

Planning Report

In respect of a Part X & XAB
(S175 and S177AE)
Planning Application for

Phase 1 Corrib Causeway
Development at

Dyke Road, Terryland,
Galway



in partnership with



March 2025



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Table of Contents

1	EXECUTIVE SUMMARY	4
2	INTRODUCTION	7
2.1	STRATEGIC CONTEXT	7
2.2	MASTERPLAN / DEVELOPMENT FRAMEWORK CONTEXT	2
2.3	ROLE OF THE LAND DEVELOPMENT AGENCY.....	3
3	SUBJECT SITE CONTEXT	4
3.1	SITE LOCATION.....	4
3.2	SITE CHARACTERISTICS.....	4
3.3	SURROUNDING CONTEXT.....	6
3.4	PUBLIC TRANSPORT ACCESSIBILITY	7
4	PROPOSED DEVELOPMENT	13
4.1	SUMMARY DEVELOPMENT DESCRIPTION	13
4.2	DETAILED DESCRIPTION.....	16
5	PLANNING HISTORY	42
5.1	SUBJECT SITE	42
5.2	SURROUNDING AREA - STUDENT ACCOMMODATION SITE	42
5.3	SURROUNDING AREA – UISCE ÉIREANN RAW WATER INTAKE	43
5.4	SURROUNDING AREA – BUS CONNECTS GALWAY CROSS CITY LINK SCHEME.....	43
5.5	SURROUNDING AREA – WOODQUAY PARK UPGRADE	44
5.6	SURROUNDING AREA – WATER SPORTS CENTRE, DYKE ROAD	45
6	CONSULTATIONS.....	46
6.1	PRE-PLANNING	46
6.2	LAND DEVELOPMENT AGENCY & GALWAY CITY COUNCIL CONSULTATIONS	46
6.3	PUBLIC CONSULTATIONS	46
7	STRATEGIC PLANNING CONTEXT	48
7.1	NATIONAL PLANNING FRAMEWORK: PROJECT IRELAND 2040	48
7.2	REBUILDING IRELAND: ACTION PLAN FOR HOUSING AND HOMELESSNESS	53
7.3	HOUSING FOR ALL – A NEW HOUSING PLAN FOR IRELAND, 2021	53
7.4	REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR THE NORTHERN AND WESTERN REGION, 2020	56
8	SECTION 28 MINISTERIAL GUIDELINES	58
8.1	SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENTS GUIDELINES, 2024	58
8.2	SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, 2023	65
8.3	URBAN DEVELOPMENT AND BUILDING HEIGHT GUIDELINES (2018).....	69
8.4	GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES, 2001	70
8.5	PART V OF THE PLANNING AND DEVELOPMENT ACT 2000: GUIDELINES (2017).....	71
8.6	THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009	72
8.7	GUIDANCE ON APPROPRIATE ASSESSMENT FOR PLANNING AUTHORITIES, 2009	80
9	GALWAY CITY DEVELOPMENT PLAN 2023-2029.....	81
9.1	CORE STRATEGY	81
9.2	ZONING.....	84
9.3	DEVELOPMENT PLAN – SPECIFIC OBJECTIVES	87
9.4	STRATEGIC REGENERATION / OPPORTUNITY SITE	87
9.5	POLICIES	89
9.6	DEVELOPMENT STANDARDS.....	89
10	DRAFT HEADFORD ROAD FRAMEWORK PLAN, 2009.....	98
10.1	EXTENT OF FRAMEWORK LANDS.....	98





10.2	VISION	98
10.3	KEY PRINCIPLES	99
10.4	CONTEXT PLAN	99
10.5	THE OVERALL FRAMEWORK.....	99
10.6	TRANSPORTATION	102
10.7	PHASING	103
11	CONCLUSION	104
	APPENDIX I – ADJOINING STUDENT ACCOMMODATION PLANNING HISTORY REVIEW	106
	APPENDIX II – BUILDING HEIGHT GUIDELINES 2018 – DEVELOPMENT MANAGEMENT CRITERIA.....	109
	APPENDIX III – DEVELOPMENT PLAN CORE STRATEGY REVIEW.....	116
	APPENDIX IV – GALWAY CITY DEVELOPMENT PLAN POLICIES AND RESPONSE.....	120





1 Executive Summary

A brief summary of the key points of this report is set out below:

- **Agent and Applicant Details** – Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, A92 ToH4, are the acting agents on this application and have been instructed by Galway City Council, City Hall, College Road, Galway, H91 X4K8, in partnership with the Land Development Agency, 2nd Floor Ashford House, Tara Street, Dublin 2, D02 VX67 to prepare and submit a planning application for a proposed development on a Galway City Council owned site of approx. 1.144 ha at Dyke Road, Terryland, Galway.
- **Application Context** - This planning application is made under Part X and XAB Section 175 (3) and Section 177AE (3) of the Planning and Development Act, 2000 (as amended). Planning applications where the Planning Authority, either in its own capacity or in partnership with another entity, proposes to carry out development within its functional area in which an Environmental Impact Assessment (EIAR) and Natura Impact Assessment (NIS) have been prepared are made directly to An Bord Pleanála for assessment and decision.
- **Report Objectives** - This report is intended to provide details on the proposed development; identify consistency with the relevant national and regional planning policy document together with guidelines issued under Section 28 of the Planning and Development Act, 2000 (as amended); and identify compliance with local statutory planning policy in the form of the Galway City Development Plan 2023-2029.
- **Site Context** - The site subject of the proposed development is infill and brownfield in nature and is located on the eastern bank of the River Corrib at Dyke Road, Terryland Galway. The subject site itself comprises a surface car park of approx. 389 no. car parking spaces. The subject site is located in the vicinity of the city centre core area and is proximate to a variety of land uses, services and amenities including retail, medical services, educational facilities, leisure and recreational facilities and civic uses. Galway Retail Park, Galway Shopping Centre, Corrib Shopping Centre and Corbett Court Shopping Centre are located both adjacent to and within 600 m of the subject site.
- **Public Transport** - The site is also exceptionally well located in terms of public transport accessibility with connections both on a regional and national scale. The subject site is located a 300m (4-minute walk) from the closest bus stops at Headford Road and Woodquay Court. In addition, the subject site is located approx. 650 m (9-minute walk) from Eyre Square which is a significant node and starting point for the majority of the urban bus routes of high-frequency including 10-minute peak hour frequencies. Ceannt Train and Bus Station are located approx. 800 m (11-minute walk) from the site with services to key regional and national towns and cities daily. The site is also proximate to the recently permitted Bus Connects Cross City Scheme (ABP Ref. 314597, refers).
- **Consultations** - During an iterative design process, extensive engagement took place between the Land Development Agency and Galway City Council across a range of departments and functions. In addition, extensive engagement was held with the public, relevant stakeholders, community groups, and Elected Members of Galway City Council. All feedback and submissions have been carefully considered by the design team and have influenced the final project design as contained in this application.
- **The Proposal** - The proposed development consists of the construction of a new residential development of 219 no. social and affordable apartment units (17,787 sqm GFA) and a childcare facility (approx. 241 sqm) in the form of 1 no. new residential block (ranging in height from 5 – 9 storeys over lower ground floor level) with associated car parking, bicycle parking, public and communal open spaces, and all ancillary works on a site area of 1.144 ha.
- **Parking, Access & Connectivity** – The proposed development provides for 2 no. access points for vehicles: 1 no. at the southern end and 1 no. at the northern end of the singular residential block. These 2 no. access points will serve multiple functions, providing entry for residential vehicles, as well as service / delivery vehicles and parking. A total of 33 no. residential car parking spaces including 2 no. accessible spaces are proposed representing a car parking ratio



of 0.15 to serve the overall development. A new pedestrian crossing point and a new, dedicated pedestrian and cycle route is proposed along Dyke Road enhancing the overall permeability of the site in terms of active travel. In addition, the team has been mindful of future connections and linkages in terms of a wider development context to ensure that the development is adaptable and can seamlessly integrate with any future planning initiatives that may arise within the immediate area. This includes the Bus Connects Cross City Scheme. A further vehicular access point is proposed to the south of the main development to facilitate new access to the existing southern car park.

- **Site Zoning** - The subject site is zoned 'CI' (Enterprise, Light Industry and Commercial). The zoning objective specifically identifies that this 'CI' zoning should allow for the development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.
- **Density and Mix** – The proposed density (231 dph – based on net site area) and the mix of units (1-, 2- and 3-beds) align with the requirements set by the Galway City Development Plan 2023-2029, Sustainable Urban Housing: Design Standards for New Apartments (2023) and the Sustainable Residential Development and Compact Settlement Guidelines (2024).
- **Social & Affordable Housing** – 197 no. apartments (90%) will be provided under the cost rental model and 22 no. apartments (10%) will be provided under the Social Housing scheme. Cost rental is a new housing tenure that was created under the Affordable Housing Act, 2021. It is aimed at people and families who are above the threshold to qualify for social housing but have difficulty affording private rented accommodation. Cost rental offers a long-term secure tenancy that is below the typical market rent.
- **Development Framework** – The subject proposal forms part of an overall three phase development framework, in the form of the Corrib Causeway Development Framework. The overall and wider development framework lands extend to 1.78 hectares and are located to the northeast of the city centre, within walking distance from Eyre Square and the wider Headford Road area. The development frameworks aims to deliver a residential-led, mixed-use development. Phase 1, relates to the current, subject proposal; Phase 2, an existing car park south of the site, is intended to be redeveloped for a mix of uses such as civic, commercial, and cultural uses; and Phase 3 is intended to provide additional residential units, should the Black Box Theatre be relocated. At present, there are no plans to demolish or relocate the Black Box Theatre. Galway City Council will prepare a Cultural Audit for the City. Subject to a decision on the future of the Black Box Theatre which may include its relocation to another existing or a purpose-built facility, the theatre will remain in situ. Phase 2 to the south as envisioned by Galway City Council shall comprise 'community, cultural and commercial uses.' This could therefore include a theatre.

The current phase 1 development proposal, subject of this planning application, has the potential to act as a catalyst to kick-start the regeneration of this three phase development framework but also the redevelopment of the wider Headford Road area. This particular site has been brought forward for the first phase of development on the basis that the Draft Headford Road Framework Plan (2009) envisioned residential development at this particular location with the more civic and commercial uses to be located further south on the phase 2 site. The current Development Framework has been prepared to align with this vision.

- **National Policy Mandate and Housing Targets** - The delivery of housing is currently the subject of a significant national policy mandate with mounting political pressure now accruing to deliver. We note specifically the ambitious targets published by the government on the 5 November 2024 and contained in the Programme for Government 2025, published in January 2025, which seeks to deliver over 300,000 new homes by the end of 2030. It should be highlighted from the outset of this report that the subject site is identified as a key regeneration and opportunity site within the National Planning Framework clearly defining the site as a critical landbank to deliver social and affordable housing within the Galway city area.



Key Opportunity - In summary, this infill, brownfield site offers a significant opportunity for the delivery of social and affordable apartment units within Galway City. This planning report will set out that the current Phase 1 – Corrib Causeway – Dyke Road proposed development is appropriate to the site, the surrounding area and is well founded in planning terms.





2 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, have been instructed by **Galway City Council, City Hall, College Road, Galway, H91 X4K8** in partnership with the Land Development Agency, 2nd Floor Ashford House, Tara Street, Dublin 2, D02 VX67 to prepare this Planning Report to accompany a Part X planning application for a proposed development on a site of 1.144 ha at Dyke Road, Terryland, Galway. This application contains an Environmental Impact Assessment Report and a Natura Impact Statement.

The proposed development involves the construction of a new residential development of 219 no. apartment units and a childcare facility (approx. 241 sqm) in the form of 1 no. new residential block (5 – 9 storeys over lower ground floor level) with associated car parking, bicycle parking, public and communal open spaces, and all ancillary works on a site area of 1.144 ha.

This report is intended to specify the design rationale behind the subject proposal; identify consistency with the relevant national planning policy guidelines under section 28 of the Planning and Development Act, 2000 (as amended), and with local statutory planning policy in the form of the Galway City Development Plan 2023-2029; and provide a detailed description of the proposal for the benefit of An Bord Pleanála.

2.1 Strategic Context

This planning application is made under Part X and XAB Section 175 (3) and Section 177AE (3) of the Planning and Development Act, 2000 (as amended). Planning applications where the Planning Authority, either in its own capacity or in partnership with another entity, proposes to carry out development within its functional area in which an Environmental Impact Assessment (EIAR) and Natura Impact Assessment (NIS) has been prepared are made directly to An Bord Pleanála for assessment and decision.

The lands subject of this application – referred to as Phase 1 – Corrib Causeway – Dyke Road are under the ownership of Galway City Council (GCC). The consenting process for planning permission was determined on the basis of the role of Galway City Council in the project – as landowners – noting their development agreement with the Land Development Agency (LDA) in respect of the subject lands.

Any development proposals advanced by certain State and Local Authorities is required to be made under Part X and XAB of The Planning and Development Act, 2000 (as amended) and the procedures to be followed for such proposals are set out under Part 8 of the Planning and Development Regulations, 2001 (as amended).

As per Article 249 of the Planning and Developments Regulations, 2001, (as amended), 3 no. hard copies of the plans and particulars are issued to An Bord Pleanála as part of this planning application. We note that in all Strategic Infrastructure Development cases, one of the copies as required by the Regulations must be a softcopy, a USB pdf format is submitted in this case. We refer to the accompanying cover letter for a list of the supporting application documentation.

We also wish to confirm that a digital copy of all material is available to be viewed at the following website: www.corribcausewaypart10.ie.

In addition, a copy of the planning application has been issued to the relevant prescribed bodies as set out under Article 121 of the Planning and Development Regulations, 2001 (as amended). The following prescribed bodies have been notified:

- | | |
|--|--|
| ○ An Chomhairle Ealaíon (The Arts Council) | ○ Minister of Education |
| ○ An Taisce | ○ Minister of Environment, Climate and Communications |
| ○ Commission for Regulation of Utilities | ○ Minister of Housing, Local Government and Heritage |
| ○ Córas Iompair Éireann | ○ Minister of Tourism, Culture, Arts, Gaeltacht, Sport and Media |





- Environmental Protection Agency
- Fáilte Ireland
- Galway City & County Childcare Committee
- Galway County Council
- Health and Safety Authority
- Health Service Executive
- Inland Fisheries Ireland
- Irish Aviation Authority
- Minister for Agriculture, Food and the Marine
- National Transport Authority
- Northern and Western Regional Assembly
- Office of the Public Works
- The Heritage Council
- Transport Infrastructure Ireland
- Údarás na Gaeltachata
- Úisce Éireann
- Waterways Ireland

2.2 Masterplan / Development Framework Context

The subject proposal forms part of an overall three phase development framework, the Corrib Causeway Development Framework. The Corrib Causeway Development Framework forms part of a strategic brownfield landbank located on the edge of Galway City Centre, which has been earmarked for comprehensive redevelopment by the Galway City Council Development Plan 2023-2029.

The overall development framework site extends to approx.. 1.78 ha and is located to the northeast of the city centre, within walking distance of Eyre Square and at the Headford Road area on the eastern bank of the River Corrib. The Development Framework document itself is prepared as a direct response to Section 10.26, Specific Objective No. 4 of the Galway City Development Plan 2023-2029, which seeks the preparation of a masterplan for the Dyke Road Regeneration site in advance of the adoption of the Headford Road LAP where there are proposals to advance the development of this site. For clarity, we note that the Headford Road LAP making process has not commenced nor is there any confirmed timeline for the coming forward of the plan. In addition, the LDA were required to carry out a Development Framework / Masterplan for the entire site as part of their development framework agreement with Galway City Council.

The Development Framework prepared and submitted with this application and in response to Section 10.26, Specific Objective No. 4 aims to deliver a residential-led, mixed-use development. Phase 1 relates to the current subject proposal; Phase 2, an existing car park south of the site is intended to be redeveloped for civic, commercial, and cultural uses; and Phase 3 is intended to provide additional residential units, should the Black Box Theatre be relocated.

At present, we note that there are no plans to demolish or relocate the Black Box Theatre. Galway City Council shall undertake an audit of cultural facilities within the city. The purpose of the audit will be to identify any gaps, demand and capacity. Subject to a decision on the future of the Black Box Theatre, which may include its relocation to another existing or a purpose-built facility, the Theatre will remain in situ. Phase 2 to the south as envisioned by Galway City Council shall comprise ‘community, cultural and commercial uses.’ This could therefore include a theatre. Phase 3 would be subject to clarity of the future of the Black Box Theatre and could comprise a further residential phase. Both phases 2 and 3 are to be brought forward for development by Galway City Council.

The proposed development has the potential to act as a catalyst to kick-start the regeneration of the wider area and revitalise underutilised lands through the implementation of a fully integrated and sustainable development.

This particular site has been brought forward for the first phase of development on the basis that the Draft Headford Road Framework Plan (2009) envisioned residential development at this particular location with the more civic and commercial uses to be located further south on the Phase 2 site fronting onto the Headford Road to provide an active frontage and streetscape. The current Development Framework has been prepared to align with this vision.





It should be noted that the Development Framework document itself does not set the framework for any development consent nor has it, or will it, be adopted by the Planning Authority as a statutory masterplan. The objective of this document is to set out a cohesive and plan-led development framework for an overall 3 phase development with Phase 2 and 3 of the development framework subject to separate future planning applications and associated consent.

2.3 Role of the Land Development Agency

The Land Development Agency plays a critical role in the delivery of housing in Ireland by acting as a commercial, state-sponsored body that facilitates the efficient development of publicly owned land. Established to maximise the potential of State-controlled land, the LDA focuses on identifying underutilised or strategic parcels and transforming them into vibrant, sustainable communities. Its key objective is to ensure that public land is used in the most beneficial and effective manner, particularly when it comes to addressing the national housing shortage. The LDA's mission is to accelerate the delivery of housing, with a significant emphasis on affordable and social housing, while also considering environmental sustainability and urban regeneration.

The Land Development Agency and Galway City Council have worked closely and collaboratively together to bring forward a development framework redevelopment of the entire Dyke Road site and specifically, the current development proposal for the Phase 1 Corrib Causeway site at Dyke Road. The objective of this partnership is to bring forward a high-quality residential development that is aligned with the region's growth and planning objectives. The site, which is strategically located proximate to key transport links and urban amenities, offers a unique opportunity for the creation of much-needed housing, while also supporting the regeneration of an area that has the potential to significantly contribute to the city's long-term development.

As the lead developer on this project, the LDA is responsible for coordinating the various stages of development, from planning and design through to construction and delivery. This includes ensuring that the project adheres to sustainable development principles and meets the needs of the local community, with a particular focus on affordability. In this case, the LDA's role extends beyond that of a traditional developer; it acts as a key facilitator, working to bring together public sector resources and expertise while ensuring that the project meets both national housing targets and local requirements. The role of the public in this process has been fundamental to the realisation of the project. The LDA have ensured that appropriate consultation and public involvement at the early stages of this project informed an iterative design process, which has delivered a clear development framework context for the overall site and an appropriate Phase 1 – Corrib Causeway – Dyke Road development.



3 Subject Site Context

3.1 Site Location

The overall subject site (measuring approx. 1.144 ha gross / 0.95 ha net) is located in Galway City, on the eastern bank of the River Corrib. The site addresses Dyke Road to the west, the existing Dyke Road Car Park to the south and the R866 (also known as Headford Road), further southeast. The site borders retail and commercial developments of Galway Retail Park to the east, and the Black Box Theatre to the north and Terryland Forest Park is located further north.



Figure 1 – Aerial Map with Subject Site outlined in Red

3.2 Site Characteristics

The Phase 1 Corrib Causeway site comprises a surface car park of approx. 389 no. car parking spaces. The Dyke Road Car Park (Phase 2 site) to the south of the site contains approx. 165 no. car parking spaces.

The eastern boundary of the site is defined by existing hedgerows, which separate it from Galway Retail Park, while a timber fence runs along the western boundary adjacent to Dyke Road. There is an existing bring bank facility located within the site facing the Dyke Road including 8 no. bottle banks and 2 no. clothing banks. The proposed development will involve the removal of the bring bank facilities and an alternate location for these within the city will be considered by Galway City Council in due course.



Figure 2 – View from within subject site towards Headford Road and Galway Retail Park (left) View from subject site to adjoining Galway Retail Park (right) (taken 16.10.24)



Figure 3 – View from South Dyke Road Car Park Entrance toward subject site and Black Box Theatre (taken 16.10.24)





Figure 4 – View looking into Subject Site from Dyke Road (taken 16.10.24)

3.3 Surrounding Context

The subject site is located in the vicinity of the city centre area and is proximate to a variety of land uses, services, amenities and public transport nodes.

Galway Retail Park, Galway Shopping Centre, Corrib Shopping Centre and Corbett Court Shopping Centre are located within 600 m of the subject site. These centres have a wide variety of retail, medical and convenience uses and services providing for daily needs. The site is also proximate to a number of community and social infrastructure facilities including educational uses (including the University of Galway), childcare facilities, sports clubs and leisure centres, parks and public open spaces, community centres, libraries, youth clubs, arts and cultural facilities, and medical centres (a review of all available social, community and cultural infrastructure in the vicinity of the site is detailed in Section 9 of the accompanying *Social, Community and Cultural Infrastructure Audit*).

