



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-301693-18

Strategic Housing Development

Demolition of existing Westwood Hotel and construction of a student accommodation scheme (394 bedspaces), pedestrian and cyclist links to Thomas Hynes Road and N59 Upper Newcastle Road and associated works.

Location

Westwood Hotel, Dangan, Upper Newcastle, Galway.

Planning Authority

Galway City Council

Applicant

NTM ROI Seed Capital LP

Prescribed Bodies

Irish Water

Transport Infrastructure Ireland

Observers

Save the Westwood House Hotel
Group, Pdraig Folan, John C.
O'Donnell, Brian Burton, Tessie Nevin,
Pauline Ridge, Terry Deasy, Fiona &
Martin Costello, Maura & Niall Gilligan,
Bartley Joyce, Niall Egan, Edmond
Thornton, Hillary Wright and Julie
Baxter, Noel Grealish, Finbar J. Smyth,
Michael Beatty, Dolores O'Loughlin,
Teresa Turley, Paul Hourigan, Shelia
Moore, Michael & Nora Corley, Joan
Hughes, Maura O'Riordan, Mary
Walsh, Michael Mulhall & Fiona Quinn,
Marian Tierney, Hildegard Naughton,
Anne Feeney, Anne O'Hara Quinn,
Niamh Doherty & Christopher Duke,
Neil Sweeney, Ann McDonnell,
Pdraig Lenihan & Catriona Clear,
Paula & Colman O'Flaherty, Bertie
Flaherty & Joanne Flaherty, Bernard &
Dympna Finan, Tim & Joan Hogan,
Michael Bradley, Dangan Heights
Community Association, Martina
O'Flaherty, James & Veronica Keenan,
Paul & Valerie Coleman, Pat & Helena
Francis, John Boyle, Bridie Kenny, Joe
& Mary Nally, Michael & Sarah
Withero, Samantha Collins, Hazel Park
Residents Association, Bridget
Browne, Marie Walshe, Martin & Norrie
Quinn, Kathleen Cafferky, Ronan
Ryan, Clar Grogan, Mary Hynes,

Conleth & Mary Cunnane, Ger
Cunningham & Mary McNamee,
Lorraine Courtney, Ethel Balfe, Basil &
Beryl Fenton, Siobhan Keane, John
Ryan, Jim Sherry, Terry O'Flaherty,
Maura Cunningham, Bridie & Joseph
Corcoran (2), Corionna Corcoran,
Geraldine Byrne & Damien Byrne,
Christy Kelly, Meadhbh Hughes,
Michael Sheppard, Dun Daingean
Residents Association.

Date of Site Inspection

9 August 2018

Inspector

Una Crosse

Contents

1.0 Introduction	5
2.0 Site Location and Description	5
3.0 Proposed Strategic Housing Development	6
4.0 Planning History.....	9
5.0 Section 5 Pre Application Consultation – ABP-300845-18	11
6.0 Relevant Planning Policy	15
7.0 Observer Submissions.....	25
8.0 Planning Authority Submission	28
9.0 Prescribed Bodies.....	35
10.0 Assessment.....	36
11.0 Recommendation	60
12.0 Reasons and Considerations	60
13.0 Conditions	60
APPENDIX ONE	66

1.0 Introduction

This is an assessment of a proposed strategic housing development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016. The application, made by NTM ROI Seed Capital LP, was received by the Board on 25th May 2018.

2.0 Site Location and Description

- 2.1. The proposed development is located in the townland of Dangan, along the Newcastle Road and Thomas Hynes Road within the jurisdiction of Galway City Council. The site has a stated area of 0.88 hectares and is located approximately 2.3km to the north west of Galway City Centre at the junction of the Upper Newcastle Road and the Thomas Hynes Road. There is an existing three/four storey hotel on the development site known as the 'Westwood' House Hotel which accommodates c.58 bedrooms with bar/restaurant, function rooms and ancillary services. The applicant indicates this hotel has been in operation since c. 1999 when it replaced a public house on the site. Access to the hotel site is currently from the N59 with parking to the front, eastern and rear boundary of the site. There is an existing undeveloped area of the site to the south of the hotel which has an access from 'Tudor Lawn'. This is currently separated from the hotel development and is overgrown.
- 2.2. The site is bounded by the Newcastle Road (N59) to the north, Thomas Hynes Road to the east, the residential estates known as 'Dún Dangean' and 'Tudor Lawn' to the west and to the south. To the north and north east of the site the IDA Galway Business Park and NUIG Northern Campus occupy a considerable area of land with the NUIG Sports Pavilion approximately 300 metres north-west of the site. The area to the east, west and south of the site is characterised by residential development. There is a change in level between the application site and the properties to the west of c. 1 metre with the site falling in level from west to east.

- 2.3. There are public footpaths along Newcastle Road and Thomas Hynes Road with public lighting. There is a bus stop located to the south-east section of the site along Thomas Hynes Road with an hourly bus service to the city centre. There is an existing pedestrian access point from the site to the Thomas Hynes Road by way of a gap in the wall.

3.0 Proposed Strategic Housing Development

The development as submitted comprises the construction of a student accommodation development which is proposed as follows:

- Demolition of the existing structures onsite (totalling 5,253 sqm) associated with the existing Westwood House Hotel.
- Construction of student accommodation with an overall gross floor area of 12,112sq.m comprising 63 units providing a total of 394 bedspaces proposed to be used for student accommodation during the academic term and tourist accommodation during the summer.
- The development comprises 5 blocks.
- Block A addresses Thomas Hynes Road with its short northern elevation addressing the Newcastle Road. It is 5 storeys in height and includes a café at ground floor. It connects with Block B at second floor level and above.
- Block B addresses the Newcastle Road and is 5 storeys reducing to 4 for the 15 metres closest to the western boundary of the site. The ground floor accommodates the facility reception and other communal facilities including gaming pods, Staff areas, TV/cinema room, games lounge, study rooms and laundry. It also includes the ESB substation and Switch room.
- Block C is a standalone block to the rear of and perpendicular to block A and parallel to Block B. It is 5 storeys reducing to 4 storeys for the 10 metres closest to the western boundary of the site. It accommodates a gym at ground floor in addition to waste stores.
- Block D has a similar orientation to Block C located to the rear of Block E and is 4-storeys in height. At ground floor it accommodates plant room, data comms room and water tank which are single storey. It connects to Block E by means of a corridor above ground floor level.

- Block E is an 'L' shaped structure which address the Thomas Hynes Road and the boundary which is located within Tudor Lawn. It is 5-storeys for most of its length along the Thomas Hynes Road reducing to 4-storeys up to the southern corner of the site and three storeys along the boundary with Tudor Lawn.
- The mix of units is as follows:
 - Twenty-three 4-bed apartments (36.5%);
 - One 5-bed (1.5%),
 - One 6-bed (1.5%),
 - Thirteen 7-bed units (21%)
 - Twenty-five 8-beds (39.5%).
- The development includes 700 sq.m of communal/commercial space including a café/restaurant of 150 sq.m which is proposed at the corner of Block A facing the main road junction. Block B includes a reception area and communal area including TV cinema room, gaming pods, study areas, laundry area and games/lounge area with a corridor provided to connect the two communal areas within Block B. A gym space of 60m² has been provided within Block C with ancillary services included in Blocks B, C & D.
- Vehicular access to the development is proposed from the Newcastle Road (N59) at the northwest boundary of the site (similar to existing) which leads into an access road with is located along the western boundary of the site. Two pedestrian/bicycle entrances are proposed along the eastern boundary of the site. Emergency vehicular access is proposed to the north east of the site adjoining the proposed café/restaurant/reception area.
- 24 car parking spaces are proposed, 10 of which are permanent and the remainder (14) temporary/summer spaces which are located within a games area with hard surface. Bicycle parking spaces (c.140 spaces) are proposed in 11 sheltered racks and a designated coach set down area is proposed to the south of Block A. A plant room, switch room and sub-station are also proposed within the site.
- Ancillary works proposed include landscaped areas comprising 3 courtyard garden areas, foul and surface water sewers, works to the public footpath and all other associated site services, site infrastructure and site development works.

- It is states that in the event of a grant of permission that appropriate temporary measures would be put in place during the construction period to maintain the telecommunication service provided by the existing telecommunications infrastructure on the roof of the existing building. It is proposed that in tandem a separate planning application would be submitted to the City Council to obtain planning consent for replacement infrastructure.

The following table outlines the main details of the proposal:

Detail	Proposed Development
Area of Site (planning application boundary)	8,797 sq.m (0.88ha) (area for the purpose of plot ratio calculation is 8,044 sq.m excluding public roads)
Area to be demolished	5,253 sq.m (existing Westwood Hotel)
Gross Floor area	12,112 sq.m including plant areas (11,876 sq.m without)
No. of Units	63
Mix of Units	<ul style="list-style-type: none"> • Twenty-three 4-bed apartments (36.5%); • One 5-bed (1.5%), • One 6-bed (1.5%), • Thirteen 7-bed units (21%) • Twenty-five 8-beds (39.5%).
No. of Bedspaces	394
Height of Blocks	Block A – 5 storeys Block B – 4 & 5 storeys Block C – 4 & 5 storeys Block D – 4 storeys Block E – 3, 4 & 5 storeys
Other Uses	Café/Restaurant – 150 sq.m Other Communal Areas – 550 sq.m

Density	79 units per ha (based on site are of 0.8ha site)
Plot Ratio	1.48:1
Bicycle Spaces	140
Communal Open Space	3,979 sq.m principally in 3 courtyards within the scheme.

4.0 Planning History

4.1. On Site

There is a considerable planning history on the subject site which is summarised as follows:

File Ref. No. 11/98 - Permission granted by Galway City Council for the retention of existing telecommunications equipment consisting of 6 antennae, 5 dishes and associated equipment cabinets located at roof level.

File Ref. No. 10/255 - Permission granted for the retention of the existing 6 antennae plus 1 link dish and associated equipment cabinets.

File Ref. No. 00/698/PL61.124475 - Permission granted for a 4 storey over basement apart-hotel extension to include leisure centre facilities and staff administration offices, meeting rooms etc. Decision to grant permission upheld in March 2002.

File Ref. No. 99/85 - Permission granted for hotel signage.

File Ref. No. 99/25 - Permission refused for a vehicular entrance from Thomas Hynes Road to the site of the hotel.

File Ref. No. 99/24 - Permission granted for air handling unit and elevational changes.

File Ref. No. 98/193 - Permission granted for alterations to previous permission including demolition of existing structure, construction of 2-storey bar and elevational changes to façade.

File Ref. No. 97/434 - Permission granted for a three storey 50 bedroom hotel extension with conference rooms, public bar, residents bar, restaurant, kitchen and ancillary area, car parking for 114 no cars and 3 no. coaches.

File Ref No. 95/209/PL.61.096373 - Permission granted to Michelle Casey for development consisting of two/three storey blocks containing eight apartments and eight maisonettes with entrance off Tudor Lawn at corner of Tudor Lawn, Thomas Hynes Road. This permission was not implemented.

4.2. **Decisions of Interest**

A number of the documents, PA opinion and observations reference a number of planning references which I outline below for the Board's convenience:

On NUIG Lands

Ref.15/221 (ABP-PL61.246079) - Permission granted to NUIG for student accommodation comprising 429 bedspaces on Campus with the accommodation also proposed for short-term letting during summer months.

It is also noted that the Corrib Village development was granted under **Ref. 89/820:** which was the original grant of planning permission planning for 109 student apartments and staff housing and which was extended by **Refs.91/848** and **92/213.**

Other Student Accommodation Developments Referenced

PL61.246807 (Ref. 16/40) – Permission granted for redesign and change of use of 3 storey office building over basement car park to provide 4 storey building over basement car park comprising 77 student and self-catering holiday apartment suites. This site is located at Sandyfort Business Centre, Bohermore on land zoned CI.

PL61.247406 (Ref. 16/156) 5 storey block of managed student accommodation (147 bedspaces/46 units) modifying/ superseding previously permitted apartments under planning register reference 13/306 at Fairgreen Road.

ABP-300613-18 (Ref. 17/21) – Permission sought for predominantly student accommodation scheme (c. 10,747 sq.m) provided in 2 blocks (consisting of a total of 345 no. bedrooms) at Queen Street/Dock Road – currently on appeal.

5.0 Section 5 Pre Application Consultation – ABP-300845-18

5.1. Notice of Pre-Application Consultation Opinion

A notice of pre-application consultation opinion was issued by the Board on 5th April 2018 under Section 6(7) of the Planning and Development (Housing) and Residential Tenancies Act 2016 following the submission of the application request on 7th February 2018.

The notice of Pre-Application Consultation Opinion states that the Board was of the opinion that the documents submitted with the request to enter into consultations required further consideration and amendment to constitute a reasonable basis for an application for strategic housing development. The opinion that issued considered that following issues needed to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Further consideration and/or justification of the documents as they relate to the internal layout of the proposed development, having particular regard to the quantum, distribution and compatibility of communal facilities and their location within the overall development, creation of an attractive and accessible central hub, and the provision of a greater range of apartment types. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.
2. Further consideration and if necessary, further justification for, the quantum of car parking spaces proposed and management/operational details for the proposed dual functioning hard standing area. In addition, other traffic and transportation matters that should be addressed at application stage include, inter alia, the following: quantum of bicycle parking provision; access arrangements and parking/management of coach movements on site; potential conflict in pedestrian and vehicular movements. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.
3. Further consideration and/or justification of the documents as they relate to the proposed commercial element of the scheme, in particular relating to public accessibility and availability for use by the wider public. The further consideration of

these issues may require an amendment to the documents and/or design proposals submitted at application stage.

In addition specified information was outlined which it was stated should be submitted with any application for permission:

1. Accurate calculation of the overall site area
2. A site layout plan which clearly indicates proposed vehicular and pedestrian access points to the site. Parking spaces should be clearly delineated.
3. Photomontages and cross sections showing how the development will interface with adjoining residential lands including public grass verges along Thomas Hynes road.
4. A site-specific student and tourist accommodation management plan which addresses, inter alia, use of parking spaces, access to communal facilities including recreational facilities.
5. Details of existing and proposed levels across the development site relative to adjoining lands.
6. A detailed roof plan providing details of any structures or plant proposed at this level.
7. A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture where proposed.
8. A construction and demolition waste management plan should be provided.
9. Details regarding occupancy rates particularly during the summer months when the accommodation is to be occupied by tourists.

5.2. **Applicant's Statement**

In a document entitled 'Statement of Response to the Notice of Pre-Application Consultation Opinion' submitted with the application, the applicant's agent provides a statement in relation to the matters specifically required by the Board which is summarised as follows:

Item 1 - Internal Layout

- Ground floor areas of Block's A, B & C redesigned to provide 700 m² of communal facilities (previously 640m²) including a café/restaurant of 150 sq.m which is proposed at the corner of Block A facing the main road junction providing a stronger presence and visibility from the public side with access also from courtyard site;
- Block B includes a reception area and communal area including TV cinema room, gaming pods, study areas, laundry area and games/lounge area with a corridor provided to connect the two communal areas within Block B and views to all areas from reception design and a gym space of 60m² has been provided within Block C;
- A student hub proposed around 3 sides of 'Courtyard 1' consisting of reception communal areas, administration areas, gym and café/restaurant;
- Apartment types now proposed include higher percentage of 4-bed units with 394 bedspaces within 63 apartments (53 at pre-app) with the revised mix providing 23 4-bed apartments (37%); 1 each of 5-bed and 6-bed (2% each), 13 7-bed units (21%) and 25 8-beds (40%);
- Revised internal layout more suitable mix of unit types and provides flexible operational arrangements;

Item 2 – Traffic and Transportation

- Galway City Council have requested a minimum number of spaces be provided and applicant agreed requesting an increase for summer letting with the multi-use hard-stand area proposed to accommodate sports and parking for summer months;
- Students encouraged to use other forms of transport with private car strongly and actively discouraged by charging for limited spaces available;
- 'Licence to reside' proposed to stipulate that students may not bring cars unless they have somewhere to park it that does not interfere with local residents which is policy in 12 other GSA (prospective operator) residences;
- Move in/move out procedure provided in Student Accommodation management plan which involves staggering arrival and departure times;

- For summer letting, public transport encouraged with 14 additional spaces and excess cars directed to off-street pay and display with removable bollards in place at entrance to this area to prevent its use for parking during term time;
- 140 bicycle parking spaces proposed (36% of residents) more than sufficient for likely usage given usage at other GSA managed residences;
- Dedicated coach set down area is proposed within the site boundary and will use the hammerhead at the south of the site to turn thereby not impacting on external roads with coaches provided with designated drop-off/collection times;
- Independent road safety audit of proposal conducted with recommendations acknowledged and specific measures adopted (Drwg. No. A079-010);

Item 3 – Commercial Element

- Ground floor of Block A redesigned with café/restaurant at corner facing main road junction giving café a strong presence with intention to install a commercial tenant to be used as an unlicensed café/restaurant opening from 7AM to 10PM seating c.60 with space for additional 40 in the courtyard;
- Full accessibility to the public is proposed with the size of unit suitable for the targeted use and mitigate potential impact of removal of food and beverage offering in existing hotel;
- Takeaway food and beverages proposed;

Specific Information Required

- Overall site area for planning purposes is 8,797 sq.m (0.88ha) which it notes includes area of 2 new footpaths (86 sq.m) with area in legal ownership 8711 sq.m. Stated that area use for calculation of plot ratio is 8,044 sq.m.
- Proposed access arrangements outlined in drawings and in Transport Statement with one vehicular access point and two pedestrian/cyclist entrances;
- Photomontages included to show interfaces;
- Student accommodation management plan included to set out how the proposal will be managed during term and summer;
- Roof plan included;

- Landscaping drawings included;
- Construction and demolition waste management plan;
- Occupancy rates included in student accommodation management plan with maximum summer occupancy of 468 guests with typical summer occupancy rates 70-90% and >95% during academic year.

