permeability through appropriate block sizes and given the layout proposes no alteration to the site layout and the wider permeability we submit the design principles of DMURS are complied with.

#### Public Realm- How safe, secure and enjoyable are the public areas?

4.4.15 Response: The layout and design has taken into account security and passive surveillance, providing a high level of passive surveillance over the internal streets and the public open space. The design of the dwellings provide direct frontage onto all public and private spaces creating a safe, secure and enjoyable residential development. The site is relatively flat and designed to accommodate easy circulation and uses. An accessible platform lift has also been provided adjacent to the public right of way to the north of the building to act as an inclusive design measure.

#### Adaptability- How will the buildings cope with change?

4.4.16 Response: Each of the proposed units meet or exceed the minimum standards for residential unit size; along with this the development provides a mix of dwelling types to allow residents choice and adaptability in the future.

4.4.17 The architectural style is contemporary and reflects the modern requirements to balance daylight, elevations with the need to satisfy energy reducing objectives.

#### Privacy/Amenity: How do the buildings provide a high quality amenity?

4.4.18 Each residential unit is provided with an area of usable private open space in the form of either a terrace, balcony or private garden area all of which meet or exceed the relevant standards. In terms of internal floor area(s) and configurations all of the units meet or exceed the relevant unit size requirements.

#### Parking: How will the parking be secure and attractive?

4.4.19 All vehicle parking will benefit from passive surveillance and appropriately designed with a balance of hard and soft landscaping works to ensure the streetscape is not dominated by parked vehicles.

#### Detailed design: How well thought through is the building and landscape design?

4.4.20 Given the subject site's current vacant condition and the well-considered design the proposal represents a significant positive impact on the existing local environment. The proposed open spaces, play areas and the public permeability designed into it offer significant benefits for the broader area as well as for the proposal.



### 4.5 Urban Development and Building Heights (2018)

4.5.1 The guidelines put in place a presumption in favour of high buildings at locations with good public transport services, subject to design specifics.

4.5.2 In relation to redevelopment and enhancement of urban areas the guidelines state that:

'to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation terms of reusing previously developed 'brownfield land', building up urban infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements.'

4.5.3 The guidelines also place significant emphasis on promoting development within the existing urban footprint utilising the existing sustainable mobility corridors and networks. They state:

'On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.'

4.5.4 Of relevance is SPPR 4 which states:

'SPPR 4: It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;
2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and
3. Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.'

4.5.5 In response we submit the proposed building heights are an appropriate design response as envisaged under the guidelines for this inner urban location.

4.5.6 In this policy context the design rationale incorporated into the design is for the development incorporating building heights up to 3no. storeys. On this basis we submit the design will be fully consistent with the approach envisaged under the guidelines for a suburban location.



Internal streetscape CGI's



### 4.5 Urban Development and Building Heights Contd.

4.5.7 Consideration of Criteria under section 3.2 of the Building Height Guidelines is set out below.

- Criteria 1: The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.

4.5.8 Response: The site is located within walking distance of the Town Centre and acceptable in locational terms. A bus stop is proposed that will serve the development going forward.

- Criteria 2: Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

4.5.9 Response: It has been detailed in the accompanying design statement how the development will be assimilated into it's surrounding context.

- Criteria 3: On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

4.5.10 Response: The existing site sets the context for assessment. Overall the layout has been designed to create active street frontages, thereby creating significant public spaces for the future patrons/ residents to utilise.

- Criteria 4: The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.

4.5.11 Response: The development occupies a strategic location in the area and will provide an active frontage that will address the surrounding streetscape.

- Criteria 5: The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.

4.5.12 Response: The proposal incorporates an appropriate balance of scale, form and height to result in a high architectural palette of materials which is kept simple and clear so as to create order between the elements and to have a connection to its context. As per the Design Statement enclosed the design approach works carefully with the grain of the streetscape, with it's new elevations engendering a strong sense of depth and rhythm.

- Criteria 6: The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).

4.5.13 Response: A Flood Risk Assessment is enclosed which concludes the development is not at risk of flooding. Also the urban design provides for public spaces and key thoroughfares.

- Criteria 7: The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.

4.5.14 Response: The proposal will encourage connectivity and permeability through the site for the residents and the wider public and will create a sense of place.

- Criteria 8: The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

4.5.15 Response: The proposed mix of units has been designed having regard to the Cavan CDP and Apartment Guidelines to provide a range of unit sizes to meet the housing needs for a range of people.

- Criteria 9: The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.

- Criteria 10: Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.

- Criteria 11: Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

4.5.16 Response: Again the existing site sets the context. The design team have developed the current scheme having regard to natural daylight, ventilation and views. A detailed Daylight, Sunlight and Shadow analysis has been prepared and is enclosed under separate cover.

4.5.17 In response we submit the proposed building heights are an appropriate design response as envisaged under the guidelines for this outer-suburban location.

4.5.18 The design rationale incorporated into the layout along via the apartment blocks is for increased building heights up to 3no. storeys. In summary the design will be consistent with the approach envisaged under the guidelines for such a suburban location.



### 4.6 Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities (2020 - 2023)

- 4.6.1 The Design Standards for New Apartments provide for updated guidance on apartment developments in response to the National Planning Framework and Rebuilding Ireland.
- 4.6.2 As set out under the Ministers Foreword:  
'Apartments are a key and growing part of the way in which we live in various parts of our country and particularly in our cities and towns.'
- 4.6.3 Also paragraph 1.8 of the guidelines state:  
'It is therefore critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts both the investment and the seeking out of this crucial form of housing by households, that will then result in greater delivery of apartments in Ireland's cities and towns and other appropriate locations.'
- 4.6.4 Further we highlight section 2 of the guidelines which set out the clear context in terms of where apartment are appropriate in terms of location:  
  1. Central and/or accessible urban locations
  2. Intermediate urban locations
  3. Peripheral and/or less accessible urban locations
- 4.6.5 We also highlight paragraph 2.5 which states:  
'Accordingly apartments may be considered as part of a housing mix of housing types in a given housing development at any urban location, including suburbs, towns and villages.'
- 4.6.6 Also of relevance in this regard we highlight as per paragraph 1.20 - 1.21 of the Guidelines wherein it states:  
'Planning authorities and An Bord Pleanála are required to have regard to the guidelines and are also required to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions.  
  
Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements.'
- 4.6.7 In response to this clear policy context of the apartment guidelines, the central location within Cavan town and the low volume of apartments constructed across the county in recent years we submit the scheme as proposed is a wholly appropriate location for the apartment-led development as proposed.
- 4.6.8 In respect of Specific Planning Policy Requirements (SPPR's) set out in the guidelines we set out below relevant extracts and our responses.

- 4.6.9 SPPR1 Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.
- 4.6.10 SPPR2 For all refurbishment schemes on sites of any size, or urban infill on sites of up to 0.25ha:  
  - i. Where up to 9no. residential units are proposed, notwithstanding SPPR1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio type units;
  - ii. Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9no. units may be carried forward and the parameters set out in SPPR1, shall apply from the 10th residential unit to the 49th.
  - iii. For schemes of 50 or more units, SPPR2 shall apply to the entire development.
- Response(s)
- 4.6.11 The provisions of SPPR2 are applicable for 50 or more units in terms of unit mix. Specifically in terms of apartment units proposed we highlight:  
  - 15no. 1 bed units are proposed (28%).
  - 39no. 2 bed units are proposed (72%).
- 4.6.12 On this basis the requirements of SPPR 1 & 2 are complied with.
- 4.6.13 SPPR3 Sets out minimum floor areas for apartments.  
Response:
- 4.6.14 We refer to the accompanying housing quality assessment which demonstrates how all units proposed comply with the relevant standards, with the majority also complying with a 10% uplift in floor areas.
- 4.6.15 SPPR4 In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme.  
Response
- 4.6.16 Out of the 54 apartment units proposed are dual aspect; SPPR4 is complied with.
- 4.6.17 SPPR5 Ground level apartment floor to ceiling heights shall generally be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.
- 4.6.18 In response the proposal complies with SPPR5.



## 04 National & Regional Policy

### Private Amenity Space

4.6.19 Appendix 1 of the apartment guidelines set out the standards for private amenity space in the form of balconies/terraces, these are set-out below

#### Response

4.6.20 The private amenity spaces for the proposed apartments will meet the required standards as set out in Appendix 1 of the apartment guidelines. We again refer to the accompanying housing quality assessment.

Description	Minimum Requirement (per unit)	Description	Minimum Requirement (per unit)
One-Bed (2 person)	5sqm	Two-Bed (4 person)	7sqm
Two-Bed (3 person)	6qsm	Three-Bed (5person +)	9qsm

### Communal Facilities in Apartments

4.6.21 The minimum communal amenity space standards to be achieved for apartments are set also set out in Appendix 1 of the guidelines; see below

4.6.22 In summary we submit the proposed design accords with above policy requirements of the apartment guidelines and a generous provision of communal and public open space for residents is proposed.

Proposed Apartment Type (person)	No.	Communal area required (per unit)	Communal areas provided
One-Bed	15	15 x 5sqm: 75sqm	530.3sq.m communal space for apartment residents and 7995sq.m public open space
Two-bed (3 person)	39	39 x 6sq.m: 234sq.m	
Two bed (4 person)	0	0 x 7sq.m: 273sq.m	
Three bed (5 person +)	0	0 x 9sq.m: 0sq.m	
Totals	54	309sq.m	

Tables 6 & 7 Communal space provision

### Location and Car Parking

4.6.23 Leading on from the above SPPR overview we highlight a key inclusion in the Apartment Guidelines is a key policy change under sections 4.18 & 4.19 wherein it states:

'The quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria.'

'In larger scale and higher density development, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.'

