



STATEMENT OF RESPONSE

In respect of

**LANDS AT DRUMLARK
CAVAN TOWN**

Prepared by

GENESIS PLANNING CONSULTANTS

On behalf of

DRUMLARK INVESTMENTS LTD

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	TABLE OF CONTENTS	PAGE NO
1	INTRODUCTION	5
2	STATEMENT OF RESPONSE	6
2.1	Overview	6
2.2	Item 1: Planning considerations- Layout and design	7
2.3	Item 2: Roads Infrastructure/Traffic Impacts	7
2.4	Item 3: Internal Roads Layout	8
2.5	Item 4: Drainage	9
2.6	Item 5: Active Travel	9
2.7	Item 6: Road Safety	10
2.8	Item 7: Environment	10
2.9	Item 8: Infilling of lands	11
3	SUMMARY & CONCLUSION	13

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1 INTRODUCTION

1.1 The pre-application consultation opinion from the Planning Authority in relation to the proposed LRD at Drumlark, Cavan Town was dated 20th September 2023, case reference LRD23-001.

1.2 Having regard to the above the opinion states that:

'Following consideration of the issues raised during the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act would constitute a reasonable basis for Large-scale Residential Development.'

1.3 The opinion further states that the Planning Authority considers a total of 28 matters incorporating specific information should be submitted with any LRD application.

1.4 Section 2 of this statement responds to specific issues raised by the Planning Authority in their notice of opinion and references particulars which have been included as part of the planning application documents.

2 STATEMENT OF RESPONSE TO ISSUES RAISED

2.1 Overview

2.1.1 The following sets out how the proposal has addressed the issues raised in the LRD Consultation Opinion, with reference to the accompanying documentation submitted, to demonstrate how the proposal addresses matters raised in the LRD opinion and also to demonstrate how the proposal is consistent with the policy and legislative context.

2.2 Item 1: Planning considerations - Layout and Design:

1. *The applicant is requested to provide a revised Site Layout Plan (Dwg. No. 23001-BCD-MFA- 00-00-DR-A-502) to include the following changes:*

I) Apartment Blocks A & B re-located to the south-west area of the overall site and proposed sites 41-56 is requested to be revised to suitably scaled units.

2.2.1 Response: We refer to the revised architectural drawing no: 23001-BCD-MFA- 00-00-DR-A-503 which reflects the changes of Apartment Blocks A & B re-located to the south-west area of the overall site and proposed sites 41-56 now suitably scaled units.

(II) Public Open Space located along the eastern boundary of the site (shown as area 3 and area 4 Public Open Space) is requested to be revised to include the existing agricultural track which is requested to be integrated into the overall Public Open Space. The revised Site Layout is to include a walkway linking the Public Open Space along the Eastern boundary, to the proposed walkway and future green way along the western boundary of the site. Public open space, which should be functional and accessible to all, should be meeting at least minimum standards.

2.2.2 Response: We refer to the revised architectural drawing reflecting the revised open space under drawing no: 23001-BCD-MFA- 00-00-DR-A-504. This layout has also been incorporated into landscape plans by Parkhood.

(III) The applicant is requested to show section drawings (north-south) and (east-west) through the proposed development to illustrate the existing and proposed topography and the finished topsoil depths (allowing for settlement) of open space areas, and contiguous elevations.

2.2.3 Response: We refer to the architectural drawing reflecting the relevant sections on drawing no: 23001-BCD-MFA- 00-00-DR-A-507 by MF Architects.

(IV) The applicant is required to demonstrate how the boundary treatment will ensure passive surveillance and protection along the full length of the western boundary of the site, to the rear of the houses adjacent to the proposed walkway.

2.2.4 Response: This is addressed; we refer to the accompanying landscape plans by Parkhood and boundary proposals that will achieve passive surveillance.

(V) The applicant is requested to submit a Landscape Architects' Plan to include details (Sections drawings) of the treatment of proposed rear garden spaces, including all level, boundary treatments and site entrance design.

