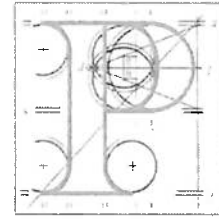


**Our Case Number:** ABP-319306-24



**An  
Bord  
Pleanála**

Gerard and Shelia Cooney  
Drumelis  
Cavan  
Co. Cavan  
H12 HW54

**Date:** 1st May 2024

**Re:** Proposed development of Cavan Town Sports Campus  
in the townlands of Kilnavara, Lurganboy (Loughtee Upper By), Creighan and Rosscolgan in Cavan  
Town.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

JA02

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glao Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Drumelis

Cavan

Co. Cavan

H12HW54

27<sup>th</sup> April 2024

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1

**R.E. Application to An Bord Pleanála for approval under Sections 175 and 177AE of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) by Cavan County Council for Cavan Regional Sports Campus**

Dear Sir/Madam,

We are the property owners of 10 Lurganboy, Cavan, H12 W012 . Our property is the last house on the Eastern side of Kilnavaragh Lane and will bound the proposed new development's North-Western boundary for circa 85m, along the entirety of our Southern boundary.

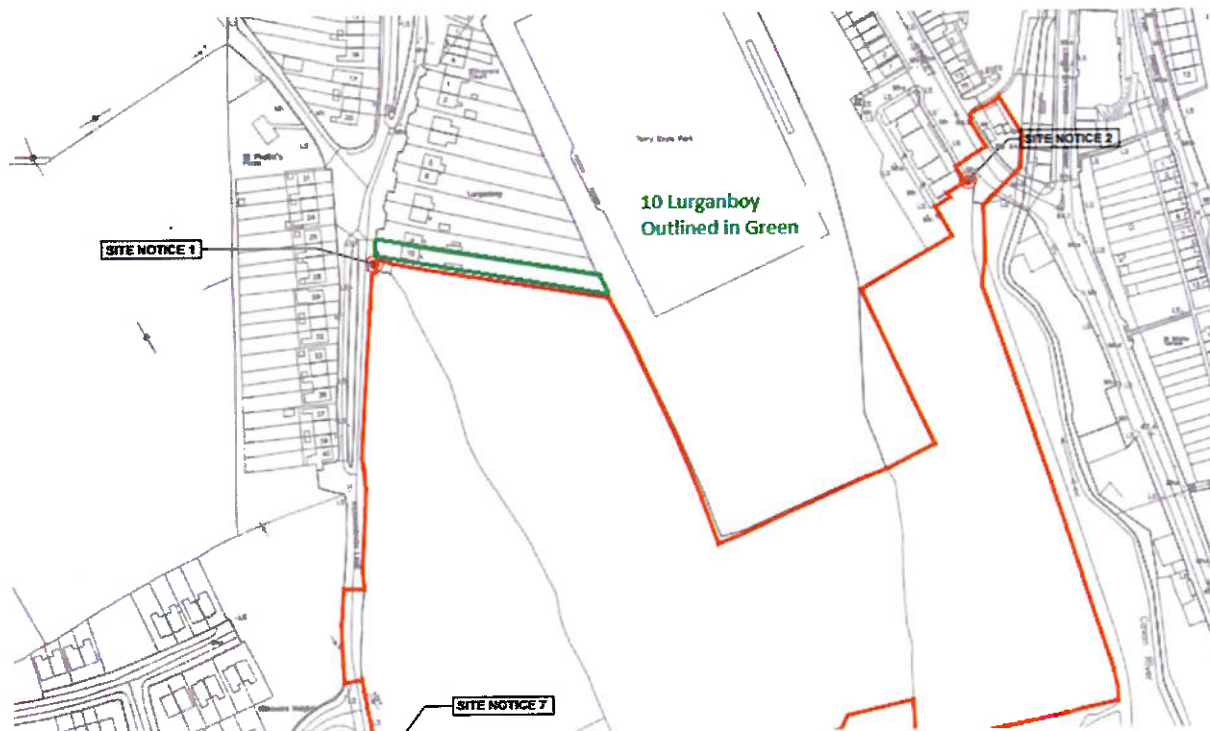


Figure 1 - Extract from Site Location Map A2156-100-02. Our house and property is outlined in green

We would like to point out that we are supportive in general of the development and agree that it will be of great benefit to the local community, the town of Cavan and the greater region. We are generally supportive of the proposed concept and design. We note, however, that we have not been engaged with as stakeholders, nor consulted in the design process of the proposed development. We have carefully reviewed the plans and particulars provided on the Council's website pertaining to the application to An Bord Pleanála and feel there are a number of areas that have not been addressed that would be required to determine the impact of the proposed development on our property. It is our view that the following issues should be addressed in order to comply with the requirements of European Commission Directive 2011/92/EU and to address proper planning as set out herein.