4.6.24 In terms of parking provision and location we submit the location is to be regarded as a 'central urban location'. In this regard paragraph 4.21 of the guidelines is particularly relevant and states:

'In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such as rail and bus stations in close proximity.'

4.6.25 In this context the proposal is to minimise car parking provision and encourage modal shift. We consider this to be an acceptable scenario for the above policies to be applied on several grounds:

- It is consistent with the policy context set by the Apartment Guidelines, which take policy precedence over any local planning policy;
- It achieves urban regeneration & consolidation in accordance with objective 13 of the NPF which states:

'In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.'

- It avoids over-provision of car parking at pedestrian level which often detracts from the urban streetscape environment in design terms.

4.6.26 Therefore in terms of location the proposal incorporates parking at a rate of 1 per apartment, along with provision for visitors at a rate of 1 per 4.5 units we submit the parking provision is consistent with the apartment guidelines and location policy. We refer to section 5.3 of this statement for further discussion.

### Waste storage

4.6.27 We refer to the attached site layout plan prepared by Michael Fitzpatrick Architects and the Operational Waste Management Plan by this practice which details how bin storage areas are to be provided for each apartment unit. In summary we submit the storage areas proposed for duplex apartments is appropriate.

### Bicycle storage

4.6.28 We highlight the provision of a designated bicycle storage area at surface level. These storage areas are readily accessible both from street level and for all apartment residents.

4.6.29 Maintenance of the bicycle storage area will be the responsibility of the management company, and a planning condition relating to same can be attached as per section 6.14 of the apartment guidelines and as required under the MUDS Act.



## 04 National & Regional Policy

### Daylight provision

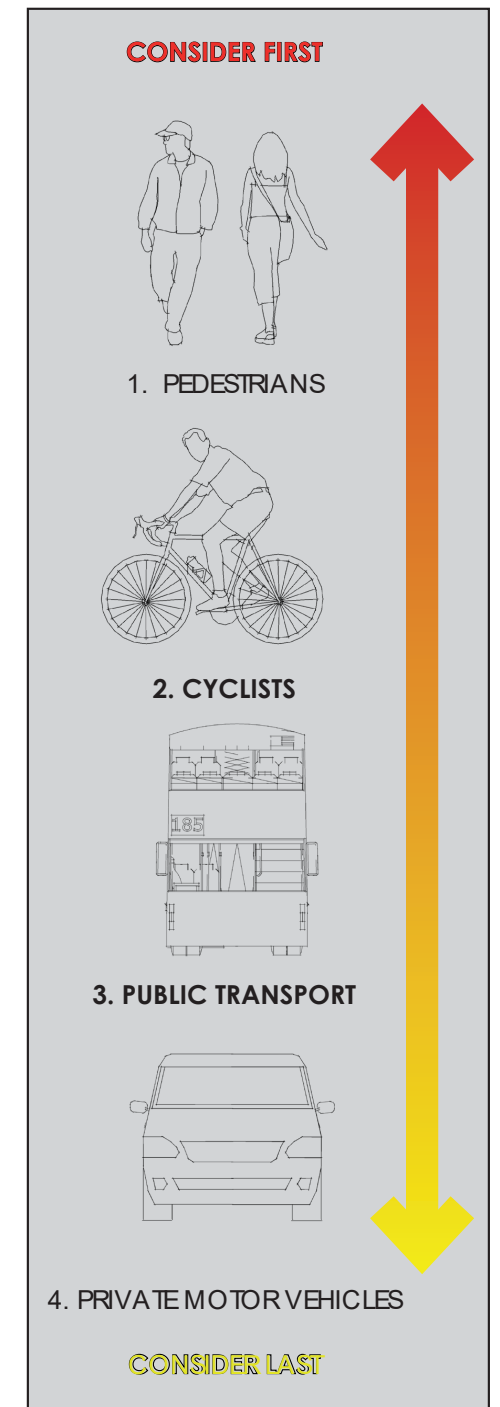
- 4.6.30 Also in terms of daylight requirements all apartments have been designed to meet relevant BRE Guideline Standards. We refer to the accompanying Daylight assessment by Chris Shackleton for more discussion and which also assesses the proposal in the context of communal, private and public open spaces.
- 4.6.31 Given the daylight analysis demonstrates apartment units and open spaces (public and private) will perform satisfactorily on daylight then compensatory measures as per rSection 6.7 of the Apartment Guidelines are not required.

### 4.7 Smarter Travel - A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020

- 4.7.1 The Government has committed in 'Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020' to reducing the total share of car commuting from 65% to 45%, a rise in non-car trips by 55% and that the total vehicle miles travelled by the car fleet will not increase. The key targets are as follows:
- Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services.
  - 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%.
  - Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work.
  - The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels.
  - A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.
- 4.7.2 Key to achievement of these targets is better alignment between land use and transport to minimise travel demand.
- 4.7.3 Given the subject site is located within close proximity Cavan town and public transport nodes the principle of the scheme with a density of 32.6 units per hectare in this location is in accordance with the principles set down in Smarter Travel. Also the provision of connections to the footpath and cycle network will assist in achieving sustainable travel modes for local journeys.

### 4.8 Design Manual for Urban Roads and Streets (DMURS)

- 4.8.1 We submit the principal design guidance of DMURS has been incorporated into the proposal. DMURS sets out 4no. core design principles which designers must have regard to in the design of roads and streets. These four core principals are summarised as:
- Design principle 1: Connected networks
  - Design principle 2: Multi functional streets
  - Design principle 3: Pedestrian focus
  - Design principle 4: Multi-disciplinary approach
- 4.8.2 In response we highlight:
- A street hierarchy within the site based on context, linkages, vehicle and pedestrian movement, desire lines and proposed layouts.
  - The provision of pedestrian linkages at intervals to ensure ease of access for pedestrians to other areas within and around the site.
  - A 'pedestrian focus' is incorporated into the layout via provision of a new pedestrian footpath within the site.
  - Pedestrian links to open space and landscaped areas.
  - Provision of adequate street furniture & street lighting throughout.
  - The provision of a raised courtesy strips.
  - The use of contrasting materials between pedestrian and vehicular routes.
  - Entrance corner radii of 3 metres within the site to reduce traffic speeds.
  - The avoidance of long road sections to limit internal traffic speeds; also courtesy strips at appropriate intervals.
  - Provision of bicycle storage space at street level to encourage use of public transport/sustainable modes of transport.
  - Incorporation of the 'pedestrian focus' to inform the site landscaping works.
  - Provision of internal speed limits and 'children at play' signs.
  - A layout that is consistent with DMURS section 4.3.5 that seeks 'shared streets' where cyclists and motor vehicles share the carriageway.
- 4.8.3 Overall the site layout is consistent with the design objectives of DMURS. We refer to the accompanying DMURS Design Audit for further discussion.





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4.8.4 Also in terms of DMURS compliance we refer to sections 3.3 in particular which deals with layouts and permeability.

4.8.5 Key extracts are highlighted:

### 'Street layouts

'The movement towards more integrated and sustainable forms of development will result in a shift away from dendritic street layouts to highly connected networks which maximise permeability, particularly for pedestrians and cyclists. When designing new street networks designers should implement solutions that support the development of sustainable communities. In general, such networks should:

- be based on layouts where all streets lead to other streets, limiting the use of cul-de-sacs that provide no through access.
- maximise the number of walkable/cycleable routes between destinations.'

'Street layouts that are orthogonal in nature are the most effective in terms of permeability and legibility.'

4.8.6 Also section 3.3.2 of DMURS sets out the design approach required for block sizes and states:

'With regard to block dimensions:

- A block dimension of 60-80m is optimal for pedestrian movement and will sustain a variety of building types. This range of dimensions should be considered for use within intensively developed areas, such as Centres, to maximise accessibility.
- Larger blocks within Centres and Business Parks/Industrial Estates may be required to cater for larger commercial or civic developments. In such cases mid-block pedestrian links should be provided.
- A block dimension of up to 100m will enable a reasonable level of permeability for pedestrians and may also be used in Neighbourhoods and Suburbs.

Within a development there may be sections of a site where accessibility requirements are low or where the site constraints may not facilitate a more permeable block pattern. Where this occurs designers may need to apply larger block dimensions. However, all efforts should be made to ensure the maximum block dimension does not exceed 120m. On larger and/or irregular blocks short cul-de-sacs may also be used for midblock penetration to serve a small number of dwellings and to enable more compact/efficient forms of development (see Figure 3.11).'

4.8.7 In summary the site layout and design is consistent with the requirements of DMURS as it incorporates an Orthogonal Layout, the Optimal Block Size of 60-80 metres is achieved and the largest block dimension of 120 metres is also acceptable given the site topography constraints.