6.0 Relevant Planning Policy

6.1. Section 28 Ministerial Guidelines

Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the planning authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

- 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual')
- 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities'
- 'Design Manual for Urban Roads and Streets' (DMURS)

The following documents are also considered relevant:

- Dept. of Education and Skills 'National Student Accommodation Strategy' (July 2017)
- Dept. of Education and Science 'Guidelines on Residential Developments for 3rd Level Students Section 50 Finance Act 1999' (1999).
- Dept. of Education and Science 'Matters Arising in Relation to the Guidelines on Residential Developments for 3rd Level Students Section 50 Finance Act 1999.' (July 2005)

6.2. Galway City Development Plan 2017-2023

6.2.1. Zoning

The site has two zonings as follows:

R - To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.

Section 11.2.8 notes uses which are compatible with and contribute to the zoning objective include residential and residential institution.

CI - To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone.

Section 11.2.6 of the Plan outlines the considerations for the zoning with the Plan stating that the following Uses which may contribute to the zoning objectives, dependant on the CI location and scale of development, for example: Residential content of a scale that would not unduly interfere with the primary use of the land for CI purposes and would accord with the principles of sustainable neighbourhoods outlined in Chapter 2.

The subject lands do not have any specific development objectives as set out in Pages 170-172 of the Plan.

Relevant City Development Plan Policies and Objectives

6.2.2. Student Accommodation

Section 11.29 of the Plan deals with Student Accommodation and states that the City Council supports the provision of high quality, professionally managed, purpose built student accommodation on/off campus at appropriate locations in terms of access to sustainable and public transport modes and third level institutes, in a manner that respects the residential amenities of the surrounding area.

Student accommodation should be designed to be attractive, accessible, safe, and minimise adverse impacts on the surrounding area while creating mixed, healthy and inclusive communities. The nature, layout and design of the development should be appropriate to its location and context and should not result in an unacceptable impact on local character, environmental quality or residential amenity. Proposals should be designed to be safe and secure for their occupants whilst respecting the character and permeability of the surrounding area. An appropriate management plan should be part of student accommodation applications to minimise potential negative impacts from occupants and the development on surrounding properties

and neighbourhoods and to create a positive and safe living environment for students. Adequate open space of suitable orientation should be provided within developments.

Proposals for student accommodation should comply in general with the design standards promoted in the *Guidelines on Residential Development for Third Level Students* (DES 1999), the subsequent supplementary document (2005) and the *Student Accommodation Scheme*, (ORC 2007) unless superseded by new standards. Alternative design standards will be required to show that they are adapted from other international standards and prevailing best practice.

When assessing planning applications for student accommodation consideration will be given to the following:

- The location and accessibility to educational facilities and the proximity to existing or planned public transport corridors and cycle routes;
- The potential impact on local residential amenities;
- Adequate amenity areas and open space;
- The level and quality of on-site facilities, including storage facilities, waste management, bicycle facilities, leisure facilities, car parking and amenity;
- The architectural quality of the design and also the external layout, with respect to materials, scale, height and relationship to adjacent structures. Internal layouts should take cognisance of the need for flexibility for future possible changes of uses;
- The number of existing similar facilities in the area. In assessing a proposal for student accommodation the Council will take cognisance of the amount of student accommodation which exists in the locality and will resist the over-concentration of such schemes in any one area, in the interests of sustainable development and residential amenity.
- Details of the full nature and extent of use of the proposed use of the facilities outside of term time.

- Consideration regarding compliance with Part V arrangements for social housing will not be required where the accommodation is for student accommodation of a recognised third level institution.
- All permissions for student accommodation shall have a condition attached requiring planning permission for a change of use from student accommodation to other types of accommodation. Future applications for change of use will be resisted except where it is demonstrated that continuing over-provision of student accommodation exists in the city.

6.2.3. Neighbourhoods/Suburbs

Section 2.4 of the Plan refers to the neighbourhood concept with the Dangan area within an 'Established Suburb' which are addressed in section 2.6 of the Plan. The following elements of Policy 2.6 are considered relevant.

'Ensure a balance between the reasonable protection of the residential amenities and the character of the established suburbs and the need to provide for sustainable residential development'.

6.2.4. Residential Development

Section 11.3 addresses residential development. 11.3.2 deals with '**Established Suburbs**' and states that policies and objectives are as per standards for Outer Suburbs except:

11.3.2 (a) General

In the interests of sustainability and urban design, higher densities may be appropriate when new residential development or commercial/community development has regard to the prevailing pattern, form and density of these areas.

11.3.2 (b) Amenity Standards

Shall be as per Outer Suburbs except in certain circumstances where the established form and layout would deem a reduction in these standards appropriate, in the interests of sustainability and urban design.

11.3.2 (c) Car Parking Standards

- 1 on-site per dwelling and 1 grouped visitor per 3 dwellings or,
- 1 space per dwelling if grouped.

Section 11.3.1 of the Plan deals with the Outer Suburbs with section 11.3.1 (a) 'General' stating that residential development shall be laid out in such a way so as to maximise accessibility to local services, public transport and to encourage walking and cycling. The following are also considered to be of note:

- Pedestrian, cycle and vehicular movement shall be convenient, safe and integrated into the overall layout of the development. The layout of all new residential development shall have regard to adjoining developments and undeveloped zoned land. Where appropriate, linkages and complementary open spaces shall be provided between adjoining developments.
- Innovative layouts, including courtyard developments, shared open spaces and the clustering of dwellings shall be used, where appropriate, to achieve high standards of amenity.
- Existing hedgerow, trees, watercourses and stone walls shall be retained where feasible. A landscaping scheme including hard and soft landscaping, and incorporating SUDS principles where appropriate, shall be designed as an integral part of the development.
- A plot ratio of 0.46:1 for new residential development shall not normally be exceeded.
- Residential developments of 10 units and over shall normally provide a mix in type of residential units.
- Non-residential development shall be considered at appropriate locations on residentially zoned lands where it is of a scale that serves the local need and where all other development management requirements are satisfied. Plot ratio for such commercial, leisure, community and mixed developments on residentially zoned lands shall not normally exceed 1:1. On distributor roads or other major access roads where commercial development will contribute to the quality of urban design and is otherwise acceptable a higher plot ratio may be considered.

Where commercial developments are acceptable on residentially zoned land, 10% of the area of a site, shall normally be provided as open space. Where the development

includes residential uses, communal and private open space standards in 11.3.1(c) shall apply.

Standards for Roads and Streets in New Residential Development is set out in section 11.3.1 (b).

Amenity Open Space Provision in Residential Developments is set out in section 11.3.1 (c) stating that communal recreation and amenity space is required at a rate of 15% of the gross site area. It is states that in all proposed residential development over ten units, a recreational facility shall be provided as part of the communal open space and funded by the developer.

Overlooking is addressed in section 11.3.1 (d) where it is stated that residential units shall not directly overlook private open space or land with development potential from above ground floor level by less than 11 metres minimum and in the case of developments exceeding 2 storeys in height a greater distance than 11 metres may be required, depending on the specific site characteristics.

Daylight is set out in section 11.3.1 (e)

Car Parking Standards are set out in section 11.3.1 (g)

Cycle Parking Standards are included at section 11.3.1 (h)

Bin Storage Standards are included at section 11.3.1 (i)

6.2.5. Commercial Development

Section 11.9 of the Plan outlines the policies and objectives in respect of Commercial and Industry, the following of which are considered relevant:

The Council shall take into account the following when considering the design and layout of development in CI and I zones in so far as they relate to a particular development proposal:

- Maximum densities shall only be attainable under optimum site conditions having regard to criteria such as height, open space and protection of amenities.
- Adequate space must be available for onsite storage of materials and refuse, loading and unloading, on site circulation of vehicles and parking for motor vehicles and bicycles. In this regard adequate on site waste management facilities must be provided.

- Developments shall be required to provide an element of open space which would include a landscaping scheme for the site having regard to screening of boundaries and vehicle parking areas and to the visual appearance of the site, in particular the area between the front building line and the front boundaries.
- Open space shall be provided in a manner in which it can function as an effective amenity area taking into account its location on the site, physical size, aspect to avail of sunlight and accessibility. In this regard open space inappropriately sited or sized or open space incidental to roads, boundaries or pathways, shall not be accepted by the Council, as fulfilling this requirement. Such landscaping schemes shall encourage habitat bio-diversity and incorporate SUDS where feasible.
- Parking spaces shall be clearly marked out and delineated. Parking spaces for vehicles of people with disabilities shall be provided and clearly marked and located close to main entrances to premises.
- All plant equipment shall be addressed at design stage and generally shall not be visible from public areas.
- Buildings or structures intended for use by the general public shall be designed to allow access and internal circulation for people with disabilities.

Section 11.9.2 deals with site coverage and plot ratios for CI Land Use Zone stating that the development intensity standards of site coverage and plot ratio are designed so as to help prevent the adverse effects of over-development. Site coverage and plot ratios are given in Table no. 11. 3. The figures are the maximum attainable only under optimum site conditions. The site coverage is determined by dividing the total area of ground covered by the building by the total area of the site.

The max. site coverage in the CI zone is 0.80 and the maximum plot ratio is 1.25.

It is stated that where a site has an established plot ratio in excess of the general maximum for its zone, re-development may, in exceptional circumstances, be permitted in line with its existing plot ratio if this conforms to the proper planning and sustainable development of the area.

Section 11.9.3 outlines the Open Space Requirements and states that the minimum open space requirements, which will apply in CI zones, are set out in Table 11.4.

6.3. Applicant's Statement

The applicant's statement of consistency with relevant policy required under Section 8(1)(iv) of the Act is included in a report entitled Planning Report and Statement of Consistency and is summarised as follows:

- Galway has one of highest areas of demand for student housing in the State with cumulative student population of over 24,000 with increasing student population and planned increase of international students, predicted excess demand (shortfall) of 2,206 bedspaces by 2019 in Galway;
- Risk that prospective students to Galway (esp. International ones) put off by shortage of quality student accommodation compared to other cities;
- Proposal will provide much needed purpose built student accommodation, ensure better utilisation of urban land and free up conventional housing for non-student residential accommodation;
- Adopted settlement strategy based on consolidating the urban form of the city;
- Residential is a use which may contribute to the zoning objective dependent on the CI location and scale of development subject to the residential content being of a scale that would not unduly interfere with the primary use of the land for CI purposes and would accord with the principles of sustainable neighbourhoods.
- Recent precedent under Ref. 16/40 for a student housing on CI zoned land with reference to the commercial nature of the proposed change to use to student accommodation;
- Proposed student accommodation with ancillary uses including retail/cafe are compatible within the R zoning with proposal consistent;
- Proposal to open facility to short term visitor/tourist use adds to commercial nature of proposal;
- Strategic location at junction of N59, designated bus and cycle routes and proximity to NUIG Main and satellite campuses make principle of proposal acceptable;

- Redevelopment proposal provides for regeneration of an underutilised site southern half of which has no active use, perimeter blocks creates strong urban edge animating street frontage and improving passive surveillance;
- Proposal accords with the principles in the Urban Design Manual in respect of context, connectivity, inclusivity, variety, efficiency, distinctiveness and privacy and amenity;
- City Plan makes provision for higher plot ratios in some circumstances with Guidelines providing for increased densities on brownfield sites with design respecting adjoining properties with existing plot ratio of hotel 1.3:1 (based on site area of 6,699 sq.m – excludes area to the south);
- New Apartment guidelines promote higher densities on sites within walking distance of city centres and significant employment locations with the site within 20 minute walk of main NUIG campus and immediately adjacent to the Northern Campus with site served by 404 bus route;
- Design of a high standard with innovative solution to breaking down the mass of the development with internal space above requirement for such development and ample communal open space with impact on amenities of surrounding area addressed in reports including daylight/sunlight, noise etc;
- Proposed plot ratio acceptable given represents an appropriate use of a brownfield site, is consistent with established plot ratio on site, the sites highly accessible location and walkability to NUIG and innovative provision of open space and complies with national guidance which seeks more efficient land use at appropriate and highly serviced locations;
- City Council have requested minimum number of car parking spaces with applicant requesting ability to provide higher number for summer months resulting in design of multi-use hard stand areas (with surface water attenuation beneath). Students encouraged to use environmentally friendly forms of transport with travel by car discouraged by charging for onsite spaces, provision of license to reside and move-in/move-out procedures as well as 140 bicycle spaces;
- Specific design measures included to minimise opportunities for overlooking with blank gables, manipulation of direction in which rooms face, finger block layout

reducing to 3/4 storeys, existing mature trees, 3-storey block facing Tudor Lawn, sound attenuation of heat pumps and 3-4m wall along western boundary;

- Daylight/sunlight analysis report and shadow study shows imperceptible level of impact on daylight/sunlight of windows and rear gardens of adjoining properties;
- Proposed café is accessible to residents and members of the public contributing to areas character in terms of vibrancy, activity and improved local facilities;
- Cumulative assessment of student accommodation (excl. NUIG campus) outlines location and capacity of existing and proposed schemes with map in Appendix C with spatial relationship outlined providing unlikely significant cumulative effect with site separated from existing facilities by range of other uses with no resultant over concentration;
- Proposal would generate fewer vehicle trips than existing hotel with proposal leading to reduction in traffic, proposed access junction shall operate within practical capacity, proposal reduces traffic movements on Newcastle Upper/Thomas Hynes Junction which is at capacity with future infrastructure also relieving pressure on junction, sightlines of 70m available and swept path analysis undertaken;
- Road safety audit undertaken and recommendations acknowledged with measures adopted;
- Mobility management framework prepared to act as a transportation demand management tool for the site with co-ordinator to be appointed;
- Proposal complies with DMURS;
- Student accommodation management plan outlines how the property is to be managed internally during academic term and for summer letting and how facility will engage with and contribute to local community;
- Appendix D provides a matrix of planning policies and guidance and the proposals compliance with same;

7.0 Observer Submissions

7.1. A total of 74 valid observations were made under section 8(1)(vii) of the Act of 2016. Appendix 1 outlines the issues raised in each of the valid observations received. The following is a summary of the main issues raised in the submissions:

7.1.1. Procedural

- ESB substation on site with no consent from ESB
- Incorrect name and address for hotel
- SHD process removes local input from process;
- Use of green area bordering Thomas Hynes Road not in applicant's control;

7.1.2. Demolition/Loss of Westwood House Hotel

- Only social/community amenity in the area particularly for older residents with other hotels/amenities considerably distant, promoting car dependence;
- Facility for NUIG, IDA Park and UCHG accommodation requirements;
- Recently constructed architecturally pleasing structure within sylvan setting;
- Noise pollution from demolition of the hotel;
- Contrary to GCDP policy for development of sustainable neighbourhoods;
- Proposed café not adequate replacement;
- Loss of trees on site and visual impact/environmental impact of same;
- Loss of mobile telephony will impact on service;
- Hotel has excellent facilities for disabled visitors;
- Loss of hotel accommodation to west of the City centre;
- Removal of trees which are a valuable amenity and subject to preservation order;

7.1.3. Concentration of Students in Area

- Too many students in the area leading to noise and anti-social behaviour;
- Approx. 300 houses in the area used for student accommodation;
- NUIG strategic plan proposing 1200 bedspaces which is sufficient for the area;
- NUIG have sufficient land within the Campus to cater for demand;

- Demand for student accommodation not the same as in Dublin with ‘digs’ accommodation offered locally;

7.1.4. **Principle, Zoning & Policy**

- Materially contravenes policy for CI zoning interfering with primary purpose of zoning with CI area limited in extent and should be protected;
- ABP not empowered to grant permission on basis of zoning contravention;
- Precedent used for use on CI lands has different context;
- Proposal conflicts with plot ratio and site coverage objectives for zoning;
- Policy prohibits replacement of existing dwellings with apartments;
- Fails tests outlined in City Plan for student accommodation;
- Area is a maturing suburb with older age profile;
- Protected views over Corrib obstructed;
- Upmarket proposal with high rents not accessible to most students;
- Need for a strategic plan for the area;

7.1.5. **Height, Scale, Density and Design**

- Height considerably in excess of what’s on site and adjoining area;
- Height, scale, set back out of character with the existing area;
- Density and scale excessive and incompatible with low density area;
- Excessive height giving rise to unacceptable impacts on adjoining properties given proximity to houses;
- Visual intrusion and overshadowing caused by height;
- Townscape of area impacted by height of structures and proximity to road edge;
- Loss of trees on site with only 4 being retained, changing character of area;
- Design and height unsuitable to the character of the area;
- Quality of accommodation inadequate as cramped on site close to road;
- Inadequate services and outdoor amenity space proposed on site;
- Inadequate daylight in the proposed building;
- Inappropriate comparisons with Dublin and Edinburgh;
- Impact of blank elevations addressing properties;