2.2.5 Response: We refer to the relevant Landscape Architects Plan which includes the requested sections of the rear gardens, boundary treatments and site entrance design by Parkhood Landscape Architects.

(VI) *Details should be submitted of the proposed foot/cycle path connections through the proposed walkway including surfacing materials and lighting details, as well as connectivity to adjacent lands. The potential links should be fully designed into the scheme.*

2.2.6 Response: We refer to the relevant Landscape Architects Plan which includes the requested path details along with surfacing and lighting details. Connection to adjacent lands is also provided for.

(VII) *The applicant is requested to submit a Bat Survey of the site.*

2.2.7 Response: Complied with. We refer to the accompanying Ecological Impact Assessment by Hydrec which concludes no bat roosts were detected within the site.

(VIII) *A phasing plan should be submitted.*

2.2.8 Response: Complied with. We refer to the accompanying phasing plan on drawing no: 23001-BCD-MFA- 00-00-DR-A-510 by MF Architects.

(IX) *All internal and external space standards associated with all residential units should comply with relevant national standards and/or the adopted Cavan County Development Plan*

2.2.9 Response: Complied with. We refer to the accompanying Housing Quality Assessment.

(X) *Part v proposals should be submitted.*

2.2.10 Response: This is addressed in the accompanying Part V proposals.

(XI) *External finishes should be of high quality low maintenance type.*

2.2.11 Response: This is addressed on accompanying drawings and material schedule of finishes by MF Architects shown on both drawings and in the Design Statement.

2.3 **Item 2: Roads Infrastructure/Traffic Impacts**

(2) *The scheme layout is requested to take cognisance of the Northern Strategic Link Road plan for the area.*

2.3.1 Response: The proposed scheme has taken cognisance of the Northern Strategic Link Road plan for the area.

(3) *The Traffic and Transportation Assessment is requested to be updated as follows:
A full operational assessment is requested to be completed on the following 6 no. junctions:*

- *L-1532/L-1513 Loreto Road junction*
- *L-1532/Drumgola Wood junction*
- *L-1532/The Gallops junction*
- *L-1532/L-5538 Keadue Lane junction*
- *L1532/R-212 Latt Cross Roundabout*
- *R212/ L-6633 Athbara/ R-901 Church Street/ L-5538 Keadue Lane / Cathedral exit junction. The assessment is requested to detail the development's impact on queue lengths and delays at the said junctions (queue lengths during the am peak hour is requested to be measured)*

and, where required, propose mitigation to reduce the impacts of the development generated traffic on the surrounding road network.

- 2.3.2 Response: A full operational assessment has been completed on the following 6no. junctions mentioned above. The assessment gives details regarding the development's impact on queue lengths and delays at the said junctions. Refer to Section 5.0 of Traffic and Transport Assessment submitted under separate cover for details.

(4) Sightlines at the development's access is requested to be based on the measured 85th percentile speed of traffic at the location. The applicant should provide a detailed sightline drawing indicating the requisite unobstructed visibility splays in both directions at the site access. The drawing is requested to detail the extent of proposals for removal of and/or works to the existing roadside boundaries, as well as relocation of any affected road furniture/utility infrastructure to facilitate same.

- 2.3.3 Response: A speed survey was carried out at the location of the development access junction to measure the 85th percentile of the speed at this location. The speed survey results indicated that the 85th percentile speed at the development access junction was 65.2kph. However it was agreed with the local authority that the sightlines of 59m on both directions of L1532 in accordance with Design manual for urban Roads and Street (DMURS) for a design speed of 60kph is feasible at this location.

(5) Drawings is requested to be revised to indicate the allowance of a 4m wide setback along the full L-1532 road frontage of the lands within the applicant's control to facilitate potential future upgrading of public infrastructure/Active Travel facilities benefiting the development.

- 2.3.4 Response: This is addressed on CS Consulting Drawing no. D111-CSC-XX-XX-DR-C-0001 which indicates the allowance of a 4m wide setback along the full L1532 road frontage.