Figure 3.8 of DMURS

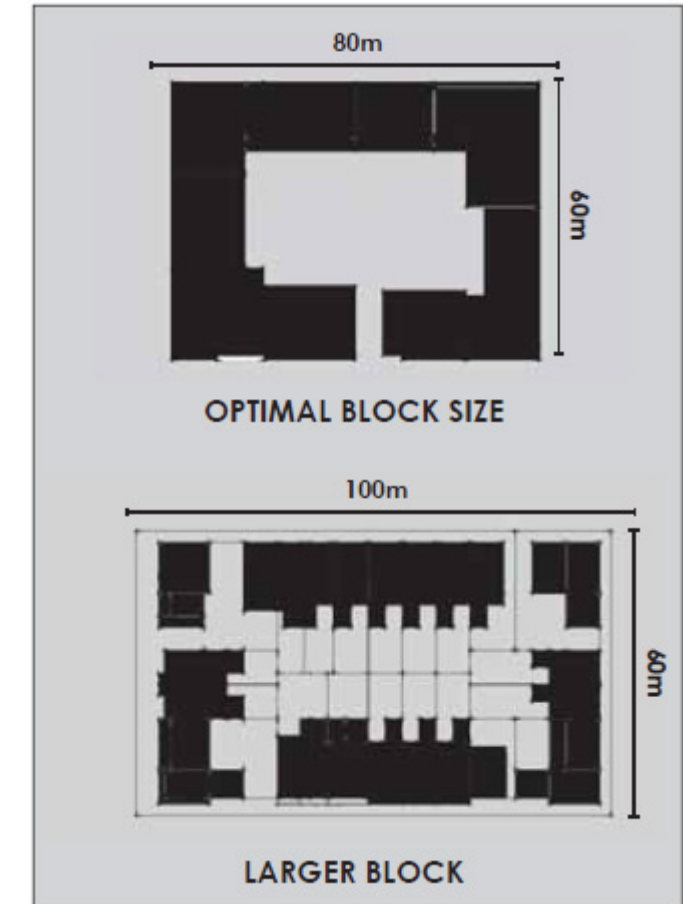


Figure 3.10 of DMURS

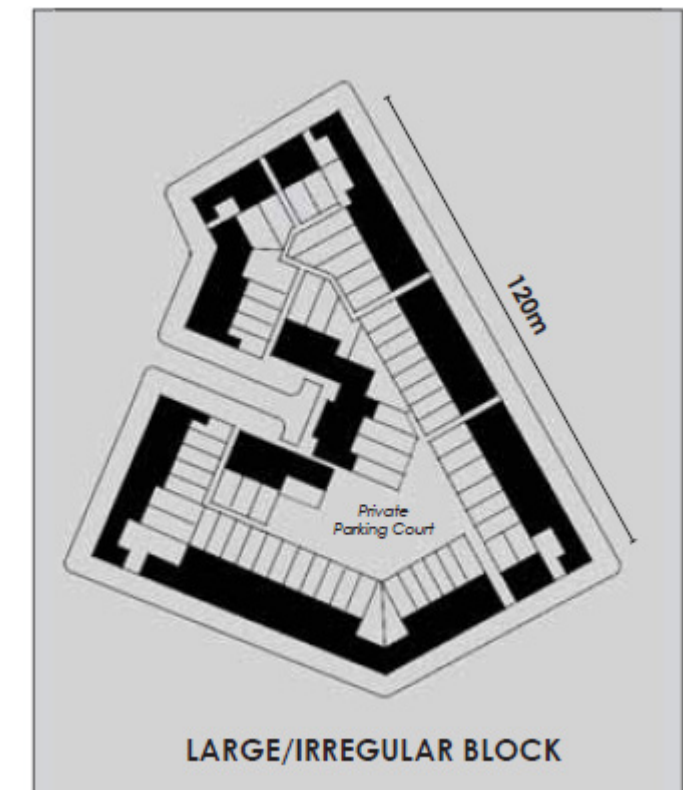


Figure 3.11 of DMURS



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4.8.8 Also in terms of DMURS and incorporating cyclists we refer to section 4.3.5 which states:

'This Manual and the National Cycle Manual (2011) (NCM) promote cycling as a sustainable form of transport and seek to rebalance design priorities to promote a safer and more comfortable environment for cyclists.'

'Figure 4.52, from the NCM, provides an overview of the integration and segregation of cycle traffic within the carriageway based on vehicle speeds and traffic volumes. For example:

- On lightly-trafficked/low-speed streets, designers are generally directed to create Shared Streets where cyclists and motor vehicles share the carriageway
- On busier/moderate speed streets, designers are generally directed to apply separate cycle lanes/cycle tracks.'

4.8.9 In response the layout is fully consistent with DMURS and the National Cycle Manual in this regard, as cyclists share the carriageway within the layout for the 30km/h zone and separate cycle lanes are proposed for the site junction which will facilitate any future road upgrade/cycle lane works proposed by the Council going forward.

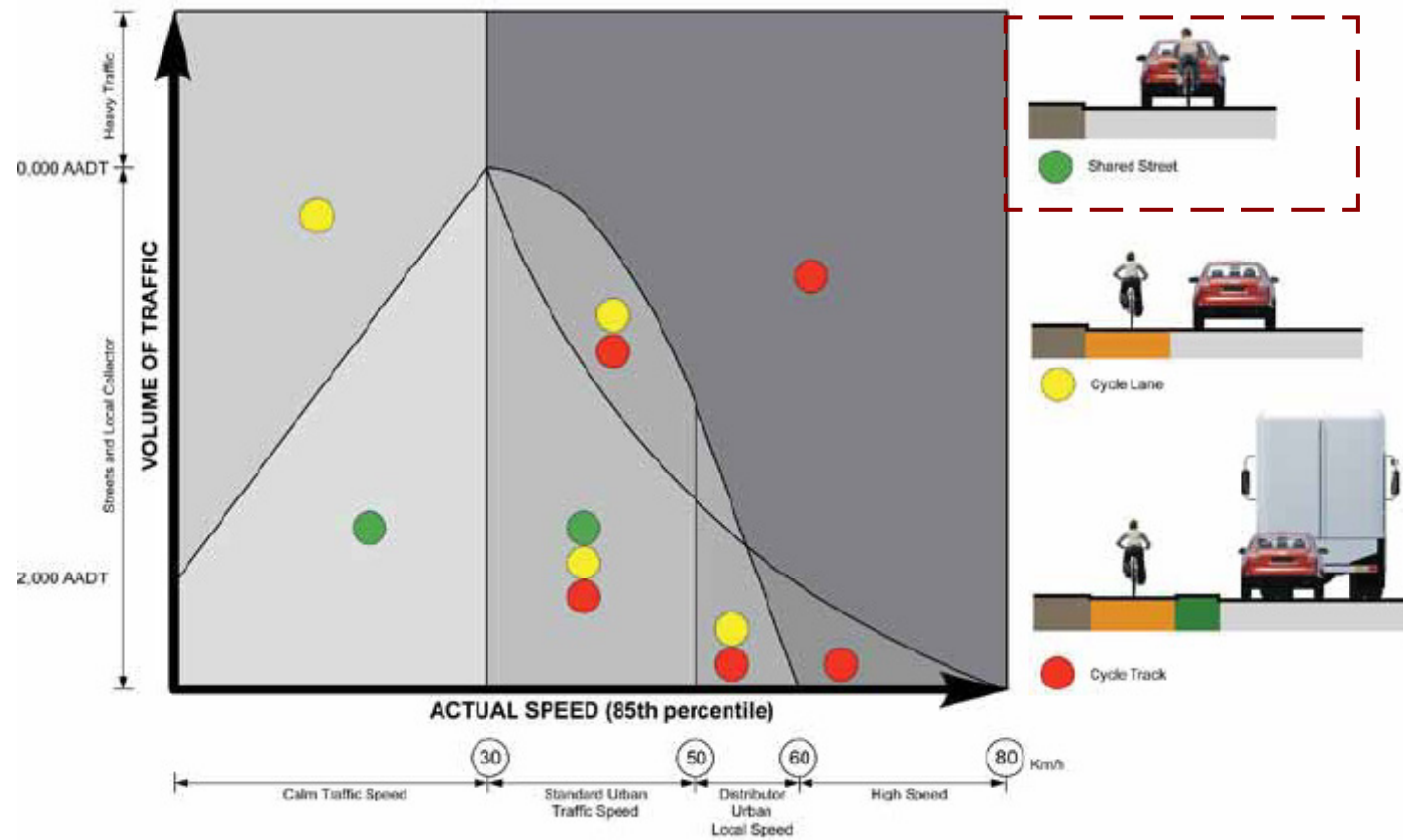


Figure 4.52 of DMURS which illustrates the appropriate use of integrated or segregated cycle facilities according to the volume and speed of traffic



Extract from the site layout which illustrates the block sizes and also how the segregated cycle facilities lead to on-street shared streets for cyclists within the 30km/h residential estate



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### 4.9 Appropriate Assessment of Plans and Projects; Guidelines for Planning Authorities

- 4.9.1 Being located in proximity to the River Barrow we note the following Natura 2000 sites occur within 15km of the subject site including:
- Lough Oughter SPA
  - Lough Oughter & Associated Loughs SPA
- 4.9.2 In summary we refer to the Appropriate Assessment screening statement by Hydrec which concludes the proposal will not impact on a Natura 2000 site.
- 4.9.3 We submit the correct determination by the Planning Authority, as the competent authority to carry out screening for appropriate assessment, should therefore reach a conclusion that on the basis of objective information that the proposed development, individually or in combination with other plans or projects, will not have a significant effect on any Natura 2000 sites.