7.1.6. **Lack of Parking**

- Inadequate parking on site resulting in overspill parking on adjoining roads and within adjoining estates which already experience overspill parking;
- Existing car parks for Corrib Village in NUIG indicate parking requirements;
- Census indicates 34% of students commute by car to University with proposed parking unrealistic;
- Demand for staff parking not clear;
- Insufficient parking for summer letting and off-site locations not clear;
- Licence to reside not enforceable;

7.1.7. **Mobility, Traffic, Access and Pedestrian/Cycle Facilities**

- Traffic congestion at junction of N59 and Thomas Hynes Road made worse;
- Access from estates will be more difficult;
- Traffic survey undertaken outside of University term and peak tourist season with NUIG one of largest traffic contributors in the area;
- Location of access road adjoining Dun Daingean and Tudor Lawn to west of site will impact on privacy and amenities with impact from coaches not addressed;
- Heavy pedestrian traffic across the N59 creating further delay, proposal on wrong side of road;
- Additional footfall overfilling paths creating hazard with difficulties crossing the road;
- Inadequate cycle paths on roads and inadequate public lighting;
- Traffic impact analysis inadequate as future changes in travel patterns not included;
- Bus service at capacity, inadequate frequency and delayed by traffic congestion with suggestions of improvements not guaranteed;
- No set down area for coaches etc. and insufficient turning areas;
- Unlike Dublin, NUIG serves large part of West of Ireland where public transport links underdeveloped;

7.1.8. **Residential Amenity**

- Devaluation of property;

- Overshadowing with daylight/sunlight analysis not including some adjoining properties;
- Reliance on overshadowing from existing trees in daylight report
- Overlooking of adjoining properties given proximity;
- Noise levels should be determined based on similar student developments;
- No external noise barriers proposed;
- Impact of noise from courtyards;
- Anti-social behaviour existing in the area and increased from proposal;
- Loss of privacy for residents in Clifton Crescent;
- Impacts from noise and dust from demolition and construction phases;
- Concern at future management of proposal;
- Staff presence on site unclear and not apparent what is classed as anti-social behaviour;

8.0 Planning Authority Submission

8.1. Overview

The planning authority, Galway City Council, has made a submission in accordance with the requirements of section 8(5)(a) of the Act of 2016. It summarises the observer comments as per section 8(5)(a)(i) in Appendix A and the views of the relevant elected members as expressed at the full Council meeting held on 9th July 2018, as per section 8(5)(a)(iii). The planning and technical analysis in accordance with the requirements of section 8(5)(a)(ii) and 8(5)(b)(i) may be summarised as follows:

8.2. Planning Analysis

The Chief Executives View are outlined in the following summary:

- The report outlines, the planning history, the relevant City Plan policy and the SHD consultation process all of which are detailed elsewhere in this report;

- Notes that site is in close proximity to NUIG which has over 18000 of the 24000 students in the City most of whom are accommodated privately off campus and notes a growing demand for purpose built student accommodation;
- Some of this information as above detailed in recently permitted student accommodation development (Ref.15/221 (ABP-PL61.246079));
- Other student housing schemes permitted outlined and noted despite delivery significant shortfall within the city of purpose built accommodation with convenient access to the NUIG with provision freeing up existing housing;
- Multi-level and multi-unit development normally open for consideration on such zoned lands with multiple applications received for apartments sought where demolition of structures such as hotels involved;
- Principle of building demolition and construction of higher density development open for consideration subject to compliance with City Plan policies, standards and national guidelines;
- Brownfield reference not accepted as Hotel is functioning and site is well maintained with policy relating to established suburbs (11.3.2) applying which is as per (11.3.1 (outer suburbs) except part (a));
- Applying density of 1:1 which would yield 9149m² with proposal 2727m² over (28%) conflicting with City Plan and impacting capacity of the site with level of exceedance not considered to have regard to prevailing pattern, form and density of these areas conflicting with the Plan and not acceptable as previously advised;
- Accepted ABP can deviate from GCDP policies recommended if principle is accepted that scale should be reduced in floor area, height and/or extent so that density does not exceed 9,149 sq.m;
- Design restricts direct overlooking from most proximate blocks;
- Conclusion of daylight/sunlight study accepted with existing trees providing significant screening and not considered existing dwelling adversely affected by proposal in terms of overlooking or overshadowing and reduction in scale would further mitigate any impact;

- Significant corner site, flanked by major roads that higher level building can be accommodated adjacent to major roads with visual impact, streetscape and public realm views acceptable with applicant revising heights during pre-consultation process and if reduced as above would be acceptable;
- Finishes acceptable subject to exact specification agreement;
- Detailed management plan for the control of movement, noise and other activities essential as per Policy 11.29;
- Coffee shop/restaurant has increased since pre-consultations occupying a prominent location at entrance and fully and directly accessible to public facilitating integration;
- Access acceptable with no requirement for car parking for student accommodation in GCDP and given proximity to university parking considered sufficient as no need for car usage;
- Parking would be managed by operators to prevent unregulated parking with paid permit system proposed as outlined with details of the operation of the additional parking during summer letting;
- Further clarification required by way of condition of location of ample pay and display parking and subject to management controls being further amplified should not give rise to over-spill parking;
- Conclusion of noise report acceptable subject to mitigation measures proposed being clarified and certified in advance of occupation;
- Conclusion of AA screening noted with ABP consenting authority;
- Design reflects institutional status with uniformity mitigated through good layout, open space and high quality finishes with scale generally acceptable with impact on area recommended to be mitigated by reduction in height to 4-storeys;
- Volume of 3-storeys adjacent to existing housing rising to higher levels at main roads is acceptable with buildings well designed presenting attractive modern face to proposal integrating well with other university buildings in the area;

- Recreation and Amenity Department satisfied with proposals for replanting along Thomas Hynes Road and within scheme with strip of open space facing onto Thomas Hynes Road enhanced with revised proposals acceptable;
- Part V not applicable;
- Value of hotel to local community acknowledged however as private facility that has been put up for sale not within realm of PA to control the use arrangements existing within the current business and no policy in CDP to prohibit demolition as not protected structure or designated community facility.
- Subject to conditions proposal consistent with City Plan and proper planning and if Board minded to grant permission it should be granted as per conditions in Appendix D;
- A summary of the issues raised in the submissions received by the Board are outlined in Appendix A.

8.3. Other Technical Reports

The PA include the reports from both Irish Water and Transport Infrastructure Ireland which were received by the Board and which are outlined in Section 9 below.

In relation to Internal reports, the following reports received by the Planning Authority are summarised:

Transportation Department – (Two emailed reports received):

The following to be provided at developer's expense:

- Pedestrian crossing facilities with integrated control with traffic lights on Newcastle Road and UTMC details to be agreed;
- Integrated public lighting design to be submitted for agreement;
- Satisfied overall approach consistent with discussion and National and Local transport policy:
- Reduction in car parking provision at specific request of transport given proximity of University;
- Cycle parking provided with ability to increase if demand requires;

- Issues related to drop off and pick up planned for by operator with plans regarding commitments by tenants not to have vehicles or to specify locations and remains to be seen how effective this will be with valet parking to off-site locations envisaged;
- Scheme heavily dependent on future bus and cycling infrastructure not in control of applicant or GCC with further bus stops in the area possible;
- Junction adjacent working beyond practical capacity with proposal reducing traffic movements as number of movements reduced from that which existing on site;

Recreation and Amenity

Accept Landscape, Ecological and Arboricultural detailing and documents and propose conditions which are summarised as follows:

- Landscape Architect to be retained;
- Ecologist to be retained;
- Landscaping and screening in accordance with plans;

8.4. Recommended Conditions

Appendix D contains 20 recommended conditions from the City Council which are summarised as follows:

1. Development to be carried out in accordance with application documentation;
2. Revised plans reducing development by reducing development to 10,000m² max by omission of 5th floor;
3. Arborist to be retained to oversee works;
4. Landscape Architect to be retained;
5. Ecologist to be retained;
6. Landscaping and screening in accordance with plans;
7. Development Contribution (€109,088) which provides a credit for the hotel;

8. Permission is for student accommodation and change of use require permission with change of use resisted except where over-provision of student accommodation exists;
9. Other than out of terms time, accommodation to be used for student accommodation;
10. Final details for approval of the student/out of term usage including nuisance and parking protocol and controls for accommodation and measures for non-compliance;
11. Final details of materials;
12. Alterations to public services, public areas or utilities to be carried out at developer's expense;
13. Vehicular wheel wash;
14. House of construction; and liaison officer;
15. Irish Water connection;
16. Irish Water capital investments programme;
17. Public lighting design;
18. Full details of pedestrian crossing facilities ;
19. Café/restaurant not to operate as a takeaway;
20. Bin storage to be provided at suitable location and suitably screened;

8.5. Views of the Relevant Elected Members

Appendix E of the submission provides a summary of the views expressed by Elected Members at full Council Meeting held on 9th July 2018 and the views outlined are summarised as follows:

- Contrary to City Plan policy relating to protection of amenities and character;
- Contrary to C1 zoning in terms of scale of residential and primary purpose of zoning with a rezoning required;
- Contravenes standards in City with overdevelopment by 30% with site too small for development of density proposed;

- Size and bulk excessive in a residential area creating overshadowing;
- Inadequate information on waste management, ongoing problems with management structures for development in the city;
- Inadequate detail on student accommodation element, security, issues of noise and parking;
- Condition that café not include take away difficult to enforce with proposed café not replacing facility currently onsite;
- Legacy of traffic problems in the area with adjacent communities impacted with student parking huge problem with proposal worsening problem of illegal parking;
- Parking proposed insult to community and distinction should not be made between students and residents and have to assume all students own cars;
- Recent census shows 33% of students have cars with 10 spaces illogical;
- Proposal should have considered underground parking with students not willing to pay for yearly NUIG disc and enforcement of evidence of parking elsewhere unenforceable;
- If students can afford proposed rent likely they will have a car with existing student accommodation full of cars;
- Bus service in the area inadequate requiring considerable increase with pay and display parking inadequate with small number of parking spaces against CDP;
- Proposal will give rise to traffic congestion and will be a traffic hazard with existing access/egress difficult at the busy junction and proposed nearby school should be considered in traffic impact;
- Proposed pedestrian crossing another traffic control along the road;
- Issues of noise and anti-social behaviour at night;
- Loss of Hotel which is a major facility is not the solution as will have huge impact on community and while not designated as a community facility in the CDP it functions as a community facility;
- Economic viability of hotel may be an issue;

- Should be located on Campus where doesn't impact on community with lack of facilities in this area with area full of students who are transient and don't add to community;
- Scattering of students in housing estates is a problem with proposal taking students out of estates solving problems arising;
- Environmental impact of demolishing a 20 year old building is significant as not good environmental practice;
- Consent from ESB has not been submitted;
- Agreement between Dublin City Council and DCA that when new campus buildings constructed that student accommodation to match is built on Campus;

The submission included at Appendix E also included reference to a motion passed to include submissions from two Councillors which were made to the Board but which they state were not accepted/rejected. For the Board's information the submissions were invalidated as no fee was received. The issues raised can be summarised as follows:

- Traffic and parking major issues in the Newcastle area with traffic management measures introduced and park and ride facility provided by NUIG but student overflow parking still a problem with proposal worsening situation;
- Area already saturated with students in estates and student accommodation with new building being built on Campus with no impact on community with pre-planning undertaken with NUIG and alterations made;
- Building is too big for the site and site too small for the density;
- Ten car parking spaces insult to the area;
- Loss of hotel will have a huge negative impact on the area leaving a huge void;
- Site density, transport, road access, traffic, size and bulk in residential area;

9.0 Prescribed Bodies

Submissions were received from the following prescribed bodies with a summary of the response outlined under each:

9.1. Irish Water

Irish Water confirms that subject to a valid connection agreement being put in place the proposed connections to the Irish Water networks can be facilitated.

9.2. Transport Infrastructure Ireland

The submission received is summarised as follows:

- Rely on planning authority to abide by official policy as outlined in DoECLG; Spatial Planning and National Roads Guidance for Planning Authorities (2012);
- Proposal shall be undertaken strictly in accordance with recommendation of the Transport (Traffic Impact) Assessment);
- Any recommendation arising should be incorporated as conditions of permission if granted;
- Any additional works required as a result of the assessment should be funded by the developer;

10.0 Assessment

10.1. Introduction

Pursuant to site inspection and inspection of the surrounding environs including the road network, examination of all documentation, plans and particulars and submissions/observations on file, I consider the following the relevant planning considerations for this application:

- Procedural Matters
- Compliance with Planning Policy
- Need for Accommodation
- Concentration and Management of Accommodation
- Visual Impact, Building Height, Design and Amenity Spaces
- Residential Amenity
- Mobility Management and Access

- AA Screening
- Other Matters

10.2. Procedural Matters

An observation submitted by Edmond Thornton outlines his contention that the application is invalid because the documents are incorrect with the wrong name for the hotel and the wrong address for the location with land registry deeds and maps attached to the observation in addition to maps, eircode details and photos. While the submission is noted the details provided have been sufficient to validate the application and to identify the proposal for the purposes of facilitating the submission of observations of which 74 were received.

The matter of the ESB substation has been raised in a number of observations. An existing substation is shown on the existing plan with a revised location proposed for same within the proposed development. This is not a matter of land ownership and therefore this is a legal matter outside of the subject planning process. Section 34(13) of the Planning and Development Act 2000, as amended would apply in this instance.

There are a number of observations raised about the procedure of the SHD process. This process is set down in Statute and therefore it is not a matter appropriately addressed as part of the assessment of this application.

10.3. Loss of Hotel

One of the principle concerns expressed in almost all of the observations received is the demolition of the Westwood House Hotel and the resultant loss of what is considered to be a central amenity and community facility in this area. While the hotel may act as a focal point in the community, it is not a public facility and it is not located on public lands. It is a commercial operation located on lands in private ownership and therefore it is within the rights of the owner to seek permission to undertake development on the lands and to have same assessed as appropriate. In this regard the role of the Board in this application is to assess and adjudicate what is proposed and the compatibility of same. I would also note that the proposal

includes a cafe/restaurant which it is proposed will be open to the public and therefore will provide a local facility. Furthermore, the Report of the Chief Executive from Galway City Council states that the existing hotel is neither a protected structure nor a designated community facility. While I note reference to the objectives in respect of sustainable neighbourhoods in Section 2 of the Plan there are no policy grounds to support the retention of the hotel or prevent its demolition.

10.4. **Compliance with Planning Policy**

Zoning

- 10.4.1. The site incorporates two zonings proportionally c.45% residential and c.55% commercial/industrial. The 'R' residential zoning provides that residential and residential institutions are compatible uses. Hotels and hostels are uses which may contribute to the zoning objectives dependant on the R location and scale of development. The use proposed, student accommodation with short term summer letting is compatible with the zoning in my opinion.
- 10.4.2. The slightly larger proportion of the site is zoned CI (Commercial/Industrial). The Plan provides for uses which may contribute to the zoning objectives dependent on the CI location and scale of development and these include a residential content of a scale that would not unduly interfere with the primary use of the land for CI purposes and would accord with the principles of sustainable neighbourhoods in Chapter 2.
- 10.4.3. At the outset I would note that the site has a commercial use, the hotel, most of which is located on the residentially zoned element of the site. Secondly, the majority of the commercially zoned element is overgrown and underutilised and while part of the legal boundary of the site is not serving any gainful purpose and particularly not for the use for which it has been zoned. Thirdly, the area of the commercial zone is limited in area and arguably splitting the two zones to develop them separately for the principle stated intention of the zoning on the sites would arguably make neither viable from a sustainable development perspective. The site given its configuration is most appropriately developed as one entity as is proposed.
- 10.4.4. I would note that there are a number of submissions which consider that the proposal contravenes the CI zoning objective. The observation from the Save the Westwood House Hotel group states that the proposal materially contravenes the

City Plan zoning for enterprise, light industry and commercial (CI) with student accommodation not a compatible use or a use which contributes to the zoning objective dependent on location and scale. They state that the appropriate scale of residential development which is suitable in CI zoning is that which would not interfere with the primary use of the land for CI purposes. They also state that the area of CI zoning is limited in extent and is subsumed into the site and is entirely taken up with student accommodation which could not be described as one that would not unduly interfere with the primary use for CI purposes. They consider that to permit the loss of the entire zone for such peripheral uses would constitute an interference with the use of the land for its primary purpose.

- 10.4.5. I would suggest that there are a number of elements or tests to the consideration of the use within this zone. Firstly, the CI location and in this regard the relatively limited extent of area of the CI zone is of particular relevance given it has limited capacity in its delivery of commercial development of any reasonable scale. Secondly, in terms of its location, the site is adjoined to the west, south and east by existing residential development. The observations stress the residential character of the area and in this regard a use which is residential in nature would be eminently suitable on this site given its location.
- 10.4.6. In relation to the scale of the proposal, while I note the concerns expressed in the observations at the scale of the proposal, the scale cannot be appropriately considered solely in the context of the scale of the existing residential development in the adjoining area which is low-density homogenous housing with little by means of variety in terms of unit typology. A development of the scale and density proposed would accord with the principles of sustainability in the context of the efficient use of a finite land resource in such close proximity to the NUIG campus and the city centre. In this regard I consider that the proposed use would be a compatible use which contributes to the zoning objective given its location and scale.
- 10.4.7. The CI zoning objective then specifically states that the residential content should be of a scale that would not unduly interfere with the primary use of the land for CI purposes and would accord with the principles of sustainable neighbourhoods outlined in Chapter 2. In relation to the residential content being of a scale that would not unduly interfere with the primary use of the land for CI purposes, as outlined elsewhere most of the site area zoned for CI purposes is vacant, overgrown and

under-utilised. The area zoned for CI is also limited in area and therefore limited in terms of its sustainable use separate to the residential zoned area of the site.