In addition, there are many restaurants, public houses and coffee shops within the city centre and surrounding area, all of which are within walking distance and provide for a diverse selection of places for residents to eat, drink and socialise. Post office, credit unions and banks are all vital aspects of social infrastructure and there are many options for such civic services in the immediate vicinity of the site.

We refer An Bord Pleanála to the accompanying *Social, Community and Cultural Infrastructure Audit* for a detailed assessment of the available facilities in close proximity to the subject site.

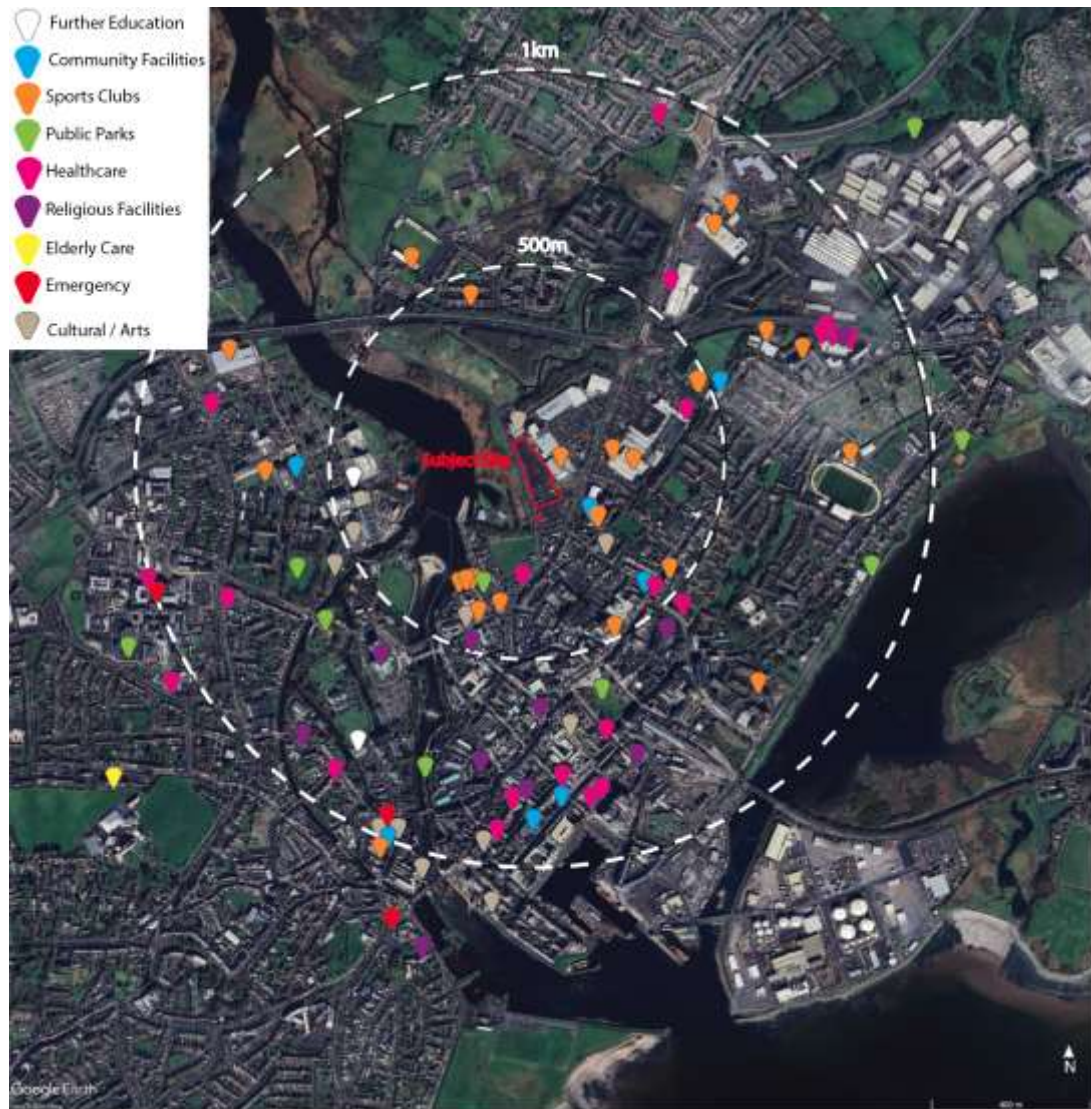


Figure 5 – Social, Community and Cultural Infrastructure Facilities within 1 km radius of Subject Site

3.4 Public Transport Accessibility

Local Bus Network

The subject site is located 300m (4-minute walk) from the closest bus stops at Headford Road (Stop ID: 523711) and Woodquay Court (Stop ID: 525411). Both stops are served by the 407 bus route. Located 550 metres (7-minute walk) from the subject site is Saint Francis Street (Stop ID: 523021). This stop is served by the following routes; 402, 404, 405, 407, 410, 411, 412, 419 and 424. Approx. 600 m from the site (9-minute walk) is Bóthar Bhreandán Uí Eithir (Stop ID: 523211) which is served by routes: 401, 404, 409, 430. In addition, the subject site is located approx. 650 m (9-minute walk) from Eyre Square which is a significant node and starting point for the majority of the urban bus routes in the city.

The table below provides further information regarding these routes:

No.	Route	Mon-Fri	Saturday	Sunday
401	Salthill – Eyre Square – Parkmore Ind. Est.	Every 20 mins	Every 20 mins	Every 20 mins
402	Seacrest – Eyre Square – Merlin Park Hospital	Every 30 mins	Every 30 mins	Every hour
404	Oranmore – Eyre Square - Newcastle	Every 30 mins	Every 30 mins	Every 30 mins



No.	Route	Mon-Fri	Saturday	Sunday
405	Rahoon – Eyre Square - Ballybane	Every 20 mins	Every 20 mins	Every 40 mins
407	Eyre Square – Bothar an Choiste	Every 30 mins	Every 30 mins	Every hour
409	Eyre Square – Parkmore Ind. Est.	Every 10-15 mins	Every 10-20 mins	Every 15-20 mins
410	Eyre Square – Mount Prospect	Every hour	Every Hour	Not Operational
411	Eyre Square – Tor Buí	Every 30 mins	Every 30 mins	Every 30-45 mins
412	Eyre Square – Mount Prospect	Every 30 mins	Not Operational	Not Operational
419	Galway – Oughterard - Clifden	Approx. every 2 hours	Approx. every 2 hours	Differing times
424	Galway – Carraroe - Lettermullen	15 mins - Hourly	Approx. Hourly	Approx. Hourly
430	Galway - Ballina	5 services daily	5 services daily	Not Operational

Table 1 – Bus Routes / Frequency

We refer An Bord Pleanála to the accompanying *Public Transport Capacity Assessment* prepared by PUNCH Consulting Engineers which concludes that there is sufficient capacity in the network to accommodate the proposed development. The surveyed bus stops in the local area indicated a high rate of available capacity for potential public transport commuters from the proposed development, with most buses running with 75% available capacity.

BusConnects Galway

The subject site will also benefit from the National Transport Authority's (NTA) Bus Connects 'Cross City Network' scheme.

The NTA plans to commence the implementation of the New Galway Bus Network between 2025 and 2026. As part of Bus Connects, the NTA are also advancing work on the Sustainable Transport Corridors, which will improve travel times on the bus network and improve connections for pedestrians and cyclists. Other parts of the Bus Connects programme, like simpler fares, will be delivered with the new bus network.

The key benefits of the final new network include:

- An approximately 50% increase in the amount of bus services in Galway city, Bearna and Oranmore.
- The extension of bus services to new areas with more routes with frequent services and an enhanced weekend timetable.
- A new 24-hour bus service, to be known as Route 9, would operate from Knocknacarra through the city centre to Doughiska and Parkmore.
- More residents of the city and its suburbs having access to the public transport network with Upper Ballymoneen Road, the Coast Road between Galway City and Oranmore and Oranhill among the areas to benefit.





- More routes running cross-city, and the main point of interchange located at Eyre Square.

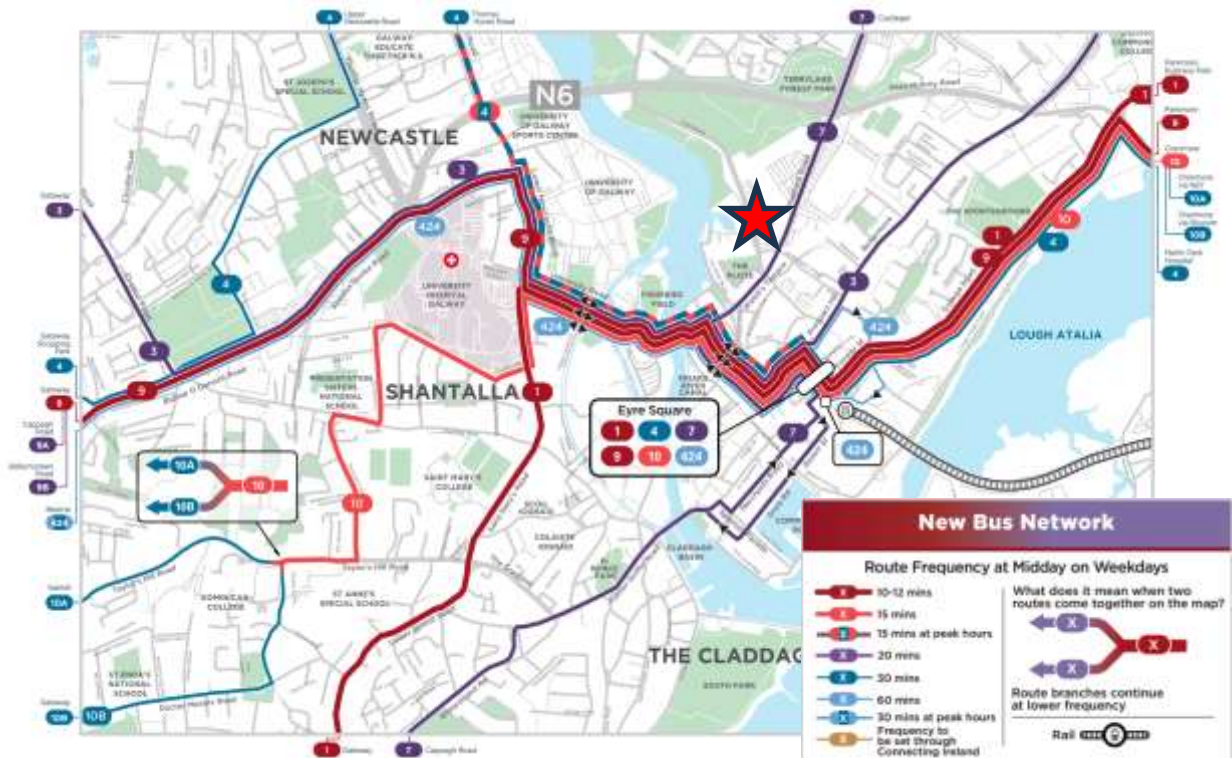


Figure 6 – Proposed BusConnects New Network Map with Site Identified by Red Star (Source: NTA)

Route	From	Via	To	How Often	Replaces Route...
1	Gateway	W. Distributor Road - Threadneedle Road - Salthill Promenade - Upper Salthill Road - St Mary's Road - Newcastle Road - University Road - Galway Cathedral - City Centre - College Road - Wellpark Road - Monivea Road - Ballybane Road - Castlepark Road - Monivea Road - Parkmore Road	Parkmore Business Park	15 mins	401
3	Gateway	W. Distributor Road - Clybaun Road Upper - Rahoon Road - Diarmuid Road - Bun a Croic - Circular Road - Seamus Quirke Road - Newcastle Road - University Road - Galway Cathedral - City Centre - Prospect Hill - Bohemore - Tuam Road - Monivea Road - McDonagh Avenue/Clarke Avenue - McDermot Avenue/Tone Avenue - Connolly Avenue - St James Road - Ballybane Road	Ballybrit Industrial Estate	20 mins	405
4	Gateway	Galway West Business Park - Rahoon Road - Seamus Quirke Road - Bóthar Le Cheile - Siobhán McKenna Road - Thomas Hynes Road - Upper Newcastle Road - University Road - Galway Cathedral - City Centre - College Road - Dublin Road - Renmore Road - Hawthorn Drive - Fuschia Drive - Ballyloughane Road - Dublin Road	Merlin Park Hospital	30 mins	402 + 404
4	NUI Galway	Upper Newcastle Road - Newcastle Road - University Road - Galway Cathedral	City Centre	15 mins, at peaks	NEW
7	Cappagh Road	Barna Road - Upper Salthill Road - Salthill Promenade - Seapoint Promenade - Whitestrand Road - Father Griffin Road - Dock Road/Merchants Road - City Centre - Eglinton Street - Headford Road - Coolough Road - Tirellan Heights - Headford Road - Bóthar an Choiste	Castlegar	20 mins	407
9	Knocknacarra (W. Distributor Road)	Gateway Exchange - W. Distributor Road - Rahoon Road - Seamus Quirke Road - University Road - Galway Cathedral - City Centre (via Cross City Link) - College Road - Dublin Road - Doughiska Road - Parkmore Road	Parkmore Business Park	10 mins	409
9A	Cappagh Road	W. Distributor Road - Gateway Exchange - W. Distributor Road - Rahoon Road - Seamus Quirke Road - University Road - Galway Cathedral - City Centre - College Road - Dublin Road - Doughiska Road - Parkmore Road	Parkmore Business Park	20 mins	411
9B	Upper Ballymoneen Road	Ballymoneen Road - Shangport Road - Clybaun Road Lower - W. Distributor Road - Gateway Exchange - W. Distributor Road - Rahoon Road - Seamus Quirke Road - University Road - Galway Cathedral - City Centre - College Road - Dublin Road - Doughiska Road - Parkmore Road	Parkmore Business Park	20 mins	NEW + 411
10*	Taylor's Hill Road	Maunsell's Road - Shantalla Road - Comcille Road - Costello Road - Newcastle Road - University Road - Galway Cathedral - City Centre (via Cross City Link) - College Road - Dublin Road - (Alternating paths depending on branch) - Main Street - Oranhill Road - Collí Clocha - Main Street (Lidl)	Oranmore	15 mins	NEW
10A	Salthill	Upper Salthill Road - Knocknacarra Road - Kingston Road - Taylor's Hill Road - Maunsell's Road - Shantalla Road - Comcille Road - Costello Road - Newcastle Road - University Road - Galway Cathedral - City Centre - College Road - Dublin Road - Galway Clinic - Eastern Approach Road - Main Street - Oranhill Road - Collí Clocha - Main Street (Lidl)	Oranmore via Eastern Approach Road	30 mins	404
10B	Gateway	W. Distributor Road - Bishop O'Donnell Road - Threadneedle Road - Doctor Mannix Road - Devon Gardens - Rosary Lane - Taylor's Hill Road - Maunsell's Road - Shantalla Road - Comcille Road - Costello Road - Newcastle Road - University Road - Galway Cathedral - City Centre - College Road - Dublin Road - Doughiska Road - Roscam - Coast Road - Main Street - Oranhill Road - Collí Clocha - Main Street (Lidl)	Oranmore via Roscam	30 mins	NEW
424	Bearna	Barna Road - Kingston Road - Shangport Road - Clybaun Road Lower - Western Distributor Road - Gateway Exchange - W. Distributor Road - Rahoon Road - Seamus Quirke Road - University Road - Galway Cathedral - City Centre. Limited stops in Galway.	Ceannt Station	60 mins, 30 mins at peaks	424

Table 2 – Proposed BusConnects Routes & Frequency



We note that planning permission has been granted by An Bord Pleanála on 27/09/2024 for the BusConnects Galway Cross-City Link Scheme (University Road to Dublin Road). This scheme will form a central route for public transport, cyclists and will better connect places of interest for pedestrians along an east-west corridor through Galway City Centre.

The aim of the permitted, but not yet implemented scheme is to provide improved walking, cycling and bus infrastructure on this key access corridor in Galway City, which will enable and deliver efficient, safe, and integrated sustainable transport movement along the corridor. The extents of the permitted scheme are imaged below:



Figure 7 – Extents of Galway BusConnects Cross-City Link (subject site identified by Red Star)

The team has been mindful of the Bus Connects cross city link and has ensured that the development is adaptable and can seamlessly integrate with this permitted scheme. We can confirm that the site layout submitted has considered and incorporated the Bus Connects cross city scheme.

Regional Bus Network

Principal destinations of regional buses within Galway City are from Ceannt Station (approx. 800 m from site / 11 – minute walk) and Fairgreen Coach Station (approx. 700 m from site / 10 – minute walk).

Both stations provide daily regional bus services to the following cities and towns:

North	Donegal, Sligo, Mayo, Headford, Tuam
South	Cork, Limerick, Clare, Kerry
East	Dublin, Athlone, Ballinasloe, Loughrea, Athenry, Waterford
West	Connemara, Clifden, Spiddal

Table 3 – Regional Bus Destinations from Galway Bus Stations

Rail Service

Galway City's Ceannt Train Station is located approx. 800 m from the subject site (11 – minute walking distance).

This station is served by the following daily routes:

- Galway – Dublin Heuston Station
- Galway – Limerick (connections with Cork, & Tralee available)
- Galway – Athenry
- Waterford – Clonmel – Limerick Junction (connections with Dublin, Cork, Limerick and Galway available).

Further, we refer An Bord Pleanála to the accompanying *Public Transport Capacity Assessment* and *Chapter 13 – Material Assets – Traffic and Transport* which conclude that there will be ample public

transport capacity and a wide range of public transport options to cater for the future population of the proposed development. In this regard, it is submitted that the subject site is exceptionally well connected in terms of public transport accessibility on a local, regional and national scale.

Active Travel – Pedestrian & Cyclist Facilities

The majority of the roads approaching the subject site incorporate good quality pedestrian facilities. In the immediate vicinity of the subject site, pedestrians can benefit from an existing footpath of approximately 2 m width and sufficient street lighting. The following map outlines the reach from the subject site by foot within a 20-minute walk at 5-minute intervals.



Figure 8 – Subject Site Reach by Foot

At present, there is poor cycling infrastructure in the immediate vicinity of the subject site. However, we note that Galway City Council and Galway County Council, in partnership with the National Transport Authority have developed the Galway Transport Strategy, 2016 (GTS). The GTS sets out a series of actions and measures, covering infrastructural, operational and policy elements to be implemented in Galway over the next 20 years and sets out a framework to deliver the projects in a phased manner. The GTS proposes a new cycling network in Galway City which will give priority to cyclists, both for commuting and as a leisure activity and will when delivered encourage the uptake of cycling. The Cycle Network will also incorporate improvements to pedestrian facilities.

The GTS includes for a core, secondary and feeder Cycle Network which supports each other and reinforces connections across the city and environs. Where possible the proposed routes are fully segregated from motor traffic. In other locations, the network includes on road cycle lanes or sharing facilities with bus lanes. Where it is proposed to limit traffic, particularly in the city centre, the cycling environment will become much safer and more attractive. The Cycle Network in respect of the subject site is shown in the Figure below. The site will be proximate to all future Primary, Secondary and Feeder network routes.

There are a number of completed and ongoing active travel projects within Galway City led by Galway City Council as part of the GTS. We note specifically that on 21 October 2024, improvement works commenced on the existing cycle lane and footpath on Headford Road on the northbound side of Headford Road, between the bus stop opposite Terryland Retail Park and the Kirwan

Junction. Further, we note that the permitted BusConnects Galway: Cross City Link will significantly improve the pedestrian and cycling infrastructure in the immediate vicinity of the subject site.



Figure 9 – Proposed Cycle Network with subject site identified by Red Star (Source: Galway Transport Strategy, 2016)

The subject site is also in proximity to several existing ‘TFI Bikes’ depots. There are 195 no. bikes in operation across the city throughout 23 no. stations with the closest being at Headford Road (approx. 50 m / 2-minute walk) from the subject site and at Wood Quay (approx. 350 m / 5-minute walk).

Further, we note that the future Connemara Greenway project will be located just to the south of the site, improving the permeability of the area for pedestrians and cyclists. The proposed development has been designed having regard to the future Connemara Greenway project. In addition, we note that the proposed development is proximate to future proposals for the Clifden Railway Pedestrian and Cycle Bridge, which had a non-statutory public consultation from 7th March 2024 to 11th April 2024. This project will further improve the pedestrian facilities and permeability proximate to the subject site.

The bringing forward of the subject scheme coupled with future proposals outlined above, future Bus Connects and recently permitted Cross City Link Scheme (ABP Ref. 314597) will create a significantly improved public realm and pedestrian accessibility at this location.

It is our considered view that the subject site is an exceptionally well-located city centre site, in close proximity to a variety of services, amenities, public transport and active travel routes.

4 Proposed Development



Figure 10 – CGI View of Proposed Development from Dyke Road

4.1 Summary Development Description

The proposed development will consist of the construction of a new residential development of 219 no. apartment units and a childcare facility (approx. 241 sq m) in the form of 1 no. new residential block (5 - 9 storeys over lower ground floor level) with associated car parking, bicycle parking, public and communal open spaces, and all ancillary works on a site area of 1.144 ha.