2.4 **Item 3: Internal Roads Layout**

(6) In order to control vehicular speeds within the development it is recommended that the layout be revised to incorporate appropriate traffic calming measures. Consideration is requested to be given to the provision of raised junction treatments on 'ROAD 2' and 'ROAD 3' as appropriate.

- 2.4.1 Response: A raised junction shall be provided along Road 2 and Road 3. Refer to CS Consulting Drawing no. D111-CSC-XX-XX-DR-C-0001 submitted with this planning application for further details.

(7) Full details and specifications of the public lighting system required to facilitate the development and access thereto is requested to be submitted to the Planning Authority (Asset Management Section). The Public lighting design is requested to be in accordance with the Council's adopted External Lighting Policy. Trees should not be planted near public lighting columns, to ensure unimpeded lighting level.

- 2.4.2 Response:

(8) Drawings to be provided indicating 30km/h signs (incl. slow zone) to be provided in the estate in accordance with section 7.3.2.1 of the Speed Limit Guidelines (signage).

- 2.4.3 Response: Refer to CS Consulting Drawing no. D111-CSC-XX-XX-DR-C-0013 submitted with this planning application which indicated the 30km/h (incl. slow zone) signage provided in the estate in accordance with section 7.3.2.1 of the Speed Limit Guidelines (signage).

(9) Any trees proposed within grass strips adjacent to the footpaths is requested to be smaller species with a canopy spread of 4-6 metres max and minimum clearance of 4 metres.

2.4.4 Response:

(10) The site layout is requested to make provision for EV charging spaces in line with Cavan County Development Plan. Review and update Section 6.4 of the Traffic and Transport Statement as appropriate (Refers to Carlow Dev. Plan etc.) Details of EV Charging spaces to be agreed with the Planning Authority.

2.4.5 Response: The site layout has been updated to provide EV Charging spaces in accordance with Cavan County Development Plan. Section 6.4 of the Traffic and Transport Assessment has now been updated.

2.5 **Item 4: Drainage**

(11) The drainage design is requested to ensure that no surface water flows from the site onto the public road, or negatively impacts surrounding lands/property. The public road surface water regime is requested to not be negatively impacted by the development. Drainage details including discharge locations to be agreed with the MD.

2.5.1 Response: The drainage has been designed to ensure that no surface water flows from the site onto the public road, or negatively impacts surrounding lands/ property. The public road surface water regime shall not be negatively impacted by the development.

2.6 **Item 5: Active Travel**

(12) In line with Active Travel Objectives in the County Development Plan and having regard for the Cavan Town Sustainable Communities Development objectives; it is recommended that the applicant should provide proposals demonstrating how pedestrian linkages can improve connectivity between the development and the town core and Cavan Greenway, and provide shorter pedestrian travel times, in line with the "10-minute town" concept. Any connection between the proposed development and existing infrastructure is requested to be open, inviting and lit.

2.6.1 Response: It is proposed to provide a 3.25m wide shared surface which shall connect to the existing and proposed (proposed future road infrastructure works by Cavan County Council) road infrastructure which reduces the travelling time for the active travel users. It is also proposed to provide a zebra crossing over the existing L1532 road where the shared surface connects to allow pedestrians to cross safely on to the existing footpath. The zebra crossing shall have a width of 4m to allow for two-way crossing of both pedestrians and cyclists.

The proposed shared surface shall be in the close proximity to the proposed future bus stop location, which shall further support the concept of 10-minute town concept for the occupants who participate in active travel from the proposed development to the Cavan Town Centre.

(13) The applicant is requested to liaise with the Active Travel Section to agree requirements for a bus stop and access to be located in proximity to the entrance to the development. Full details including drawings to be submitted in this regard..

2.6.2 Response: It is proposed to provide a 3.25m wide shared surface that will connect along the central section of the site layout. This shared surface shall cater for both pedestrians and cyclists. This proposed shared surface shall connect the internal road layout to the existing public road infrastructure L1532.