**Main flaws in the EIAR:**

1. Lack of description for the development. There are no details of how the development is to be operated. In particular, hours of operation, access control of pedestrian entrances, security measures to be implemented, anticipated numbers of spectators and players, number of amenity walkers / cyclists etc.
2. Accuracy of information. Some information within the EIAR do not appear to be accurate. For example, the section line shown on drawing A2156-100-11 showing section line 1B and the corresponding section 1B on drawing csc-mca-xx-zz-dr-a-4101, do not allow for an appreciation of the impact of the levels, size and scale of the development adjacent to my property.
3. Consultation process. It is noted in the EIAR that extensive consultation process was conducted in 2018 as part of a feasibility study and that 12 individual meetings with key stakeholders. It is noted that no consultation was offered to ourselves as property owners at 10 Lurganboy. There was no open public consultation on emerging preferred options or scale and scope of the development that would enable us to provide feedback to the project sponsor at any stage of the design process to date.

The errors noted above, should be determined to have a material impact on the overall findings and assessment contained within the EIAR.

With our property being on the Northern Boundary of the development, with the proposed primary pedestrian & cycle access track running along the entirety of our boundary (circa 85m), immediately north of the athletic track, 452 seater stadium, infield grass pitch and other ancillary activities, we have a number of concerns which we feel haven't been appropriately assessed through the EIAR or designed out of the development as follows:

**Security**

No details of operations and if the development is going to have 24 hour security and patrols. There are no details of internal CCTV to dissuade antisocial behaviour. The proposed bollard level public lighting also does not provide a sense of security due to the lack of edge luminance/ back lighting coupled with inability to clearly identify persons at distance. There are no details of access control within the site and if the pedestrian entrances will be closed off at night or if they will only be opened when events are being undertaken within the development. Within fencing arrangements, the boundary of the site has no detailed boundary treatment. We have concerns that the only vehicular access point for the development is via the Dublin Road entrance, and the corresponding ability of An Garda Síochána to respond to antisocial behaviour at night should access be

uncontrolled, or inadequate security patrols be provided, in particular around the Northern and Western extents of the proposed development. We are furthermore concerned that no appreciable boundary fence or wall is proposed between our property and the development, which exposes the side and rear of our property, and provides easy access and egress to malevolents.

### Lighting

2.5.13 of the EIAR main text states that the lighting proposals to the pedestrian and cycle ways will allow users *"orientate themselves, identify other users, detect potential hazards, discourage crime, and engender a feeling of safety and security"*. There is a lack of design provided to justify either statement. It is unclear how the provision of bollard lighting can be used to achieve an illuminance level to enable person to identify others, detect potential hazards and discourage crime.

We are of the opinion that the lighting design for the development must be carefully designed to act as an antisocial deterrent, provide sense of security through appropriate level of colour rendering and uses the illuminance approach to design opposed to luminance.

It is also noted that the layout drawing A2156-100-11 shows three number lighting columns along each of the longitudinal sides of the running track, however the 9955-JCP-ZZ-00-DR-E-63003-P02 drawing shows lighting columns at each end of the running track, roughly six (6) metres from our boundary. It is not clear which set of locations were used to assess the flood lighting design (if there is any) and impacts of same as part of the EIAR.