Therefore most of the CI zone does not have a use and I would therefore suggest that it cannot be argued that the proposed development would unduly interfere with the primary use of the land in this regard. Furthermore, the student accommodation model with the attendant summer tourist accommodation is a quasi-residential/commercial use and therefore similar to the existing hotel on part of the CI site provides much needed accommodation for students and tourists within this commercial model.

- 10.4.8. Finally the zoning objective states that the use should accord with the principles of sustainable neighbourhoods as outlined in Chapter 2 of the City Plan. Part of the 'Aim' of the neighbourhood strategy is to provide for good quality housing for all sectors of the community in sustainable neighbourhoods that are attractive places to live and are within easy access to a range of local services, amenities, community facilities and public transport networks. Currently, as noted above, the area within which the site is located has a limited offer when it comes to unit typology with the predominant residential form, detached and semi-detached 3 and 4 bed houses. The proposed development would introduce a purpose built form of student accommodation within easy reach of the NUIG Campus by foot. In this regard it provides for the creation of a sustainable neighbourhood offering choice and variety.
- 10.4.9. The SWHHG observation states that the SHD legislation states (s.9(6)(b)) that Board shall not grant permission where proposal or part of it contravenes materially the development plan in relation to zoning of the land and ABP not empowered to grant permission on this basis. As I outline above, the proposal does not materially contravene the City Plan in relation to the zoning of the land as the proposed use can be accommodated within the CI zone in the context of the Plan. Therefore the Board can grant permission in principle for the proposal.
- 10.4.10. The SWHHG observation also refutes the use of the precedent used by the applicant for permission for student accommodation (PL61.246807) on CI land as they state the circumstances were different as the precedent referenced was for the change of use of a long vacant building with planning gain in its redevelopment, it involved a small peripheral part of a large block of CI land, the mixed use pattern of development in area taken into account, and the assessment of potential impacts

required and involved a different development plan. While I acknowledge the differences pointed out by the observer, there are also some striking similarities in the two cases. Firstly, part of the subject site is vacant and under-utilised, it is overgrown and unkempt and its development would provide a planning gain in terms of improving the visual amenity of the area. The subject CI lands are small and peripheral and part of a block of residential zoned land. Finally in terms of the City Plan, the new City Plan has a specific policy in relation to student accommodation which provides more guidance for the assessment of this use which was not previously available. In this regard I consider that the precedent outlined is relevant.

10.4.11. I would also note that a number of observations express some concern that the subject site is on the wrong side of the road. These concerns I would suggest are unfounded given the availability of the pedestrian crossing facilities and the proximity of the site to the NUIG Campus. Equally it would appear from the observations that the existing hotel is well patroned by the University and the IDA which I would note require that the same road is crossed.

10.4.12. In conclusion, given the location of the site adjoining existing residential development in close proximity to the University Campus, the quasi-residential/commercial use proposed, is considered to be acceptable in the context of the zoning.

Density, Height and Scale

10.4.13. Many of the observations received state that the density and scale of the proposal is excessive and incompatible with a low density area. The SWWHG state that the proposal conflicts/exceeds the plot ratio and site coverage objectives for the CI zone and does not conform to existing plot ratio onsite as a large part of C1 zone is vacant with no exceptional circumstances existing for deviating from same. They also state that the proposal is a single use residential development where plot ratio for R must apply with the proposal far above the density standards and is out of keeping with the prevailing character of the area. They further state that reference to the existing plot ratio of hotel being 1.3:1 omits fact that part of site is unused with existing plot ratio of 0.65:1 with the density of the proposal a concern of City Council at the pre-application stage.

- 10.4.14. In this regard, I would note that the Planning Authority state that the density (plot ratio) conflicts with the City Plan with the level of exceedance not considered to have regard to the prevailing pattern, form and density of the areas conflicting with the Plan and is not acceptable, as they state they have previously advised. They also state that they accept that ABP can deviate from GCDP policies recommended if the principle of the development is accepted but that the scale should be reduced in floor area, height and/or extent so that the density does not exceed 9,149 sq.m.
- 10.4.15. The City Plan does not appear to have any height strategy with the consideration of appropriate density and scale for sites derived solely by means of plot ratio as outlined in the submission received from the Planning Authority. The plot ratio standards are 1.25:1 for commercial and 0.46: for residential. The plot ratio of the existing hotel development is stated to be 1.3:1 and the proposed development is stated to be 1.48:1. I would consider that the existing plot ratio on the site is a reasonable and rational starting point for the consideration of 'density' as expressed by plot ratio and in this regard an increase from 1.3: to 1.48:1 is not excessive given the requirement to make the most efficient and sustainable use of land. As pointed out by the City Council the Board are not bound by the density standards in the Plan and in principle terms I consider that the plot ratio proposed is appropriate. It is the impact of same on the receiving environment that it is the primary consideration. The City Council's proposal to reduce the scheme in numerical terms has little regard for the resultant design changes and therefore I do not consider that the condition proposed by the City Council in terms of reducing the scheme is reasonable.
- 10.4.16. The proposal at 5-storeys while considerably higher than the existing surrounding 2-storey residential development is appropriately designed with the higher elements addressing the public realm reducing in height as it adjoins more sensitive boundaries. To make the most efficient and sustainable use of sites in such close proximity to the University and the City Centre, heights and densities of the nature proposed are essential and the critical matter in this assessment is the consideration of the potential impact on the adjoining receiving environment.
- 10.4.17. The Sustainable Residential Guidelines for Planning Authorities express density in terms of unit per hectare. The density of the proposal in this regard is 79 units per ha based on site are of 0.8ha site and while the 'apartments' in this instance have more bedrooms than would normally be the case in terms of more

traditional apartment development they do not have internal kitchen/living spaces so I would suggest that the density proposed could be similarly assessed. While the public bus service in the area is limited to one service per hour the site is served by public transport with bus stops in the area and therefore is suitable for higher densities as per the Guidelines. Furthermore, in order to make better public transport services viable greater densities are required.

Student Accommodation

10.4.18. Section 11.29 of the Plan deals with Student Accommodation and states that the City Council supports the provision of high quality, professionally managed, purpose built student accommodation on/off campus at appropriate locations in terms of access to sustainable and public transport modes and third level institutes, in a manner that respects the residential amenities of the surrounding area.

10.4.19. It further outlines that student accommodation should be designed to be attractive, accessible, safe, and minimise adverse impacts on the surrounding area while creating mixed, healthy and inclusive communities. The nature, layout and design of the development should be appropriate to its location and context and should not result in an unacceptable impact on local character, environmental quality or residential amenity. Proposals should be designed to be safe and secure for their occupants whilst respecting the character and permeability of the surrounding area. An appropriate management plan should be part of student accommodation applications to minimise potential negative impacts from occupants and the development on surrounding properties and neighbourhoods and to create a positive and safe living environment for students. Adequate open space of suitable orientation should be provided within developments.

10.4.20. The policy also outlines that proposals for student accommodation should comply in general with the design standards promoted in the *Guidelines on Residential Development for Third Level Students* (DES 1999), the subsequent supplementary document (2005) and the *Student Accommodation Scheme*, (ORC 2007) unless superseded by new standards. Alternative design standards will be required to show that they are adapted from other international standards and prevailing best practice.

10.4.21. The Plan states that when assessing planning applications for student accommodation consideration will be given to a number of specific matters which area outlined as follows in italics with my assessment under each one:

- *The location and accessibility to educational facilities and the proximity to existing or planned public transport corridors and cycle routes.*

Mobility management and access are addressed in Section 10.10 below.

- *The potential impact on local residential amenities*

The matter of residential amenity is specifically addressed in Section 10.9 below.

- *Adequate amenity areas and open space.*

The layout of the proposed development in addressed in Section 10.7 below.

- *The level and quality of on-site facilities, including storage facilities, waste management, bicycle facilities, leisure facilities, car parking and amenity.*

These matters are specifically addressed in Sections 10.7 and 10.10 below.

- *The architectural quality of the design and also the external layout, with respect to materials, scale, height and relationship to adjacent structures. Internal layouts should take cognisance of the need for flexibility for future possible changes of uses.*

The matter of visual impact, height and design are addressed in Section 10.8 below as well as above in relation to density, height, scale and amenity spaces. The layout is addressed in Section 10.7 below.

- *The number of existing similar facilities in the area. In assessing a proposal for student accommodation the Council will take cognisance of the amount of student accommodation which exists in the locality and will resist the over-concentration of such schemes in any one area, in the interests of sustainable development and residential amenity.*

Appendix C of the Planning Report and Statement of Consistency includes a map which provides cumulative assessment of Student accommodation schemes within the City area outside of the NUIG Campus. I would also note that I have assessed the need for accommodation in Section 10.5 and the Concentration and Management of Accommodation in Section 10.6 below.

- *Details of the full nature and extent of use of the proposed use of the facilities outside of term time.*

The application includes a Student Accommodation Management Plan which outlines the nature and extent of use of the proposed facilities outside of term time. This acknowledges that the nature of the summer business will see an increase in activity levels and that the developer will supplement the residence team to deal with the increase. Matters relating to parking, security and occupancy are also outlined with a maximum total occupancy of 468 guests but with typical occupancy of 70-90%. Given the existing hotel use on the site, I would consider that the provision of tourist accommodation during the summer months is a sustainable use of the facility supplementing the loss of the hotel bedspaces during the busy summer months.

- *Consideration regarding compliance with Part V arrangements for social housing will not be required where the accommodation is for student accommodation of a recognised third level institution.*

Part V is not provided for nor is it required.

- *All permissions for student accommodation shall have a condition attached requiring planning permission for a change of use from student accommodation to other types of accommodation. Future applications for change of use will be resisted except where it is demonstrated that continuing over-provision of student accommodation exists in the city.*

If the Board are minded to grant permission for this proposal then it is recommended that a specific conditions is attached which specifically determines the proposed use of the development and the limitations of change of use.

10.4.22. In conclusion and I consider that the proposal complies with the specific considerations provided for in the City Plan policy in respect of student accommodation.

10.5. **Need for Accommodation**

10.5.1. The National Student Accommodation Strategy was launched in July 2017 and is described as an important action in the Government's overall plan to accelerate housing supply. Rebuilding Ireland sets a target to bring on-stream an additional

7,000 purpose built accommodation bed spaces by 2019. While there were 179,354 full-time enrolments in the 2015/2016 academic year, in terms of increased demand, the Department of Education and Skills (DES) has previously indicated there is potential for the number of full-time enrolments in DES aided HEIs (Higher Education Institutes) to increase by 27% by 2030. The strategy provides an estimate of existing PBSA (purpose built student accommodation) in 2017 in Galway with 764 HEI spaces and 2,466 spaces providing a total of 3,230. The strategy also looks at projected supply and demand for purpose built student accommodation (PBSA) in the State and for Galway notes that in 2019 there will be a demand for 6,093 bed spaces with a supply of 3,887 with a shortfall of 2,206 spaces. The projected demand rises to 6,652 by 2024 with a projected supply of 4,702 the increasing demand would provide an excess demand of 1,950 bed spaces. I would also note that the applicants reference recent market research undertaken by Lisney which predicts an excess demand of 2,206 bedspaces in Galway in 2019.

10.5.2. While many of the observations reference the proposed student accommodation being proposed within the NUI Galway campus it is clear that the shortfall will not be met by the proposals within the Campus and developments within the private sector such as the proposed are necessary to meet the demands. References to socio economic situations of potential tenants referenced by observers is not a planning matter. What is clear is that there is a substantial shortfall in spaces for the projected student population in the short to medium term and in this regard I consider that the principle of the proposal is acceptable.

10.6. **Concentration and Management of Accommodation**

10.6.1. A number of observations express concern at the existing and potential additional concentration of student accommodation within the area and its impact on the long-term residential character of the area. Firstly I would note that the site is located c.300 metres from the NUI Galway Northern campus facilitating pedestrian access from the development for students. The location of the University will create a focal point for student accommodation within this area which in principle must be supported as it facilitates easy access and reduces the need for transport to the Campus other than by foot or bicycle. Therefore the principle of student accommodation directly adjacent to the University Campus must be considered acceptable.

10.6.2. The Save Westwood House Hotel Group observation estimates that in adjoining estates in excess of 300 houses are used for student accommodation with c.33 houses in Clifton Park, c.28 Cherry Park, c.75 Greenfields, c.36 in Fairfields Park are used for student accommodation with Moyola c.70% students. This indicates a number of important factors. Firstly, the importance of location and access to the University Campus which is a central factor when students are seeking accommodation. Secondly, it indicates the sporadic and unmanaged nature of student accommodation in the area and the resultant inability to manage such accommodation given it is sporadic and unregulated. I would suggest that this may be the primary reason for much of the concern expressed in particular in relation to anti-social behaviour. The proposed model of accommodation provides that all of the students are within one site which is managed, provides suitable communal facilities and includes on-site residential management to deal with issues which may arise. None of these factors are available within the existing estates. Therefore the model of accommodation proposed cannot be compared to the existing situation.

10.6.3. Furthermore, at Appendix 3 of the Planning Report and Statement of Consistency the applicant has provided a map of the other existing and proposed student accommodation facilities within the city not including those existing and proposed on the NUIG Campus. The map indicates the subject development to be the only student accommodation proposal (outside the Campus) in the vicinity of the Northern NUIG Campus. Therefore, it cannot be claimed that there is an over concentration of student accommodation within the area.

10.6.4. I would note that in the pre-application opinion issued by the Board that the applicant was requested to provide a site specific student and tourist accommodation management plan. The applicant has submitted a report entitled 'Student Accommodation Management Plan. One of the central points expressed in the Plan is the 24 hour coverage with the residence to be managed by a full-time residence manager and further full and part-time employees. Maintenance and house-keeping staff are proposed to provide ancillary support. Out of hours are proposed to be covered by way of a combination of the residence team, residence assistants or a third party security contractor working on a weekly rota basis to ensure a 24-hour coverage. It is stated that it is similar to the University wardens at on-campus residences. Access to the residence is proposed via a secure access-controlled

entrance on the Newcastle Road adjacent to the reception area. Further security is proposed by way of mobile key and fob security system and CCTV. Transport proposals including move in/move out strategy/summer tourists check in are set out in the Management Plan. The matter of anti-social behaviour is addressed at page 28, the prevention and management of which is stated as being a critical part of the residence team's responsibility with the proposed process outlined. Details of proposed community liaison are also outlined.

I note the concern raised at the noise which may emanate from the development and particularly the outdoor courtyards and access road. While I can appreciate the concerns at the potential for late night revelry, the proposed management of the development includes for 24/7 supervision including at night by way of a residential management and further full and part-time employees. I would suggest to the Board that a noise condition should be attached, if they are minded to grant permission.

As I outline above, managed student accommodation such as that proposed would be preferential within any residential area to unmanaged accommodation rented by students in an adhoc unregulated manner in the private rental sector. Therefore I consider that the principle of the proposed development is appropriate in the context of concentration of student accommodation.

10.7. Layout, Internal Configuration and Communal Facilities

One of the matters raised in the opinion issued by the Board following the pre-application process was the matter of the internal layout of the proposed development. This related particularly to the quantum, distribution and compatibility of communal facilities and their location within the overall development, the creation of an attractive and accessible central hub, and the provision of a greater range of apartment types.

In terms of the quantum, distribution and compatibility of communal facilities and their location and the creation of a central hub, the proposal now before the Board provides for a development which creates a central focus within the scheme adjoining and in the vicinity of the reception which in turn facilitates passive surveillance by the residence team referenced in Section 10.6 above. The layout also provides that the communal spaces adjoin good quality outdoor spaces with

active and passive amenity spaces. In total the development includes 700 sq.m of communal/commercial space including a café/restaurant of 150 sq.m which is proposed at the corner of Block A facing the main road junction. Block B includes a reception area and communal area including TV cinema room, gaming pods, study areas, laundry area and games/lounge area with a corridor provided to connect the two communal areas within Block B. A gym space of 60m² has been provided within Block C with ancillary services included in Blocks B, C & D. I would suggest to the Board that the nature, quantum and location of the communal spaces provides for a high quality living environment.

Furthermore, the blocks are laid out such that they all address areas of open space. The unit configuration has been amended somewhat such that c.40% are 4-6 bed (37% 4-bed) with the remainder (60%) 7-8 bed. This I consider is an improvement on what was proposed in the pre-application documentation.

One of the focal points of the scheme is the proposed café/restaurant. Measuring 150 sq.m it is proposed at the northeast corner of the development at the junction with the Newcastle Road and Thomas Hynes Road. While the observers do not consider it an acceptable replacement for the hotel, it would provide an eating and meeting point within the area with public access proposed from the street and controlled access through into the development. I consider it is proposed at a focal point of the development creating some street activity in an otherwise inactive street. There was some discussion in the Planning Authority report about prohibiting take away from the facility with a condition proposed to prevent same. However I consider that the ability to provide a take away service would be useful for the local community in particular and while I acknowledge the concerns which may be expressed about litter that the service provided would outweigh this concern which could be managed.