The proposed development will provide for:

- a) 219 no. residential apartment units (109 no. 1-bedroom units, 100 no. 2-bedroom units and 10 no. 3-bedroom units) each with an associated private open space area in the form of a balcony/terrace.
- b) A raised pedestrian boardwalk along the western elevation of the proposed building.
- c) Open Space (approx. 2,778 sq m) is proposed in the form of (a) public open space (approx. 1,183 sq m) to the west of the proposed building fronting on to Dyke Road accommodating outdoor seating, planting, a sunken garden and pedestrian pathways and connections; and (b) communal open space (approx. 1,605 sq m) to the east of the proposed building in the form of a courtyard including outdoor seating, planting, a children's play area and outdoor sports equipment.
- d) A childcare facility (approx. 241 sq m) at ground floor level with dedicated external play area (approx. 61 sqm) at surface level.
- e) A total of 33 no. new car parking spaces at surface level to serve the proposed residential development (including 2 no. accessible spaces). In addition, 2 no. set down / drop off spaces are proposed to serve the childcare facility.
- f) A total of 465 no. bicycle parking spaces to include 330 no. standard residential spaces, 100 no. visitor spaces, 25 no. cargo bicycle spaces and 10 no. bicycle parking spaces dedicated for the childcare facility staff, all at surface / lower ground floor level.



- g) Vehicular access to serve the development is proposed via Dyke Road at 2 no. new locations along the western site boundary (to the north west and south west of the main development site). Pedestrian and Cyclist access is also proposed throughout the site via Dyke Road and a new pedestrian crossing is also delivered at Dyke Road. The proposed development will extinguish the existing pedestrian connection between Galway Retail Park and the subject site as part of wider proposals for local improvements to permeability.
- h) The removal of 389 no. existing car parking spaces (311 no. from Car Park 1 and 78 no. from Car Park 2) is proposed to provide for the new development. An overall total of 165 no. existing car parking spaces will be maintained in Car Park 2.
- i) The extinguishment of the main existing vehicular entrance serving Car Park 1 and Car Park 2 at Dyke Road with provision made for a new vehicular access point (to the south of the main development site) to facilitate continued access to existing Car Park 2 and the remaining car parking spaces (165 no.).
- j) The removal of existing bring bank facilities including 2 no. clothing banks and 8 no. bottle banks from Dyke Road.
- k) 2 no. telecommunications lattice towers (overall height 6.45 m and 7.67 m) affixed to the rooftop supporting 9 no. 2m 2G/3G/4G antennas; 9 no. 0.8m 5G antennas; 6 no. 0.3m microwave transmission links; together with all associated telecommunications equipment and cabinets. The proposed overall building height including the telecommunications towers is approx. 38.18 m (+43.18 AOD).

The development will also provide for all associated site development works, infrastructure, excavation and clearance works including decommissioning the existing Black Box Theatre waste water pumping station, provision for a new pumping station complete with below ground emergency storage, all boundary treatment/retaining walls, public lighting, internal roads and pathways, ESB substations, switch rooms, water tank rooms, cleaner store and WC, meter rooms, facilities management office, parcel store, comms rooms, plant room, generator room / associated plant space, bin storage, bicycle stores, hard and soft landscaping, play equipment, below ground attenuation tanks, nature based SUDs features, green roofs, roof plant, new and replacement site services and connections for foul drainage, surface water drainage and water supply.

This planning application is accompanied by an Environmental Impact Assessment Report and Natura Impact Statement.



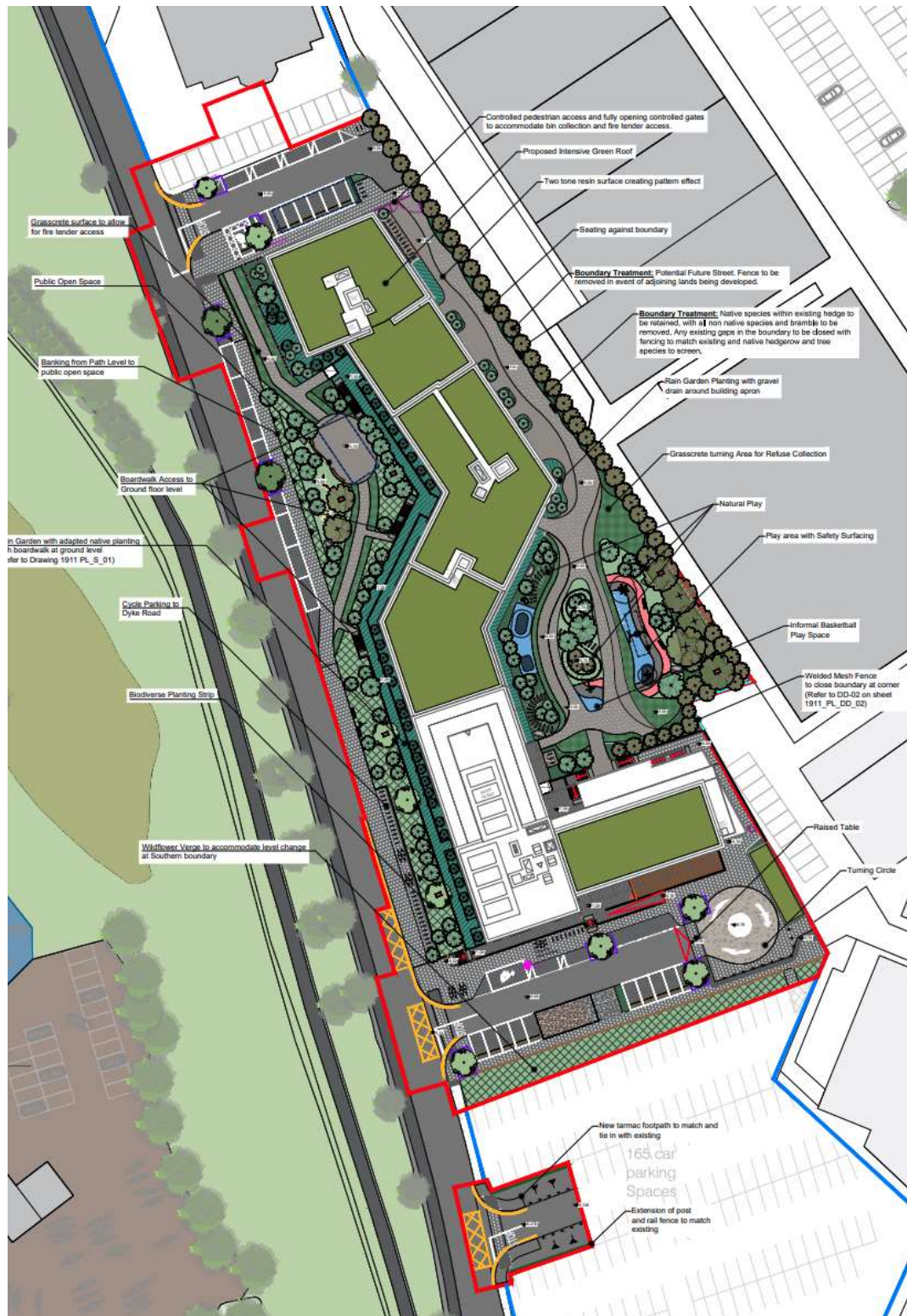


Figure 11 – Proposed Site Layout Plan / Landscape Masterplan

The key development statistics associated with the proposed development are as follows:

Key Proposed Development Statistics	
Application Red Line Boundary Area	1.144 ha
Net Site Area	0.95 ha (excluding public roads)





Mix of Uses	- Residential – 219 no. residential social and affordable apartment units (17,787 sqm GFA) - Childcare Facility (241 sqm GFA) - Total GFA (18,874 sqm)
Gross Residential Density	191 dph (based on gross site area)
Net Residential Density	231 dph (based on net site area)
SRSCG Net Residential Density	234 dph (based on a net site area excluding non-residential uses)
Height	5-9 storeys over lower ground floor level
Residential Mix	- 109 no. 1-bed units (49.8%) - 22 no. 2-bed (3-person) units (10%) - 78 no. 2-bed (4-person) units (35.6%) - 10 no. 3-bed units (4.6%)
Residential Tenure Mix	- 22 no. social housing units (10%) - 197 no. affordable housing units under cost rental model (90%)
Dual Aspect	39% (86 no. units)
Communal Open Space	1,605 sqm
Public Open Space	1,183 sqm (10% of site area)
Car Parking	33 no. car parking spaces (0.15 ratio) including 5 no. GoCar parking spaces and 2 no. accessible parking spaces.
Bicycle Parking	339 no. long stay resident spaces 110 no. short stay visitor spaces 10 no. short stay spaces dedicated for childcare facility staff use
Plot Ratio	1: 1.98 (based on net site area)
Site Coverage	0.35 (based on net site area)

Table 4 – Key Proposed Development Statistics

4.2 Detailed Description

The details of the development proposal are summarised within this section for the convenience of An Bord Pleanála.

The proposed development involves the construction of 219 no. residential apartment units as part of one residential block of 5-9 storeys in height.

Tenure Mix

In terms of tenure mix, 197 no. apartments (90%) will be provided under the cost rental model and 22 no. apartments (10%) will be provided under the Social Housing scheme.

Cost rental is a new housing tenure that was created under the Affordable Housing Act, 2021. It is aimed at people and families who are above the threshold to qualify for social housing but have difficulty affording private rented accommodation. Cost rental offers a long-term secure tenancy that is below the typical market rent. The LDA is working to achieve rents that are affordable and are costing below the average local area rental market rates.



**Residential Unit Mix**

The residential development mix provides for 219 no. units as follows:

- 109 no. 1-bedroom units (49.8%)
- 22 no. 2-bedroom (3-person) units (10%)
- 78 no. 2-bedroom (4-person) units (35.6%)
- 10 no. 3-bedroom units (4.6%)

Residential Density

A residential density of 231 units/ha is proposed on this site. This density is based on 219 units over the net site area of 0.95 ha. The density proposed is considered acceptable given the mandate in national planning policy for compact urban growth and the direct connectivity to high-capacity and high-frequency public transport within walking distance to the site in the line with the Sustainable Residential Development and Compact Settlements Guidelines, 2024. We refer An Bord Pleanála to Section 8.1 of this report for a detailed assessment of the subject site classification and applicable density range.

We note specifically that Appendix B of the Sustainable Residential Development and Compact Settlements Guidelines, 2024, state that when calculating residential densities within mixed use schemes, planning authorities shall exclude the % of non-residential uses in proportion to the net site area, i.e.:

- Calculate Net Site Area
- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwellings by reduced site area.

SRSCG Appendix B Density Calculations	Proposed Development
Calculate net site area	0.95 ha
Calculate overall GFA	18,028 sqm
Non-residential GFA	241 sqm
Residential GFA	17,787 sqm
Residential as a portion of Development	$17,787 / 18,082 = 98.37\%$
Site Area for Density Purposes	$0.95 \text{ ha} * 98.37\% = 0.935$
No. Units	219
Net Density	c. 234 dph

Table 5 – Density Calculation as per Appendix B SRSCG

Where non-residential floor space is removed from calculations the proposed net residential density is identified as 234 units per ha.



Height & Massing



Figure 12 – Verified Winter View of Proposed Development from the Riverside Quay

The proposed building height ranges from 5 to 9 storeys over lower ground floor level. This variation in height is strategically designed to create visual interest, respond to the site's context, and enhance the urban environment. Specifically, the building steps up at the southern corner to mark a key entry point and visually connect with the city centre, emphasising the building's prominent location. The proposal delivers a clever and appropriate palette of materials to mark the height at the location with a change to the patterns of materials at the upper floor levels providing for legibility in terms of building height at the entrance to the site. Similarly, at the northern end, the building steps up to 8 storeys, effectively bookending the proposed residential building and contributing to a balanced urban skyline. This approach not only offers variety in the building's massing, but also complies with the cumulative heights strategy, ensuring a gradual and cohesive transition in scale within the broader city context.

The massing is thoughtfully broken up to create dynamic visual interest from the public realm, while also preserving key views and access to natural light. The building predominantly follows the alignment of Dyke Road, establishing a strong road frontage. To mitigate the visual bulk, the design incorporates a subtle cranking of the building's form, which serves to articulate the massing and create a more visually pleasing composition. The resulting spaces between the building elements allow for high-quality public open space that enhances the pedestrian experience and the proposed landscape planting provides necessary relief from the built form.

In addition to the manipulation of height and massing, variations in materiality have been introduced across the building's facades to further reduce the perceived scale and add texture to the overall design. These material changes, combined with the step-up strategies, help to ensure that the building integrates smoothly into its surrounding context while maintaining a strong visual identity.

Overall, the proposed height, scale, and massing are considered to be appropriate for the site's specific topographical features and its city centre location. This approach balances the need for a building of appropriate scale with the desire to preserve and enhance the urban environment, ensuring the development contributes positively to the city's architectural diversity and public realm.



Figure 13 – Architect's Diagram of Proposed Building Height in context with surrounding area

Materials & Finishes

The proposed materials for the development reflects a commitment to high quality and durability, ensuring that the building not only achieves an appealing aesthetic but also maintains its integrity and performance over time. The materials selected are intended to provide a visually attractive finish while offering longevity in the face of environmental factors, such as exposure to adverse westerly weather, wear and tear, and general aging.

In addition to their durability, the materials chosen have been thoughtfully aligned with the character of the surrounding urban fabric, drawing inspiration from the local architectural palette. The selection reflects a deep understanding of the area's heritage while introducing a contemporary interpretation that resonates with the evolving city context.

The use of grey brick bookends at the building's edges evokes the distinctive limestone structures that are characteristic of the region, referencing the materiality and timeless quality of local architectural traditions. Meanwhile, the introduction of red and dark grey bricks adds variety to the façade, breaking up the massing and introducing a dynamic interplay of tones. These bricks not only create visual interest but also help define the emerging character of the quarter, marking the development as a key part of the urban regeneration while respecting the historical context.

At the ground level, a unified lower plinth referencing traditional aggregates ties the distinct volumes of the building together, creating a cohesive base that anchors the structure to the site. This plinth design also serves a functional purpose, delineating building entrances and enhancing the legibility of the development. By incorporating these materials, the lower levels are both visually distinct and sensitive to pedestrian-scale concerns, improving the accessibility and readability of the public realm.

The proposed development will integrate seamlessly into its surroundings, maintaining the area's architectural coherence while introducing a modern, yet respectful, addition to the built environment.

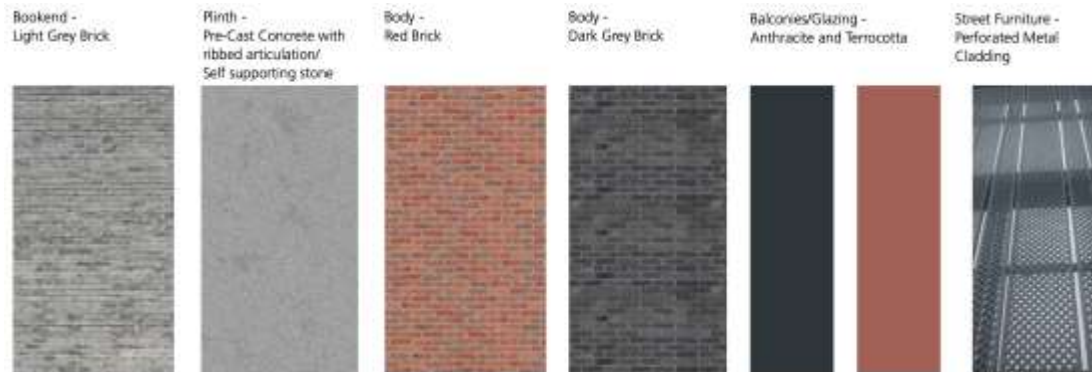


Figure 14 – Proposed Materials & Finishes

Separation Distances

The proposed development carefully considers the separation distances between the proposed building and neighbouring uses to ensure compatibility, privacy, and adequate access to natural light for both the proposed development and surrounding sites.

A separation distance of approx. 29 m is maintained between the proposed building and the Black Box Theatre to the north. To the east, the separation distance to the rear of the Galway Retail Park varies, with the minimum distance being 16 metres. This distance is appropriate for the commercial nature of the Retail Park, balancing proximity with adequate separation to minimise potential conflicts between the residential and retail uses. At the southeast corner of the site, where the proposed development is adjacent to a permitted but not yet constructed student accommodation scheme, a separation distance of approximately 14.5 metres is maintained. This distance is considered sufficient considering the layout and positioning of windows, which will protect the privacy and amenity of both the proposed apartments and the future student accommodation with no direct overlooking. The proposed building maintains a separation distance of approx. 25 metres from the existing car park to the south.

These proposed separation distances are considered entirely appropriate for the subject site and its surrounding commercial context. They have been carefully designed to ensure that the proposed development integrates well with neighbouring uses while also providing adequate space for future changes or redevelopment. The distances allow for flexibility, particularly in relation to potential future developments to the north and south as part of the broader Development Framework for the area. Similarly, the Galway Retail Park, should it undergo future redevelopment, will have sufficient space to accommodate changes without negatively impacting the proposed residential development.

We refer the An Bord Pleanála to the accompanying Sunlight and Daylight Assessment, prepared by 3D Design Bureau which confirms that the proposed apartments will receive adequate levels of sunlight and daylight. This ensures that the development not only respects existing uses but also provides a high quality of living for future residents.

Key separation and set back distances are outlined below.

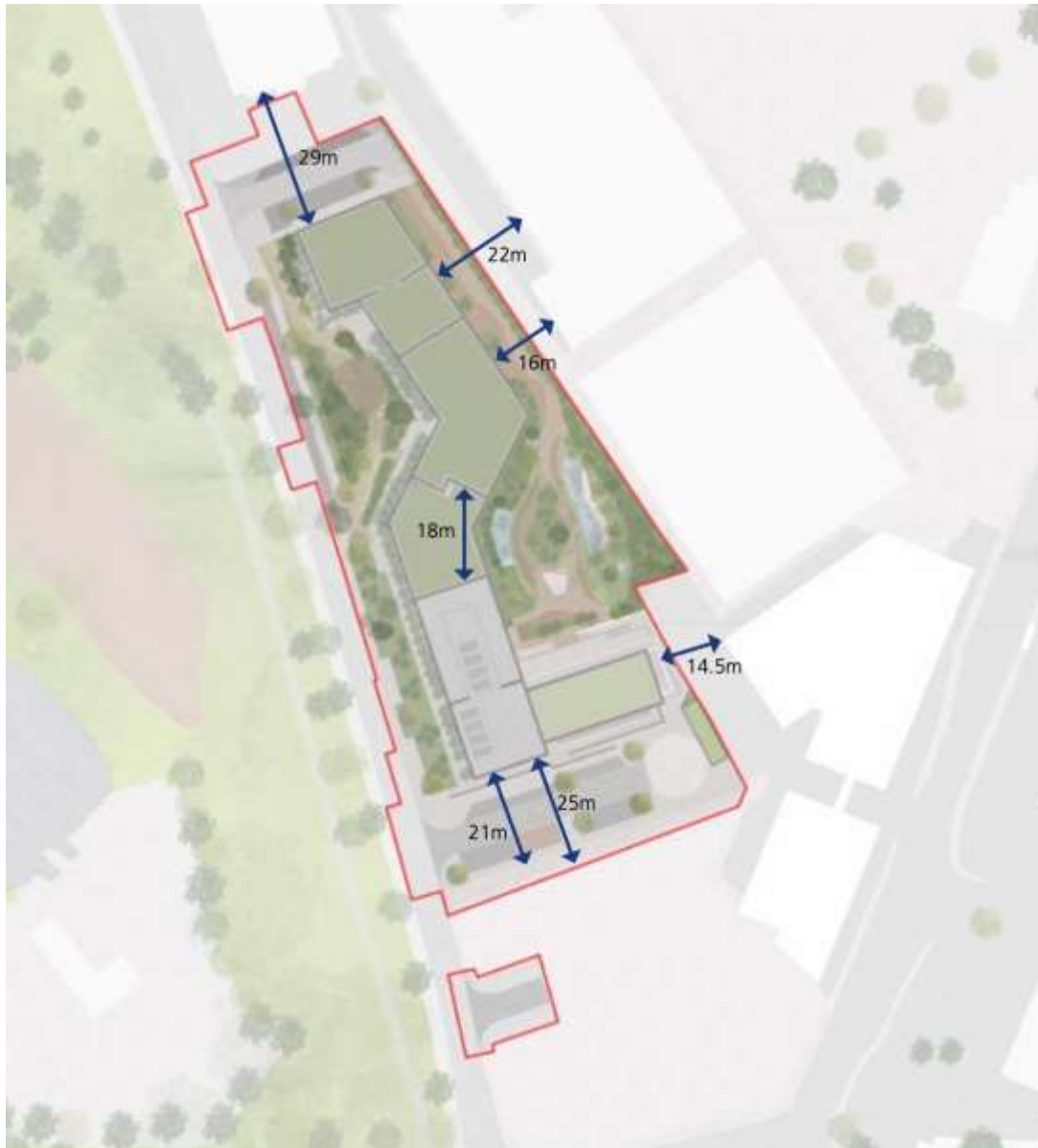


Figure 15 – Proposed Separation Distances

Dual Aspect

The scheme provides 39% dual aspect units, 86 no. units in total as identified on the enclosed Housing Quality Assessment. There are no single aspect, north facing units proposed. The majority of apartments benefit from an east-west orientation maximising available sunlight and daylight of the proposed apartment units.

Daylight & Sunlight

The proposed layout of the development has been meticulously designed to optimise the quality of sunlight and daylight for both the residential units and communal open spaces, while simultaneously minimising any potential adverse impact on the surrounding built and natural environment. This careful balance ensures that future residents will benefit from a high standard of living, with ample natural light enhancing the overall quality of life, without impacting the surrounding built and natural environment.