### 4.10 Climate Action Plan

- 4.10.1 The Climate Action Plan (2021) sets out an ambitious plan to put Ireland on a more sustainable path, cutting emissions, creating a cleaner, greener economy and society and protecting us from the consequences of climate change.
- 4.10.2 The Climate Action Plan follows the Climate Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. These targets are a key pillar of the Programme for Government. By 2030 the government aims to achieve the following:
- Cutting greenhouse gas emissions by at least 30%
  - Reaching a target of at least 32.5% energy efficiency
  - Delivering 70% renewable electricity
- 4.10.3 In response the proposed development is compliant with the objectives of the National policy context on Climate Action and Low Carbon Development as the development will incorporate A2 rated buildings and incorporate technologies to minimise impacts on climate change.
- 4.10.4 Further information is available within the Building Lifecycle Report and the Travel Plan enclosed as part of this application.
- 4.10.5 All measures when combined will ensure a sustainable inner urban development is delivered

### 4.11 Regional Spatial Economic Strategy for the Northern and Western Region

- 4.11.1 The RSES for the Northern and Western region replaces the planning guidelines for the Border Region which set out a settlement strategy which aimed to:
- ‘...maximise and optimise the development potential of the Region taking account of strengthening linkages between economies of Northern Ireland and the Republic, and the increasing recognition of the prospects for both economies on the island of Ireland.’
- 4.11.2 This region is also shaped by travel to work patterns, and the ability of certain major urban centres within the region to extend their influence into wider hinterlands and conversely for major urban centres outside the region to extend their influence into this region.
- 4.11.3 The RSES continues to state:
- ‘The Dublin-Belfast Economic Corridor and the Regional Growth Centre of Drogheda & Dundalk have a significant reach into the Central Border Counties, including into South Monaghan, and East Cavan...’
- ‘The Irish Central Border Area Network provides a further platform for collaboration between local authorities north and south, namely Armagh City, Banbridge and Craigavon; Fermanagh and Omagh; Mid Ulster and the counties of Cavan, Donegal, Leitrim, Monaghan and Sligo.’
- 4.11.4 In terms of the development strategy the RSES echoes the NPF in that it states:
- Cavan is centrally located in the Border Region and is adjacent to Northern Ireland. This strategic location has led to the county having excellent linkages nationally, regional and to Northern Ireland. Cavan is located in a part of the Border Region which is identified in the NSS as a ‘Rural Area with Strong Potential for Diversification’ and ‘Village Strengthening and Rural Area Opportunities.
  - Identify suitable development opportunities for regeneration and development that are supported by a quality site selection process that also addresses environmental constraints and opportunities.
  - RPO 3.13 To support the role of smaller and medium sized towns, which demonstrate an important role in terms of service provision and employment for their catchments within the economic function of the county. Such settlements will be identified through the Development Plan process as part of the Settlement Hierarchy and the Core Strategy.
  - RPO 7.20 Increase population living within settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, in-fill development schemes, area or site-based regeneration, serviced site provision and increased building heights appropriate to the settlement, together with infrastructure provision.
- 4.11.5 Therefore in this context as the site is strategically positioned within Cavan Town it is clear the development of the lands will be consistent with the wider objectives set down by the RSES for residential development.



### 4.12 The Planning System and Flood Risk Management Guidelines

- 4.12.1 The guidelines introduce comprehensive mechanisms for the incorporation of flood risk identification, assessment and management into the planning process. The guidelines require the planning system to:
- Avoid development in areas at risk of flooding unless proven wider sustainable development grounds and risk can be mitigated without increasing risk elsewhere.
  - Adopt a sequential approach to flood risk management for new development location based on avoidance, reduction and mitigation of flood risk.
  - Incorporate flood risk assessment into decision making on planning applications.
- 4.12.2 In summary the site is not affected by Fluvia, Tidal or Pluvial Flood risk as identified under CFRAM and the accompanying SSFRA.
- 4.12.3 Also the design of surface water infrastructure ensures no increase in run-off rates from the site will not increase flood risk elsewhere as it will drain into the ditch abutting the site.

### 4.13 Guidelines for Planning Authorities on Childcare Facilities

- 4.13.1 The development has been designed in accordance with the Guidelines. We refer to the accompanying statement on the Childcare Needs Assessment prepared by this practice.
- 4.13.2 In summary:
- Childcare/creche provision: our analysis on existing creche demand and spaces within the catchment area of 6km demonstrates that at present there is provision for a total of 751 childcare spaces.
  - Demand generated by the proposal for childcare: On analysis of the proposed scheme against the relevant childcare guidelines, the demographics of the area and the projected population have demonstrated that the likely demand generated solely from the residential scheme will be circa 20no. child places. In terms of the design response based on the average requirement of 3sq.m. per child the proposed creche can readily accommodate 47no. childcare spaces, which is considered adequate to meet the requirement generated by the proposed development, along with additional headroom if required
- 4.13.3 Furthermore being a full day care facility crèche provision is therefore consistent with both the 2001 Guidelines and Tusla standards set out in the 'Quality and Regulatory Framework' document for child care services.

### 4.14 Sustainable Residential Development and Compact Settlement Guidelines

- 4.14.1 The guidelines set out policy and guidance in relate on to the planning and development of urban and rural settlements, with a focus on residential development and the creation on of sustainable and compact settlements.
- 4.14.2 Their timely introduction (12th January 2024) is of particular relevance to this LRD proposal aligning with the overarching goal of enhancing housing supply, as articulated in the Housing for All initiative. This report outlines the purpose and significance of these new draft guidelines in shaping the future of planning and development practices.
- 4.14.2 We highlight section 2.1.2 of the guidelines which state:
- 'In the transitional period prior to the review of a statutory development plan to comply with these Guidelines the planning authority must apply the SPPRs in the Guidelines where a proposed development would not contravene materially an objective of the development plan or local area plan concerned.'
- 4.14.3 We address the relevant matters and SPPRs from the Guidelines below.
- **Density**
- 4.14.4 Cavan Town is classified as a 'Key Town / Large Town - Suburban/Urban Extension' as per section 3.3.3.3 (ii). In regards to density as per table 3.6 it states that a density of 30-50dph is acceptable.

#### **Key Town / Large Town - Suburban/Urban Extension**

Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

- 4.14.5 Regarding density policy objective 3.1 states:
- 'It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.'



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4.14.6 Response The proposed net density of the development is 32.6 p/ha and which complies with the Guidelines. We also highlight the design, character and layout is appropriate to the local character for this suburban location.

4.14.7 The approach to calculating net density has been to exclude non-usable areas of the site which include the buffer planting areas, , exclude the creche given it will serve a wider area and exclusion of the lands allocated for services and also excluding areas allocated for access to future development. We highlight table 1 in Appendix B of the guidelines and also drawing sheet 'Net Density Calculations' by MF Architects.

Net Site Area Includes	Net Site Area Excludes
<ul style="list-style-type: none"> <li>Local Streets as defined by Section 3.2.1 DMURS.</li> <li>Private and semi-private open space.</li> <li>Car parking, bicycle parking and other storage areas.</li> <li>Local parks such as neighbourhood and pocket parks or squares and plaza's</li> <li>All areas of incidental open space and landscaping.</li> </ul>	<ul style="list-style-type: none"> <li>Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.</li> <li>Lands used for commercial development (inc. retail, leisure and entertainment).</li> <li>Lands for primary schools, churches and other community services and facilities.</li> <li>Larger, Regional or District Parks, Wayleaves or rights of way.</li> </ul> <p>Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.</p>

### Quality Design and Placemaking

4.14.8 Furthermore policy and objective 4.1 regards DMURS:

'It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches, and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality design and placemaking'

4.14.9 Response: The proposal is compliant; we refer to the DMURS Audit, DMURS Compliance Statement and Quality Audit accompanying the application.

4.14.10 Also with regards to placemaking the guidelines state under policy and objective 4.2:

'It is a policy and objective of these Guidelines that the key indicators of quality design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.'

4.14.11 The guidelines are concerned with indicators of quality urban design and placemaking, which help inform the development strategy for settlements, neighbourhoods or an individual site. Appendix D sets out a Design Checklist that supplements this section with a series of questions that can be used to guide the refinement and in the preparation of planning applications.

4.14.12 Section 4.4 sets out the principles to be incorporated to achieve a quality urban design; this chapter is also accompanied by Appendix D of the Guidelines 'Key Indicators of Quality Urban Design and Placemaking.' To demonstrate how the proposal is compliant we set out responses below.

1. Sustainable and Efficient Movement	Response
i. Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)?	Yes; DMURS compliant. We refer to section 4.8 of the Planning Statement, Design Statement and DMURS Audits. The development will create new connections with the pedestrian, cycle and public transport stops and enable local journeys to be carried out via sustainable travel modes.
ii. Have opportunities to improve connections with and between established communities been identified and responded to with particular regard to strategic connections between homes, shops, employment opportunities, public transport, local services and amenities?	Yes; There will be a new pedestrian access points to the lands and the design will ensure accessibility for all. Future connection points have been created to allow for future permeability and access to homes, public transport and amenities in the region.
iii. Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users?	Yes; The development has been designed to ensure a high quality residential environment. Cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe.
iv. Has the quantum of parking been minimised (in accordance with SPPR4 where relevant) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles?	Yes; The development has been designed to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles.
2. Mix of Land Uses (Vibrant Centres and Communities)	Response
i. Is the mix and intensity of land uses appropriate to the site and its location and have land uses been distributed in a complementary manner that optimises access to public transport, amenities and local services via walking or cycling?	Yes; The subject site is a suburban site located within an existing residential urban area and in close proximity to a number of public transport nodes. The proposed development has been designed to respond to the existing character of the area and the specific site constraints with creation of new access to public transport and local services.
ii. Have a diverse and varied range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by an innovative range of housing typologies that support greater housing affordability and choice?	Yes; A range of house types and sizes are proposed which range from 1 bed to 4 bed units and includes apartments and dwellings. Also part V housing will be appropriately mixed across the site area.
iii. Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable) and promote town centre living (where applicable)?	Yes; The development is designed to create attractive vistas both from the locality and within the site. The incorporation of tree lined avenues, an appropriately scaled main entrance with associated dwellings fronting onto the local road will provide an active streetscape and revitalise the local area. Also the buildings will create a sense of place and incorporates an increased building height and overall scale to create an appropriate urban focal points.