10.8. Visual Impact, Building Height, Design and Amenity Spaces

10.8.1. While I have discussed the matter of height above in section 10.4 as it applies to planning policy, I would propose in this section to address the matter of height as it relates to visual impact. Many of the observations received consider that the

proposal is too high and is out of character with this two-storey area. As I noted above, the proposal at 5-storeys is considerably higher than the existing surrounding 2-storey residential development. However, it has been designed such that the higher elements address the public realm, that being the public roads reducing in height as it adjoins the more sensitive boundaries to the west and south. The views from the adjoining residential estates have been outlined in the CGI's included with View 3 from with Clifton Park, View 5 from within Tudor Lawn and View 7 within Dun Daingean. While the development will be visible from within the adjoining estates it would not be visually obtrusive. To make the most efficient and sustainable use of sites in such close proximity to the University and the City Centre, heights and densities of the nature proposed are essential and the critical matter in this assessment is the consideration of the potential impact on the adjoining receiving environment which I address specifically in the next section.

- 10.8.2. Coupled with the concern about height is the concern expressed in the observations at the proximity of the building line of the proposed development to the public road with the prevailing character in the area one whereby houses are set back from the road. While this may be the prevailing character, it does not make it the most appropriate urban form nor does it make the most efficient use of the site. Furthermore, setting back building lines does not provide effective surveillance of the street. As an example, on the other side of the Thomas Hynes Road, the houses in Clifton Crescent back onto the public road providing that the footpath is immediately adjoined by a c.2metre high wall. This does not facilitate any natural surveillance of the footpath. The subject proposal creates an active street edge which in turn creates passive surveillance of the public realm. This is to be welcomed in an urban area with considerable pedestrian traffic.
- 10.8.3. Another concern expressed is the removal of trees from the site. As pointed out by many observers the area within which the site is located includes a large number of mature trees many of which are located within private gardens. While it is acknowledged that there will be a large number of trees removed to facilitate the proposal, a large amount of trees will remain both within the private gardens of adjoining dwellings and within the public realm along Thomas Hynes Road in particular. While I note the report of Mr. Noel Lane, Arborist, who concurs with the condition tree assessment submitted with the application documentation, he does

not reference the retention of any particular trees but rather emphasises the importance of trees in the urban landscape, all of which I agree. However, in order to develop urban sites for appropriate development at sustainable densities and height trees such as those on site are required to be removed and as is outlined in the Landscape Plan are replaced by new trees along the site boundaries. In this regard I consider that the proposal to remove the trees proposed is acceptable.

10.9. Residential Amenity

- 10.9.1. The potential impact of the proposed development on the residential amenity of adjoining properties has been raised in many of the observations received. I would also note that the Board, in the specific information requested, sought photomontages and cross sections showing how the development will interface with adjoining residential lands including public grass verges along Thomas Hynes road. I would note that the applicant has submitted a daylight and sunlight analysis report and shadow study in addition to the architectural drawings included with the application. I have addressed the matter of noise and anti-social behaviour in Section 10.3.4 above as it relates to concerns regarding the concentration of student accommodation and therefore do not intend to repeat same here.
- 10.9.2. Prior to addressing the specific matters of overlooking, overbearing and overshadowing I would note that four properties within Dun Daingean directly adjoin the boundary with the application site. These are No's 12, 13, 14 and 15. The remainder of the properties within Dun Daingean have no party boundary with the application site and therefore the potential impact on their residential amenity is perceived as they are at a remove from the boundary. Nine properties within Tudor Lawn directly adjoin the boundary with the application site. These are No's 6, 17, 18, 19, 20, 21, 22, 23 and 24. The remainder of the properties within Tudor Lane have no party boundary with the application site and therefore, similar to Dun Daingean above, the potential impact on their residential amenity is perceived as they are at a remove from the boundary. The properties located to the east of the site No's 1-12 Clifton Crescent are separated from the subject site by the Thomas Hynes Road and the properties themselves are set back from the edge of the carriageway with their rear elevations addressing the road set behind a high wall and a green area which includes tall trees. The closest rear elevation in Clifton Park to the proposal is No. 6

which includes a single storey extension from the rear elevation. The separation distance between these (front of proposed and rear of existing single storey extension) elevations is 28 metres. I would note that the daylight/sunlight and shadow analysis assesses the impacts on the following properties: 12-15 in Dun Daingean, 6-9 and 17-25 Tudor Lawn and 1-12 Clifton Crescent.

Overlooking

10.9.3. In relation to overlooking, it is the aforementioned properties within Dun Daingean, Tudor Lawn and Clifton Crescent which are closest to the application site and which require specific consideration. I would note that the only windows which address the western boundary of the site are located within blocks A & E located along the eastern boundaries of the site. The closest windows are over 27 metres from the party boundary with the rear elevation of the closest existing rear elevation (No. 20 Tudor Lawn) a further 13 metres. The closest elevations of the proposed development to the western boundary do not have window openings. While there may be a perception of overlooking from some of the blocks, the angles of the buildings and location of windows on the elevations provides that there will be no direct overlooking of existing properties. In relation to Clifton Crescent the closest elevation of this existing residential development is a single storey extension on the rear elevation of No. 6. This is 28 metres from the closest part of the proposed elevation which is sufficient particularly as the first floor rear elevations of the existing and the elevations of proposed developments are at a further remove. Therefore I do not consider that the proposal would impact on the amenity of adjoining properties within Dun Daingean, Tudor Lawn and Clifton Crescent by reason of overlooking.

Overbearance

10.9.4. In terms of being overbearing, while I address the matter of height above in terms of policy and visual impact, the proposal provides that the finger blocks reduce to 4 and 3 storeys as they near the western boundary of the site. The closest corner of Block B, at level 4, to the western boundary is 8 metres increasing to 14 metres. The closest corner of Block C, at level 4, to the western boundary is 8 metres increasing to c.9 metres. The closest corner of Block D, at level 3, to the western boundary is 11 metres increasing to c.14 metres. The closest element of Block E to the western boundary is 6 metres at level 3 with the fourth level of the building located

substantially further back at 12 metres (c.18 metres from western boundary). While there are many observations which consider that the height of these blank elevations is overbearing I consider that there is sufficient separation distance between the proposed elevations. Furthermore, the design proposes short elevations addressing the boundary given the finger block design with the blocks having elevation lengths of 11m-14m which limits the extent of elevation addressing the adjoining boundaries. Finally, as outlined in the cross sections (AA, CC & BB), there is a considerable level difference between ground level within the sites of the existing properties to the western and the ground level on the application site. In terms of Clifton Crescent the closest elevation of this existing development is a single storey extension on the rear elevation of No. 6. This is 28 metres from the closest part of the proposed elevation. This is a significant distance with a wide public road within this buffer in addition to a high wall and a tree lined green space.

- 10.9.5. Clearly, the proposed development will considerably change the visual context of the area however, I do not consider that the impact on the residential amenity of the most proximate dwellings in Dun Daingean, Tudor Lawn and Clifton Crescent would be significant or adverse by reason of being overbearing.

Daylight/Sunlight and Overshadowing

- 10.9.6. In relation to daylight/sunlight and overshadowing, many of the observations state that the proposal will overshadow their properties. The application includes a daylight and sunlight analysis and shadow study. This outlines at page 8 the assessed neighbouring areas which includes properties 12-15 in Dun Daingean, 6-9 and 17-25 Tudor Lawn and 1-12 Clifton Crescent. I would note that many of the properties within the area have considerable overshadowing as a result of the location and height of existing trees in the area. While many of the trees on the application site are proposed for removal, the majority of trees in the overall area will remain.
- 10.9.7. In terms of sunlight to rear gardens, the study which I note outlines the methodology employed in detail, references the BRE standards which states that in order for a proposal to have a noticeable impact on the amount of sunlight received in an existing garden or amenity area the value needs to both drop below the stated target value of 50% and be reduced by more than 20% of the existing value. In relation to Clifton Crescent all of the properties meet the BRE Guidelines with one property

improved. In terms of Tudor Lawn all of the properties meet the BRE Guidelines with a number being improved and one marginally reduced but by only 2% which is well within the 20% criteria. In relation to Dun Daingean all of the properties meet the BRE Guidelines with a number being improved and one marginally reduced but by 4% which is well within the 20% criteria.

10.9.8. In relation to daylight (VSC – vertical sky component) the study outlines the BRE Guidelines that in order for a proposed development to have a noticeable impact on the VSC of an existing window the value needs to both drop below the stated target value of 27% and be reduced by more than 20% of the existing value. The study outlines the windows which have been analysed in each of the properties. In relation to house No's 1-5 Clifton Crescent all meet the BRE Guidelines with changes of 1-4% which is within the target. The consideration of houses 6-12 Clifton Crescent outlines that 2 windows in No. 6 would exceed the 20% target of 20% with window 21 at 24% and window 22 at 20% which would not meet the BRE Guidelines. Both of these windows are ground floor windows. While I note that the study shows an exceedance this is marginally above the standard in one instance and at the standard in the other. I do not consider that such an exceedance could be considered to be adverse. The remainder of the windows considered within these properties were within the Guidelines. The VSC of windows in the properties assessed in Tudor Lawn all meet the BRE standards with an increased provision of daylight in some instances. In Dun Daingean all windows will meet the standards with some improved considerable. The APSH (annual probable sunlight hours) is assessed for windows with an orientation within 90 degrees of due south. In this instance 3 properties (No's 12, 13 & 14) within Dun Daingean are addressed with all meeting the BRE guidelines.

10.9.9. In terms of overshadowing, the shadow analysis provided for 21st December has no perceptible difference between existing and proposed. There are marginal differences c. 17.00 on 21st March and c. 20.00 on 21st June on Clifton Crescent. However, given the existing overshadowing (outlined in the baseline) and the orientation of the site and development vis a vis the adjoining development the potential impacts by way of overshadowing is not considered to be significant.

Construction phase and Demolition

10.9.10. Concern has been expressed by adjoining property owners at the potential impact on their properties during the demolition and construction process. While the demolition and construction process will create noise, dust and nuisance, as outlined in the Construction Management Plan these will be managed and controlled by measures including hours of construction. The impacts associated with the demolition and construction phase are temporary and therefore will not have a permanent adverse impact on the local community.

Location of Access Road

10.9.11. A number of observations, particularly those from residents in Dun Daingean are concerned at the impact on their residential amenity from traffic using the proposed internal access road which runs parallel to the western boundary of the site. They also consider that taxis and vehicles arriving late at night will impact on their amenity. In relation to late night drop offs I would note that given the site is secured with access gates that drops offs would be made at the entrance rather than driving into the scheme itself. Use of the access road at other times is likely to be infrequent and given the current use of the hotel and the location of the existing parking spaces adjoining boundaries the proposal would not result in any significant loss in amenity.

Amenity of future occupants of the proposed development

10.9.12. The daylight/sunlight/shadow study provides an analyses the ADF (annual daylight factor) in ground floor rooms of the proposed development. Three rooms do not meet the BRE Guidelines (one kitchen and two bedrooms) but the ADF is marginally below the target and I would suggest that it would be acceptable.

10.10. Mobility Management, Traffic, Access and Parking

10.10.1. There are a number of matters arising which require consideration, namely mobility management, parking, access and traffic congestion and which I will address in turn. Firstly, the underlying transport and access strategy for the subject site is underpinned by the principles of mobility management which is set out in the Mobility Management Framework submitted and which will translate into a Mobility Management Pan once the site is operational. A mobility management framework has been submitted with the application and outlines the mobility management

measures which are proposed as part of the scheme which are stated to be included in the Management Plan for the scheme. Maps and walking and cycling catchments are outlined with the NUIG Northern Campus c.300 metres from the site. The Galway Transport Strategy provides a transport strategy for the City and its environs for the next 20-30 years and seeks amongst its objectives to establish a new cross-city bus network and establish primary, secondary and feeder cycle networks. The site adjoins the routes of proposed secondary and feeder cycle networks.

10.10.2. Within the documentation, reference is made to the proposed improvements to cycling accessibility as outlined in the GTS and to the existing provisions such as the Coca Cola Zero Bike station located c.350m from the site (Corrib Village) with the applicant indicating proposals to provide an additional station even closer to the development. While I note, as outlined in some observations, that cycle lanes are not currently available on the adjoining roads, as outlined above, the Galway Transport Strategy proposes improvements to the transport network including the provision of cycle lanes on carriageways within the immediate vicinity of the site. In order to justify improvements to the network I would suggest increasing the density of development in areas such as the proposed would make such improvements more feasible.

10.10.3. This is equally true of bus services in the area. The site is located along a designated bus route (Route 404) with an existing bus stop on the Thomas Hynes Road. Concern is expressed regarding the infrequent service and journey length given the traffic congestion. However, improvements to bus services both in terms of frequency and priority cannot be justified unless higher density development is facilitated along existing bus routes which would provide the necessary economies of scale for improved services.

10.10.4. The subject site is within easy walking distance of the Campus with a pedestrian crossing at the junction currently available to facilitate safe crossing of the carriageway. The proposal also includes works to the Thomas Hynes Road including a pedestrian crossing and a refuge island. I would note the conditions proposed by the City Council in respect of same and suggest that if the Board are minded to permit the proposal that they should be included.

10.10.5. There are many references within the submissions received to the most recent Census finding that 34% of students commute to University. I would note however that this figure is not broken down into those students who commute on a daily basis versus those who commute on a weekly basis. This census figure has been used by some observers to indicate the perceived inadequacies in the car parking provision on site and the attendant impact on adjoining residential estates by reason of overspill parking. However the 34% figure cannot be reasonably applied as it is not clear how many of the 34% are weekly commuters versus daily commuters. Reference is also made to the parking available in the Corrib Village Student Accommodation within the Campus, however, this development was carried out in the early 1990's when mobility management principles did not govern transport and parking policy.

10.10.6. I would also note that the parking on site originally proposed has been reduced principally at the request of Galway City Council whose mobility management strategy within the City Plan seeks to reduce the number of parking spaces available on the site. The applicant sought to provide additional parking for the summer tourist season and this is proposed by way of creating additional spaces in the hard surface play area. In addition, it is proposed that visitors during the summer season will be directed to pay and display parking in the area. As outlined in the City Council report, the exact location of these spaces is not clear and this should be outlined in the Mobility Management Plan required following operation of the site.

10.10.7. I would note that in principle, more parking spaces leads to more cars on the network thereby increasing congestion on a road network which is clearly operating at and beyond capacity, as stated by many observers. Therefore limiting car parking is a critical factor in seeking to manage or reduce congestion. While I note the observers concerns regarding the enforceability of the licence to reside proposal presented by the applicants, City Council policy is underpinned by the principles of mobility management which is to be welcomed. Furthermore, I would suggest that the concerns expressed by observers regarding overspill parking in the adjoining estates is an issue beyond the proposed development. The observations suggest that overspill parking is currently occurring because of the numbers of students residing within houses in the adjoining estates. As I outlined above in relation to

concentration of students, there is no control or management mechanism available to address this parking, unlike the proposed licence to reside proposed in the current application. I would suggest to the Board that the matter of parking within residential estates is a matter for the City Council if the estates are taken in charge or developers/management companies if not by way of parking measures such as those indicated to be already in force within estates such as yellow lines. The applicants have set out a framework for addressing car usage within the site and the mobility management plan to be prepared will address this matter once the development is operational. In my opinion the licence to reside proposal is reasonable and seeking to reduce the number of residents parking within the site is appropriate.

10.10.8. In relation to traffic congestion, which I allude to above, many of the observations raise concerns as to the existing traffic congestion on the carriageways in the area and particularly at the junction between the Newcastle Road and Thomas Hynes Road. The report from the City Council states that the junction adjacent to the site is working beyond practical capacity. They continue by stating that the proposal will reduce traffic movements as the number of movements likely to arise related to the proposal would be less than that which arises from the existing use on site. The proposal would therefore have a positive impact on the carrying capacity of the network and junction. In relation to the access, the proposed access is located in approximately the same location as the access to the existing hotel and having particular regard to the significantly lower number of traffic movements associated with the proposal the access is considered appropriate.

10.11. AA Screening

10.11.1. The application was accompanied by an appropriate assessment screening report. The application site is not in or immediately adjacent to any Natura 2000 site, so the proposed development would not have any direct effect on any Natura 2000 site.

10.11.2. There are a number of Natura 2000 sites within 15 km of the site as follows:

SAC's

Lough Corrib SAC (site code – 000297 - 0.5km east/northeast)

Galway Bay Complex SAC (000268 - 2.4km south)

Connemara Bog Complex SAC (site code 002034 – 11.1km west)

Gortnandarragh Limestone Pavement SAC (site code 001271- 14.8km northwest)

Ross Lake and and Woods SAC (site code 001312 – 11.7km northwest)

SPA's

Lough Corrib SPA (site code 004042 – 1.3km north)

Inner Galway Bay SPA (site code 004031 – 2.7km south)

Cregganna Marsh SPA (site code 004142 – 10km southeast)

10.11.3. I would note that the elements of the project with the potential to give rise to impacts on Natura 2000 sites are site clearance and demolition, construction activities and discharges from the site. However, given the modest scale of the development, the existing site services, the design measures incorporated within the scheme for the construction and operational phases of development, the presence of a road carriageway between the site and the nearest Natura 2000 site and particularly the absence of any hydrological pathways from the site to any of the Natura 2000 sites that the development would not be likely to have any significant effects on any Natura 2000 site, either directly or indirectly. This conclusion is consistent with the appropriate assessment screening report submitted with the application. Similarly there are no direct or indirect effects that would be likely to have significant effects on any Natura 2000 site in combination with any other plan or project.