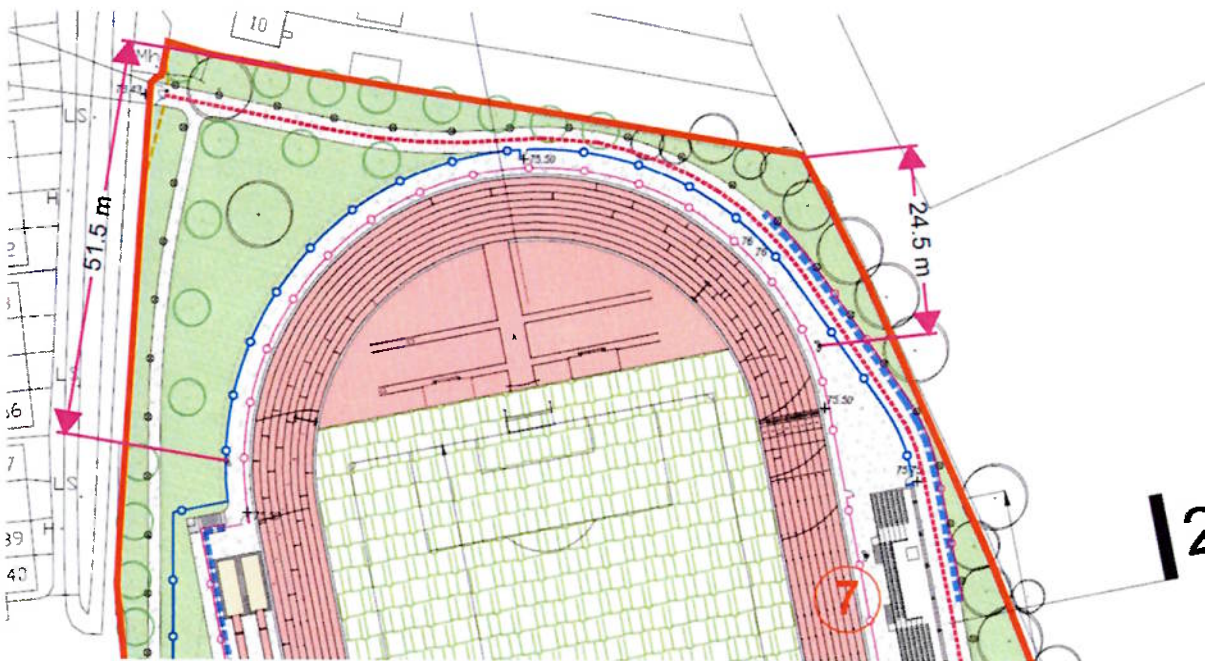


Figure 2 - Extract from A2156-100-10 - Tower flood light locations.



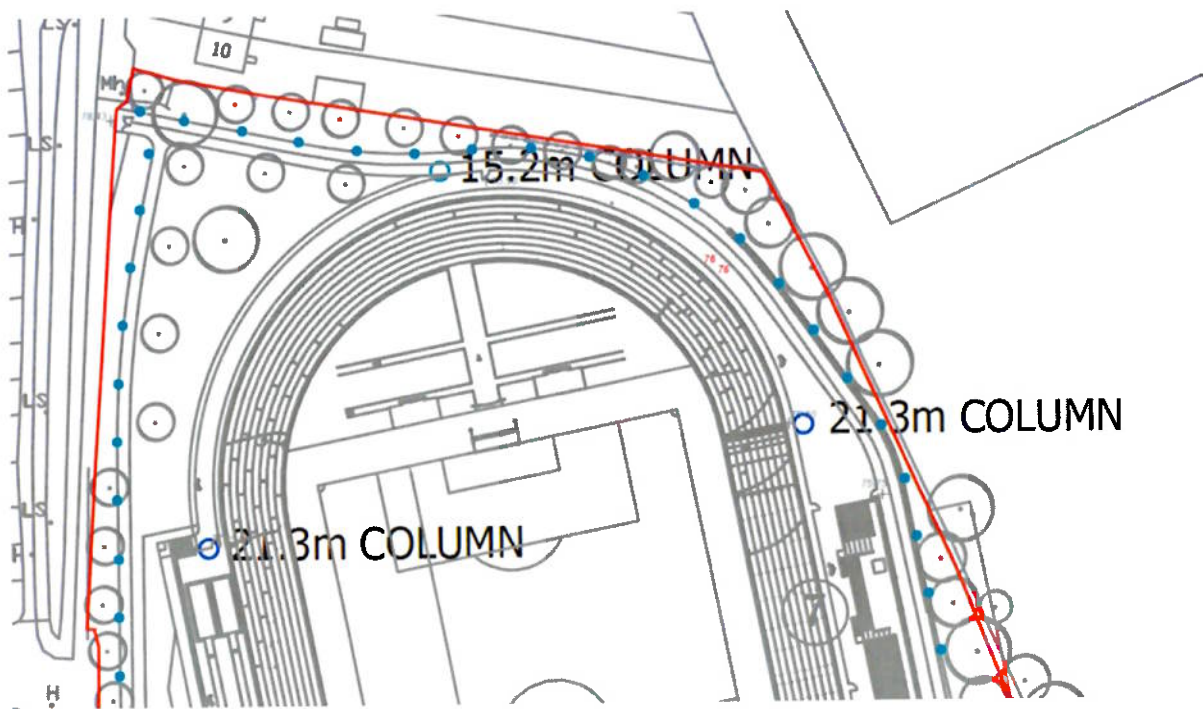


Figure 3 - extract 9955-JCP-ZZ-00-dr-e-63003 - flood light column within 6m of boundary