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i. Is the regeneration and revitalisation of an existing centre or neighbourhood supported by the enhancement of the public realm so as to create a more liveable environment, attract investment and encourage a greater number of visitors (where applicable)?	Yes; Given the existing context the development will positively enhance the natural landscape via a significant improvement to the visual amenity of the area. Open space will be provided in excess of the 10% requirement as set out in the guidelines for such lands. Also quality open spaces will be provided to include play equipment for children
<b>3. Green and Blue Infrastructure (Open Space, Landscape and Heritage)</b>	<b>Response</b>
i. Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the setting of protected structures, conservation areas and historic landscapes?	Yes; Given the existing context the development will positively enhance the natural landscape via protecting the existing ringfort on the north western boundary of the site. Additionally, the development includes for connection to the walking route on the western boundary protecting the natural landscape of the area.
ii. Have a complementary and interconnected range of open spaces, corridors and planted/landscaped areas been provided, that create and conserve ecological links and promotes active travel and healthier lifestyles?	Yes; The proposed development provides for a sustainable mix of residential types which will attract a range of occupants of different life cycle stages. The provision of apartments and duplex units is also wholly appropriate in the context of the Apartment Guidelines. The proposed open spaces, play areas and the public permeability designed into it offer significant benefits for the broader area as well as for the proposal.
iii. Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)?	Yes; The design of the development has been carefully considered so as to provide a high level of passive surveillance on both the area of open space and universal public access areas (i.e. walkways). The landscaping proposals have been formulated having careful regard to the surrounding development, to the aspect within the public open space areas and to the recreational needs of the future residents of the proposed development.
iv. Does the plan or development proposal include integrated nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation?	Yes; The development will be designed to ensure greenfield run-off rates.

4. Responsive Built Form	Response
i. Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure in terms of block layouts and building heights with particular regard to the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight?	Yes; Given the subject site's current vacant condition and the well-considered design the proposal represents a significant positive impact on the existing local environment. The proposed open spaces, play areas and the public permeability designed into it offer significant benefits for the broader area as well as for the proposal.
ii. Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface?	Yes; The proposed layout of the development provides for a straightforward, easily accessible and easily navigable network of places. The access arrangement creates an easily accessible development and improves the connectivity of the site with the surrounding area. The development has been designed to ensure a high quality residential environment. All open space areas, roads and footpaths will enjoy passive surveillance and ensure convenient connectivity.
iii. Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant), integrate well within its context and provide appropriate transitions with adjacent buildings and established communities so as to safeguard their amenities to a reasonable extent?	Yes; The development has been designed to ensure a high quality residential environment. All open space areas, roads and footpaths will enjoy passive surveillance and ensure convenient connectivity. No adverse impacts on 3rd party lands or buildings will arise.
iv. Has a coherent architectural and urban design strategy been presented that will ensure the development is sustainable, distinctive, complements the urban structure and promotes a strong sense of identity?	Yes; we refer to the design rationale set out in the Design Statement, accompanying CGI's and landscape proposals. The layout and height strategy respond to the site constraints and topography while ensuring a well-scaled design is achieved that is appropriate for this suburban location.



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- **Development Standards for Housing: Chapter 5 of the Guidelines refers and sets out a number of SPPRs; addressed below.**
- **SPPR 1 - Separational Distances** Sets out minimum separation distances. These guidelines stipulate that statutory development plans must not set a minimum separation distance of more than 16 meters between opposing windows for habitable rooms at the rear or side of houses, duplex units, or apartment units above the ground floor. In residential planning applications, maintaining a separation distance of at least 16 meters between such windows is required, although distances below this may be considered if privacy measures are integrated. No specific minimum separation distance is mandated at ground level or the front of buildings in development plans, and planning applications are individually assessed to prevent unwarranted privacy loss.
- 4.14.13 **Response:** All opposing units are designed to incorporate separation distance of 22 metres. Also it has been demonstrated through application particulars that the proposal will not have an adverse impact on the amenity of existing residential properties.
- 4.14.15 **SPPR 2- Minimum Private Open Space Standards for Houses** Sets out minimum private open space standards for houses including 20sq.m per 1 bed, 30sq.m per 2 bed, 40 sq.m for 3 bed and 50sq.m for 4 bed.

House	Minimum Private Open Space	Max Semi-Private (in lieu)
1 bed	20 sq.m	10 sq.m
2 bed	30 sq.m	15 sq.m
3 bed	40 sq.m	20 sq.m
4 bed+	50 sq.m	25 sq.m

- 4.14.16 **Response:** All private amenity spaces comply with the minimum standards for dwellings. We refer to the Housing Quality Assessment for conciseness. Also we highlight the provisions of SPPR2 take precedence over the conflicting standard in the Cavan CDP for private amenity spaces; the provisions of section 2.1.2 of the guidelines are highlighted.
- 4.14.17 **Policy and Objective 5.1- Public Open Space** Sets out minimum public open space for developments. Of relevance we highlight this policy objective is not a SPPR, therefore Planning Authorities are only to have regard to open space standards but that the provisions for public open space requirements as per the County Development Plan (15%) remain applicable.
- 4.14.18 **Response** We highlight that the public open space is set at 18% (net) for the development. We refer to the design statement and drawings outlining the breakdown of the public open space in a series of spaces across the site.
- 4.14.19 **SPPR 3- Car Parking** Sets out minimum car parking standards for developments. As per section (iii) it states that 2no. spaces per dwelling is acceptable.
- 4.14.20 **Response** We highlight that parking is provided at 2no. spaces per dwelling with 1 per unit for apartments along with 1 per 4.5 visitor spaces for apartment units. We refer to parking allocation set out in section 5.
- 4.14.21 **SPPR 4- Cycle Parking and Storage** Sets out minimum cycle parking standards for developments. As per section (i) it states that 1no. space per bedroom for all units that do not have ground level open space or smaller terraces with visitor spaces to be provided. Regarding storage, it requires a safe, secure, permanent structure is required.

- 4.14.22 **Response** We highlight that parking provision highlighted in section 5. Bicycle storage facilities are provided within acceptable walking distance from units and in dedicated safe storage facilities. We refer to the parking rationale set out in section 5.3 of this statement.

### 4.15 Environmental Impact Assessment: EPA Guidelines

- 4.15.1 An Environmental Impact Assessment (EIA) screening report has been prepared by Hydrec and is attached under separate cover. The report assesses the proposed development with respect to the EU Council Directive 2011/92/EU, as amended 2014/52/EU (EIA Directive), and Planning and Development Regulations (as amended).
- 4.15.2 Article 103(1B) of the 2001 Regulations provides that, where a planning application for sub-threshold development is not accompanied by an EIAR but is accompanied by the information specified in Schedule 7A and sub-article 103(1A), the competent authority shall carry out an examination of the nature, size or location of the development for the purposes of a screening determination.
- 4.15.3 The applicant has elected to provide the information specified in Article 103(1A) and Schedule 7A, and the provided information within this EIA Screening report sets out that the development can be screened out by the competent authority at the screening determination stage as provided for under Article 103(1B) of the 2001 Regulations. In summary the EIA screening supports a determination that there is no real likelihood of significant effects on the environment arising from the proposed development, which is the standard for determining that an EIA is not required as set out in Article 103(1B)(b)(i).