10.11.4. It is therefore, reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. 000297, or any other European site, in view of the site's Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

11.0 Recommendation

11.1. Having regard to the above assessment, I recommend that section 9(4)(c) of the Act of 2016 be applied and that permission is GRANTED for the development as proposed for the reasons and considerations and subject to the conditions set out below.

12.0 Reasons and Considerations

Having regard to the:

- a) site's location in close proximity to the National University of Ireland Galway;
- b) the policies and objectives in the Galway City Development Plan 2017-2023;
- c) Rebuilding Ireland Action Plan for Housing and Homelessness;
- d) National Student Accommodation Strategy 2017
- e) nature, scale and design of the proposed development;
- f) pattern of existing and permitted development in the area, and
- g) submissions and observations received,

It is considered that, subject to compliance with the conditions set out below that the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect the existing character of the area and would be acceptable in terms of traffic and pedestrian safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

13.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the

agreed particulars.

In default of agreement, the matter(s) in dispute shall be referred to An Board Pleanala for determination.

Reason: In the interest of clarity.

2. The development hereby permitted shall only be occupied as student accommodation, including use as visitor or tourist accommodation outside academic term times, and for no other purpose, without a prior grant of planning permission for change of use.

Reason: In the interest of residential amenity and to limit the scope of the proposed development to that for which the application was made.

3. Details and samples of the materials, colours and textures of all the external finishes to the proposed development including pavement finishes shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of the visual amenities of the area.

4. Prior to the commencement of development the following details shall be submitted to, and agreed in writing with the Planning Authority:

(a) Details of the pedestrian crossing facilities on the Thomas Hynes Road;

(b) An integrated public lighting design for the site and site boundaries;

(c) Within 6 months of the operation of the proposed facility, the developer shall submit for the written agreement of the Planning Authority a Mobility Management Plan. Details of the location, quantum and accessibility of public parking within the area shall be specifically outlined.

Reason: In the interest of traffic and public safety.

5. No additional development shall take place above roof parapet level, including lift motor enclosures, air handling equipment, storage tanks,

ducts or other external plant, telecommunication aerials, antennas or equipment, unless authorised by a further grant of planning permission.

Reason: To protect the residential amenities of property in the vicinity and the visual amenities of the area.

6. (a) During the operational phase of the proposed development, the noise level arising from the development, as measured at the nearest dwelling shall not exceed:-
 - (i) An Leq,1h value of 55 dB(A) during the period 0800 to 2200 hours from Monday to Saturday inclusive.
 - (ii) An Leq,15 min value of 45 dB(A) at any other time. The noise at such time shall not contain a tonal component.
- (b) All sound measurement shall be carried out in accordance with ISO Recommendation 1996:2007: Acoustics - Description and Measurement of Environmental Noise.

Reason: To protect the residential amenities of property in the vicinity of the site.

7. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services. In addition, prior to commencement of development mitigation measures against the risk of flooding shall be agreed with the Planning Authority including measures to address egress of occupants from the building in the case of flooding of surrounding land.

Reason: In the interest of public health.

8. (a) All foul sewage and soiled water shall be discharged to the public foul sewer.
- (b) Only clean, uncontaminated storm water shall be discharged to the surface water drainage system.

Reason: In the interest of public health.

9. Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall be prepared in accordance with the “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects”, published by the Department of the Environment, Heritage and Local Government in July 2006.

Reason: In the interest of sustainable waste management.

10. A plan containing details for the management of waste within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan.

Reason: To provide for the appropriate management of waste and, in particular recyclable materials, in the interest of protecting the environment.

11. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: In order to safeguard the residential amenities of property in the vicinity.

12. The construction of the development shall be managed in accordance

with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including hours of working, noise management measures and off-site disposal of construction/demolition waste.

Reason: In the interests of public safety and residential amenity.

13. A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. The plan shall include details of arrangements for routes for construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.

Reason: In the interests of public safety and residential amenity.

14. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

Una Crosse

Senior Planning Inspector

August 2018

APPENDIX ONE

The following provides a summary of the issues raised in each of the 74 valid observations received by the Board.

Save the Westwood House Hotel Group (c/o Stephen Dowds)

- ESB substation within the grounds shown on existing plan which is property of ESB with site part owned by another party with no consent provided with application invalid and proposed shown on proposed site plan;
- Loss of hotel, a major amenity providing location for many events and uses with no other facility/amenity in the area;
- Provides VHI approved accommodation for UCHG, used by NUIG and IDA staff;
- Significant residential community in the area (c.1800) and loss of hotel would deprive it of all its facilities contrary to City Plan which seeks the development of sustainable neighbourhoods;
- Loss of hotel promotes car dependence by loss of one facility in walking distance, reduces quality of life for residents and reduces range of community facilities;
- Materially contravenes the City Plan zoning for enterprise, light industry and commercial (CI) with student accommodation not with compatible uses or a use contribute to the zoning objective dependent on location and scale;
- Scale of residential suitable in CI zoning is that which would not interfere with the primary use of the land for CI purposes;
- Area of CI zoning limited in extent and subsumed into the site and development entirely taken up with student accommodation which could not be described as one that would not unduly interfere with the primary use for CI purposes;
- To permit loss of entire zone for such peripheral uses would constitute an interference with the use of the land for its primary purpose;

- SHD legislation states (s.9(6)(b)) that Board shall not grant permission where proposal or part of it contravenes materially the development plan in relation to zoning of the land and ABP not empowered to grant permission on this basis;
- Precedent used for permission for student accommodation (PL61.246807) on CI land different as was change of use of long vacant building with planning gain, involved small peripheral part of large block of CI land, mixed use pattern of development in area taken into account, assessment of potential impacts required and different development plan;
- Proposal conflicts/exceeds plot ratio and site coverage objectives for CI zone and does not conform to existing plot ratio onsite as large part of C1 zone is vacant with no exceptional circumstances;
- Proposal is single use residential where plot ratio for R must apply with proposal far above density standards and out of keeping with prevailing character;
- Reference to existing plot ratio of hotel being 1.3:1 omits fact part of site unused with existing plot ratio of 0.65:1 and density a concern of City Council at pre-app;
- Policy 2.6 does not permit replacement of existing dwellings with apartments;
- Height proposed considerably in excess of what's on site and in adjoining area with contextual elevations unhelpful with adjoining buildings faded (east and west context elevations mislabelled);
- Applicant exaggerates heights of development in vicinity with 4-storey buildings in University within different setting;
- Excessive height giving rise to unacceptable impacts on adjoining properties particularly to west which will face a development 22m from rear walls of houses with nearest 5-storey element 34m from nearest house and 18m from nearest garden;
- Impacts include visual intrusion, overshadowing (morning), overlooking avoided by use of blank walls which are what back gardens will be addressed by;
- Not possible to prepare daylight and sunlight report but residents to west of site greatly concerned as report relies on existing trees overshadowing;

- Access to proposal is at location where congestion occurs on the N59 with traffic from proposed new N6 accessing city past the site;
- Access from housing estates along Thomas Hynes Road difficult and exacerbated by overspill parking on public roads;
- Heavy pedestrian traffic across the N59 likely with proposal on wrong side of road with no cycle paths on N59;
- Proposed pedestrian island close to entrance with Clifton Court making existing estate more difficult;
- Traffic impact analysis inadequate as changes in traffic patterns from new Corrib Crossing and changes to schools in area not included and based on a single day's survey when University term concluded casting doubt over adequacy;
- Inadequate parking leading to overspill parking in adjoining estates as well as only busy local roads causing congestion and hazard;
- Existing Car parks for NUIG indicate how many use cars with Corrib Village having 1.02 spaces per apartment and proposed 0.16 during terms with City Plan requiring 1 space for apartment and 1 per 10 students for colleges requiring 40 in proposal;
- 0.38 spaces per apartment during summer/tourist let compared to 84 space requirement in City Plan with provision for set down proposed while cars directed to on-street pay and display parking;
- 2016 Census states 34% of third level students commute by car with proposed 10 spaces unrealistic with applicant stating hotel will generate more than proposal with hotel having 100 spaces;
- Location of access road along western site boundary will impact and detract from privacy and amenities of adjoining gardens;
- Proposal fails tests outlined in CDP student accommodation policy – residential amenities, inadequate parking, scale and height and excessive concentration of student accommodation;

- Student accommodation in adjoining estates estimated at c.33 houses in Clifton Park, c.28 Cherry Park, c.75 Greenfields, c.36 in Fairfields Park with Moyola is c.70% students with in excess of 300 houses in area student accommodation;
- Townscape of area impacted by 5-storey structures at road edge in 2-storey area making development obtrusive, insensitive and out of character;
- Site enhanced by trees which are significant and notable feature in the area with arborist report attached commenting on quality of the trees and their value in terms of local amenity and property value;
- Only 4 trees retained with arborists report having no impact on the design of proposal;

Padraig Folan (Cherry Park)

- Proposal aesthetically unsuitable to area;
- Dangerous increase in traffic creating safety concerns on already busy roads
- Dangers to children attending nearby schools
- Hotel an important service in the area with no other hotel in the area and should not be removed.

John C. O'Donnell (Hazel Park)

- Amount of students too high for area to absorb with a history of anti-social behaviour in the area and sold previous house to avoid the noise;
- Incidents of anti-social behaviour in the area which would be made worse by more students;

Brian Burton (Dangan Heights)

- South end of site zoned commercial/industrial with proposal not a valid use for the site;
- Over development and absurd scale at 5 storeys with impact on road frontage,
- Overlooking on adjoining housing;
- Design is grim and institutional and at odds with setting of existing hotel;
- Noise levels should be based on levels in similar student housing developments;
- Insufficient parking spaces with significantly more parked cars witnessed in Corrib Village with no provision for overspill parking;

- Number of staff on site needs to be determined;
- No need with NUIG strategic plan proposing 1200 new student accommodation spaces which is being implemented in phases which is sufficient;
- Need to consider proposal in context of impacts of same and other major infrastructure on the area;

Tessie Nevin (Dangan Heights)

- Only 10 spaces proposed with CSO figures reveal that 44,771 university students driving with number of spaces vastly insufficient leading to parking in neighbouring estates;
- 'Licence to reside' proposed for cars associated with occupiers is not a provision or guarantee that can be enforced;
- Proposal is a threefold increase in occupancy from that in existing hotel (130 persons) with area serviced by only one direct bus into City Centre which operates on an hourly basis and suggestions that applicant will engage with Bus Eireann to increase service cannot be guaranteed;
- Impact of noise on nearby residents;
- Health and safety concerns;
- Hotel is an important local amenity and important for tourists accommodation with limited accommodation in the area;
- Proposal not providing adequate accommodation as it is too cramped and restrictive on the side of a busy road;

Pauline Ridge (Lakeview Road, Greenfields)

- Impact of noise from the proposal with Greenfields estate changing over the years from owner occupier to rented houses with noise and incidents of anti-social behaviour increasing dramatically;
- Bringing in additional students to the area will have a catastrophic effect with the student population bound to overspill into the adjoining residential areas;
- Area has never been designated a student area with the hotel developed as an amenity for locals;

- Proposal to use as tourist accommodation during summer months provides no respite from noise in the summer;
- Proposal likely to increase noise and anti-social behaviour and result in long-term residents leaving the area;
- Serious traffic congestion exists on N59 with commuting from areas west of the City and concern at turning movement required when leaving the site to access the city;
- Concern at potential overspill of parking into the nearby estates with staff from the University currently parking cars in the estates in the area with permit parking/yellow lines required in some estates;
- NUIG currently own a large amount of ground that is not being used that would be more appropriate to house students on Campus as is the Corrib Village accommodation with no impact on local residents;

Terry Deasy (Dun Daingean, Dangan)

- Site is totally unsuitable for this intensive development and comprises an island contained by two roads and two estates with totally inadequate services proposed on site;
- Proposal has a parking requirement of c.125 spaces with provision of 10 unrealistic with parking for tourist accommodation in summer months of 24 unrealistic given requirement for c.107 persons with parking requirement potentially increasing in future;
- Loss of hotel and facility it provides with no local shops in the area and a limited bus service;

Fiona & Martin Costello (Dun Daingean, Dangan)

- Daylight and sunlight analysis does not include observers property (No. 16) and if it had would show significant impact on the property with no buildings currently overshadowing with proposed Blocks A & B blocking sunlight;
- Noise would adversely affect neighbouring residential areas with no provision for any external noise reduction factors properties at western aspect fully exposed to

noise generated in communal spaces with worst case scenarios proposed in Noise assessment not fit for purpose;

- Parking provision inadequate for staff and students with 30% of NUIG students estimated to have cars with proposal leading to overspill parking in adjoining estates with additional tourist parking inadequate;
- Proposal too dense and too high and visually incompatible with low density residential development with proposal not fit for purpose and would have a significant impact on surrounding residential properties;
- NUIG has a significant land bank close to the proposed site which would be more suitable;

Maura and Niall Gilligan (Clifton Drive, Clifton Park)

- Loss of hotel as an amenity in the area would be detrimental to the community given lack of facilities in the Newcastle area with hotel used by teams visiting nearby regional sports centre;
- Site too small for the density proposed with 5 storeys extremely imposing;
- Site adjoins two very busy roads which is difficult to cross with congestion at mornings and evenings with traffic from west of the City;
- Overspill parking already occurring within estates associated with University;
- Parking provision not realistic given little other options, no cycle lanes, poor bus connectivity;
- Trees on site and birds they host;
- Not objecting to student accommodation but to the awful effects on the area;

Bartley Joyce (Tudor Lawn)

- Hotel provides an invaluable amenity serving the people of the area and companies in the IDA Park with no other hotels nearby;
- Site at extremely busy junction with proposal making peak congestion even worse coupled with limited parking on site given most students drive and potential for overspill parking;

- Proposal 5-storey building discredits City Development Plan where new buildings must be in keeping with area leading to issues of overshadowing, health and safety, density;
- Too many students in the area;

Niall Egan (Dun Daingean, Dangan)

- Site has a mixed zoning with proposal contrary to zoning in the City Plan;
- Density on the site out of proportion with 5 storey structure massive and excessively close to the road creating a discordant feature along the frontage and fails to take into account building line;
- Previous proposal in vicinity of site for 40 houses refused for reason of scale;
- Lack of adequate parking with overspill parking already occurring in the adjoining estates;
- Mobility management framework refers to a licence to reside which is not an acceptable strategy to manage the potential parking issue and statement does not include those students who travel by car to their student accommodation;
- NUIG travel plan states that there is currently an issue with overspill parking in residential streets to west of University;
- Serious traffic issues on the N59 current with proposal making it worse;

Edmond Thornton (Dun Daingean, Dangan)

- Application invalid because documents are incorrect with wrong name for the hotel and wrong address for the location with land registry deeds and maps attached in addition to maps, eircode details and photos;
- Strong legal basis to have application declared invalid;

Hilary Wright and Julie Baxter (Dangan Heights)

- Environmental impact with 5-storeys too high and extent of proposal too large;
- No amount of trees will compensate with proposal unwanted;
- Building without windows a risk to student psychological wellbeing without adequate daylight;
- Student accommodation should be concentrated within University owned land;

Noel Grealish TD

- With exception of NUIG campus and IDA Park the area is made up of housing estates and public open spaces with exception of commercial zoning at Westwood site;
- Proposal will leave area devoid of a place to socialise or to stay in the area;
- Area is a maturing suburb with an older age profile (CSO 2016) reflected in profile of persons and household occupancy;
- Offer of a café which may or may not be open to the public is not an acceptable compromise to retaining the hotel and bar leaving permanent population marginalised with Pre-app report referencing residential amenities and minimising adverse impacts on surrounding areas while creating mixed, healthy inclusive communities;
- NUIG have own plans to build 900 bedsaces on its extensive Campus with potential scope for additional development in the future which would have no impact on amenities of the residents;
- Proposal will have a significant impact on the residents by removing the one amenity facility;
- Development of entirely residential on land zoned commercial will circumvent meaning and purpose of the zoning with removal of only amenity of its kind overlooked and description of proposed as commercial residential nature disingenuous;
- Inadequate provision of car parking leading to congested parking onsite and overspill into adjoining estates;
- Level of outdoor amenity space insufficient;
- Plot ratio exceeds limits in the City Plan;

Finbar J. Smyth (Clifton Crescent)

- Totally out of keeping with the height dominating the skyline and overshadowing nearby properties;
- Density of buildings too great with little open space;
- Inadequate car parking given recent survey of NUIG students showing 40% use cars;

- Loss of privacy for residents in Clifton Crescent;
- Noise associated with students from parties and other events and due to nature of development difficult to pinpoint the source of unacceptable noise;
- Additional traffic will be generated onto what is already a busy junction;

Michael Beatty (Dun Daingean, Dangan)