(14) *The applicant is requested to review the access road design of 'ROAD 01' from its junction with the public road (L-1532) to provide an improved cross section proposal that better facilitates vulnerable road users and supports greener and more sustainable transport to and from the development (e.g., footpaths and cycle paths accommodating the need on both sides of the carriageway).*

- 2.6.3 Response: This has been addressed in updated layouts and drawings proposed. It is proposed to provide a 3.25m wide shared surface along the central section of the site layout. This shared surface shall cater for both pedestrians and cyclists. This proposed shared surface shall connect the internal road layout to the existing public road infrastructure L1532.

2.7 Item 6: Road Safety

(15) *The revised scheme layout (including any revisions to incorporate recommendations outlined above) is requested to be subject to a Stage 1/2 Road Safety Audit to be carried out by an independent qualified engineer in accordance with TII Publication GE-STY-01024 and submitted to the Planning Authority. All recommendations of the Road Safety Audit is requested to be incorporated into the design.*

- 2.7.1 Response: A Road Safety Audit was carried out by Road Plan as part of a Quality Audit for the scheme. All the recommendations of the Road Safety Audit have been incorporated within the final design of the proposed development. Refer to Quality Audit Response document and CS Consulting Drawing no. D111-CSC-XX-XX-DR-C-0025 submitted with this planning application for further details.

(16) *A Quality Audit of the design is requested to be undertaken in accordance with Section 5.4.2 and Advice Note 4 of the Design Manual for Urban Roads and Streets (DMURS).*

- 2.7.2 Response: A Quality Audit was carried out by Road Plan. Please refer to Quality Audit Response document and CS Consulting Drawing no. D111-CSC-XX-XX-DR-C-0025 submitted with this planning application for further details.

2.8 Item 7: Environment

(17) *The Construction Environmental Management Plan (CEMP) should include a site layout demonstrating all proposed mitigation measures and associated infrastructure for the protection of the environment including both surface and ground waters, during construction.*

- 2.8.1 Response: Please refer to sub-section 7.1 of OCEMP submitted under a separate cover which provides details regarding proposed mitigation measures and associated infrastructure for the protection of the environment including both surface and ground waters, during construction.

(18) *All mitigation measures associated with protecting surface and groundwater quality must be included in the CEMP, this includes mitigation measures referenced in other reports submitted e.g. NIS/AA, etc.*

- 2.8.2 Response: All mitigation measures associated with protecting surface and groundwater quality have been included in the updated CEMP. Please refer to Construction and Environmental Management Plan (CEMP) submitted with this planning application for further details.

(19) *The applicant is requested to confirm that the development not commence until Uisce Eireann confirms that a connection to the public sewer and public mains is approved*

- 2.8.3 Response: The development shall not commence until the Uisce Eireann confirms that a connection to the public sewer and public mains is approved.

(20) *The surface water drainage system proposed to serve the development must have appropriate infrastructure including but not limited to attenuation as well as appropriate flow control mechanism on the outfall.*

2.8.4 Response: The surface water drainage system proposed to serve the development shall have appropriate infrastructure including attenuation as well as appropriate flow control mechanism before the final outfall into public sewer.

2.9 **Item 9: Infilling of Lands**

(21) It is noted that it is the intention to re-use excavated material (soils) on-site where possible (as per Section 6.4 of the Outline Construction Environment Management Plan). There will be a requirement for fill on-site which is indicated on Drawing Ref. 23001-BCD-MFA-00-ZZDR- A-507 – this drawing shows various cross sections. However, no volume calculations have been provided in relation to earthworks which should be submitted in the application.,

2.9.1 Response: Refer to sub-section 5.2 of the CEMP submitted under separate cover which provides the details of the estimated volume of materials to be excavated from site.