## 05 | Local Policy

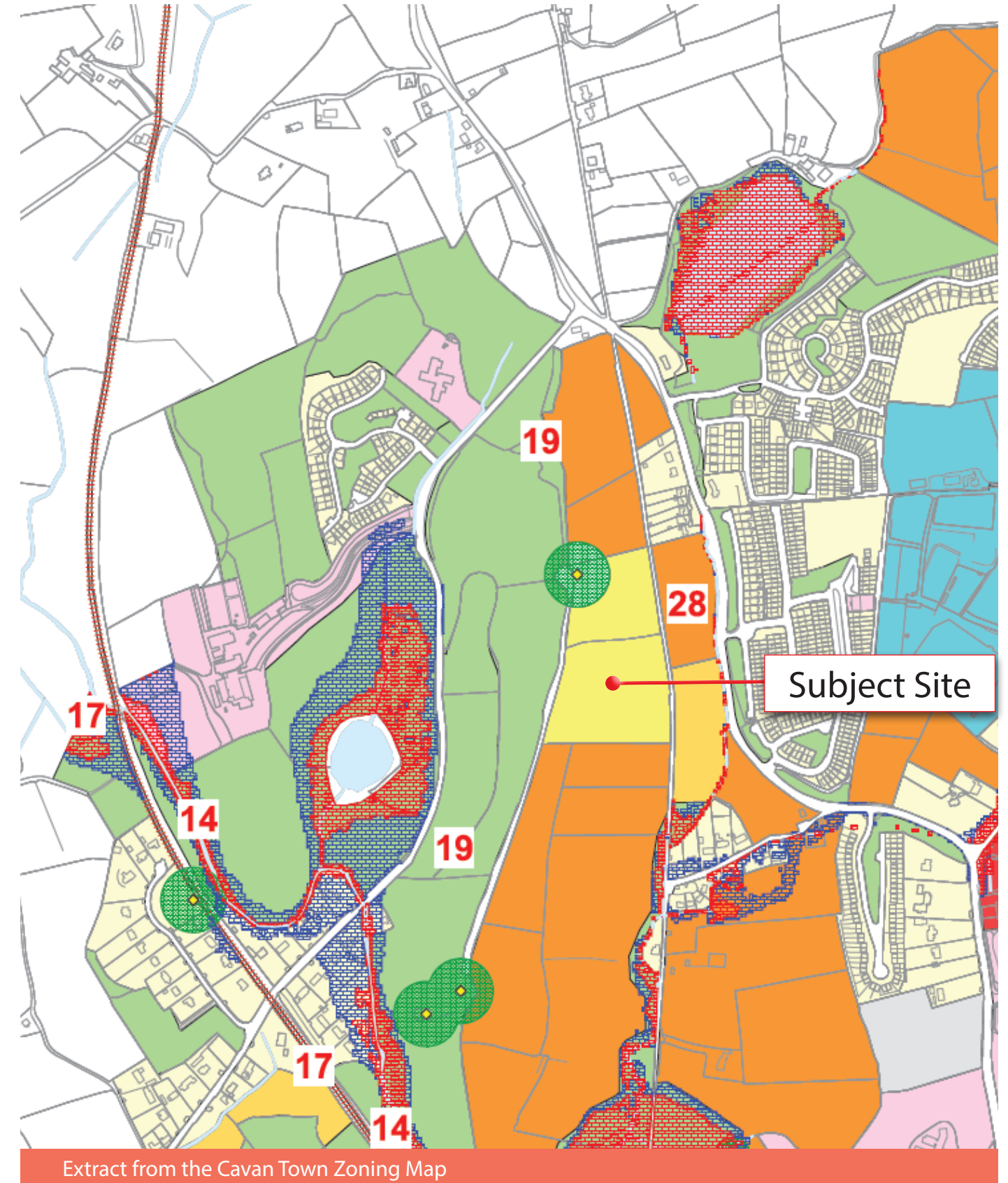
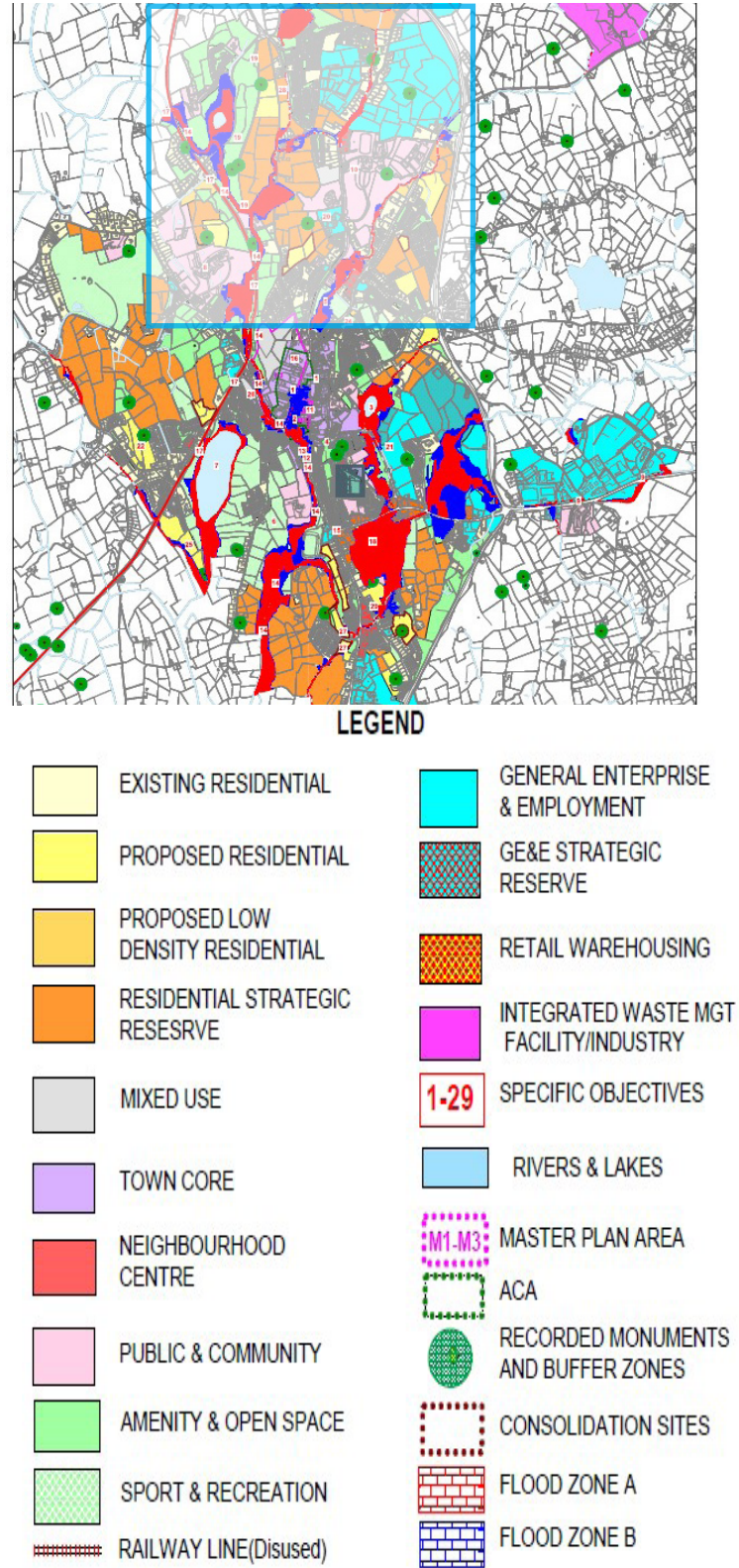
- 5.1 | Local Zoning
- 5.2 | Residential development management standards
- 5.3 | Traffic & Transport



**5.1 Local Zoning: Cavan County Development Plan and Cavan Town Local Area Plan 2022-28: Zonings & Core Strategy**

- 5.1.1 The Cavan Development Plan incorporates the Cavan Town LAP and sets out the strategic land use objectives and policies for the overall development of the Town, acting as a guide to inform development proposals.
- 5.1.2 In terms of settlement hierarchy Cavan Town Plan is identified as a Tier 1 Settlement – Principal Town.
- 5.1.3 We note the subject lands are located within the settlement boundary and zoned (1) 'Proposed Residential', (2) 'Proposed Low Density Residential' and (3) 'Residential Strategic reserve'. The zoning objectives are:
  - (1) 'Ensure the provision of high quality new residential environments with good layout and design, high energy efficiency rating, sustainable transport links and within walking distance of community facilities.'
  - (2) 'Ensure the provision of high quality low density residential environments with good layout and design.'
  - (3) 'Provide for and protect the future housing requirements of the town.'
- 5.1.4 We also note specific local objective C28 which states:
 

'Facilitate the appropriate access to proposed residential lands to the west of the site that does not compromise the future potential of the subject lands.'
- 5.1.5 In this context the development is plan-led as the zoning and land use objectives are being complied with and objective C28 provides for the access to traverse lands zoned as Strategic Reserve.
- 5.1.6 Accordingly no issues of Material Contravention of the CDP arise.





## 05 Local Policy

### Core Strategy

- 5.1.9 The CCDP provides a settlement hierarchy which provides the direction for new development within the County for the period 2022-2028. Under the core strategy Cavan Town is identified as a 'Key Town.'
- 5.1.10 With regards to overall policy objectives of the Cavan County Development Plan 2022-2028 we refer to key policy objectives:

KTC01 'Support the continued growth and sustainable development of Cavan Town to act as a growth driver in the region and to fulfil its role as a Key Town, focused on employment, retail, quality of life and economic investment.

KTV04'Require sustainable, compact, sequential growth in Cavan Town by consolidating the built-up footprint through a focus on regeneration and development of town centre infill and brownfield sites, and encouraging regeneration of underutilised, vacant and derelict lands for residential development and mixed use to facilitate population growth.'

Proposed Residential Yield	Total Yield Low Density & Proposed Residential	Housing Supply Target <sup>9</sup>	Town Core, Mixed Use and Brownfield/ infill Sites & existing residential Yield	Surplus or Deficit of Proposed Residential Land (Ha)
943	983	829	137	+14.55*

- 5.1.11 We note under the core strategy at county level it sets out a housing allocation for Cavan Town up to the period 2028 as per Table 11, with a housing allocation of 829 units to 2028.
- 5.1.12 In response our analysis finds that within Cavan Town there has only been 194 units completed since Q1 2022 (as per CSO Statistics). In comparison, the target of the Core Strategy is 829 is equivalent to 139 units per year over the plan period leaving a shortfall of 84 units.
- 5.1.12 In response we submit the proposal is therefore consistent with the core strategy and housing allocation as set out in the Cavan County Development Plan 2022-2028 to help meet this shortfall.
- 5.1.14 In this context we submit the proposed development is consistent with these overarching policy objectives of the core strategy and development plan as demonstrated above.
- 5.1.15 Furthermore we refer to the accompanying statement of housing mix which demonstrates an how the proposal will assist in addressing the acute shortage of new residential units being constructed in recent years, particularly for apartments.

## 5.2 Residential development management standards

- 5.2.1 To assist the Planning Authority's assessment we set out below the policy context of the Cavan CDP and Cavan Town LAP 2022-2028 and demonstrate how the proposal is consistent with relevant policy tests.

Cavan County Development Plan 2022-2028				
Density & Building Heights				
	Density in town/Village Core *	Density in Brownfield and Infill Sites *	Density in Proposed Residential *	Density in Proposed Low Density Residential *
Cavan Town	30-35	22-30	18-22	8-10
Virginia	25-30	20-25	16-20	8-10
Self Sustaining Towns	25-30	18-25	14-18	8-10
Medium Towns	20-25	16-20	12-16	8-10
Small Towns	17-20	14-17	10-14	8-10
Villages Category 1 and 2	8-12	8-12	8-12	8-10

\*Density ranges are targets and should not be read as maxima

RDO1 Encourage densities in accordance with above table throughout the County in accordance with the Core Strategy.

RD03 Ensure densities of proposed developments reflect the key attributes and character of the surrounding adjoining area.

BHDO 01 Seek compliance with the Urban Development and Building Height Guidelines, December, 2018 or any update thereof.

Response:

As the Planning Authority will note the character of the area is defined by a mixture of land uses and building typologies. In response the proposed density is 32.6 units per hectare and is therefore considered appropriate in terms of density and the scale of development proposed due to the urban location.

The policy context has also been given due regard. For conciseness we again refer Section 4 of this statement and to the policy context set under:

- The NPF
- Sustainable Residential Development and Compact Settlement Guidelines
- Urban Development & Building Height Guidelines

To achieve consistency with the National policy context the proposal is therefore acceptable and the provisions of Section 34 (2)(ba) are highlighted.