### **Noise**

With respect to protection of residential amenity, Chapter 11 of the EIAR does not clearly and accurately assess the impact of noise. The crowd sizes used with the Hayne, Taylor et al Proceedings of Acoustics 2011 equation  $LWA_{eq} = 15\log N + 64 \text{ dB(A)}$  where N is the number of people in the crowd are not representative nor realistic. The EIAR chapter 11 states that for the 452 seater elevated terraced seating stadium along with *"the natural topography of the site to create a number of grassed terraces to the west of the track for spectators"* will only have 20 spectators is both illogical and unreasonable and emphasises the poor description of the operation of the proposed development.

The cumulative impact of noise on our property therefore cannot have been accurately assessed or appropriately demonstrate that appropriate acoustic barriers/wall design are required between our property and the development.

### **Landscape and Visual Impact**

It is observed that the magnitude of visual change and impact of the proposed development has not been thoroughly assessed on the viewpoints. Without accurate sectional drawings and without photomontages of the proposed development from a viewpoint of Kilnavaragh Lane x St Phelims PI (53°59'13.6"N 7°21'55.5"W), it is not possible to appreciate the scale or determine the visual impact of the development on our property and the wider location. Chapter 16 of the EIAR has 6 viewpoints from Kilnavaragh lane, however, none are from the most populous area where short and medium distance views will be clearly accessible. The chapter states *"it is difficult to find long and medium distance views into the site from the northwest and north because of the lack of elevated vantages points and intervening topography, built form and vegetation"*. The accuracy of this statement is

contended, especially at the northwest corner of the development. As our property (residential property) is within 500m of the proposed development, 16.6.7 of the EIAR classifies the property as "High Sensitivity". The magnitude of effect is subjective, but could be assessed as being medium adverse, thus giving a significance of effects as Major Adverse per table 16.1.

It is not possible to assess the visual impact of the development as the drawings are not consistent with each other. The general layout drawing, A2156-100-11, shows the location of section line 1B, extending through a number of properties to the north. The section line is facing Kilnavaragh lane. Drawing CRSP-MCA-00-00-DR-C-1800-P1 shows earthworks cut and fill levels, moving from cut to fill north to south across the location of section line 1B. The sections provided however are not along section 1B as it does not correlate with the earthwork cut and fill levels, does not show any boundary walls, does not show fence lines, pathways, pitch boundaries, floodlight towers etc. It is also questioned what building is shown on 1B of csc-mca-xx-zz-dr-a-4101, as the elevation and scale of the spectator stand does not match that of csc-mca-xx-xx-dr-A-2005.