A sunlight, shadow and daylight assessment has been carried out by 3D Design Bureau. Their assessment concludes that 97% of bedrooms and living / kitchen spaces will meet, or in most cases exceed, the recommended daylight factors outlined in British Standard 8206- 2:2008. As the





building is predominantly a north-south aligned linear block, most apartments benefit from an east-west orientation and the internal units have been carefully planned to maximise the available daylight to living spaces.

For open space, the proposed communal open space is predicted to receive a level of sunlight in excess of the level recommended by the BRE 209 – Site Layout Planning for Daylight and Sunlight: a Guide to Good Practice (2022) therefore, offering residents with a high standard of open space to enjoy throughout the year.

Private Open Space

All units within the proposed development meet or exceed the minimum private open spaces requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023). Private open spaces are provided by way of balconies.

Where possible, balconies have been positioned at each corner of the apartment block to allow residents to benefit from dual aspect orientation.

Special care has been taken to ensure both privacy and connection to private outdoor spaces for the ground floor apartments. These apartments are raised above the external ground level, creating a clear boundary between the private amenity space and the public or communal areas.

In addition to the elevated design, ground floor apartments on the western side, which are located along the raised pedestrian boardwalk, are further enhanced by a line of planting between the private balconies and the raised walkway. This planting acts as a natural buffer, providing additional privacy for the residents while also softening the visual impact of the pedestrian route.

Communal Open Space

Quantity

The total area of the proposed communal space is approx. 1,650 sqm, exceeding the required 1,313 sqm for the development as per the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023) set out in the table below.

Unit Type	Minimum Area per unit	Requirement
1-bed	5 sqm	109 x 5 = 545 sqm
2-bed (3 person)	6 sqm	22 x 6 = 132 sqm
2-bed (4 persons)	7 sqm	78 x 7 = 546 sqm
3-bed	9 sqm	10 x 9 = 90 sqm
Total		1,313 sqm

Table 6 – Communal Open Space Minimum Requirement as per Apartment Guidelines, 2023

This generous space ensures there is ample room for a variety of activities, catering to the diverse needs of the residents, from young children to the elderly. The design of the space reflects an inclusive approach, ensuring that all demographic groups can enjoy and benefit from the amenities on offer.

Quality

The proposed communal open space within the development is designed to be a vibrant, multifunctional area that fosters a strong sense of community and enhances residents' quality of life. Located on the eastern side of the building, this area is sheltered from the road and traffic, providing a peaceful, car-free environment where residents can relax, play, and interact. Access is strictly controlled through secure gates along the eastern site boundary, ensuring privacy and safety for the community. This added layer of security, coupled with passive surveillance from the apartments, promotes a sense of exclusivity and safety, while encouraging social interaction among residents.



At the heart of the design is a comprehensive landscaping scheme that enhances both the aesthetic and functional qualities of the space. A range of plants, trees, and shrubs have been carefully selected to create a visually appealing and welcoming environment, offering natural shade and shelter for different activities. The landscaping contributes to a calm, restorative atmosphere, while also creating an ideal setting for both active and passive recreational pursuits.

The space includes several distinct zones, each designed to cater to specific needs. A formal play area for young children is equipped with modern play equipment, including fitness structures and a basketball hoop. In addition, there are informal, nature-based play facilities that encourage creativity and imaginative play. These areas are designed to be flexible, allowing children to explore and engage with the environment in their own way, while also providing tactile, nature-inspired experiences. This approach reflects a new direction in early learning environments, blending education and recreation in a seamless, enjoyable manner.

For residents of all ages, there are ample seating areas scattered throughout the space, encouraging relaxation, social interaction, and community gatherings. These benches provide perfect spots for quiet contemplation or informal meetings, further enhancing the social fabric of the development.

A key feature of the communal open space is its car-free nature, ensuring safety and reducing potential hazards. The area is designed to be free from traffic, making it an ideal setting for play, exercise, and leisure. Additionally, the space benefits from passive surveillance, with the open areas naturally observed from the surrounding apartments.

Overall, the proposed communal open space is not just a physical area but an essential part of the development's ethos, promoting a healthy, sustainable, and engaged community. Its design focuses on creating a flexible, inclusive space where residents can enjoy a wide variety of activities and experiences, all within a safe and supportive environment. The communal area will be a central feature of the development, contributing to the creation of a vibrant, thriving neighbourhood.



Figure 16 – CGI of Proposed Communal Open Space Area

Public Open Space

Quantity

A total of 1,183 sqm is proposed as Public Open Space located to the west of the site, along the Dyke Road, and envisioned as a linear park. This provision equates to 12.5% of the net site area and is in line with the Sustainable Residential Development and Compact Settlements Guidelines, 2024 which requires not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area.

Quality

This public open space is designed to serve as an inviting and inclusive space, accessible to both residents and the broader public. Its central location along a main thoroughfare ensures that it will be a vibrant community asset, providing a welcoming green retreat in the heart of the urban landscape.

The overall design of the park centres on achieving a harmonious balance between nature and urban life, creating a tranquil yet accessible environment. Landscaping will play a key role, with a diverse mix of native trees, shrubs, and wildflower meadows, enhancing biodiversity while adding vibrant seasonal colour.

The park will be equipped with several seating areas, strategically placed throughout the space to encourage relaxation, socialisation, and enjoyment of the surrounding landscape. In addition to traditional seating, the park will feature natural play. These play spaces will incorporate elements of nature, such as logs, boulders, and other tactile materials, which encourage imaginative, free-form play.



Figure 17 – CGI View of Proposed Public Open Space & Boardwalk fronting Dyke Road

Boardwalk

A key feature of the Public Open Space is a raised pedestrian boardwalk, which runs along the entire length of the park in a north-south direction. This elevated structure serves both a functional and aesthetic purpose, providing visitors with a scenic route to explore the park and its surrounding environment. The boardwalk will offer expansive views of the nearby River Corrib and its natural surroundings, connecting park visitors with the wider landscape and offering an elevated perspective on the local ecology.

The proposed boardwalk is a critical component of the proposed development providing both a functional and aesthetic role, designed not only for everyday use but also as part of a broader flood defence strategy.

This elevated pathway provides a secondary means of escape in case of emergencies such as fire or flooding, offering an important safety feature for residents and visitors alike.

On a day-to-day basis, the boardwalk will function as a primary access route for residents, providing convenient, direct access to their residential cores. It will seamlessly integrate with the development, allowing residents to move between their apartments, the public open space and wider area with ease. The boardwalk will connect the public open space to the broader urban environment, offering a key pedestrian route.

The boardwalk's design will be lightweight and unobtrusive, ensuring that it does not overwhelm the landscape or the broader visual aesthetic of the development. The boardwalk serves as a critical spatial element, delineating public open space from private residential areas. It ensures seamless block access for residents while fostering a harmonious relationship with the landscaped area to the west. The lightweight structures lightly interact with the ground, offering a visual and functional counterbalance to the main architectural form.



Figure 18 – Proposed West Elevation showing Boardwalk



Figure 19 – CGI View of Boardwalk Design

Landscape Treatment

The landscape design for the development draws significant inspiration from the site's proximity to the River Corrib, with a strong emphasis on naturalistic, fluvial forms and shapes that resonate with the surrounding environment. The intent is to create a landscape that is not only distinct and unique but also deeply connected to its immediate context, reflecting the natural character of the area. By integrating elements that echo the fluidity and organic forms of the river, the design aims to foster a strong sense of place that enhances the overall experience for residents and all who interact with the space. This landscape approach is focused on creating an environment that feels both rooted in nature and tailored to enrich everyday life.

In terms of ground treatment, the open spaces will feature predominantly wild grass and wildflower meadows, promoting a natural, ecological aesthetic that supports local biodiversity. At the site's boundaries and edges, native wildflower seed mixes will be employed, chosen specifically for their benefits to local birdlife and pollinators. These planting areas will be cut no more than three times a year, in keeping with best practices for encouraging biodiversity. This approach not only supports the ecological health of the site but also enhances its visual appeal through vibrant, seasonal wildflower blooms. The Tree Planting Strategy for the site focuses on



diversity, using a mix of native tree species and carefully selected non-native flowering and fruiting varieties.

The design of site furniture will incorporate durable and functional elements, such as timber or timber composite seats with steel frames, which complement the natural surroundings. The furniture will be designed to blend seamlessly into the environment, offering comfort and utility while maintaining a low environmental impact. Stainless steel cycle stands will be provided to encourage sustainable transportation, and flexible bollards will be strategically placed to control vehicular access in the southern car park, ensuring safe pedestrian movement and reducing the potential for congestion or conflict between vehicles and pedestrians.

The landscape strategy is designed to create a sustainable, ecologically rich environment that not only supports local wildlife but also enhances the quality of life for the community. By drawing inspiration from the natural forms of the River Corrib and focusing on native plants, wildlife habitats, and thoughtful design, the development will establish a distinctive sense of place that resonates with its surroundings and fosters a deeper connection to the natural environment.

Boundary Treatment

The existing boundary treatment at the site is a low timber fence at the Dyke Road that is proposed to be removed. The existing hedgerows along the eastern boundary with the Galway Retail Park are proposed to be retained and enhanced.

The boundary treatments to the west and east of the site will feature a combination of native tree and hedgerow planting. These natural barriers will help to soften the transition between the development and the surrounding environment, enhancing the site's visual integration with its context. The boundary planting will provide privacy for residents, creating a natural screen that reduces the visibility of the site from the surrounding roads and developments, particularly Dyke Road to the west and the Galway Retail Park to the east.

The proposed planting buffer along the boundaries will not only screen views into the site but also reduce the visual impact of the development from surrounding areas. This will improve the overall sense of privacy for residents and contribute to a quieter, more sheltered living environment. By carefully selecting plant species that complement the site's natural context, the landscape design will enhance the sense of seclusion for residents while minimising the intrusion of urban elements, creating a tranquil oasis within the city.

In addition, secure gates are proposed at the northeastern boundary, providing controlled access to the communal open space.

To account for the level changes across the site, some retaining wall features are proposed. A retaining wall (max. 600 mm) topped with railing is proposed across a small portion of the pedestrian streetscape at Dyke Road. This retaining wall feature is proposed to allow for fire tender access. A retaining wall topped with railing is proposed for a small southern section of the eastern boundary with the adjoining permitted but not yet implemented student accommodation site.





Figure 20 – Proposed Boundary Treatment Strategy

Childcare Provision

A childcare facility of approx. 241 sqm is proposed at ground floor level at the eastern elevation. Locating the childcare facility at this portion of the site facilitates direct access off the proposed link road resulting in a safe and secure environment for child drop off and pick up. The childcare facility is afforded an outdoor play area (approx. 61 sqm).

The proposed childcare facility has been designed to provide for the childcare needs of the proposed development. The facility has been scaled with additional headroom to accommodate not only demand arising from the proposed scheme, but also future phases of Development Framework. An assessment of the proposed development and in particular, the requirement for a childcare facility against the Childcare Facilities Guidelines for Planning Authorities, 2001 is detailed in Section 8.4 of this report and the accompanying *Social, Community and Cultural Infrastructure Audit* prepared by Brock McClure Planning & Development Consultants.

The proposed development allows for an outdoor play space dedicated to the childcare facility, 2 no. vehicle drop off / set down areas and 10 no. dedicated staff bicycle parking spaces.

Refuse Storage Arrangements

Each apartment unit is provided with sufficient internal storage space to facilitate a 3 bin-system. Dedicated communal refuse storage areas are also provided at basement level which again, will facilitate the collection of mixed dry recyclables, organic waste and residual waste.

There are 2 no. waste storage rooms located at the lower ground floor level that are accessed from the ground floor of every stair core and have an external access point from the communal open space. The refuse store provides adequate storage space to satisfy the three-bin system. On collection days, the management company will move the specific bin to the designated collection points. A separate waste storage room is proposed for the childcare facility and shall be managed by the operator.



The proposed refuse storage areas and arrangements have been designed in accordance with the National Waste Management Plan for a Circular Economy 2024-2030 and the Galway City Council (Segregation, Storage and Presentation of Household and Commercial Waste) Bye-Laws, 2019. We refer An Bord Pleanála to the accompanying *Operational Waste Management Plan* prepared by AECOM Consulting Engineers for further information in this regard.

Access & Permeability

The proposed development prioritises accessibility and permeability, ensuring that both vehicular and pedestrian movement are seamlessly integrated into the surrounding infrastructure, while fostering a connection to the broader urban fabric.

Access

To accommodate the needs of both residents and visitors, the scheme includes two formal access points for vehicles: one at the southern end and another at the northern end of the proposed block. These access points will serve multiple functions, providing entry for residential vehicles and parking, as well as service and delivery vehicles. They will also provide access to the childcare facility within the development, ensuring ease of access for parents, staff, and service providers. The careful positioning of these access points minimises disruption to the surrounding roads while ensuring that all areas of the development are easily accessible by motor vehicles when necessary.

Dyke Road Permeability

In addition to the vehicular access, the development places a strong emphasis on pedestrian and cyclist connectivity offering a suite of improvements to local permeability both within the site and within the wider context. Specifically, a new pedestrian environment is proposed at, through and within the subject site. The proposed development will allow for future interconnection and an improved relationship between the subject site and the adjoining sites to fundamentally deliver on what will become a new urban environment both within this site but also across the wider Headford Road area. With this in mind, the applicant views the current Phase 1 Corrib Causeway development site and its proposal as the starting point for the creation of a newly improved pedestrian environment local to the site but within the surrounding neighbourhood.

A new, dedicated pedestrian and cycle route will be introduced along Dyke Road, enhancing the overall permeability of the site. This route will provide an important link between the city centre and Terryland Forest Park, creating a seamless corridor for walking and cycling that encourages sustainable transportation. By connecting these two significant areas, the route fosters greater movement through the city, encouraging residents and visitors to engage more actively with the surrounding environment.

The new route along Dyke Road will connect to existing cycle routes along Headford Road, as well as the future Connemara Greenway. This will include the future Clifden Railway Bridge Route, a key part of the planned greenway that will cross the River Corrib. By linking with this broader network, the development will become an integral part of a larger regional cycle and pedestrian network, enhancing the site's accessibility and promoting active transport. These connections will provide residents and visitors with easy access to the wider area, linking them not only to the city centre but also to recreational areas such as Terryland Forest Park, creating a cohesive green infrastructure that enhances overall mobility within the city.

The streetscape of Dyke Road itself will be significantly improved as part of the development's strategy. The road will be defined by an attractive public realm, designed to create a welcoming and engaging environment for pedestrians, cyclists, and motorists alike. A new public open space along the west of the proposed building invites that pedestrian into the site with a new connecting path, rest areas in the form of seating and also a quality landscape environment. In addition, a new pedestrian crossing is proposed across the Dyke Road further improving pedestrian permeability to and from the subject site.





Figure 21 – Permeability links of Proposed Development

Proposed and Potential Future Permeability

The design of the proposed development has been carefully considered in relation to the existing surrounding developments, the wider planning context and future redevelopment of the area. The team has been mindful of potential future connections and linkages to ensure that the development integrates seamlessly into the existing urban fabric and contributes to the broader connectivity of the area. The development aims to create a well-connected and accessible neighbourhood that not only serves its own residents but also enhances the overall movement network within the area.



Figure 22 – Permeability links of Proposed Development and Future Potential Links

1. North to South Pedestrian Link along the Eastern Boundary:

A new north south link along the eastern boundary of the Phase 1 Corrib Causeway site is proposed. Design of this north south link along the eastern boundary has been carefully planned to allow for potential future modifications. Specifically, a portion of the proposed hedgerow along the eastern boundary has been designed with flexibility in mind, making it possible to remove or adjust part of the hedge should the connection to Headford Road or into the Galway Retail Park be pursued in the future as part of separate planning applications. In addition, we note that the communal open space is oversized and has a buffer area incorporated which can be integrated into any future potential street design.

The approach taken as part of the application is considered appropriate from a residential perspective and to ensure appropriate levels of security and residential amenity are afforded to the residents until such time as the Galway Retail park comes forward for development. This is a key priority for future residents of the Phase 1 Corrib Causeway development site.

The overall design however does ensure that there is potential for this boundary to evolve over time and develop into a vibrant mixed use street, integrating a variety of uses within any future redevelopment of the retail park.

Images below show the current proposed eastern boundary and what a future link could look like where the Galway Retail Park comes forward for development.



Figure 23 – CGI of Currently Proposed Eastern Boundary



Figure 24 – Potential Future Eastern Boundary



2. Eastern Connection:

Similarly, to the south of the site, an east to west connection link is proposed as part of Phase 1 Corrib Causeway development. There is an opportunity for a potential eastward connection that could link the development through the permitted but not yet constructed Student Accommodation development to the Headford Road and the existing Galway Retail Park. This connection would further enhance the development's accessibility and contribute to a more cohesive urban network by providing easier movement between the site and key destinations such as retail, services, and transport links.

This potential connection offers a significant opportunity to integrate the development more fully into the surrounding area, encouraging walking, cycling, and sustainable transportation options. Just like the northern connection, the design has been mindful of this opportunity, and provisions are in place to facilitate the creation of this connection should it be needed in the future. Design of this east west link along the southern boundary has been carefully planned to allow for potential future modifications. This southern link street can be easily updated through the removal of the existing turning head to allow for appropriate access through either the phase 2 site or the student accommodation site, or both allowing connections to the Headford Road and beyond.



Figure 25 – Proposed Phase 1 (Left) & Possible Future Southern Connections (Right)

It should also be highlighted that the design of the site also provides for a further potential connection point to the north east of the proposed Phase 1 Corrib Causeway development block as seen on the landscape plans below with a pathway running right up to the shared boundary as per the landscape layout below.

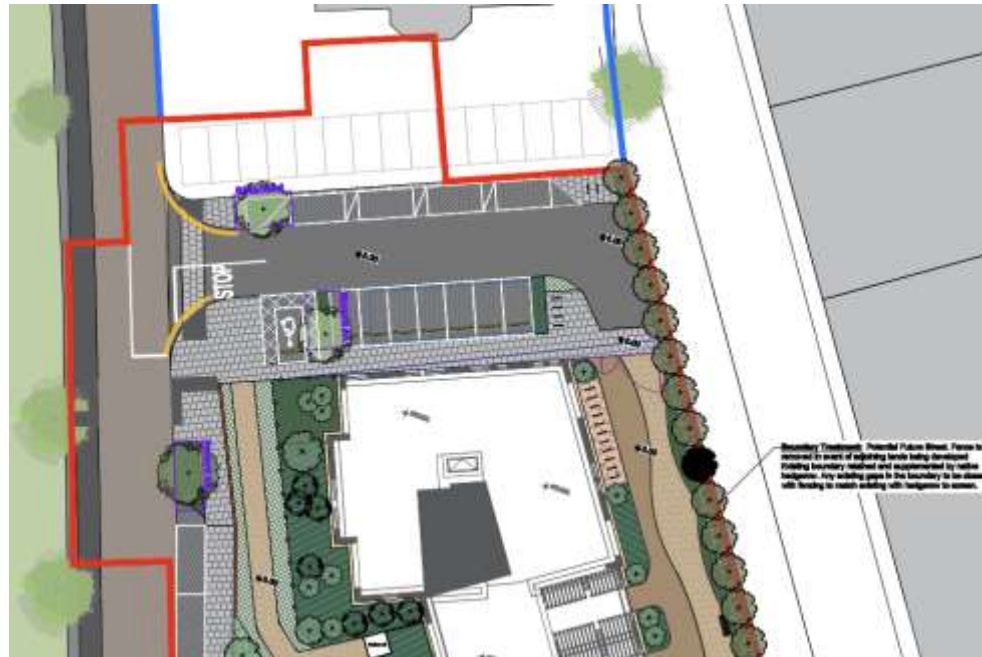


Figure 26 – Snippet of Landscape Plan for northern boundary

In both instances, the proposed development takes a forward-thinking approach by anticipating and accommodating future infrastructure needs. The design for Phase 1 Corrib Causeway development is intended to function autonomously in the short term ensuring that it meets the current needs of the development while also positioning the site for seamless integration with future urban growth. This strategic approach is in line with the vision set forth in the Draft Headford Framework Plan, 2009, which outlines key connectivity improvements for the surrounding area as per the Development Framework adjusted proposed connections figure below:

- A. North-south movement corridors linking the city centre to Terryland Park.
- B. The redeveloped Galway Retail Park, with potential permeability along the eastern boundary and the northern edge of Phase 1.
- C. The approved student accommodation scheme, if constructed and southern edge of Phase 1.
- D. Dyke Road to Headford Road south of phase 2.



Figure 27 – Permeability links of Proposed Development and Future Potential Links

The integration of the proposed development with these potential connections with surrounding future potential developments demonstrates a commitment to urban connectivity, supporting both local mobility and community engagement. The proposed development takes a proactive and strategic approach to planning, ensuring that it functions efficiently in the present while remaining flexible and adaptable to future growth.

Existing Car Park Proposals

The proposed development involves the removal of 389 no. existing car parking spaces (311 no. from Car Park 1 and 78 no. from Car Park 2) to provide for the new development. An overall total of 165 no. existing car parking spaces will be maintained in Car Park 2.