- Height of proposal adjacent to 2-storey houses and replacing a 2-storey building which was built in sympathy with surrounding area;
- Hotel is a major social amenity in an area with no other amenities;
- Proposal will have a major impact on the estate with noise levels, increased traffic and little parking for number of proposed students;
- Access too close to N59 impacting on traffic and noise levels impacting on an aging community with proposals for a secondary school in the area which would increase traffic, noise and parking;
- No cycle lanes provided with huge increase in students cycling;
- Student accommodation being built in the area with proposal increasing student accommodation to near 1800 persons which is unfair;

Dolores O'Loughlin (Cherry Park)

- Proposed density and scale not suitable for such a low density area and proposed height will not blend in with such an established area;
- No other amenity in the area;
- Scarcity of proposed parking with existing parking issues;
- Traffic safety in an already busy area;

Teresa Turley (The Grange, Circular Road)

- Loss of hotel amenity for the area with the hotel fitting into the area surrounded by mature trees the felling of which is not environmentally friendly;
- Proposed building is too big, bulky, too high and badly designed and completely out of character;
- Building will overshadow and dominate every house in the area and out of character;

- Insufficient parking spaces for development of the size given number of students with cars, staff with overspill parking existing already in estates;
- Amount of proposed students will create noise and anti-social behaviour from some with residents having no recourse to Residential Tenancy Board;
- Traffic congestion caused by proposal at very busy junction;
- Protected view over the City and the Corrib will be obstructed;
- Question the need for the number of rooms;

Paul Hourigan (Tudor Lawn)

- Hotel provides only social amenity in the area and ideally located for IDA Park and NUIG with a mobile phone base station on hotel roof the removal of which may impact phone reception;
- Height of new building totally out of place for the area, will impact on property value and seriously overshadow the property with health impacts from loss of natural light;
- Noise associated with students with close proximity and size of proposal bringing increased noise, smoke and anti-social behaviour impacting on health and safety;
- Parking insufficient with proposal aimed at affluent student market with presumption that at least 50% of student will have cars and expect a space with no parking in the area with overspill parking in adjoining estates creating serious health and safety issues;
- Parking insufficient for summer tourist accommodation and staff parking not mentioned;

Shelia Moore (Greenfield's Road)

- Very high level of students in the area giving rise to anti-social behaviour in an area made up mainly of elderly residents;
- Students commuting daily and residential students causing overspill parking in estates preventing deliveries and creating health and safety issue;
- Traffic congestion currently on road network into the city with bus service delayed by traffic;
- Height of blocks and overlooking of surrounding estates blocking light;

- Hotel only amenity in the area with its removal requiring travel to the city;
- Proposal will force elderly out of the area;

Michael and Nora Corley (Cherry Park)

- Height and density of proposal will have a negative effect on aesthetics and urban design of the area with building out of character;
- Demolition of hotel will cause noise pollution with heavy machinery worsening existing traffic problems and air pollution from excessive dust;
- Parking proposed inadequate and will not accommodate student and holiday lettings leading to overspill parking in adjacent estates and increased traffic congestion;
- Demolition of hotel will deprive the community of a major social outlet;

Joan Hughes (Tudor Lawn)

- Preservation of hotel is vital to the aging residents of the area with community attachment to the hotel with no other nearby meeting points;
- Constant noise from the hotel which can be problematic with larger scale of proposal likely to heighten noise levels and proposed courtyard has potential for noise pollution impacting on amenity of adjoining dwellings and gardens;
- Rear bedroom window obstructed by hotel with proposed higher building leading to further loss of light and impact on privacy;
- Concern at proposed density of population for the site with Newcastle area already densely populated during academic year with proposed development affecting demand on local water supply;
- Bus service at capacity with no seats available with proposal adding to an already poor quality pressurised service with bus stop on narrow path unsuitable for proposed footfall;
- Lack of cycle lanes, pedestrian crossing and poor street lighting obvious deterrent for proposed development;
- Location at major road junction leaves students vulnerable to a fatal accident accessing the development with potential for overspill parking in adjoining estates and increase in traffic adding to current congestion;

Maura O’Riordan (Cherry Park)

- Loss of Westwood hotel which is a vital social focal point for residents and IDA;
- Loss of trees on the site will negatively affect the environment and visual amenity;
- Hotel mirrors neighbouring area with proposal too high overlooking and overshadowing the area;
- Excessive traffic congestion on adjoining roads with proposal creating additional congestion;
- Many students have cars with insufficient parking proposed and potential for overspill parking in neighbouring estates;
- Enjoyment of homes disrupted by existing students in estate and high concentration of students proposed will disrupt area;
- Construction will result in noise, dust and nuisance;
- Concerns raised also apply to summer tourist letting proposed with no public parking in the area resulting in traffic congestion and overspill parking;
- Scale and size of proposal will disrupt enjoyment of properties;

Mary Walsh (Cherry Park)

- Height and density out of character with area and intrusion on residents;
- Further impact on existing traffic congestion at junction and IDA Park and Thomas Hynes Road;
- Car parking provision totally unrealistic and inadequate with concern at overspill;
- Loss of Hotel major impact on the social and quality of life of residents;

Michael Mulhall & Fiona Quinn (Dun Daingean)

- Proposal is 6-storeys with equipment on the roof with permanent views of our gardens, imposing and overlooking home;
- Proposed access road too close to nearby back gardens increasing traffic noise;
- Massive increase in traffic levels on already congested junction with traffic implications of construction;
- No cycle paths in vicinity and single bus route with greater number of students requiring longer backlog at traffic lights;
- Insufficient car parking for students and tourists and overspill into estates;

- Noise and anti-social behaviour from students at night and weekends passing estate;
- Scale and density not in keeping with area;
- Hotel is the local areas only amenity.

Marian Tierney (Cherry Park)

- Height and density will have a negative effect on the aesthetic and urban design of the area as building out of character;
- Demolition process will create heavy traffic, noise and air pollution disrupting the area;
- Parking inadequate and will lead to overspill parking in adjacent estates and increased traffic congestion at junction;
- Proposal will deprive area of major social outlet;

Hildegarde Naughton TD

- CSO figures reveal 44,771 students drive to University with parking proposed vastly insufficient leading to parking in neighbouring estates;
- Imposing a licence to reside is not a provision or guarantee that ABP should accept due to impossibility of enforcement;
- Proposal is 3-fold increase in bed capacity of existing hotel and area served by one direct bus on hourly basis;
- Developer indicates engagement with Bus Eireann but delivery not guaranteed;

Anne Feeney (Dun Daingean)

- Proposed 2.3 bigger than hotel creating overdevelopment;
- Proposal 5/6 storeys in height with equipment with existing 3-storeys;
- Location and proposed height not suitable in a high density residential area overshadowing houses with loss of light and impact on privacy;
- Location at busy junction will heighten risk of accidents due to increased use of footpaths, impact on flow of traffic on busy road;
- Increase of emissions from air conditioners due to size of buildings
- Increase in noise in the area;
- Loss of the hotel with area not suitable for high rise student accommodation;

Anne O'Hara Quinn (Dangan Heights)

- Dramatic overdevelopment of the site more appropriate to city centre;
- Existing buildings set back with proposal dominating the area so close to road;
- No precedent exists for the height in this area;
- Over intensification of development not creating sustainable community;
- Loss of trees with some trees of particular value;
- Deficient parking impacting on local residents with licence to reside not applying to family and friends with substantial impact on community.

Niamh Doheny & Christopher Duke (Cherry Park)

- Demolition of hotel is loss of valuable community and social amenity;
- Inadequate car parking leaving to overspill parking;
- Anti-social behaviour and noise pollution from students within houses in estates with high concentration close to residential dwelling creating further problems;
- Proposal excessive in height overlooking back gardens with existing hotel 3-storeys surrounded by mature trees;
- Loss of trees will have an adverse impact on character of area and loss of sound barrier;

Neil Sweeney (Hazel Park)

- 50% of the site zoned enterprise, light industry and commercial and residential should not be allowed;
- Density out of proportion with area with scant regard for adjoining estates;
- Additional 394 students unfair imposition on an area struggling with excess of rented properties and anti-social behaviour;
- Does not explain how noise levels outside the development can be managed with students returning late at night causing disturbances;
- NUIG main concern is for students and not neighbouring residents;
- Provision of open space inadequate creating health and safety concerns;
- Comparison with Dublin and other cities for car parking not appropriate as CSO showing much higher proportion of students in Galway driving;

- Assertion that overspill parking will be directed to pay and display cannot be sustained as no control with only 25 pay and display spaces available;
- Visit to Corrib Village accommodation shows how inadequate the car parking is;
- Loss of hotel will have adverse effect as only amenity in the area and would increase need to travel on already congested roads;
- Student accommodation should not be provided at expense of residents with NUIG having sufficient land to accommodate students;
- SHD process removes local input from planning process and comparison to Dublin and Edinburgh not valid questioning local planning involvement;

Ann McDonnell (Tudor Lawns)

- 5-storey development to rear of home would devalue property with overshadowing of home and garden;
- Scale and density inappropriate and excessive with visual impact from home;
- Existing congestion on N59;
- Insufficient parking and overspill parking in adjoining estates;
- Noise pollution from students in quiet predominately elderly community;
- Impact on community of loss of hotel;

Padraig Lenihan & Caitriona Clear (Clifton Park)

- Height of structure will overshadow houses in Clifton Park;
- Students within existing estates which involves noise and activity from student life with proposal not accessible to most ordinary students;
- Trees should be retained as offset negative effects of traffic congestion;
- Insufficient parking for tourist accommodation;
- Hotel an indispensable resource for the community;
- Complex will not solve the student accommodation crisis given likely cost of up-market development;

Paula & Colman O'Flaherty (Dun Daingean)

- Proposal too dense, overdeveloped, physically overbearing and inappropriate;
- Impact of noise from internal road along west of site with impact of coaches not fully addressed with no set down area in the Plan;

- Noise impact assessment confirms previous noise condition not being satisfied with little confidence in attenuation methods proposed;
- Scale of proposal inappropriate to neighbouring context with CGI's showing imposing nature of proposed on western boundary properties (Block E);
- Noise and air pollution within block C (waste store);

Bertie Flaherty & Joanne Flaherty (Tudor Lawn)

- Hotel is only social amenity in the area with no other amenities;
- Size of proposal and lack of parking not acceptable with parking in adjoining estates not acceptable given existing parking problems;
- Proposal will be opposed with no one having right to change an area for benefit of financial developments;

Bernard & Dympna Finan (Clifton Crescent)

- Loss of amenity in the area;
- Height of the building;
- Insufficient car parking;
- Increase in noise levels;
- Increase in traffic congestion;
- Inappropriate location of the proposal;

Tim and Joan Hogan (Clifton Crescent)

- Proposal would change sense of community with café not suitable for older residents and not appropriate facility for the community;
- Student residence not conducive to peaceful community;
- Proposal higher than other properties with overlooking and loss of privacy;
- Noise during construction and from students leaving and accessing the building and noise from tourists and buses with impact on sleep;
- Parking inadequate resulting in parking on roads and adjoining estates with traffic a danger to residents;
- No cycle lanes in the area with junction of N59 very busy with increase in cyclists a safety risk;

- Increase in student bedspaces in the area (incl. Corrib Village) will change community with increased noise;
- Impact on property value and loss of trees;

Michael Bradley (Upper Newcastle)

- Removal of beautiful building and amenity for residents in the area and accommodation for tourists;
- Parking inadequate and does not comply;
- Overshadowing of existing houses and lack of privacy;
- Additional traffic would cause additional pressure on already congested system;
- Removal of trees;

Dangan Heights Community Association (Dangan Heights)

- Loss of hotel a massive loss to the community;
- Deficit of car parking leading to intrusion on residents and concern that overflow car parking will cause safety concerns;
- N59 extremely busy and cannot handle proposal;
- Concern at future management of the development;

Martina O'Flaherty (Ballagh, Bushypark)

- Own 'Donoratico' in Dun Daingean with proposal out of scale and character;
- Density of student population at maximum with proposals at Corrib Village and Newcastle one of Galway's oldest residential areas;
- Hotel only remaining amenity in the area;

James and Veronica Keenan (Clifton Crescent)

- Height totally out of character with area;
- Parking spaces inadequate with CSO showing 44,771 students drive to college necessitating at least 100 spaces with staff parking mandatory and overspill parking problematic for the area;
- No explanation of off-site parking and UK examples unsupported and insufficient parking for summer letting;
- Requirements of parking for students and tourist letting evident in Corrib Village;
- Details of management proposals inadequate;

- Out of reach financially for most students with area saturated with students;
- Residents of area entitled to peaceful existence;
- Site at a busy junction with construction traffic causing serious disruption;
- Noise pollution during demolition and construction;
- Hotel only amenity in the area;
- Impact of students on elderly community from noise;

Paul and Valerie Coleman (Tudor Lawn)

- Hotel is a valuable resource to the community;
- Number of proposed parking spaces inadequate leading to overspill parking in estates with reality of large number of students driving to college with no land in vicinity available for parking purposes;
- Additional traffic create added danger to the area;
- Density and height outside accepted norms and 2-storeys higher than existing hotel;
- Privacy will be lost with removal of trees with no way to mitigate;

Pat & Helena Francis (Circular Road)

- Loss of hotel which is an important amenity with scale of proposal not in keeping with the area overlooking homes removing privacy;
- Proposed 5-storey would not protect existing amenity with removal of hotel removing amenity;
- Residents not considered in the application with vast amount of land owned by NUIG who could provide units;
- Section 11.29 of City Plan outlines student accommodation with university campus having all the amenities that students need;
- Insufficient car parking for proposal with overflow into adjoining estates;
- More than enough student accommodation in the area which is one of the elements of the City Plan which resist over-concentration of such schemes in any one area;

John Boyle (Dun Daingean)

- Lack of car parking spaces on site for both students and tourists and impacts on local estates from overspill parking;
- Additional traffic, pedestrian and cyclist at busy junction with no right hand filter and no cycle lane on Upper Newcastle Road creating safety issues;
- Density of proposal compared to existing density within the area with height of proposal close to the footpath and does not look well;
- City Development Plan (s2.6) seeks to ensure new development will not adversely affect the character of these areas and question if NUIG can provide lands close to University;
- Question assurances from applicant that proposal will not increase anti-social behaviour and measures proposed to prevent same;
- Loss of hotel as a social space with scarcity of hotels and pubs in the area;

Bridie Kenny (Tudor Lawn)

- Proposal will lead to loss of view and light from back garden;
- Proposed changes complete disruption with noise and less safety protection;
- Traffic problems given number of exits and traffic congestion along the route;
- Property devaluation;

Joe & Mary Nally (Laurel Park)

- Not suitable site for a 5-storey building with overlooking of private houses and noise due to population increase;
- Parking totally inadequate with student population driving and without proper facilities will parking in adjoining estates with existing hotel providing parking;
- Proposal would not protect existing amenity of the hotel with no amenity for the residents and IDA park with proposal a loss of local amenity;
- Potential for proposal to devalue properties in the area with the NUIG owning lots of land which can accommodate student accommodation;
- City Council should respect residents in relation to losing the amenity of the hotel;
- Insufficient parking for the proposed student and tourist proposals;
- City Plan states that over concentration of student accommodation schemes will be resisted with more than enough accommodation in the area.