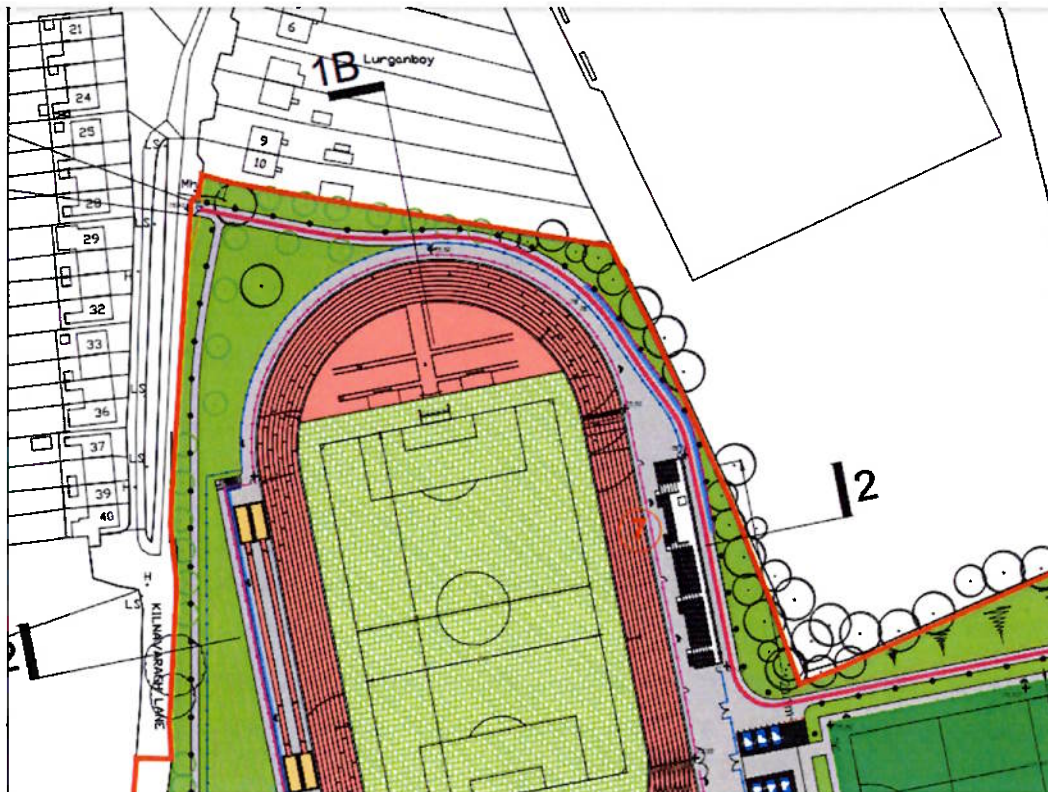


Figure 4 - Extract from A2156-100-11. Section 1B location

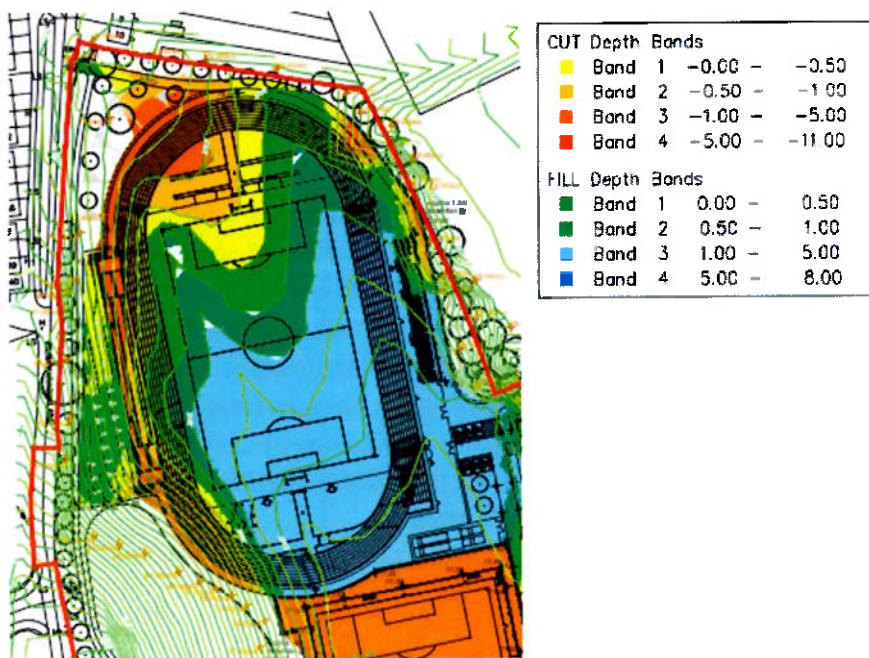


Figure 5 - extract from CRSP-MCA-00-00-DR-C-1800-P1 - showing proposed cut and fill earthworks

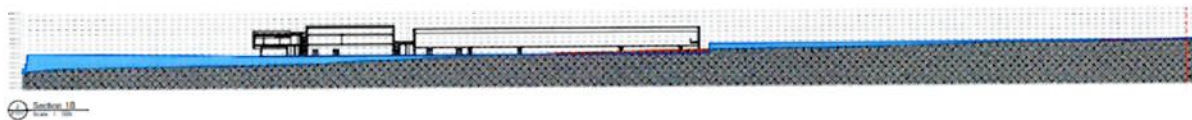


Figure 6 - Extract from csc-mca-xx-zz-dr-a-4101 - showing section 1B – misrepresented & incorrect building

### **Synopsis**

We appreciate the proposed development will have significant benefits for the local community and the greater area, however, we feel the current proposal without proper assessment will have an unduly and disproportionate negative impact on our property. If the aforementioned concerns are addressed through proper mitigation design and assessment, we would be amenable to withdrawing our observations on the proposed development.

Again, we wish to reiterate our support for the proposed development, and would be amenable to meet and discuss concerns with appropriate design professionals in order to resolve outstanding design and operational concerns relating to the application.

Yours Faithfully

Gerard and Shelia Cooney