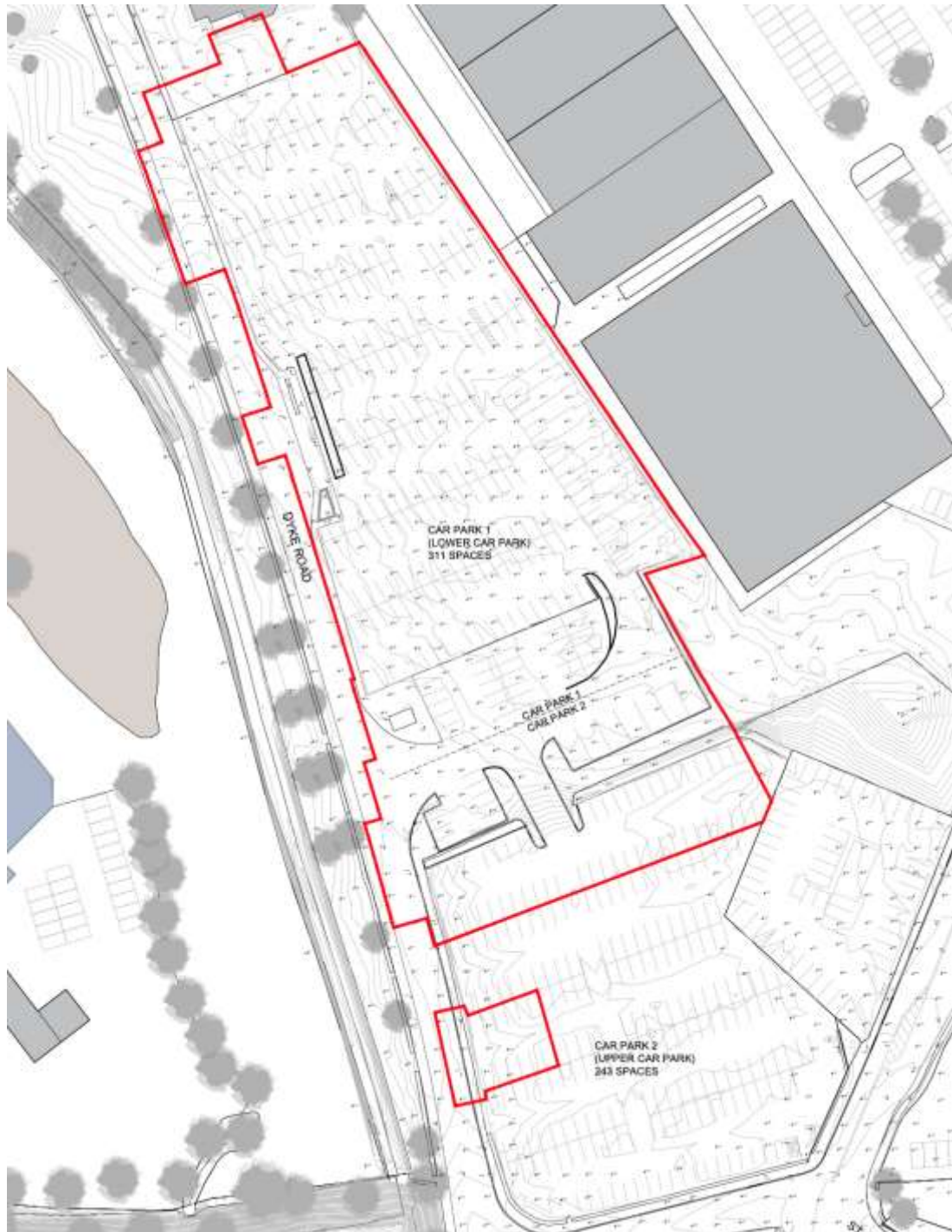


Figure 28 – Existing Site Layout Plan showing existing car parking spaces

Proposed Car Parking

The proposed development will provide a total of 33 no. residential car parking spaces including 2 no. accessible spaces. 10% of the spaces will have EV Charges and the remainder of the spaces will be ducted for future EV use.

In addition, 2 no. dedicated set down/drop off spaces are proposed to serve the childcare facility. The set down / drop off bays are proposed at the southern access route in front of the childcare facility.

The proposed car parking provision is in line with both the Galway City Development Plan 2023-2029 and the Sustainable Residential Development and Compact Settlements Guidelines, 2024 which seek to minimise, substantially reduce or wholly eliminate car parking in city centre and urban neighbourhood locations.

In addition, we note that a review of 2022 Census data for means of travel to work, school or college for the District Electoral Divisions intersecting the subject site at 1 km radius showed that sustainable transport modes on foot, bicycle, bus, minibus, coach or train is the leading means of travel across the surrounding area at 43.3%. It is therefore reasonable to assume that future residents of the proposed development will exhibit similar commuting patterns, with a substantial proportion of residents opting to use public transport, walking, cycling, or car-sharing as their primary modes of travel. This data supports the rationale for reducing the number of private parking spaces provided. We refer An Bord Pleanála for further details on the proposed car parking quantum and justification in Section 8.1 of this report.

Bicycle Parking

The proposed development will provide a total of 465 no. bicycle parking spaces broken down as follows:

Type	Total
Resident Long Stay	345 (incl. 15 cargo)
Resident Visitor	110 (incl. 8 cargo and 2 no. universally accessible spaces)
Childcare Facility Staff	10
Total	465

Table 7 – Proposed Bicycle Parking

Resident long stay bicycle parking will be secure and covered located at the lower ground floor level. In addition, locations for cycle maintenance are proposed within building Core C for residents to utilise.

Visitor cycle parking spaces and childcare facility staff spaces are proposed at surface level.

Safety & Security

The proposed development is designed to provide residents and their visitors with a strong sense of safety and security by maximising natural surveillance across key areas, including streets, open spaces, play zones, and surface parking areas for both bicycles and cars.

To ensure passive surveillance, windows are incorporated on all facades of the residential blocks, promoting visibility and interaction with the surrounding spaces. The open areas are not only secure but also overlooked, creating a sense of openness while maintaining privacy. The streets and pathways will be well-lit to enhance safety, ensuring that residents feel secure at all times, day or night.



The apartment building features entrance lobbies at three distinct locations, all of which are easily accessible from the street. This distribution ensures convenient access while enhancing the overall security of the site. Car parking spaces are strategically located along the site's internal roads, designed to be easily identifiable and welcoming for both residents and visitors. The parking areas will be clear, open, and well-lit, contributing to a safe and user-friendly environment.

To further enhance privacy and security, the ground-floor apartments will include privacy buffers – landscape features designed to offer separation from the public realm. These buffers ensure that residents can enjoy private spaces while maintaining safety and comfort.

The communal amenity garden will be secured with access-controlled gates, ensuring privacy for residents while allowing them exclusive use of the space. This area will be overlooked, benefiting from passive surveillance that creates a sense of community and security. For the ground floor apartments, a combination of planting and gates will be used to enhance both security and privacy, establishing a clear boundary between private and public spaces.

For apartments situated to the west, along the pedestrian route, an additional line of planting will be introduced between their private amenity spaces and the raised boardwalk, further enhancing privacy and providing an additional layer of security for residents. This thoughtful planting design creates a buffer zone that fosters a greater sense of ownership and privacy, while still contributing to the overall open and accessible feel of the development.

Overall, the design incorporates a range of measures that not only ensure the safety and security of the residents but also contribute to a welcoming and inclusive environment for everyone.

Universal Access

Creating an inclusive and accessible residential neighbourhood has been at the forefront of the design of the proposed development to ensure a sense of community and belonging is fostered, while also promoting health and well-being. It is vital that neighbourhoods are designed to be accessible to all individuals, ensuring that everyone, regardless of age, physical ability, or background, can live, work, and play in a safe and supportive environment. The proposed development incorporates 22 units that have been designed to be fully Universal Design (UD) compliant and the LDA's Apartment Typology booklet. The apartment layouts within that have been designed with UD in mind and can be modified or fitted out as UD units relatively simple.

Inclusive design means considering the diverse needs of all individuals, ensuring that the neighbourhood is accessible and usable by people of all ages, physical abilities, and socio-economic backgrounds. This involves designing streets, buildings, and public spaces that are barrier-free and welcoming to everyone. The proposal incorporates several strategies to create a development that is both inclusive and accessible:

- A variety of unit types will be provided, catering to a range of household sizes, living arrangements, and economic circumstances, ensuring that the development is suitable for different lifestyles.
- To promote ease of movement, falls and gradients in the public realm will be minimized wherever possible, and level access will be provided to all residential lobbies, ensuring that individuals with mobility challenges can access their homes without difficulty.
- All units will meet the standards set out in the Building Regulations: Technical Guidance Document M (2022), ensuring that they are fully accessible and accommodate the needs of residents with varying levels of physical ability.
- The design of the development ensures that all amenity areas, parks, and streets are overlooked by residential units, providing passive surveillance and contributing to the overall safety and accessibility of the public spaces.
- The courtyard gardens will be semi-private spaces, with boundaries defined by low railings or hedges, ensuring maximum visibility for safety and enhancing the sense of openness and inclusivity in the development.



We refer the An Bord Pleanála to the *Universal Design Statement* prepared by MOLA Architecture for further information in this regard.

Management / Taking in Charge

As part of the long-term management and maintenance strategy for the development, it is proposed that the internal link roads, footpaths, and public open spaces within the site boundary will be taken in charge by Galway City Council.

It is expected that the remainder of the development will be operated and managed by the Land Development Agency. We refer An Bord Pleanála to the accompanying Proposed Taking in Charge Plan on drawing no. DRG-MOLA-ZZ-00-DR-A-0120 for further information in this regard.

Masterplan / Development Framework Requirements

Section 10.26, Specific Objective No. 4 of the Galway City Development Plan 2023-2029 sets out that in advance of the adoption of the Headford Local Area Plan, the advancement of development at this site at Dyke Road will require a masterplan which will take cognisance of the integrated development strategy included for in the framework plan for this area.

In line with this requirement, a Development Framework has been prepared for the entire Dyke Road Car Park and Black Box Theatre landholding, which has been the subject of extensive consultation and collaboration between GCC and the LDA and wider public.

The enclosed Development Framework Plan provides an overview of the masterplanning process and the supporting assessments.

The Development Framework provides for the comprehensive redevelopment of the entire lands. It forms a strong basis for the delivery of high-quality and sustainable redevelopment of the subject lands and conveys the development vision for the overall site embedded within urban design principles for density and sustainable design.

The development framework aims to deliver a residential-led, mixed-use development. Phase 1, the subject proposal; Phase 2, an existing car park south of the site, is intended to be redeveloped for civic, commercial, and cultural uses; and Phase 3 is intended to provide additional residential units, should the Black Box Theatre be relocated.

At present, we note that there are no plans to demolish or relocate the Black Box Theatre. Galway City Council shall undertake an audit of cultural facilities within the city. The purpose of the audit will be to identify any gaps, demand and capacity. Subject to a decision on the future of the Black Box Theatre which may include its relocation to another existing or a purpose-built facility, the Theatre will remain in situ. Phase 2 to the south as envisioned by Galway City Council shall comprise ‘community, cultural and commercial uses.’ This could therefore include a theatre. Phase 3 would be subject on clarity of the future of the Black Box Theatre and could comprise a further residential phase. Both phases 2 and 3 are to be brought forward for development by Galway City Council.

This particular site has been brought forward for the first phase of development on the basis that the Draft Headford Road Framework Plan, 2009 envisioned residential development at this particular location with the more civic and commercial uses to be located further south on the phase 2 site. The current Development Framework has been prepared to align with this vision.

The proposed development has the potential to act as a catalyst to kick-start the regeneration of the wider area and revitalise underutilised lands through the implementation of a fully integrated and sustainable development.

It should be noted that the Development Framework document itself does not set the framework for any development consent nor has it, or will it, be adopted by the Planning Authority as a statutory masterplan. The objective of this document is to set out a cohesive and plan-led development framework for an overall 3 phase development with Phase 2 and 3 of the development framework subject to separate future planning applications and associated consent.

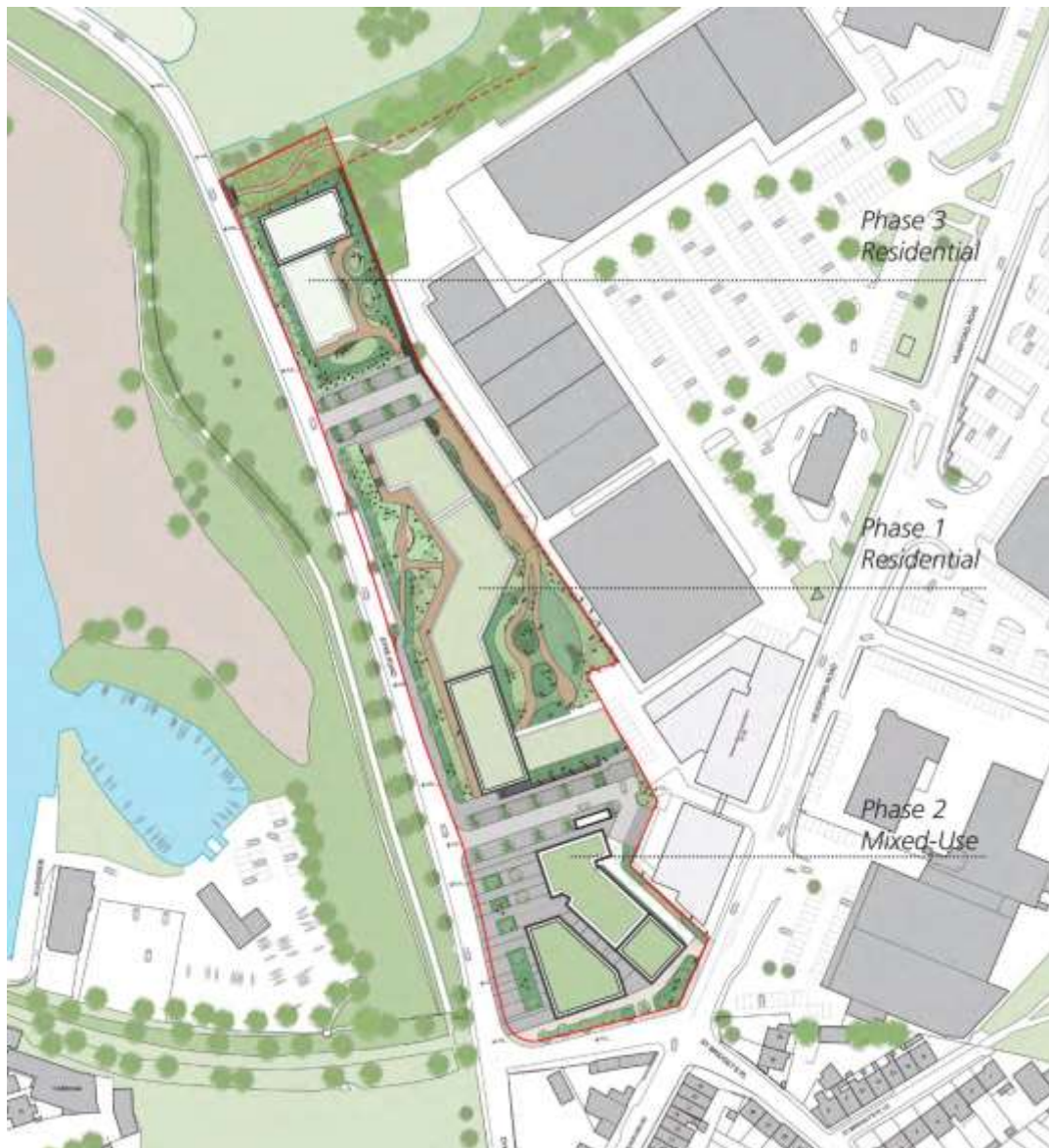


Figure 29 – Masterplan Development Indicative Framework Plan

Site Infrastructure

Surface Water

It is proposed to limit the surface water run-off from the site by providing 2 no. shallow concrete attenuation tanks. It is also proposed to incorporate SuDS measures such as an area of intensive green roof, exfiltration permeable paving and lengths of raingarden / swales.

It is also proposed to provide a new separate gravity surface water drainage network to serve the development. The new network will discharge into the existing 525 mm concrete pipe and continue north to the discharge point into the Terryland Stream.

Further, it is proposed to divert the surface water sewer which serves the Galway Retail Park on the Headford Road around the proposed building and reconnect it to the proposed 525 mm concrete pipe.

Wastewater

It is proposed to relay the gravity foul sewer serving the Black Box Theatre and install a new gravity sewer network to serve the development. The existing wastewater pumping station (WWPS) that serves the Black Box Theatre is to be decommissioned and a new WWPS constructed.



The new WWPS has been positioned based on the flood extents within the site and to maximize the separation from buildings. An emergency tank with 24-hour storage capacity at DWF has been provided to serve Phase 1 Corrib Causeway development and the Black Box Theatre.

The existing 150mm rising main serving the existing WWPS is to be retained and reused. Uisce Éireann have confirmed that a 20m upgrade of a 150mm diameter sewer from Dyke Road to Wood Quay will be required. These works will be undertaken by UÉ.

Water Supply

It is proposed to take a connection off the 250mm asbestos watermain on the Dyke Road. The new watermain will pass through the Phase 1 Corrib Causeway lands and loop around 3 sides (south, east, and north) of the development.

A Confirmation of Feasibility was received from Uisce Eireann on 23rd May 2024 confirming that the proposed water connection is feasible without infrastructure upgrade.

Telecommunications

A *Telecommunications Report* has been prepared by Independent Site Management (ISM) and forms part of the application documentation. The report assessed the two wireless telecommunication channels / networks of telecommunication channels that may be affected by the height and scale of the proposed development on radio frequency links and microwave transmission links.

The assessment identified that the proposed development will block the antenna propagation from each of the 3 no. mobile network operators on the neighbouring Galway Retail Park masts. As such, 2 no. telecommunications lattice towers are proposed to be affixed to the rooftop.

The lattice tower on the north end of the roof will accommodate 3 no. 2m 2G/3G/4G antennas, 3 no. 0.8 m 5G antennas and 3 no. microwave transmission links. The lattice tower on the south end of the roof is proposed to accommodate 6 no. 2 m 2G/3G/4G antennas, 6 no. 0.8 m 5G antennas and 3 no. 0.3 m microwave transmission links together with all associated telecommunications equipment and cabinets.

Public Lighting

6 no. different design styles of lighting are proposed across the subject site to achieve appropriate light levels in line with relevant standards (we refer to Section 2.2 of the accompanying *Lighting Impact Report* prepared by Homan O'Brien for a full list of relevant standards and guidance documents) with little to no pollution to adjacent sites and developments. The lighting design is based on the use of LED lighting which has minimal or no UV output of significance and use of monochromatic sources and a warm-white (3000k) LED lamp with low blue content.

All lighting throughout the proposal shall be energy efficient with provision made for low energy lamps. The proposed lighting design also ensures that there is no direct upward light.

It is considered that the public lighting plan has been appropriately designed to minimise light spill to outside areas and ensure that there are no impacts on existing and future flora and fauna communities.

Details of the proposed public lighting layouts and specifications can be found in the *Lighting Impact Report* and *Site Lighting Layout* submitted as part of this application pack, prepared by Homan O'Brien.

Appropriate Assessment / Natura Impact Statement

We refer the An Bord Pleanála to the accompanying *Appropriate Assessment Screening Report* and *Natura Impact Statement* prepared by Scott Cawley Ltd.



The NIS has been prepared following an assessment in view of best scientific knowledge of the potential for, the proposed development to have significant effects, either individually or in combination with other plans or projects on European sites, set out in the *Appropriate Assessment (AA) Screening Report*.

The NIS has been prepared in accordance with the provisions of Part XAB of the Planning and Development Act, 2000 (as amended) and in accordance with the requirements of Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive).

The NIS concludes:

“It has been objectively concluded by Scott Cawley Ltd., following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts from the Proposed Development and the effective implementation of the prescribed mitigation measures, that the Proposed Development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects.”

Drawing upon the above, we conclude that the proposed development will not give rise to unacceptable impact upon the environment from a biodiversity perspective in the context of site-specific ecology and from an Appropriate Assessment perspective in the context the identified relevant Natura 2000 sites. As set out in relation to the landscape strategy above, we confirm that the proposed development will give rise to enhancements to local biodiversity through habitat creation, including through the introductive of extensive SuDS to the site.

EIAR

A voluntary EIAR under Schedule 5, part 2 of the Planning and Development Regulations, 2001 (as amended) and has been prepared for this application given the Development Framework masterplan context of the site. The EIAR has been prepared in accordance with Directive 2011/92/EU as amended by Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment as adopted on 16 April 2014.

The EIAR has assessed the impacts and resulting effects likely to occur as a result of the proposed development on the various aspects of the receiving environment. Mitigation measures are included to reduce impacts on the environment, where considered necessary. Mitigation measures have also been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate:

“The Proposed Development will be operated in a manner that will ensure that the potential impacts on the receiving environment are avoided where possible. In cases where impacts or potential impacts have been identified, mitigation measures have been proposed to reduce the significance of particular impacts. These mitigation recommendations are contained within each chapter exploring specific environmental aspects.”