Michael & Sarah Withero (Dun Daingean)

- Not suitable as plot ratio is not sufficient for development of this magnitude, height and density;
- Proposal not in keeping with City Plan;
- Proposed parking grossly deficient with concern that parking will overflow into adjoining estates;
- Existing building unobtrusive and appealing with proposal inconsiderate with trees surrounding existing building and object to removal of trees and concern at impact of proposal of those retained;
- High density of student accommodation in the area with new bedspaces proposed in Corrib Village with demographic of area skewed with student population out of proportion;
- Hotel only amenity in the area with residents depending on it and loss of facilities impacting negatively on the community;

Samantha Collins (London)

- Loss of hotel with disabled people disadvantaged as hotel welcomes disabled tourists with excellent disabled facilities;
- Hotel provides employment in the local area;
- Increased traffic on busy road causing delays and risk of danger;
- Loss of trees;
- Enough existing student accommodation in the area;
- Noise and pollution from demolition and construction;
- Height of proposed buildings will change current views from houses;

Hazel Park Residents Association (Catherine Payne)

- Density near small housing estates already saturated with student letting;
- Major traffic delays on N59 affecting residents entering and exiting estate;
- Insufficient parking;
- Loss of hotel and impact on community (social occasions and food) with nearest hotel 2 miles away;

Bridget Browne (Dangan Court)

- Monumental carbon footprints occurring knocking an architecturally designed 19 year old building and replacing it with a much larger concrete building;
- Introducing pedestrian lights on Thomas Hynes Road will increase existing traffic backlog and impact ambulances and not conducive to modern traffic planning;
- Removal of trees will have a negative environmental and visual impact on the area with proposed development visually intrusive with its back to local residential community and poor street frontage not enhancing the local area;

Marie Walshe (Greenfields Road)

- Loss of hotel impacting on community;
- Proposal too high swamping residents in Dun Daingean and Tudor Lawn with student accommodation not a choice for next door neighbour with impact on property values;
- Pollution and traffic chaos during demolition of the hotel;
- Proposal will not fit into the area;
- Lack of parking spaces with students having cars and potential for overspill parking in adjoining estates;
- Noise from taxis and anti-social behaviour;
- Traffic chaos on roads from increased volume and impact on erratic bus service;

Martin and Norrie Quinn (Dangan Heights)

- Loss of vital community amenity
- Size of building in height and magnitude on a busy junction;
- Location not convenient to campus as on wrong side of the road for easy and safe access;
- Parking spaces inadequate to cater for high end students with their own cars and no provision for staff parking or tourist letting;
- Abnormal pedestrian use of the busy N59 with proposal on wrong side of N59 and ample land within Campus complex;
- Galway European Capital of Culture in 2020 with high demand for suitable hotel accommodation;

Kathleen Cafferky (The Orchard, Dangan Court)

- Proposal will change the existing pleasant residential area;
- Ragoon flats built in 1970's supposed to solve housing crisis and demolished in 1990's and do not need bad planning decisions duplicated;
- Parking totally inadequate for students and staff, no cycle lanes available and a bus service that is delayed by traffic congestion;
- Student accommodation being delivered on the NUIG campus and while shortage of student accommodation in Dublin not the same in Galway with digs accommodation offered in locality all of which was not taken up;

Ronan Ryan (Tudor Lawn)

- TIA concludes proposal will generate fewer vehicle trips than existing hotel with assessment based on data collected on 16 May 2017 when lectures in NUIG had ended and peak tourist season had not commenced;
- NUIG related traffic one of largest contributors to the congestion in the area must be considered for any valid TIA;
- Junction at hotel is gateway to Galway City from North Connemara with ambulance and emergency services travelling this route and TIA not distinguishing between ambulance and other traffic and junction regularly congested;
- Density of proposal will generate high volume of student foot traffic using pedestrian crossings at junction adding to congestion and accommodation should be strategically placed to minimise impact such as Corrib Village;
- Lack of cycle lanes with unlit cyclists problematic on local roads with conflict between cyclists, cars and pedestrians adding to congestion and risk of accidents;
- Scientific foundation in TIA weak with data used often irrelevant and/or invalid with local knowledge of local traffic invaluable and should be taken into account;
- Impact on the environment from demolition of hotel and carbon cost of waste disposal;
- Dangan Woods not mentioned in the ecological assessment, EIA screening or AA screening and question if impact on Woods should be considered;

- Consider that all trees have value rather than conclusion of Arboricultural assessment and have great aesthetic beauty, create link to Dangan Woods and buffer noise pollution which is not taken into account by arborist;
- Question why reports are not commissioned independently;
- Local community strong advocates for needs of NUIG and student population with Westwood Hotel providing facilities for NUIG;
- Hotel key social hub of community and demolition a huge loss to local community and needs of local community not met proposal especially for senior citizens;
- Improved models of housing and student accommodation should not be at expense of local community with greater engagement required with proposal disregarding needs of the community;

Clar Grogan (Tudor Lawn)

- Lack of car parking with students driving to university increasing, car parks at NUIG inadequate with potential impact on adjoining estates;
- Difficult to exit Tudor Lawn at peak business and college times with congestion at junction and increased pedestrian crossing requests;
- Hotel is much needed and viable hotel in the area and plays vital role in community with proposal contravening City Plan;

Mary Hynes ((Dun Daingean)

- Breaches City Plan in terms of residential density/height, redevelopment and protection of existing amenity and neighbourhoods/established suburbs given its height and scale;
- Insufficient parking given parking ratio in Corrib Village and for tourist accommodation with no option but to park in adjoining estates;
- Hotel is only amenity in the area and its demolition would erode local community;
- Anti-social behaviour and noise pollution from proposal unacceptable to aging population;
- Number of trees subject to preservation order and proposed for removal;

Conleth and Mary Cunnane (Dangan Court)

- Proposal too high for the area and bigger than Hotel, occupies too much of the site area, encroaching close to boundaries and public roads;
- Hotel only meeting/socialising space in the area and important resource with access to other hotels requiring car access and increasing congestion;
- Removal of trees changing area from green leafy suburb to hard grey urban environment;
- Parking provision inadequate with existing students already having cars and staff parking with far more car users among applicants for accommodation with impact on adjoining estates from overspill parking with NUIG car park operating on a permit basis;

Ger Cunningham & Mary McNamee (Dun Daingean)

- Parking provision not realistic and will result in overspill parking in estates;
- No parking provided for the proposed take away facility in the café and disposal of rubbish from take away;
- Proposal will dominate the area;
- Huge loss of trees with impact on community and impact on global warming;
- Impact of loss of hotel on community and wider public;
- Anti-social behaviour from additional students in the area;

Lorraine Courtney (Dun Daingean)

- Unacceptable building height in breach of SRD Guidelines where majority of buildings are 2-storey with area suburban not city centre;
- Proposal towering and imposing structure dominates the landscape;
- Arborist engaged by residents recommends protecting the valuable asset;
- Congestion on N59 worsened by extra students using pedestrian lights;
- No cycle paths in vicinity and 1 bus route running once per hour with access too close to back gardens of estate;
- Insufficient car parking for proposal and tourist accommodation;
- Increased carbon footprint during demolition and construction;
- Invalid address on documents;
- Need for strategic plan for the area given development proposed in the area;

Ethel Balfe (Dangan Heights)

- Demolition of the Hotel which is only hotel, pub and amenity in the area;
- Existing buildings fits well into the area with proposal a monstrous, ugly replacement involving destruction of mature trees;
- Height and size of proposal out of harmony with existing area leading to overlooking;
- Unacceptable increase in number of students in the area with new accommodation in NUIG;
- Inadequate number of parking spaces and many students owning own cars with existing overspill parking in the adjoining estates increasing;
- Noise pollution and unwelcome intrusion into estates of students with no leisure facilities;
- Herding together students negatively impact social development with houses in the area renting rooms to students allowing them integrate in community;
- Site at very busy junction with proposal adding to already chaotic traffic problems;
- Impact of proposal on the existing overstretched one-hourly bus service;
- No facilities for the tourist element of proposal;

Basil & Beryl Fenton (Clifton Drive)

- Site within existing well established residential community with substantial student rental with additional students destroying community;
- Demolition of hotel will remove only venue/amenity in the area which supports locals and businesses;
- Health and safety issues with location on N59, no cycle lanes and insufficient space for proposed island on Thomas Hynes Road and exit from Clifton Road to N59 virtually impossible;
- Height and density not in keeping with the area, ignores City Plan and zoning;
- Removal of mature trees and green area needed to minimise carbon footprint with independent expert confirming same;
- Loss of established architectural building, employment and support location for Oncology in NUIGH;

- Population density significantly in excess of National Guidelines;
- ESB substation not included and no agreement with ESB;
- No provision for safe and sufficient turning space for vehicles with need to reverse onto N59;
- Proposal institutional in nature, impact of height on noise and wind environment;
- Use of green area bordering Thomas Hynes Road not in applicants control;
- EIA does not mention new factory block on other side of N59 and proposal not a brownfield site as referenced but a valuable commercial asset to neighbourhood and wider community;
- Parking for summer guests proposed on on-street parking with only 12 spaces;
- Overlooking of properties in Clifton Crescent and if ABP decide to grant permission it should be no more than 3-storeys;

Siobhan Keane (Dun Daingean)

- City Plan seeks to ensure new development will not adversely affect character of the area and have regard to scale and proportion of existing development;
- Montage not to scale with proposal overshadowing Dun Daingean with overlooking and lack of privacy;
- Removal of trees, service entrance backing onto existing houses and noise with hotel already exceeding what is permitted in a residential area;
- Lack of parking within proposal with overspill parking;
- No cycle lanes to NUIG and issues with safety of existing cyclists;
- Area becoming a student hub with plans for a new school and other development with need for a strategic plan for the area with student accommodation in other areas on Campus;
- Proximity of access to N59 with traffic chaos during construction with one hourly bus service with pedestrian crossing adding to traffic delays.

John Ryan (Ardilaun Road)

- Already major parking issues in the area with proposal exacerbating the issue;
- Site at one of busiest junctions in Galway with additional students crossing the road making issue worse;

- Size unfeasible with far too many students and not large enough to accommodate all proposed;
- Overlooking of neighbouring houses, reducing privacy;
- Lack of amenities in the area with proposed amenities insufficient;

Jim Sherry (Tudor Lawn)

- Building is too large for the area with too many students;
- Noise impact and insufficient parking for the size of building;
- Problems with accessing road from estate and overspill parking;
- Dust and dirt from demolition;

Terry O'Flaherty (Councillor)

- Request very valid concerns of the residents are taken into account;

Maura Cunningham (Cherry Park)

- Demolition of a 20 year old building;
- Noise and traffic disruption from construction;
- Enormity of the building height taking up the entire site and overlooking properties;
- Parking inadequate and overspill parking in adjoining estates;
- More suitable sites in the area for student accommodation;

Bridie and Joseph Corcoran (Dun Daingean)

- Overdevelopment of the site, permanent visible structure and lack of privacy;
- Entry too close to back gardens of estate with lack of privacy and noise;
- Traffic chaos during demolition and construction and impact on N59 affecting road users;
- Pedestrian crossing adding to traffic delays with potential for backlog and no other road access to the N59;
- Car parking insufficient and question how noise can be controlled;
- Increased carbon footprint during demolition and construction;
- Invalid Addresses;
- Loss of income for landlords with company foreign based and seek to keep income in local area with proposal not helping housing crisis;

- Need a strategic plan for the area which is proposed for new development with student accommodation sited on Campus in other jurisdictions;

Corionna Corcoran (Dun Daingean)

- Overdevelopment of the site, permanent visible structure and lack of privacy;
- Entry too close to back gardens of estate with lack of privacy and noise;
- Traffic chaos during demolition and construction and impact on N59 affecting road users;
- Pedestrian crossing adding to traffic delays with potential for backlog and no other road access to the N59;
- Car parking insufficient and question how noise can be controlled;
- Increased carbon footprint during demolition and construction;
- Invalid Addresses;
- Loss of income for landlords with company foreign based and seek to keep income in local area with proposal not helping housing crisis;
- Need a strategic plan for the area which is proposed for new development with student accommodation sited on Campus in other jurisdictions;

Bridie and Joseph Corcoran (Dun Daingean – 2nd Submission)

- Overdevelopment of the site, permanent visible structure and lack of privacy;
- Entry too close to back gardens of estate with lack of privacy and noise;
- Traffic chaos during demolition and construction and impact on N59 affecting road users;
- Pedestrian crossing adding to traffic delays with potential for backlog and no other road access to the N59;
- Car parking insufficient and question how noise can be controlled;
- Increased carbon footprint during demolition and construction;
- Invalid Addresses;
- Loss of income for landlords with company foreign based and seek to keep income in local area with proposal not helping housing crisis;
- Need a strategic plan for the area which is proposed for new development with student accommodation sited on Campus in other jurisdictions;

Geraldine Byrne and Damien Byrne (Tudor Lawn)

- Loss of amenity and social isolation caused by demolition of the hotel which is used frequently by local community and impact caused to various clubs with no other function rooms available in the area;
- Increase in population on west side of city and Westwood is the only hotel in the area impacting on provision of tourist accommodation/accommodation and other uses associated with UCHG/IDA/NUIG;
- No clear and sustainable policy for student accommodation in the area with area saturated with students and suffering years of anti-social behaviour;
- Other proposed developments in the area will increase traffic use of area;
- Prevailing form, pattern and density must be considered with proposal not making a positive contribution and at odds with well-kept community;
- Overdevelopment of the site materially contravening the City Plan with reference to policy on established suburbs (s.2.6), residential densities (pg.30) and redevelopment (pg 32);
- Traffic survey undertaken inadequate as students finished exams and not true reflection of volume of traffic on roads where backlog existing and request TII consulted;
- Pedestrian crossing would have future detrimental effect on flow of traffic;
- Request traffic survey undertaken at peak times for a number of days;
- Lack of parking in the area and request surveys undertaken when students return with estates saturated with student parking;
- Who will monitor and enforce licence to reside proposal;
- Poor public transport in the area with one hourly bus service;
- Access to Tudor Lawn at peak times impossible with reference in TIA to queue lengths untrue;
- Consider third level institutions cannot continue to expand without transport and parking facilities;
- Question if NUIG have given permission for facilities to be used by general public (parking shown in an image on sports field);

- Object to loss of light and query light study as 5-storey structure at end of garden will impede on natural light;
- Noise from students in the area with proposal increasing same;
- Impact of proposal on trees in back garden of property from proposed road;
- Piece of ground including Gate entrance to south of site located at entrance to Tudor Lane with ownership held by residents of Tudor Lane and Clifton Court and if the case applicant will not have any access;
- Property values in the area will be devalued with considerable land bank held by NUIG which proposes additional student accommodation;

Christy Kelly (Dangan Heights)

- Change existing urban structure with area 2-storey in height except for proposed student accommodation under construction on NUIG campus with height of that less obtrusive given difference in road levels and distance from N59;
- Overshadowing and dominate skyline negatively impacting visual amenity;
- Proposal to remove 4 trees on Thomas Hynes Road which are on public property with no apparent letter of consent on file;
- ABP restricted height of IDA Business Park to 2-3 storeys;
- Galway City Plan (policy 2.6) seeks to ensure a balance between protecting existing amenities and providing sustainable residential development with proposal not in keeping with this policy with removal of focal point in community;
- Ignores policy (pg.31) regarding infill development;
- No proposal to replace existing commercial activity with no enhancement of community or local services;
- Chapter 11.29 of City Plan deals with student accommodation setting out points to be considered which the Board should keep in mind;
- Parking insufficient with least amount of accommodating facilities proposed with spaces insufficient for students, staff and for summer letting;
- Amount of student accommodation in area creating imbalance in local community with more student accommodation proposed in NUIG Campus;

- Plot ratio in City Plan exceeded, height and scale out of character, too near road and should be set back, little or no amenity space;
- Fail to see why necessary to provide a footpath carving the public open space outside the curtilage of the development site at traffic lights;
- Makes little sense for public to make submissions to draft Development Plan when applications of this scale submitted directly to ABP;

Meadhbh Hughes (Tudor Lawn)

- Hotel used regularly and loss of amenity will impact creating social isolation;
- Loss of privacy as house located directly behind hotel;
- Noise caused already by hotel from deliveries, waste disposal, staff, car noise with such issues arising from proposal on a greater scale from courtyards;
- Work shift hours at hospital requiring daytime sleep which would be impacted from demolition and construction as will sleeping patterns of young children;
- Density of students on a small site with area saturated with students with concerns regarding safety, local infrastructure, demand for water;
- Site at major road junction and potential for accidents due to number of students;
- Parking insufficient with majority of students owning their own cars with issue arising with overspill parking;
- Roads already congested with proposal adding further problems;
- Validity and accuracy of travel survey must be questioned with public transport in the area less than satisfactory impacting on older resident's access to service;
- Question absence of dedicated pedestrian crossings, cycle lanes and lighting in the area with issue at quality of footpaths for proposed footfall;
- Potential rodent issues during construction;

Michael Sheppard (Dangan Heights)

- Too many units/students in well populated student area and scale/height of proposal out of line with size of site;
- Café a token space and not in keeping with needs of students;
- Location of site at busy junction already under severe pressure;
- Destruction of mature trees on site unacceptable;

- Lack of sufficient car parking with 24% of students owning cars and insufficient parking at NUIG with residents already impacted by this problem;
- Height of proposed buildings resulting in overlooking and impact on privacy;
- Lack of provision of leisure space/facilities in the area for proposed increase in students leading to noise pollution;
- Impact on once an hour bus service with greater inconvenience for current residents in the area;
- Additional problems arising from summer letting with inadequate parking and no facilities for visitors (playgrounds/leisure facilities/shops/restaurants);
- Access and egress from proposal will add to already busy junctions on N59;

Dun Daingean Residents Association (c/o Ger Cunningham)

- Not clear how many parking spaces required for staff with concerns of residents about student parking requirement not addressed;
- Fear that students will use adjoining estate to park cars with overspill parking existing associated with hotel and question how licence to reside will be enforced with estates nearer to development than pay for parking area;
- More cars using estate will compound problems entering and exiting estate;
- Comparisons with Bohermore not appropriate as context different (City Centre) within easy walking distance of City Centre with Westwood site suburban with limited transport options with summer users car dependent;
- Off-site facility for summer use not identified with adjoining estates easy option;
- Unlike Dublin Universities, NUIG serves large part of West of Ireland where public transport links are underdeveloped and higher car use for students;
- Junction of N59 already over capacity with suggestion new Ring Road reducing same not likely;
- Height and density out of character, too imposing, dominating surrounding houses, removing sense of community and plot ratio 30% more than maximum representing over development of the site and contravention of City Plan;
- Site context not properly addressed with area suburban low density not city centre with proposal gross overdevelopment;

- Statement in EIA screening ignores surrounding residential estates which bound the site with IDA and NUIG away from the site;
- Not clear if students can bring friends to the facility with possibility that 400 students congregated at one time with noise impacting adjoining estates;
- 24 hour staff presence on site unclear and not clear what applicants class as anti-social behaviour;
- More buses required to facilitate increased volume of students;
- Concern at safety of crossing road with NUIG on wrong side of road;
- No bicycle lanes in the area with potential shuttles not used if times don't suit;
- Proposal not compensating for loss of hotel which is well used by community
- Major amenity destroyed with amenities and public transport in area exaggerated;
- Tree fronting Moycullen Road should be retained as provides privacy to estate;
- Noel Lane, Arborist report outlining impact of loss of 100 mature trees;
- Access road along boundary creating noise and adversely impacting on privacy.
- Request a visit to the site and area;