Cavan County Development Plan 2022-2028
Residential Mix
DL 02 Residential schemes shall provide a range of dwelling sizes and typologies to accommodate emerging demographic trends in line with the County's Housing Strategy and Housing Needs Demand Assessment or other evidence supported methodology.
Age Friendly Housing, Site Coverage & Plot Ratio
Section 13.4.5 Age Friendly Housing
AFH 01 Promote age friendly housing and public realm design to ensure supports are available for older people to live independently.
AFH 02 Support the adoption of existing dwellings to meet the needs of older people.
AFH 03 Promote universal and lifetime adoptable design in new dwellings in order to future proof and suit the changing needs of the occupants.
Section 13.4.4 Plot Ratio:
'Plot ratio seeks to control the mass and bulk of buildings to prevent the adverse effect of over-development, whilst ensuring the efficient and sustainable use of serviced land.'
PR 01 Individual development proposals will be assessed on performance-based criteria dependent on location and individual site characteristics in accordance with the provisions of national policy NPF NPO 13.
Section 13.4.3 Site Coverage
'SCDO 01 Individual development proposals will be assessed on performance-based criteria dependent on location and individual site characteristics in accordance with the provisions of national policy NPF NPO 13.
<u>Responses:</u>
Unit Mix: In terms of unit mix the development proposes a mix of 1, 2, 3 and 4 bedroom units. We submit the nature of the residential mix is appropriate to cater for the smaller household sizes and allows for movement between residential types as they become available
Age Friendly Housing: A number of single storey units are proposed; both as bungalows and all duplex apartment units are single storey on the ground floor. The objective for Age Friendly Housing is therefore incorporated into the layout.
Site Coverage: This is proposed at 16% which is acceptable for this site.
Plot Ratio: In terms of Plot Ratio the proposal is 0.26; which is acceptable for this site.

Cavan County Development Plan 2022-2028
Quality Design & Layout
Section 13.4.10 Design and Layout
New residential developments should deliver high quality architectural design, layout and mix.
DL 01 Require that all proposals for residential development demonstrate compliance with the Sustainable Residential Development in Urban Areas (Cities, Towns and Villages), the Urban Design Manual- A Best Practice Guide 2009 and the Urban Development and Buildings Heights Guidelines for the Planning Authorities (2018), or any updates thereof.
DL 02 Residential schemes shall provide a range of dwelling sizes and typologies to accommodate emerging demographic trends in line with the County's Housing Strategy and Housing Needs Demand Assessment or other evidence supported methodology.
DL 03 Planning proposals for housing schemes are required to present a considered design approach to tailor the scale, design, layout and density of housing in responding to the individual character of the respective town or village.
<u>Response:</u> The site layout incorporates a sense of place with an accessible residential environment proposed. All areas of the site are fully connected with a series of open spaces.
The design has also been informed by the 12 criteria of the Urban Design Manual and relevant guidelines which includes the recently adopted Compact Settlement Guidelines.
We refer to the accompanying Design Statement which sets out in detail the design principles.
Apartments
Section 13.4.14 Apartments
The provision of apartment schemes shall be generally encouraged in appropriate locations, at a suitable scale and extent. Primarily this will be town centre locations and proximate to public transport and in the appropriate settlements.
Section 13.4.14 'Proposals for new apartment schemes shall be designed in line with the design criteria as set out in the 2018 Ministerial Guidelines – Sustainable Urban Housing -Design Standards for New Apartments- Guidelines for Planning Authorities or any subsequent update.'
APT 01 A detailed design statement is required to be submitted with any development containing multiple apartments and/or duplex units, including private and communal amenity space, as per the minimum apartment design standards.
<u>Response:</u> The apartment/duplex units proposed have been designed to be in full accordance with the requirements of the Apartment Guidelines. We refer to sections 4.6 of this statement which sets out how the units are compliant and also the accompanying Housing Quality Assessment.



Cavan County Development Plan 2022-2028
Public Open Space
<p>PCOS 01 Ensure public open spaces in new residential developments comply with the Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, DEHLG (2009) and the accompanying Urban Design Manual (2009) or any updates thereof.</p> <p>PCOS 02 Ensure public open space is well designed, of a high visual standard, generally flat, retain natural features and proposes appropriate landscaping or wetland and has a high level of surveillance and overlooking.</p> <p><u>Response:</u> The proposal incorporates 18.38% net of the site area for Public Open Space or 16.84% of the gross site area along with additional communal Space for apartment residents. Given the site constraints the layout positions the Public Open Space and Communal Spaces in the optimum locations for passive surveillance, use and amenity purposes.</p>
Daylight, Overlooking & Overshadowing
<p>Section 13.4.9 Overlooking and Overshadowing</p> <p>New residential development should be designed to maximise the use of natural daylight and sunlight. Innovative building design and layout that demonstrates a high level of energy efficiency and use of renewable energy sourced will be encouraged. New development should be designed to avoid overlooking of existing or proposed residential units.</p> <p>OO 06 Require daylight and shadow projection diagrams to be submitted in all proposals where buildings of a significant height are involved or where new buildings are located very close to adjoining buildings. This will provide an element of control in situations where overlooking occurs.</p> <p>OO 07 Daylight and sunlight levels should generally be in accordance with the recommendations of Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (B.R. 209, 2011) and any updates thereof.</p> <p>OO 08 New residential development should be designed to maximise the use of natural daylight and sunlight. Innovative building design and layout that demonstrates a high level of energy conservation, energy efficiency and use of renewable energy sources will be encouraged.</p> <p><u>Response:</u> No issues arise in terms of overlooking adjacent lands. Being an urban context the proposal does not result in overlooking of residential units or their associated private amenity spaces.</p> <p>A daylight and shadow assessment has been prepared by Chris Shackleton and enclosed. In summary sets out how the proposal performs against the guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (2022).</p>
Public Lighting
<p>PLG 01 The design of all new developments shall take into consideration the layout of the proposed public lighting column locations and the proposed landscape design. Trees or vegetation shall not be planted within 7 metres of a public light column.</p> <p>PLG 02 Residential developments shall require a public lighting scheme to be submitted as part of the site layout avoiding dark corners and alleyways.</p> <p><u>Response:</u> We refer to the accompanying Public Lighting Plan prepared by Veelite.</p>

Cavan County Development Plan 2022-2028
Trees & Green Infrastructure
<p>WTHS3 Encourage the retention of mature trees and the use of tree surgery rather than felling where possible when undertaking, approving or authorising development.</p> <p><u>Response:</u> No mature trees are to be lost to facilitate the scheme with all mature trees being retained. The design approach has been informed by detailed ecology, arborist and landscape surveys and regard given to the existing agricultural use of the lands currently.</p>
Services
<p><u>Response:</u> The development has been designed to connect to the existing infrastructure at this location; namely the road, footpath and Irish Water infrastructure. Connection is also available to the ESB network.</p> <p>On this basis being a serviced site the proposal is fully consistent with the wider policy context to develop such lands. For conciseness we refer to the accompanying Engineering report by CS Consulting Engineers and drawings.</p>
Ecology
<p><u>Response:</u> We refer to the accompanying Ecological Impact Assessment by Hydrec which demonstrates that no rare, threatened or legally protected habitats will be lost to the development.</p>
Childcare
<p><u>Response:</u> Development objectives CCF01- 05 are relevant. In response the development has been designed in accordance with the Guidelines. We refer to the accompanying statement on the Childcare Needs Assessment prepared by this practice.</p>
Archaeology
<p>Development objectives AH1- AH4 as per the CDP are relevant which seek to protect and enhance archaeological sites and monuments.</p> <p><u>Response:</u> We refer to the Archaeological Assessment prepared by ACS. In summary the assessment incorporates both a desk study and Geophysical survey and no archaeological features were noted within the site.</p> <p>As with such sites mitigation is recommended; as per page (iii) of the report by ACS it states:</p> <p>'It is therefore recommended that targeted archaeological test trenching is conditioned within any planning permission for the site in order to verify the geophysical survey results, as well as a photographic survey of the wet ditch and the laneway, with test trenches excavated across the latter. This shall be carried out prior to construction commencing by a licence-eligible archaeologist.'</p> <p>Going forward this can be addressed by planning condition, as is typical for such sites.</p>



### 5.3 Traffic and Transport

- 5.3.1 A Traffic and Transport Assessment (TTA) and an accompanying Mobility Management Plan have been prepared by CS Consulting Engineers in respect of the proposed development.
- 5.3.2 In respect of the existing road network, it is noted that the site will be accessed from the L1532. This road also provides direct access to residential, retail, amenity and employment lands in Cavan and the wider area.
- 5.3.3 In respect of traffic generation from the development to inform the TTA junction turning counts were undertaken at several locations as determined by the Planning Authority during pre-planning consultations.
- 5.3.4 Also as detailed in the Road Safety Audit the new entrance into the scheme from the L1531 meets design requirements to accommodate the proposed development.
- 5.3.5 In summary the TTA demonstrates that the subject site is well located in terms of access to local services amenities.
- 5.3.6 Overall the results of the TTA indicate that the additional traffic generated by the proposed development under respective phases and when fully operational shall have no adverse impact on road junctions in the surrounding area.
- 5.3.7 A bus lay-by is also proposed, cycle and pedestrian connections along with a restriction on parking to 1 space per unit are all considered measures that will encourage the principles of Smarter Travel and DMURS to be achieved.

#### Pedestrian Access

- 5.3.8 Of relevance to the site layout is the new entrance from L1531 and associated footpaths.
- 5.3.9 Having regard to this previous permission and the footpath layout the design rationale incorporated into the scheme has been to provide pedestrian connectivity via a new entrance along with the entrance 'future proofed' to cater for a cycle network at this location when provided by the Council.
- 5.3.10 In addition to the new entrance point a separate shared cycle/pedestrian path is proposed which connects with the open space and creche. This cycle/walkway is designed to be Part M compliant in relation to gradients and also captures natural 'desire lines' for pedestrian movement and also connects with the existing footpaths to the site's perimeter.
- 5.3.11 This shared cycle/pedestrian path is design in accordance with pre-planning discussions held with Engineers in the Local Authority.