We refer An Bord Pleanála to the accompanying EIAR for a detailed review of the likely effects on the environment of the proposed development, if carried out. The EIAR incorporates the following chapters:

Chapter 1	Introduction
Chapter 2	Site Context
Chapter 3	Description of the Proposed Development
Chapter 4	Consideration of Alternatives
Chapter 5	Population and Human Health
Chapter 6	Biodiversity
Chapter 7	Land and Soil
Chapter 8	Hydrology and Hydrogeology
Chapter 9	Noise and Vibration
Chapter 10	Air Quality



Chapter 11	<u>Microclimate</u>
Chapter 12	<u>The Landscape</u>
Chapter 13	<u>Material Assets – Traffic and Transport</u>
Chapter 14	<u>Material Assets - Waste</u>
Chapter 15	<u>Material Assets - Utilities</u>
Chapter 16	<u>Cultural Heritage</u>
Chapter 17	<u>Risk Management</u>
Chapter 18	<u>Interactions</u>
Chapter 19	<u>Mitigation and Monitoring Measures</u>



5 Planning History

5.1 Subject Site

There are no recent planning applications directly relating to the subject site. Rather the site has been in long term use as a public car park.

5.2 Surrounding Area - Student Accommodation Site

There are 3 planning applications relating to a site to the southeast of the site, referred to as the student accommodation site. All 3 applications are summarised in brief below. We refer An Bord Pleanála to Appendix I for a detailed review of these applications.

Reg. Ref.	Development Description	Decision
17143 / ABP-301831-18	<i>'Permission for development which will consist of the construction of a three storey mixed use development (c. 2532 sqm), consisting of retail use on ground and partial first floors, gym use on partial first and second floors, and all associated signage, landscaping, site works and services.'</i>	A decision was made to grant permission for this application on 21/12/2018 after an appeal to An Bord Pleanála to remove a condition in the original grant.
20184 / ABP-309673-21	<i>'Demolition of an ESB enclosure and construction of a seven/eight storey development comprising 4 retail units, a gymnasium and student accommodation (254 beds).'</i>	A decision was made to grant permission for this application on 11/02/2021. A third party appeal was made to An Bord Pleanála. The grant of permission was subsequently upheld.
22259	<i>'Minor amendments to previously approved development Reg. Ref. 20184 & ABP-309673-21'</i>	A decision was made to grant permission for this application on 06/01/23 subject to conditions.

Table 8 – Planning History Summary of Adjoining Site to southeast

The permitted site layout plan for this development is set out below.



Figure 30 – Permitted Site Layout Plan Reg. Ref. 22259

5.3 Surrounding Area – Uisce Éireann Raw Water Intake

REG. REF. 19107

This application was lodged by Irish Water (now known as Uisce Éireann) on 11/04/2019 for the following development:

“A new raw water intake works located on the east bank of the River Corrib 100m downstream of Quincentenary Bridge; associated pipework to transfer raw water from the new intake works to the existing intakes works, which in turn supplies Terryland Water Treatment Plant (WTP); and a new treated water rising main extending between Terryland WTP and existing rising main on the east bank of the River Corrib”

A decision was made to request further information and subsequently the development was granted with conditions on 24/01/2020. A final grant of permission issued on the 24/02/2020.

Following a site visit completed on 9th August 2023, it is evident that these works are underway. The extent of the red line boundary for this application is outlined below.

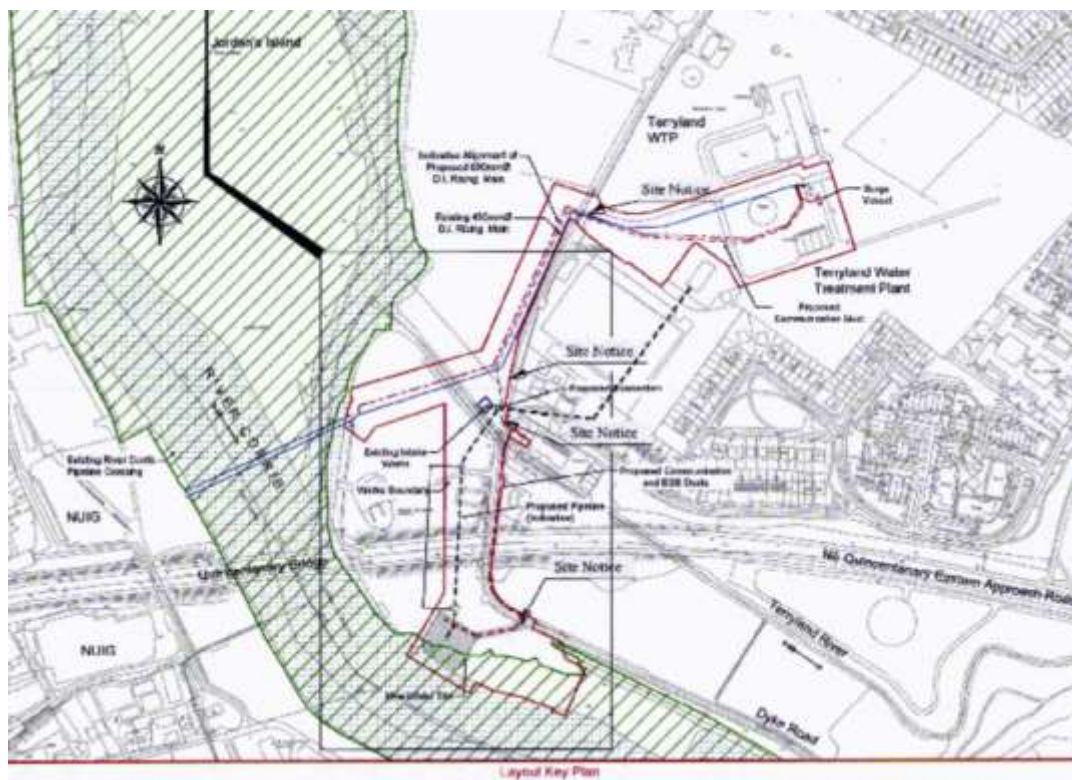


Figure 31 - Site Location Plan/ Red Line Boundary

5.4 Surrounding Area – Bus Connects Galway Cross City Link Scheme

REG. REF. ABP – 314597-22

This application was lodged by Galway City Council on 09/09/2022 for the following development:

“The proposed scheme is 1 of the 5 no. bus corridor schemes within Galway City under the Cross City scheme and has been retitled BusConnects and is accompanied by a Compulsory Purchase Order reference ABP 314654-22.

The proposed scheme submitted under this application will provide for a Cross City Link (University Road to Dublin Road) scheme which has an overall combined length of approximately 6.7km and is routed along the University Road, St. Vincent's Avenue, St. Francis Street, Eglinton Street, Eyre Square, Forster Street, College Road and Dublin Road and also encompasses numerous roads within the city centre including Fairgreen Road, Bothar Uí Eithir, Prospect Hill, Bothar na mBan, St. Brendan's Avenue, Headford Road, Dyke Road, Woodquay, Daly's Place, Merchants Road, Forthill Street, Queen Street and Dock Road.”

This Strategic Infrastructure Development was granted by An Bord Pleanála on 27/09/2024 with conditions.

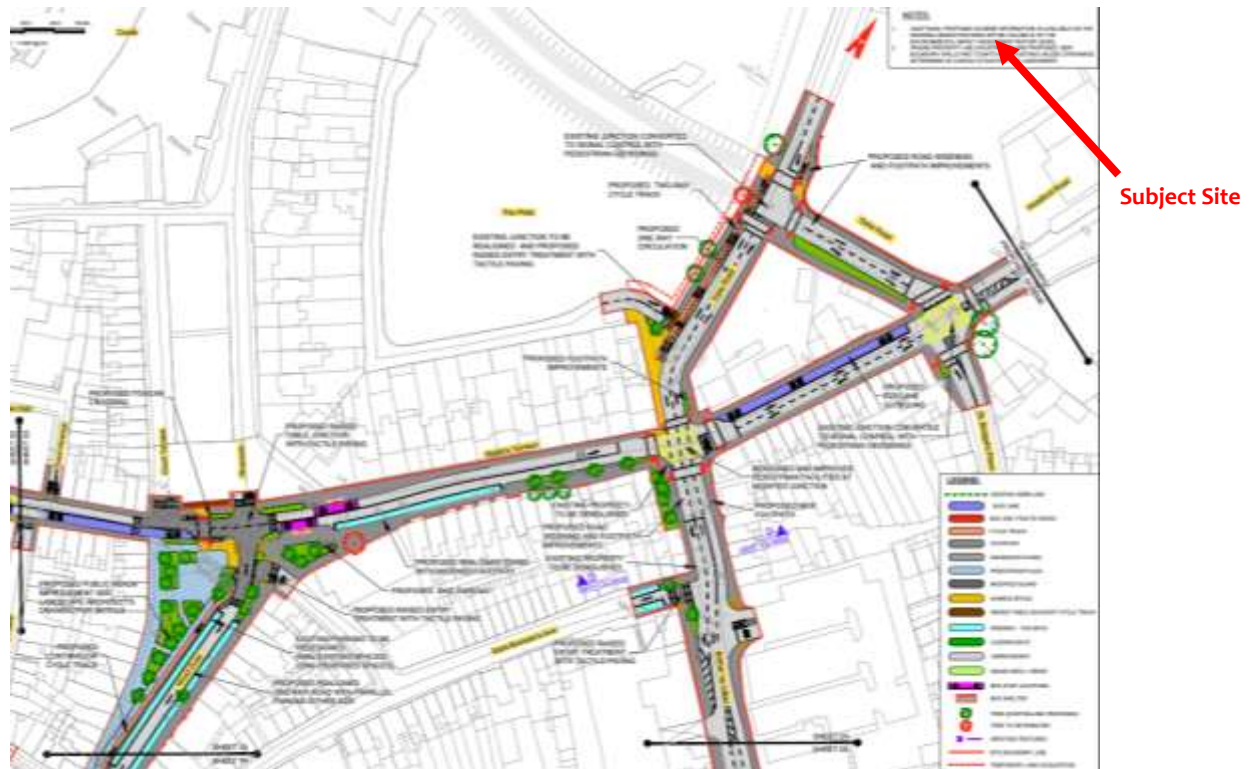


Figure 32 – Permitted Portion of BusConnects Scheme in relation to subject site

5.5 Surrounding Area – Woodquay Park Upgrade

REG. REF. ABP 320938-24

This application was lodged by Galway City Council on 27/09/2024 for the following development:

“Upgrades and expansion of Woodquay park including the provision of:

(a) Hard & Soft Landscaping; (b) Removal of 1 no. Class C and 1 no. Class B trees. Planting of 4 no. new Golden Alder trees. (c) Relocation and reduction in size of existing bike share station; (d) Galway Orb Sculpture and Light Feature; (e) Litter Bins; (f) Bollards; (g) Flexible Events and Open Space Area; (h) enhanced public lighting; (i) enhanced SuDS based surface water management; (j) relocation of existing ICA memorial; and all associated ancillary works. Provision of 4 no. pedestrian crossings; vehicular parking consisting relocation of 2 no. EV spaces, relocation of 2 no. accessible spaces and retention of approx. 10 no. on street parking spaces on Corrib Terrace and relocation of 4 no. motorcycle spaces. Net removal of 11 no. existing spaces. All other associated works.”

This development was granted permission by An Bord Pleanála on 12/03/2025 with conditions.



Figure 33 – Proposed Woodquay Park Site Layout Plan

5.6 Surrounding Area – Water Sports Centre, Dyke Road

REG. REF. JP61.320181

Galway City Council submitted a Part 10 application on 11/07/2024 for development consisting of:

“Change of use of the old Galway Corporation Waterworks, Dyke Road, Galway (a protected structure no 3502), to be used as a water sports centre. The proposals include alterations to the existing building, new boundaries, new pedestrian road crossing and drop of area, hard & soft landscaping, footways, public lighting, connections to existing services, and all ancillary site development works.

It is also proposed to provide a floating pontoon on the River Corrib. The proposed pontoon structure will comprise of a 10m x 2.0m wide floating galvanised steel pontoon connected to an access gangway by a roller connection. The pontoon will be terrestrially anchored and setback from the riverbank.”

The application is currently under further consideration by An Bord Pleanála.



Figure 34 – Proposed Water Sports Centre Site Layout Plan

6 Consultations

The proposed development has been subject to extensive pre-application engagement with relevant stakeholders and the public to ensure that knowledge, views and concerns would be taken on board as design progressed.

6.1 Pre-Planning

Under the Part X and XAB application process, there is no formal provision made for consultation between An Bord Pleanála and a Local Authority in respect of a potential development proposal.

6.2 Land Development Agency & Galway City Council Consultations

Throughout the design process, extensive engagement took place between the Land Development Agency, as the lead developer and Galway City Council, as the applicant across a range of departments and functions. Technical experts within the Design Team also consulted extensively with their counterparts in the Roads, Drainage, Parks, and Housing Departments to ensure that the proposed development was fully consistent with the required standards of the Local Authority on multiple fronts. This engagement and collaboration have enabled the LDA and GCC to develop a robust relationship. Their views, formed and shaped by invaluable local experience and knowledge, guided the proposed development. This feedback was instrumental in informing the development proposal.

The partnership aims to address the significant housing needs identified within Galway City, aligning with Council's housing strategy. By working closely with GCC, the LDA ensures that the development not only meets statutory requirements but also serves the community's needs effectively. The proposed development is a testament to the strong collaboration between the LDA and GCC, showcasing a shared commitment to enhancing housing availability and quality in Galway City.

6.3 Public Consultations



As part of the masterplanning and proposed development design process, the Land Development Agency undertook extensive engagement with the public, relevant stakeholders, community groups, and Elected Members of Galway City Council. The LDA promotes a proactive and inclusive approach to community and stakeholder engagement, starting from the earliest stages in the planning and design process, through to construction and eventual occupation of a housing scheme.



A Community & Stakeholder Engagement Plan was established to guide the public consultation process and sets out the following stages:

- Stage 1: Introductory Communications
- Stage 2: Vision Document
- Stage 3: Public Consultation on Draft Development Framework
- Stage 4: Community Stakeholder Engagement Report
- Stage 5: Final Development Framework and Phase 1 Planning Application

The non-statutory public consultation was facilitated through the publication of a website (www.corribcauseway.ie) in March 2024 which contained comprehensive information of the proposed development framework development, the strategic and historical context, design principles, and the current status of the project which will be continually updated and in line with progress made on the planning application. The website provided regular updates and a platform to provide feedback, submissions and to promote the public drop-in clinics and meetings.

Most importantly, the website contained the publication of a detailed Vision Document which guided the public through the proposals and the wider development framework vision for the lands. The document deliberately avoided the use of overly technical language resulting in a document that was fully accessible and legible. The document encourages active public participation and provided the opportunity for all relevant stakeholders to engage.

The public consultation period ran from September 2023 through to July 2024. A series of meetings, workshops and drop-in clinics were conducted over the course of the consultation period. Over 150 people were directly engaged with (in person) during the consultation period. Others submitted their views, concerns, and suggestions via email and phone. The drop-in clinics were found to be a positive experience for the community, commercial and residential stakeholders, GCC and the LDA.

A Consultation and Stakeholder Engagement Report was published on the www.corribcauseway.ie website in December 2024 which provided an overview of the stakeholder feedback received throughout the public consultation process. A summary of the Report is contained in Appendix 1 of the accompanying Development Framework.

A summary of findings across a series of common themes is set out in the Consultation and Stakeholder Engagement Report and the accompanying Development Framework under the key themes of Arts & Culture, Homes, Traffic and Connections, Environment & Sustainability, Community & Security, Environment & Sustainability and Local Business & Enterprise. All feedback and submissions have been carefully considered by the design team and have influenced the final project design as contained in this application.



7 Strategic Planning Context

7.1 National Planning Framework: Project Ireland 2040



As a strategic development framework, this Plan sets out the long-term context for the Country's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional, and local levels.

The key high - level objectives of the Plan are:

- To continue a path of economic, environmental, and social progress that will improve our prosperity, sustainability and well - being.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodates and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

The NPF envisages the population of Galway City and Suburbs to grow by between 40,000 -45,000 people by 2040 which is an increase of almost 55%. It also targets half of the homes to accommodate this population increase to be located within the existing built footprint, on lands which include key regeneration/brownfield sites, infill sites and underutilised lands at locations that are well served by existing and planned public transport.

Section 2.6 of the National Planning Framework 2040 states the following with regard to compact and sustainable growth:

'Making the continuous regeneration and development of existing built-up areas as attractive and as viable as greenfield development. This requires greater certainty and cost equalisation as a result of a steady supply of sites and land and investment in infrastructure and amenities through more active land management in urban areas'.

The national planning framework promotes the creation of mixed tenure communities by stating: *"More affordable homes must be provided in our urban areas as part of the creation of mixed-tenure communities."*

The key future growth enablers for Galway have been identified as:

- *"Delivering a number of regeneration projects to extend and intensify the City Centre, including the Station, Docks, Headford Road and Sandy Road areas;*
- *Provision of a Citywide public transport network with enhanced accessibility between existing and proposed residential areas and the City Centre, third level institutions and the employment areas to the east of the city;*
- *Public realm and urban amenity projects, focused on streets and public spaces, particularly in support of an extended city centre area and where residential and employment areas can be linked to pedestrian routes;*



- Development of a strategic cycleway network with a number of high-capacity flagship routes; Delivery of the Galway City Ring Road; Delivery of the Galway East Main Drainage Scheme as part of the wider Greater Galway Area Drainage Study.”

Appendix 1 of the National Planning Framework 2040 states that the following with regard to the policy of making stronger urban places:

National Policy Objective 2A

A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.

National Policy Objective 3B

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

National Policy Objective 6

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

National Policy Objective 11

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 12

The Government will establish a National Regeneration and Development Agency to work with local authorities, other public bodies and capital spending departments and agencies to co-ordinate and secure the best use of public lands, investment required within the capital envelopes provided in the National Development Plan and to drive the renewal of strategic areas not being utilised to their full potential. The Government will consider how best to make State lands available to such a body to kick-start its development role and to legislate for enhanced compulsory purchase powers to ensure that the necessary transformation of the places most in need of regeneration can take place more swiftly and effectively.

National Policy Objective 13

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well- designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

National Policy Objective 35

Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

National Policy Objective 66

A more effective strategic and centrally managed approach will be taken to realise the development potential of the overall portfolio of state owned and/or influenced lands in the five main cities other major urban areas and in rural towns and villages as a priority, particularly through the establishment of a National Regeneration and Development Agency.

The site's zoning and opportunity site designation allows for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable form of development.



It is submitted that the current proposal for 219 no. new residential units and a childcare facility will deliver on the above objectives of the NPF. We note specifically that the addition of a wide range of unit typologies is appropriate at this highly accessible site, catering to a wide demographic of potential future residents.

7.1.1 Updated Draft First Revision to the National Planning Framework, 2024



Following a decision of Government in June 2023, the preparation of a revised National Planning Framework commenced. This Draft Framework was published in July 2024 and an Updated Draft First Revision to the NPF was published in November 2024. The revised Framework sets out that in the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living in our country. The updated projection is that the population of Ireland will increase to approximately 5.7 million by 2030 and 6.3 million people by 2040. This population growth will require new jobs and new homes.

The Updated Draft Revised NPF states that Galway has been Ireland's most rapidly developing urban area for half a century and is a key driver for the West of Ireland. The City is identified to be located at a pivotal point on the Atlantic Economic Corridor, from where the influence of Ireland's southern Atlantic cities (Cork and Limerick) extends northwards.

The Updated Draft Revised NPF sets out the following in relation to development and growth in Galway City:

- *“As the largest centres of population, employment and services outside Dublin, the four cities of Cork, Limerick, Galway and Waterford, will continue to provide a focus for their regions.*
- *Supporting ambitious growth targets to enable the four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% over 2016 levels to 2040 and to enhance their significant potential to become cities of scale.*
- *Enabling the four cities to be regional drivers and to lead in partnership with each other and as partners in regional / inter-regional networks as viable alternatives to Dublin.”*

The Draft Revised NPF sets out that Galway City and Suburbs is targeted for an additional 36,000 people between 2022 and 2040 or achieve at the least, a population of 122,000 in total by 2040.

The Draft Revised NPF acknowledges that *“to grow its potential, Galway needs to address recent legacy issues arising from urban sprawl and reliance on private cars and build on key strengths, including world class med-tech cluster, third level institutions embedded within the City, a vibrant arts and cultural scene, year-round tourism and an attractive natural setting. All of these factors will contribute to a positive national reputation... It will be necessary to focus on regeneration and redevelopment projects within the existing built-up area, and develop a more compact urban form, facilitated through well-designed medium and higher density development. It will also be necessary to identify sustainable greenfield development sites that can be integrated with the existing built up area of the city and serviced by high capacity public transport.”*

The key future growth enablers for Galway have been identified as:

- *“Delivering a number of regeneration projects to extend and intensify the City Centre, including the Station, Docks, Headford Road and Sandy Road areas;*

- Provision of a Citywide public transport network, informed by the development of a Galway Metropolitan Area Transport Strategy (GMATS) with enhanced accessibility between existing and proposed residential areas and the City Centre, third level institutions and the employment areas to the east of the city;
- Public realm and urban amenity projects, focused on streets and public spaces, particularly in support of an extended city centre area and where residential and employment areas can be linked to pedestrian routes;
- Development of a strategic cycleway network with a number of high-capacity flagship routes; Delivery of the Galway City Ring Road; Delivery of the Galway East Main Drainage Scheme as part of the wider Greater Galway Area Drainage Study.”

The following revised policies are considered key in the context of the proposed development:

Revised National Policy Objective 2 –

“The projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined.”

Revised National Policy Objective 3 –

“Northern and western region: approximately 150,000 additional people between 2022 and 2040 (c. 210,000 additional people over 2016-2040) i.e. a population of just over 1 million.”

Revised National Policy Objective 4 –

“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.”