(22) The Outline Construction Environment Management Plan refers to waste generation and removal and the use of authorised waste collectors and sites. However, the plan references outdated (revoked) waste legislation (Waste Permit Regulations, 1998) and refers to outdated guidelines on Construction and Demolition Waste, DoE, 1996 – which have been replaced by the 'Best Practice Guidelines for the preparation of resource & waste management plans for construction & development projects' (EPA, 2021). Therefore, the plan should be revised and amended accordingly.

2.9.2 Response: The Outline Construction Environment Management Plan has been updated to omit any references of the outdated waste legislation, and reference has been made to the 'Best Practice Guidelines for the preparation of resource & waste management plans for construction & development projects' (EPA, 2021).

(23) The applicants are requested to submit a comprehensive and detailed plan is requested to in relation to the proposed works (to include site clearance works and construction works) and all wastes that may arise. The plan is requested to be prepared in accordance with the 'Best Practice Guidelines for the preparation of resource & waste management plans for construction & development projects' (EPA, 2021). The plan is requested to be submitted to the planning authority on completion for approval prior to any works commencing.

2.9.3 Response: Refer to section 6.0 of the Outline Construction Environment Management Plan submitted under separate cover which provides information in relation to the proposed works (to include site clearance works and construction works) and all wastes that may arise. The plan has been prepared in accordance with the 'Best Practice Guidelines for the preparation of resource & waste management plans for construction & development projects' (EPA, 2021).

(24) The Construction Environmental Management Plan (CEMP) should include a site layout demonstrating all proposed mitigation measures and associated infrastructure for the protection of the environment including both surface and ground waters, during construction.

2.9.4 Response: Please refer to sub-section 7.1 of OCEMP submitted under a separate cover which provides details regarding proposed mitigation measures and associated infrastructure for the protection of the environment including both surface and ground waters, during construction.

(25) All mitigation measures associated with protecting surface and groundwater quality must be included in the CEMP, this includes mitigation measures referenced in other reports submitted e.g. NIS/AA, etc..

2.9.5 Response: All mitigation measures associated with protecting surface and groundwater quality have been included in the updated CEMP. Please refer to Construction and Environmental Management Plan (CEMP) submitted with this planning application for further details.

(27) The surface water drainage system proposed to serve the development must have

appropriate infrastructure including but not limited to attenuation as well as appropriate flow control mechanism on the outfall.

- 2.9.6 Response: The surface water drainage system proposed to serve the development shall have appropriate infrastructure including attenuation as well as appropriate flow control mechanism before the final outfall into public sewer.

(28) The provision of all Water Services infrastructure relating to this proposed development must be agreed in writing with both Uisce Eireann and Cavan County Council and thereafter provided and installed by the developers in strict accordance with the respective Uisce Eireann detailed specifications and/or expressed written directions in force at the time the project reaches Construction stage.

- 2.9.7 Response: The provision of all Water Services infrastructure relating to this proposed development shall be agreed in writing with both Uisce Eireann and Cavan County Council and thereafter provided and installed by the developers in strict accordance with the respective Uisce Eireann detailed specifications and/or expressed written directions in force at the time the project reaches construction stage.

3 SUMMARY & CONCLUSION

- 3.1 This statement outlines how the items identified in the pre-application LRD consultation opinion from the Planning Authority in relation to the proposed development have been addressed in full by the applicant and design team prior to submission of the application.
- 3.2 The layout and design incorporated into the final scheme are considered to result in improvements to the overall proposed development and ensure that a high-quality scheme is presented.
- 3.3 It is submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and section 28 guidelines.
- 3.4 In conclusion we consider that the above responses and the submitted documents and drawings have addressed the substantive issues raised by the Planning Authority, providing a robust planning and architectural basis for the proposed development as submitted.
- 3.5 In the event that the Planning Authority consider that further design modifications are required to further assist in addressing any ancillary matters it is respectfully submitted that such modifications could be incorporated by condition.
- 3.6 We trust that the application documentation is in order and we look forward to a favourable decision.



Ronan Woods
Director