### 5.3 Traffic and Transport

#### Car Parking

- 5.3.12 Policies relevant are noted below:
- CP 01 Require development proposals to provide adequate car parking provision and associated servicing arrangements. The specific amount of car parking will be determined according to the characteristics of the development and its location having regard to the standards set out in Table 7.4.
  - CP 02 Seek to ensure that all new private car parking facilities are provided to an appropriate standard, proximate to the development which it serves and in accordance with the Design Manual for Urban Roads and Streets (2020).
  - CP 08 Ensure all applications for car parking are accompanied with EV Charging points.
- 5.3.13 Also section 7.6 of the CDP states:
- 'There is a degree of flexibility depending on the nature and location of the development and it's proximity to public transport which allows developers to submit a car parking analysis of a particular area in order to demonstrate the supply and demand for car parking spaces.'
- 5.3.14 In summary the appropriate quantum of parking provision was determined having regard to the locational and policy context both locally and nationally. For dwellings 2 spaces are proposed per unit, for apartments 1 space is proposed and provision made for visitors at a rate of 1 space per 4.5apartments. The creche will also have dedicated parking and drop off/collection area.
- 5.3.15 In relation to disabled parking requirements No standards for disabled-accessible car parking spaces have been given in the Cavan County Development Plan 2022-2028. Nonetheless a total of 3no. disabled person parking bays are proposed as part of the communal/on-street parking provision. This is good practice.
- 5.3.16 Overall we submit the parking provision is consistent with the apartment guidelines and location policy.
- 5.3.17 Further the parking layout complies with the development plan standard for EV charge points, with 10% of spaces being provided for EV charge points. Going forward additional EV charge points can also be achieved as exempt development under SI 115 of 2021.
- 5.3.18 For reference set out below how parking standards are incorporated into the overall layout.

#### Bicycle storage

- 5.3.19 The Apartment Guidelines require that bicycle parking be allocated on a per-bed basis along with provision for visitors.
- 5.3.20 In response the total number of bicycle storage proposed for the development is 120 spaces to include for visitors and which is provided by means of enclosed and secure storage facilities at surface level and in proximity to open spaces to encourage usage and accessibility.



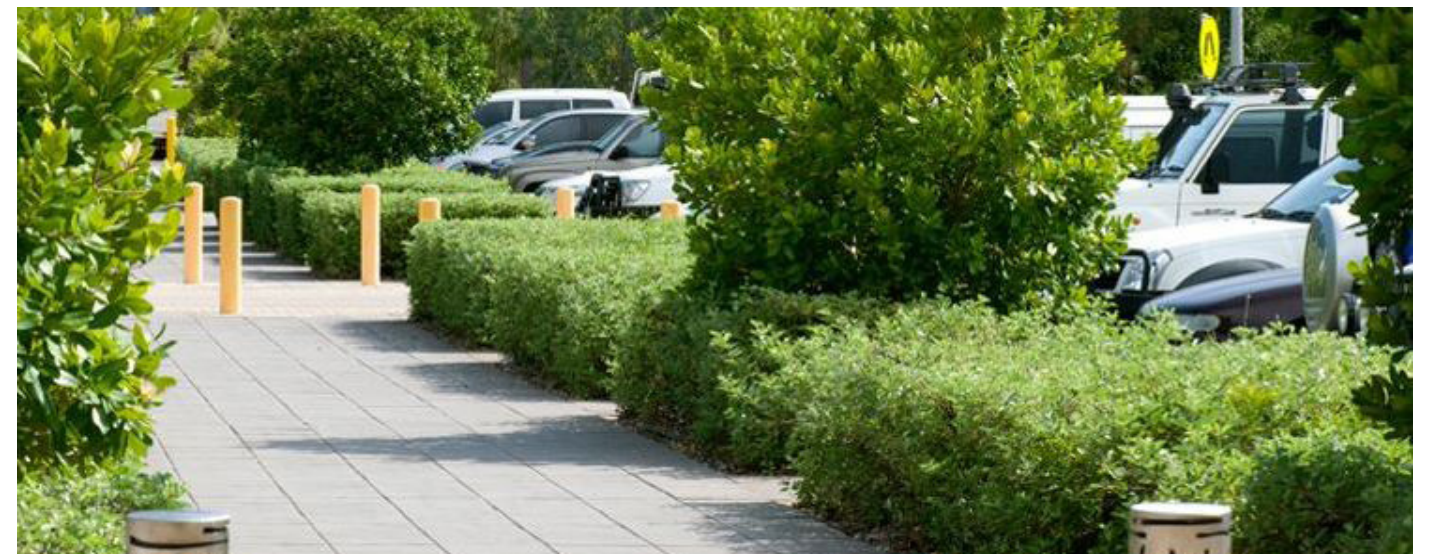
## 05 Local Policy

LAND USE/UNIT TYPE	AREA/NO. OF UNITS	CCDP CAR PARKING RATE P/UNIT (**2020 APARTMENT GUIDELINES)	NUMBER OF CAR PARKING SPACES PROPOSED P/UNIT *(TOTAL) **(2020 APARTMENT GUIDELINES)
2-4 bed dwelling units	91no.	2 space per unit in curtilage	182
1 bed apartment units	15no.	1 space per unit	15 **(Also 1 visitor space per 4.1 apartments as per below)
2 bed apartment units	39no.	1 space per unit	39 **(Also 1 visitor space per 4.1 apartments as per below)
Residential Totals	145		236 spaces
Visitor Spaces			12 (1 per 4.5 apartment units)
Overall Total		248 residential spaces & 6 spaces for creche Note: EV vehicles= 11 EV charge points Note 3: Disabled spots= 5	

### Proposed car parking provision

Land Use/ Unit Type	No. of Units	Apartment Guidelines minimum cycle storage per bedroom unit at 1 per bedroom	No. of cycle spaces proposed per unit type (total)	No. of visitor cycle spaces proposed per unit type **(2020 Apartment Guidelines)
2-4 bed dwellings	91	N/A	2 In curtilage	N/A
1 bed apartments	15	15	1 (15 Total)	15
2 bed apartments	39	78	2 (78 Total)	78
Residential Totals	145			93
Required residential bicycle storage spaces (shelter/rack/internal)	**(Total derived based on apartment units & visitors only; excludes dwellings)		Apartments: 93 Apartment Visitors: 27 Creche: 5	
Overall total			120 for apartments & 5 for creche	

### Proposed Bicycle storage provision







## 06 Conclusion

### 6.1 Summary & Conclusion



### 6.1 Conclusions

- 6.1 The attached proposal has been prepared following section 247 pre-planning consultations meeting held with the Planning Authority.
- 6.2 The design particulars have been reviewed and amended in order to address both the opinions of the Planning Authority and to ensure compliance with relevant national policies, guidelines and local policy objectives under the Cavan County Development Plan 2022-2028.
- 6.3 At a national and regional level, this statement and accompanying documents has demonstrated the consistency of the development with the following:
- National Planning Framework 2040;
  - Housing for All;
  - Sustainable Residential Development and Compact Settlement Guidelines;
  - Urban Development and Building Heights;
  - Smarter Travel - A Sustainable Transport Future;
  - Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for Planning Authorities 2020-2023;
  - Design Manual for Urban Roads and Streets;
  - Guidelines for Planning Authorities on Childcare Facilities;
  - Habitats Directive – Appropriate Assessment Guidelines;
  - Regional and Spatial Strategy for the Northern and Western Region;
  - Urban Design Manual;
  - The Planning System and Flood Risk Management Guidelines
- 6.4 Compliance is also demonstrated with the policies and provisions of the Cavan County Development Plan and the Cavan Town Local Area Plan.
- 6.5 We submit the proposed development will provide an appropriate form of high-quality residential development at an appropriate density for this inner urban site.
- 6.6 Design particulars can be summarised as:
- Net site density proposals of 32.6 units per hectare (net) which is considered to be an appropriate balance between national policy, local policy and the existing site context.
  - Overall unit numbers of 145 residential units.
  - A variety of residential apartments.
  - A variety of building typologies which will create variety in streetscape, provide an appropriate balance in terms of a response to the context and ensure qualitative design standard is provided throughout.
  - Active frontages throughout the site;
  - A centrally located creche;
  - Open space provision to a high qualitative standards delivering 18% net of the site area for Public Open Space or 16% of the gross site area which caters for all age brackets;
  - Communal space for apartment residents;
  - A DMURS compliant road, footpath and cycle network.
  - A layout that is appropriate in terms of Master planning relative to adjacent lands;

- Associated works to include for connection to services;
- Overall a scheme that responds to it's locational context in terms of density and scale, making the best and most efficient use of the land and the opportunities which it presents.

- 6.7 It is respectfully submitted that the Planning Authority have regard to the justification set out in this statement which demonstrates that the proposal is entirely appropriate.
- 6.8 In terms of planning assessment National policy under the NPF sets out clear policy which Planning Authorities are required to incorporate into planning decisions. We again highlight objective 13 of the NPF which states:
- 'In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.'
- 6.9 We submit the relevant National policy context now provides support for such infill development proposals to ensure efficient use of lands and encourage sustainable travel modes where car parking is minimised.
- 6.10 The National policy context is considered to provide a determining policy basis for the Planning Authority to grant permission. We highlight section 34 (2)(ba) of the Planning and Development Act wherein it states:
- 'Where specific planning policy requirements of guidelines referred to in subsection 2(a) differ from the provisions of the development plan of a Planning Authority, then those requirements shall, to the extent that they so differ apply instead of the provisions of the development plan.'
- 6.11 As required under LRD legislation this planning statement demonstrates that the proposed development is consistent with the national, regional and local planning policy framework and that the proposal will provide for an effective and efficient use of this suburban site which is highly accessible and well served by public transport.
- 6.12 In the context of the attached details and relevant government policies which seek to provide additional residential units to address the housing shortage we trust that the application will meet with favourable assessment by the Planning Authority.



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