Revised National Policy Objective 7 –

“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact growth and sequential patterns of growth.”

Revised National Policy Objective 8 –

“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.”

Revised National Policy Objective 10 –

“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high-capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.”

Revised National Policy Objective 12 –

“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”

Revised National Policy Objective 14 –

“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.”

Revised National Policy Objective 20 –

“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”

Revised National Policy Objective 22 –



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

Revised National Policy Objective 20 –

“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”

Revised National Policy Objective 21 –

“The Government will support the LDA, in association with Local Authorities, to fulfil its statutory mandate to deliver a significant number of homes on State lands in major mixed tenure developments, with a particular focus on brownfield and infill urban sites in the five main cities and regional centres as a priority.”

Revised National Policy Objective 22 –

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

Revised National Policy Objective 37 –

“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.”

Revised National Policy Objective 42 –

“To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.”

Revised National Policy Objective 43 –

“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

Revised National Policy Objective 45 –

“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.”

The proposed development inherently complies with the overarching themes of the NPF by proposing a compact, well-designed sustainable form of residential development on an underutilised urban site located in close proximity to a range of social, commercial and community facilities and public transport services.

The scale and locational characteristics of the subject site therefore provides an opportunity for a sustainable, higher residential development and the delivery of a significant contribution to meeting housing need.



7.2 Rebuilding Ireland: Action Plan for Housing and Homelessness



The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The plan outlines that *“Accelerating delivery of housing for the private, social and rented sectors is a key priority for the Government. Ensuring sufficient stable and sustained provision of housing that is affordable, in the right locations, meets peoples different needs and is of lasting quality is one of the greatest challenges facing the country at present.”*

The plan repeatedly states the need for housing to be in appropriate locations, *“In addition to the scale of housing provision, the delivery of housing in the right place is also central to enabling a good standard of living and improving quality of life. Locating housing in the right place provides the opportunity for wider family and social networks to thrive, maximises access to employment opportunities and to services such as education, public transport, health and amenities, while also delivering on sustainability objectives related to efficiency in service delivery and investment provision.”*

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 219 no. new social and affordable residential apartment units at a key location adjacent to services and amenities. The site has the benefit of accessibility to public transport services and is considered a significant opportunity site for the delivery of residential units. The proposal also supports Pillar 2 and will provide for 22 no. Part V units and the remaining 197 no. units will be provided under the affordable housing ‘Cost Rental’ scheme supporting Pillar 4.

We submit that the proposed development is consistent with the Action Plan for Housing and Homelessness.

7.3 Housing for All – A New Housing Plan for Ireland, 2021



The Housing for All (HFA) plan has been introduced by the Government in order to achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure. It caters for:



- Preventing homelessness
- Protecting tenants
- Supporting social inclusion

The plan focuses on:

- Introducing incentives and measures to bring vacant and derelict properties back into residential use.
- Supporting homeownership and increasing affordability.
- Preventing homelessness, protecting tenants and supporting social inclusion and increasing social housing delivery.
- Increase the levels of new housing stock with the goal of ending homelessness by 2030.
- Achieve a more sustainable housing system with a planning system that is fit for purpose and that will create long-term vibrant communities with the necessary supporting infrastructure.
- Increasing the capacity and efficiency of delivery in both public and private sectors.
- Deliver 33,000 new homes per annum including 9,500 social and 6,000 affordable homes.
- Setting out a pathway to economic, societal and environmental sustainability in the delivery of housing.

There is a clear intent within the Plan to increase the supply housing, supporting homeownership and increasing affordability through the Land Development Agency as a powerful driver of urban regeneration for affordable homes.

The Plan notes that the enactment of the Land Development Agency Act, 2021, establishing the LDA as a commercial State Agency, marks an historic move to use all lands available to the State to provide for housing supply and affordability needs. The Land Development Agency is a step change in the Government's involvement in the housing market and represents a crucial lever in terms of reaching a sustainable housing market.

The Plan outlines that the LDA will be an important source of major mixed tenure and affordable homes on State lands in association with Local Authorities. The Plan notes the following with respect to the LDA:

- State land bank to provide more land to the LDA to bring forward up to 15,000 homes and State to fund Local Authorities for land acquisition.
- Increase funding capacity for the LDA for strategic development of public lands for affordable and social housing in city and town centres at scale.

The proposed development is being brought forward by Galway City Council in collaboration with the Land Development Agency. The subject lands are owned by Galway City Council and will see the redevelopment of these underutilised Council lands for the provision of 219 no. residential units. 90% or 197 residential units will be provided under the 'Cost Rental' LDA model. 10% or 22 residential units will be provided under the Part V, social housing scheme. As such, the proposed development is aligned closely with the principles and main objectives of the Housing for All – A New Housing Plan for Ireland, 2021.





7.3.1 Housing for All Progress Report – Q2 2024

Housing for All Q2 2024 Progress Report



This progress report is the latest update for Housing for All and details the progress and measures achieved during the first six months of 2024. The first half of 2024 has seen continued strong momentum in the delivery of homes across the country.

In the year to the end of May, building started on 52,000 new homes, an increase of over 85% on the previous 12 months, with over 32,000 of these started in the first five months of 2024 alone.

Since the launch of Housing for All in September 2021, almost 74,000 new homes have been built and the Government is confident that this year's target of 33,450 new homes will be met.

The future delivery pipeline is also considered to be strong with almost 38,000 homes approved for planning permission in the year to end of March 2024. Over 25,000 new social homes are at various stages of design and construction.

Cost rental homes have been delivered in Ireland for the first time, with rents at rates at least 25% below market value. More than 1,700 cost rental homes have been provided by approved housing bodies, local authorities, and the Land Development Agency. Construction is currently underway on 392 cost rental apartments in Adamstown, secured under the Project Tosaigh initiative.

To build on the success to date of Project Tosaigh, the LDA has established a homebuilder partnership panel under the second phase of the initiative, which will target the delivery of 5,000 new affordable homes.

Delivery of homes on State lands is well underway, including almost 300 new homes at Shanganagh in a partnership between the LDA and Dún Laoghaire-Rathdown County Council, the first phase to be delivered later this year. In Mungret, building will start on 183 homes later this year in partnership with Limerick City and County Council. Construction is also underway at St. Kevin's in Cork and the former Devoy Barracks in Naas. A pipeline of state land is being built to support development of homes at speed and scale into the future.

The Progress Report acknowledges the recently published draft first revision to the National Planning Framework which includes high level projections of housing need to 2040 which average 50,000 new homes per year. The Report states that new Housing for All targets from 2025 onwards will be available in the Autumn, together with an updated Action Plan setting out how it is planned to achieve this increased level of ambition.

In addition, we highlight to An Bord Pleanála that Appendix 2 of the Progress Report has identified the Dyke Road, Galway site as an 'Active Local Authority / LDA Delivery Partnerships' with a yield of 220 no. residential units for planning to be submitted in Q4 2024.

The proposed development will provide 219 no. residential units to aid in meeting the housing targets of Housing for All. The proposal represents 0.44% of the annual 50,000 housing target expected to be delivered in Q1 2029.



7.4 Regional Spatial and Economic Strategy for the Northern and Western Region, 2020



Galway City is located in the Northern and Western Region and comes under the Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region (2020-2032). The primary aim of the Strategy is to support the implementation of Project Ireland 2040 providing a long-term strategic planning and economic framework for the development of the Regions. It sets out a settlement hierarchy for the region, including key target locations for population and employment growth.

The RSES sets out that the LDA has an urgent focus on managing lands which are currently within the ownership of the state to regenerate underutilised sites and increase the supply of new homes and boost housing supply. RSES sets out that assets held by the state must be utilised with Galway referenced specifically. The current application brought forward by Galway City Council is centred on a partnership and development agreement with the LDA and supports the objective of the RSES.

RSES also establishes Galway as the largest regional urban centre. It recognises the primacy of the city in the settlement hierarchy of the Northern and Western Regional Assembly (NWRA) area. It also acknowledges the significant influence that the city exerts on much of the western part of the region in developing the economy and in improving competitiveness. Reflecting this influence and as required by the NPF, the RSES includes a Metropolitan Area Strategic Plan (MASP) for Galway City and environs. A key sustainability element of the RSES and MASP is to deliver growth in a compact form with an objective to locate at least half of all new homes that are targeted, within the city footprint of the MASP.

Chapter 3 of the RSES identifies a number of strategic locations that present the opportunity and capacity to deliver the necessary quantum of housing to facilitate targeted growth:

- Consolidation of the existing neighbourhoods of Knocknacarra, Ragoon, Castlegar and Roscam.
- Development of Regeneration Lands at Ceannt Station Quarter, Inner Harbour and **Headford Road**.
- Ardaun.
- Murrough
- Baile Chláir, Bearna, Oranmore and Briarhill.

The redevelopment of key regeneration / brownfield sites in the city, including the wider Headford Road site, and development of infill sites and underutilised lands at locations that are well served by existing and planned public transport are specifically identified areas that will support compact growth and population targets for the city.

The following policies are considered relevant:

Policy 1.3 Metropolitan Area Strategic Plan (MASP)

“Recognise the importance of the Galway Metropolitan Area Strategic Plan (MASP) in the delivery of strategic growth with critical mass that supports the development of the city and existing surrounding settlements as strong, attractive urban places supported by a level of services and infrastructure that creates successful, sustainable, universally accessible and socially inclusive communities and which harnesses the strengths associated with scale to maximise economic opportunities and supports investment.”



RPO 3.1

“Develop urban places of regional-scale through:

- *Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth;*
- *Delivering significant compact growth in Key Town; and*
- *Developing derelict and underutilised sites, with an initial focus within town cores.”*

RPO 3.6.4

“The assembly support the regeneration and development of city centre sites at Galway Harbour, Ceannt Station and Headford Road (S/M).”

It is also noted that RSES promotes the preparation of a Building Heights Study as per R.P.O 3.6.3. We understand that this has been prepared (and completed in 2021) and that the current version of this study is appended to the current Galway City Development Plan 2023-2029. The proposed development has been considered against the provisions of the Urban Density and Building Height Study, 2021.

The proposed development is aligned with the main principles and objectives of the RSES. The proposed development will provide a high-density city centre development supporting the principle of compact growth and will help to achieve the city’s established population and housing targets. Evidently, this site is earmarked for significant redevelopment as confirmed by RPO 3.6.4. This application delivers on this objective as a first phase planning application for the regeneration of a key city centre site in Galway.



8 Section 28 Ministerial Guidelines

8.1 Sustainable Residential Development and Compact Settlements Guidelines, 2024



The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)* referred to as the 2024 Guidelines from herewith in this report, set out policy and guidance in relation to the planning and development of urban and rural settlements with a focus on residential development and the creation of compact sustainable settlements.

These 2024 Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and provide updated guidance to take account of current policy and economic, social and environmental considerations. There is a renewed focus in the 2024 Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

Given the NPF priorities for compact growth and reflecting the variety of settlements and settlement contexts where residential development takes place. The Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines to ensure that densities are efficient while, at the same time, tailored to the settlement context.

Section 3.3 identifies settlements, area types and density ranges for cities and metropolitan (MASP) areas. It's noted that the strategy for all cities is to support consolidation and intensification within and close to the existing built-up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport.

The following sets out the key development parameters, as they relate to the site at Dyke Road:

POLICY AND OBJECTIVE 3.1 (AREAS & DENSITY RANGES)

Policy and Objective 3.1 *"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4."*

Policy Objective 3.1. of the 2024 Guidelines adopts a 2-step approach to density, that being Step 1 - the application of an appropriate range followed by Step 2 - a requirement to refine the density in terms of site's accessibility and considerations in relation to local character amenity and the natural environment.

Step 1

Table 3.2 of the 2024 Guidelines clearly set out density ranges for Galway City. The ranges are broken down into City Centre; City Urban Neighbourhoods; City Suburban/Urban Extension. In terms of categorisation, we note that the Galway City Development Plan includes the Dyke Road site within its Core Shopping Area. This site is also a centrally located and accessible urban site in the wider city context. On this basis, it would be our view that the site is considered to be most akin to the City Centre range, which is defined as follows:

*“The city centres of Limerick, Galway and Waterford, comprising the city centre and immediately surrounding neighbourhoods, are the most central and accessible urban locations in their regions with the greatest intensity of land uses, **including higher order employment, recreation, cultural, education, commercial and retail uses.**”*

The 2024 Guidelines state that for city centre sites, it is a policy and objective of the Guidelines (Policy and Objective 3.1 refers) that residential densities in the range of **100-250 DPH** shall be generally applied in the city centre of Galway.

In relation to density, Section 3.3.6. further states that there is a presumption in these 2024 Guidelines against very high densities that exceed 300 dph (net) on a piecemeal basis. Densities that exceed 300 dph (net) are open for consideration on a plan-led basis only and where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan.

Step 2

Section 3.4 of the 2024 Guidelines relates to refining density which must consider **site accessibility** and considerations in relation to **local character, amenity and the natural environment**.

The density range for the subject site, 100 – 250 dph, shall be then further considered and refined based on the consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment as per the table below:

High Capacity Public Transport Node or Interchange
• Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop. • Highest densities should be applied at the node or interchange and decrease with distance. • 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.
Accessible Location
• Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.
Intermediate Location
• Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and • Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.
Peripheral
• Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

Figure 35 – Extracted Tabled 3.8 from SRSCG

It is our considered view that the subject site at Dyke Road can be classified as a 'High Capacity Public Transport Node or Interchange' location as per table 3.8 for the following reasons:

- **Urban Bus:** The subject site is located a 300m (4-minute walk) from the closest bus stops; Headford Road (Stop ID: 523711) and Woodquay Court (Stop ID: 525411). Both stops are

served by the 407 bus route. Located 550 metres (7-minute walk) from the subject site is Saint Francis Street (Stop ID: 523021). This stop is served by the following routes; 402, 404, 405, 407, 410, 411, 412, 419 and 424. Approx. 600 m from the site (9-minute walk) is Bóthar Bhreandán Ui Eithir (Stop ID: 523211) which is served by routes: 401, 404, 409, 430. These routes are high-frequency and high-capacity urban bus services.

- **BusConnects:** The proposed development will benefit from the permitted Bus Connects Cross City Link Proposals (ABP Ref. 314597) and future BusConnects Galway schemes and upgrades.
- **Regional Bus:** Principal destinations of regional buses within Galway City are from Ceannt Station (c. 800 m from site / 11 – minute walk) and Fairgreen Coach Station (c. 700 m from site / 10 – minute walk).
- **Train Station:** Galway City's Ceannt Train Station is located c. 800 m from the subject site (11 – minute walking distance).

As such, it is considered that densities within the higher end of the 100 – 250 dph are most appropriate for this city centre site with excellent accessibility to various high capacity and high, urban frequency public transport modes.

The proposed density (231 dph) is considered appropriate given the site size, location, and context of the surrounding built environment. The proposed density allows for the sustainable development of the site whilst providing much needed residential accommodation within the city centre.

Secondly, in terms of considerations of character, amenity and the natural environment, we note that the 2024 Guidelines seek to refine density within the context of:

- the prevailing scale, and mass of buildings, urban grain and architectural language for the area with a responsive site design required.
- the historic environment
- the impact on the environment and on protected habitats and species
- the amenities of local residential properties in close proximity to the site
- the capacity of water and waste water networks

In consideration of the above, the local context, the subject site is located in a mainly commercial adjoining the Galway Retail Park and the Black Box Theatre. The existing heights of the surrounding area are low, however, we note that the adjoining site to the southeast has permission for a student accommodation development with heights reaching 8 storeys. The planning context for the site, the Regeneration and Opportunity site designation coupled with the Draft Headford Framework Plan, 2009 have set higher standards for height and density for this area of the City. As such, the subject site is responsive and mindful of its existing context whilst also striking a balance at introducing a higher density and taller development to establish a new context for the future regeneration of the entire Headford Road area.

We note also that there are no historic environments of consideration in this context and matters relating to the environment and protected habitats are addressed under separate cover with clear conclusions drawn as to the appropriateness of the proposal in this regard. Matters relating to amenities and impact on adjacent properties have been addressed appropriately. Lastly, the application material submitted with the application confirmed that there is sufficient capacity in the local network in terms of water and waste water to cater for this development.

It is considered that proposed the proposed development strikes a balance between respecting the receiving character while also establishing its own, slightly higher density context.

As such, it is our professional planning opinion that the proposed residential density of 231 dph is most appropriate for the subject site.

Further, we note that Appendix B of the 2024 Guidelines state that when calculating residential densities within mixed use schemes, planning authorities shall exclude the % of non-residential uses in proportion to the net site area, i.e.:

- Calculate Net Site Area



- Calculate the overall GFA
- Differentiate between the % of residential and non-residential GFA
- Reduce net site area by the percentage of non-residential GFA
- Divide number of dwellings by reduced site area.

SRSCG Appendix B Density Calculations	Proposed Development
Calculate net site area	0.95 ha
Calculate overall GFA	18,028 sqm
Non-residential GFA	241 sqm
Residential GFA	17,787 sqm
Residential as a portion of Development	$17,787 / 18,082 = 98.37\%$
Site Area for Density Purposes	$0.95 \text{ ha} * 98.37\% = 0.935$
No. Units	219
Net Density	approx. 234 dph

Table 9 – Density Calculation as per Appendix B SRSCG

The proposed net density is 234 dph and is within the appropriate range for the subject site of 100-250 dph, at the higher end of the range as refined above.

DEVELOPMENT STANDARDS FOR HOUSING

The 2024 Guidelines also include a number of Specific Planning Policy Requirements (SPPRs) that should be considered in the context of the future development of the Dyke Road site. SPPRs 1, 3, 4 and 5 are considered relevant for the current site and the key requirements for same are set out below:

SPPR 1 (Separation Distances) –

“It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces...”

As noted in Section 4.2 above, in general, separation distances exceed 16 m between the proposed development and the existing adjoining uses as specified in SPPR1.

At the southeast corner of the site, where the proposed development is located adjacent to a permitted but not yet constructed student accommodation scheme, a separation distance of approximately 14.5 metres is proposed. While this is slightly below the 16-metre threshold outlined in the policy, it is important to note that this separation is considered appropriate and acceptable due to the orientation and layout of the blocks and positioning of windows. The positioning and orientation of the buildings have been carefully designed to minimise direct line-of-sight between opposing windows. The proposed apartments and the permitted student accommodation are laid



out in such a way that the windows will not directly overlook each other. This layout, combined with the careful placement of habitable rooms, ensures that the privacy of both developments is safeguarded and that there will be no undue overlooking. This approach is compliant with SPPR1 which states that separation distances below 16 metres may be considered acceptable where there are no opposing windows serving habitable rooms.

SPPR 3 (Car Parking) –

“It is a specific planning policy requirement of these Guidelines that:

(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling...

Applicants will be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.”

In accordance with SPPR3, the proposed car parking provision is minimised given the subject site’s city centre location, proximity to public transport nodes, services and amenities.

The proposed development will provide a total of 33 no. residential car parking spaces (0.15 ratio) including 2 no. accessible spaces. 10% of the spaces will have EV Charges and the remainder of the spaces will be ducted for future EV use. A set down area / loading bay is proposed at the southern access route in front of the childcare facility.

The proposed development has been designed to minimise reliance on car use and encourage and support the use of sustainable modes of transport. In summary, the proposed residential car parking ratio is considered to be both appropriate and acceptable for the following reasons:

- The site’s location within the city centre provides excellent access to a wide range of public transport options, including bus, train, and cycle routes, reducing the need for residents to rely on private car ownership. In addition, the site is well-positioned near major employment hubs, educational institutions, retail outlets, and leisure facilities, all of which contribute to a highly accessible urban environment where residents can easily walk, cycle, or use public transport for their daily activities.
- A comprehensive Mobility Management Plan (MMP) has been developed by PUNCH Consulting Engineers as part of the subject proposal, which includes strategies to promote sustainable transport and reduce the need for private car use. The plan outlines measures such as the introduction of a car-sharing scheme and initiatives to encourage the use of public transport, cycling, and walking. These strategies will help mitigate any potential reliance on private vehicles and ensure that the parking provisions remain in line with the sustainable goals of the development.
- The wider characteristics of the Development Framework development. The development aligns with the broader vision for the site, which prioritises connectivity, walkability, and the integration of public transport options. By minimising car parking, the development contributes to the goal of fostering a pedestrian-friendly environment that supports the green infrastructure and public spaces in the vicinity.

Census Data

CSO 2022 data for 8 no. District Electoral Divisions (St. Nicholas, Menlough, Castlegar, Eyre Square, Nuns Island, Newcastle, Shantalla and Claddagh) intersecting the subject site at a 1 km radius data was used to establish the most utilised means of transport to travel to work, school or college as per the table below.

Means of Travel	No. of People	% Total
On foot	5,379	30%
Bicycle	911	5%
Bus, minibus or coach	1,452	8%
Train, DART or LUAS	59	0.3%
Motorcycle / Scooter	49	0.3%
Car Driver	4,004	22.5%
Car Passenger	1,551	9%
Van	276	1.5%
Other (incl. lorry)	28	0.1%
Work mainly from home	1,295	7.3%
Not Stated	2,822	16%

Table 10 – Means of Travel to Work, School or College (CSO, 2022)

Sustainable transport modes on foot, bicycle, bus, minibus or coach or train is the leading means of travel across the Study Area at 43.3%. This is significantly higher than the State average of 26.64% for the same transport methods. Travelling by car either as a driver or passenger equates to 31.5% in the Study Area. This is significantly lower than the State average of 53.8%. It is therefore reasonable to assume that future residents of the proposed development will exhibit similar commuting patterns, with a substantial proportion of residents opting to use public transport, walking, cycling, or car-sharing as their primary modes of travel. This data supports the rationale for reducing the number of private parking spaces provided, as it reflects a trend toward more sustainable commuting options, in line with SPPR 3.

SPPR 4 (Cycle Parking and Storage) –

“It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:

- (i) ***Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.***
- (ii) ***Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”***

In accordance with SPPR4, the proposed development includes safe and secure cycle storage facilities to meet the needs of residents and visitors:

- Quantity: The proposed development will provide a total of 465 no. bicycle parking spaces ensuring an appropriate provision for all potential users.
 - A total of 345 bicycle parking spaces including 15 no. spaces for cargo bikes is proposed for long-term bicycle parking for residents in exceeding the minimum standard of 1 cycle space per bedroom. The minimum requirement for the proposed development is 339 spaces as follows:
 - 109 x 1-bed = 109 spaces
 - 22 x 2-bed = 44 spaces
 - 78 x 2-bed = 156 spaces



- 10 x 3-bed = 30 spaces
 - Total = 339 spaces.
- 110 spaces will be designated for visitors, including 8 cargo bike spaces and 2 universally accessible spaces to cater to all user groups.
- 10 spaces will be allocated specifically for staff working at the childcare facility within the development.
- As such, the proposed development exceeds the required minimum quantum for bicycle parking provision.
- Design: To meet the requirements for secure and accessible parking, the design of the cycle storage facilities will be as follows:
 - Resident long stay cycle parking will be located in a secure, covered area on the lower ground floor level. This location is chosen to ensure safety and protection from the elements, making it both secure and convenient for residents. Access to the cycle parking storage locations will be from each building core and from the communal amenity space.
 - In addition to the parking spaces, dedicated cycle maintenance locations will be provided within Building Core C. This area will be available for residents to maintain their bicycles, ensuring convenience and further promoting cycling as a sustainable mode of transport.
 - Visitor and childcare facility staff cycle parking spaces will be located at surface level, making them easily accessible to visitors and staff. The visitor spaces will be conveniently positioned to allow easy access for non-resident cyclists, while the staff spaces will be located close to the childcare facility.

Policy and Objective 5.1 (Public Open Space) –

“It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations...”

The proposed development provides a total of 1,183 sqm of public open space fronting on to the Dyke Road. This equates to 12.5% of the net site area (0.95 ha). This falls comfortably within the mid-range of the 10-15% policy requirement and is fully in line with the objectives set out in the Guidelines.

The subject site is within close proximity and a short walking distance to the Terryland Forest Park to the north. The Terryland Forest Park is an important ecological and recreational resource within the area, and its presence enhances the overall green infrastructure of the surrounding locality. The proposed development will therefore not only offer public open space within the site itself but will also contribute to a broader green network that is accessible to both residents and the public.

The proposed development is entirely consistent with the overall principles and provisions of the Sustainable Residential Developments and Compact Settlement Guidelines (2024).



8.2 Sustainable Urban Housing: Design Standards for New Apartments, 2023



Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023' (the Apartment Guidelines, 2023) are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

The current proposal provides for 219 no. residential units and this Report sets out the compliance of the proposal with the key policy requirements and standards as they relate to the proposed apartment units within the scheme as follows:

Specific Planning Policy Requirement 1

Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).

Response to SPPR1

The proposed unit mix provides:

- 109 x 1-bed (1- or 2-person household) units = 49.8%
- 22 x 2-bed (3-person household) units = 10%
- 78 x 2-bed (4-person household) units = 35.6%
- 10 x 3-bed (5-person household) units = 4.6%

We submit the proposal is in compliance with the above SPPR given that the development will not exceed the 50% maximum for one bed units. In addition, we note that the Galway City Development Plan 2023-2029 has been informed by an evidence-based Housing Need and Demand Assessment and no specific unit mix requirements have been set out in the Development Plan.

Specific Planning Policy Requirement 2

For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development;*

All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development.

Response to SPPR2

We note that the subject site area exceeds 0.25ha. SPPR 2 does not apply in this instance.

Specific Planning Policy Requirement 3

Minimum Apartment Floor Areas (Studio apartment (1 person) 37 sq.m; 1-bedroom apartment (2 persons) 45 sq.m; 2-bedroom apartment (4 persons) 73 sq.m and 3-bedroom apartment (5 persons) 90 sq.m)

Response to SPPR3

The proposed development complies with the minimum apartment floor areas as follows:

- 1-bedroom apartment (2 persons) – 47.6 sqm – 55.3 sqm
- 2-bedroom apartment (3 persons) – 67.2 sqm
- 2-bedroom apartment (4 persons)- 74.5 sqm – 83.5 sqm
- 3-bedroom apartment (5 persons) – 90.8 – 93.7 sqm

We note that 65% of the proposed apartment units exceed the minimum apartment floor areas by 10%. For further information in this regard, please refer to the enclosed architectural drawings and ‘Housing Quality Assessment’ schedule prepared by MOLA Architects, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

Specific Planning Policy Requirement 4

“In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

(i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.

(ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

(iii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”

Response to SPPR4

The development in this instance is considered located in a central and accessible urban location defined as follows:

- Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions; The subject site is within walking distance (600 m / 5-minute walk) of the Galway City Centre area. The site is in proximity to a variety of land uses, services, amenities including retail, commercial uses, medical services, educational facilities, leisure and recreational facilities and civic uses, including major employment locations including University of Galway and University Hospital Galway.
- Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.

As there is no DART or Luas within Galway City, we note that the subject site is located a 300m (4-minute walk) from the closest bus stops; Headford Road and Woodquay Court. In addition, the subject site is located approx. 650 m (9-minute walk) from Eyre Square which is a significant node and starting point for the majority of the urban bus routes of high-frequency including 10-minute peak hour frequencies.

The subject site’s central and accessible urban location aligns with the requirement of 33% dual aspect ratio.

The subject proposal delivers 39% dual aspect units. We note specifically that that a total of 85 of the 219 no. units proposed deliver dual aspect.

Given this, the proposed development complies with the dual aspect ratio required of the Apartment Guidelines, 2023.

Specific Planning Policy Requirements 5

“Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.”

Response to SPPR5

We can confirm that the ground floor of the proposed scheme provides floor to ceiling heights of 2.7 m.

Specific Planning Policy Requirements 6

“A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , subject to overall design quality and compliance with building regulations.”

Response to SPPR6

SPPR 8 (v) is the predominant policy on the number of apartments per core. However, we can confirm that the number of apartments per floor per core will not exceed 12 no. in any block. To this end, it is noted that that the maximum number of units per floor core proposed in this development is 12 no. units per floor core.

In addition to the Specific Planning Policy Requirements noted above the ‘Guidelines’ sets out additional requirement for the following items:

Internal Storage

Unit Type	Min. Storage Requirements	Proposed
1-bed	3 sqm	4.4 sqm – 5.8 sqm
2-bed (3 person)	5 sqm	6.3 sqm
2-bed (4 persons)	6 sqm	6.1 sqm – 8.3 sqm
3-bed	9 sqm	9 sqm – 9.4 sqm

Table 11 – Minimum Storage Requirement and Provision

We submit that compliance with the minimum required areas for internal storage space is achieved in all units.

Private Amenity Space

The proposed development complies with the requirements set down in respect of private amenity open space in the guidelines. All of the units are provided with private open space comfortably in excess of the minimum, as shown in the Housing Quality Assessment prepared by MOLA Architects.

Unit Type	Min. Private Open Space Req.	Proposed
1-bed	5 sqm	5.2 sqm – 16.4 sqm
2-bed (3 person)	6 sqm	6 sqm
2-bed (4 persons)	7 sqm	7 sqm – 13.9 sqm



3-bed	9 sqm	9 - 9.1 sqm
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Table 12 - Private Amenity Space Requirement and Provision

We submit that compliance with the minimum required areas for private amenity space is achieved in all units. We submit this is consistent with the design standards and is acceptable in this instance given the overall design quality put forward.

All balconies will meet or exceed the minimum depth requirement of 1.5 m.

Communal Amenity Space

Unit Type	Minimum Area per unit	Requirement
1-bed	5 sqm	109 x 5 = 545 sqm
2-bed (3 person)	6 sqm	22 x 6 = 132 sqm
2-bed (4 persons)	7 sqm	78 x 7 = 546 sqm
3-bed	9 sqm	10 x 9 = 90 sqm
Total		1,313 sqm

Table 13 – Minimum Communal Amenity Space Requirement and Provision

The current proposal exceeds the minimum requirement of 1,313 sqm and provides for a total of 1,650 sqm of communal amenity space.

Childcare Facilities

The new Apartment Guidelines, 2023 reiterate the requirement for the provision of one childcare facility for every 75 dwelling units, subject to the proposed development mix and existing local childcare facilities:

*‘4.7: Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the **scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area.**’*

In addition to this, it clarifies the following:

‘One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.’

The above provision ultimately suggests that 1 bed and studio units will not require childcare provision. This exemption may apply in part or whole to units with 2 or more bedrooms. For the purpose of this memo, the requirement arising from **all** 2 and 3 bed units is considered. This is considered a prudent approach for the project in this case and is an approach that has also been established by way of precedent at Bord level.

Furthermore, the above provision also suggests that 20 childcare spaces per 75 units should be delivered as a general rule of thumb. This is an approach applied in this case.

The current Phase 1 Corrib Causeway site proposal delivers a total of 219 no. residential units with the following mix:

- 109 no. 1-bedroom units
- 22 no. 2-bedroom, 3-person units
- 78 no. 2-bedroom, 4-person units
- 10 no. 3-bedroom units

The worst case scenario or uppermost requirement is that all 2 and 3 bed units have the potential to create demand for childcare provision. On this basis, **a total of 110 units therefore have the**



potential to require childcare based on the current unit mix (98 x 2 beds and 12 x 3 beds). We note the following calculations in this regard:

- 110 units - 1 facility required for every 75 units = $110/75 = 1.4667$
- 20 childcare spaces required for every 75 units = $20 \times 1.4667 = \mathbf{c. 29.334 \text{ spaces required}}$

A floor area figure of a **minimum** of 2.32 sqm is generally applied per child space as per the Childcare Guidelines of 2001. This can increase to 3.7 sqm per childcare space for smaller children as per Appendix 1 of the Childcare Guidelines. A facility of 68.05 sqm is therefore required as a **minimum** or where the higher figure is applied for all childcare facilities this extends up to a facility of up to 108.54 sqm. For clarity, this calculation is based on $29.334 \text{ spaces} \times 2.32 \text{ sqm} = 68.05 \text{ sqm}$ / $29.334 \text{ spaces} \times 3.7 \text{ sqm} = 108.54 \text{ sqm}$. **We note that extraneous areas such as kitchens, toilets, sleeping and other ancillary areas are deemed to be separate and these requirements significantly increase floor area.**

The proposal will provide for a childcare facility (GFA approx. 241 sqm) in a standalone building, accessible to all within the development and external users if necessary.

We therefore submit the proposed development is acceptable in addressing the anticipated demand that might arise from the proposed development.

We submit to An Bord Pleanála that the proposal is consistent with the overall principles and minimum quantitative requirements of the Sustainable Urban Housing: Design Standards for New Apartments (2023).

8.3 Urban Development and Building Height Guidelines (2018)

Urban Development and Building Heights

Guidelines for Planning Authorities

December 2018



The publication of the ‘**Urban Development and Building Heights, Guidelines for Planning Authorities (2018)**’ from hereon in referred to as the Building Height Guidelines 2018 is intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. We note that section 1.14 of the document sets out the following:

*“Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.”*

The Building Height Guidelines 2018 are the predominant context for assessment of height in this case. We note that Galway City Council has prepared an Urban Density and Building Heights Study, 2021 to accompany the City Development Plan and the proposed development has had due regard to this study in addition to the Building Height Guidelines.

From the outset, it is noted that the Building Height Guidelines 2018 expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

“In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.”

Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered particularly relevant to the current site context and the compliance of the scheme with these SPPRs is set out below.

SPPR 3 (A)

“It is a specific planning policy requirement that where:

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

Applicant Response to SPPR 3A

The performance of the proposal vis a vis the building height criteria is further assessed below in sub-section ‘Development Management Criteria’.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of An Bord Pleanála that the proposed development satisfies the Development Management Criteria. The relevant criteria, followed by an applicant response is set out in Appendix II to clearly demonstrated for An Bord Pleanála that the current proposal respects the outlined Development Management Criteria.

In consideration of responses contained in Appendix II, the current proposal for 219 no. apartment units can be positively considered on this site by the competent authority. Specifically, the proposal has addressed the specific development criteria requirements of the Building Height Guidelines 2018 and is in compliance with the key SPPRs. Most notably the site’s location is considered to address the very spirit and intent of the Building Height Guidelines 2018 that being one proximate to public transport and a variety of services.

We submit to that the subject proposal is consistent with the Urban Development and Building Height Guideline for Planning Authorities (2018).

8.4 Guidelines for Planning Authorities on Childcare Facilities, 2001

Childcare Facilities

Guidelines for Planning Authorities

The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines state: “Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities.”

The Guidelines identify several appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working



- In the vicinity of schools
- Neighbourhood, District and Town Centres
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes, and dedicated cycle ways

Notwithstanding the locations identified above, the Guidelines state that proposals should have regard to the following:

- Child Care (Pre-School Services) Regulations, 1996.
- Suitability of the site for the type and size of facility proposed.
- Availability of outdoor play area and details of management of same.
- Convenient to public transport nodes.
- Safe access and convenient parking for customers and staff.
- Local traffic conditions.
- Number of such facilities in the area; and
- Intended hours of operation.

The recommendation for new housing developments is the provision of 1 facility for each 75 dwellings. This will generally provide for 20 childcare spaces based on a requirement of 35 of such dwellings requiring childcare spaces.

Based on the mix proposed, we note the following requirements for childcare:

- 50% of 2 and 3 bedroom units will require childcare provision. We have identified that there are 110 x 2 and 3 bedroom units (100 x 2 bedroom units and 10 x 3 bedroom units) proposed and so 50% equates to 55 no. units having the potential to require childcare.
- The worst case scenario or uppermost requirement is that all 2 and 3 bed units have the potential to create demand for childcare provision. On this basis, **a total of 110 units therefore have the potential to require childcare based on the current unit mix (100 x 2 beds and 10 x 3 beds)**. We note the following calculations in this regard:
 - 110 units - 1 facility required for every 75 units = $110/75 = 1.4667$
 - 20 childcare spaces required for every 75 units = $20 \times 1.4667 = \text{c. } 29.334 \text{ spaces required}$

A childcare facility of approx. 241 sqm is proposed at ground floor level at the eastern elevation. Locating the childcare facility at this portion of the site facilitates direct access off the proposed link road resulting in a safe and secure environment for child drop off and pick up. The childcare facility is afforded an appropriate outdoor play area.

The childcare facility has been designed to provide for the childcare needs of the proposed development. The facility has been scaled with additional headroom to accommodate not only demand arising from the proposed scheme, but also future phases of development.

The proposal allows for an outside play space, vehicle drop off and dedicated staff cycle parking.

The current proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001) as amended by the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023).

8.5 Part V of the Planning and Development Act 2000: Guidelines (2017)

This Guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the 2017 Guidelines, which states:

“The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site.”



The proposed development is a Part 10 Application as GCC is the Applicant in partnership with the LDA. The entire scheme is an affordable and social housing development.

Of the 219 no. units proposed, 197 no. affordable apartments (90%) will be provided under the cost rental model and 22 no. apartments (10%) will be provided under the Social Housing scheme.

Whilst Part V does not apply to local authority own development, the proposed development exceeds the requirements of Part V of the Planning and Development Act 2000 (as amended) as a 100% Social and Affordable Housing Scheme is proposed.

8.6 The Planning System and Flood Risk Management, 2009



Status - The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). With this in mind, the status of the Guidelines requires that An Bord Pleanála have regard to the Guidelines in carrying out their functions under the Planning Act.

Purpose - The purpose of the Guidelines seeks that Planning Authorities must implement the Guidelines in ensuring that where relevant, flood risk is a key consideration in preparing development plans, local areas plans and in the assessment of planning applications.

Objectives - The Core Objectives of the Guidelines are to:

- *Avoid inappropriate development in areas at risk of flooding;*
- *Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;*
- *Ensure effective management of residual risks for development permitted in floodplains;*
- *Avoid unnecessary restriction of national, regional or local economic and social growth;*
- *Improve the understanding of flood risk among relevant stakeholders; and*
- *Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.*

Key Principles - In achieving the aims and objectives of the Guidelines, the key principles that should be adopted are:

- Avoiding the risk where possible
- Substitute less vulnerable uses where avoidance is not possible
- Mitigate and manage the risk where avoidance and substitution are not possible.



Figure 37 – Sequential Approach Principle in Flood Risk Management

Flood Planning - We note that in the preparation of the Galway City Council Development Plan 2023-2029, in accordance with *The Planning System and Flood Risk Management, Guidelines for Planning Authorities* (2009), a Strategic Flood Risk Assessment (SFRA) has been carried out to assess the implications for planning policy of flood risk. The SFRA adopts a largely precautionary approach to land use zoning to avoid directing development towards areas at risk of flooding. Areas subject to development and identified as being at risk of flooding, are assessed through a justification, to determine their suitability and requirements for site-specific flood risk assessment and detailed mitigation are considered on a site by site basis.

As part of the Strategic Flood Risk Assessment of the Galway City Development Plan 2023-2029, the subject site lies within Flood Zone A. It is important to note that the subject site has passed the 'Development Plan Justification Test' as part of the 2022 SFRA prepared by JBA Consulting in the preparation of the current Galway City Development Plan 2023-2029. We refer An Bord Pleanála to Section 3.3.1 of the accompanying *Site-Specific Flood Risk Assessment* for full details of JBA's commentary on the subject site from this SFRA and surrounding area and the key points are summarised as follows:

- "The site benefits greatly from the Dyke Road defence in Galway City and is directly adjacent to the embankment. This embankment will be subject to assessment, and possible remediation, under the Corrib go Costa FRS.
- The sites are close to the city centre and are earmarked for significant future redevelopment. It is an important objective for the council to develop here, and as such meets Part 2 of the Justification Test, as shown in Appendix C.1.
- Part 3 of the Justification Test has been carried out and included a detailed flood risk assessment and model runs. The model runs carried out show that the site is currently defended to the 1% AEP standard of protection, but that the embankment height is variable and does not include a freeboard allowance. There is a high residual risk of flooding in both the 0.1% AEP event and when climate change is considered, when the embankment is overtopped and a high volume of water from the Corrib is allowed to fill the site and surrounding lands. Flood levels in the 0.1% AEP result in between 0.5 and 1.5m of flooding across the site.
- As with the Headford Road Shopping Centre, development proposals for the sites will need to consider appropriate finished floor levels and mechanism for managing residual flood risks. However, the Stage 3 FRA undertaken in this assessment has demonstrated that the principle of land raising is acceptable.

Site Zoning - Within the Galway City Development Plan 2023-2029, the subject site is primarily zoned "Enterprise, Light Industry and Commercial" (CI). This zoning allows for the development of **regeneration and opportunity sites** which are required to deliver on mixed use development to include for residential development in this particular case. The zoning supports residential use as a predominant use at the **Headford Road Regeneration and Opportunity sites**. There are 3 such

sites at this location, one of which is the **Dyke Road Car Park Site**, subject of this application. We note also that Section 11.2.4 of the Development Plan makes specific exception for the delivery of residential development on publicly owned lands on these sites in accordance with national housing policy.

Core Strategy - In addition, it is worth noting that the Core Strategy of the Galway City Development Plan 2023-2029 promotes the development of regeneration and opportunity sites noting that these sites are ‘targeted for housing delivery in the current plan period’.

Supporting Policy - Furthermore, **Policy 10.2** of the Development Plan supports the development of this regeneration and opportunity site setting out the following:

“1. Facilitate and enable the redevelopment of strategic Regeneration and Opportunity Sites in the city to support the sustainable and compact growth of the city which will add value and create more attractive places in which people can live and work and achieve alignment with the National Strategic Outcomes of the NPF and the Regional Policy Objectives of the RSES and implementation of the Core Strategy.

2. Give priority to the development of the strategic Regeneration and Opportunity sites in line with core strategy, in particular to deliver new residential neighbourhoods, on lands supported by a number of land use zonings including CC and CI, as referenced in the land use zoning objectives in Chapter 11.”

National Priority Site for Housing - The regeneration of these lands is an identified growth enabler in the National Policy Framework and the Dyke Road site specifically is identified within the Development Plan as a national priority site for delivery of housing and other uses in collaboration with the City Council.

The Development Plan sets out that as a Land Development Agency project, the residential element of the development at the Dyke Road site will include for **affordable housing options**. Other uses may include office/commercial uses as well as provision for civic and cultural arts infrastructure. The site is also identified as offering potential to explore innovation and research uses allied to the University of Galway given the linkage to the university made possible by the new pedestrian and cycle bridge.

In summary, the subject site is zoned for development and residential use is specifically supported by the CI zoning objective governing the site, the core strategy and Policy 10.2 of the Development Plan. This site is clearly identified as a regeneration and opportunity site at a local level and a national priority site at a national level.

Site Specific Flood Risk Assessment - A *Site-Specific Flood Risk Assessment* and associated drawings have been prepared by AECOM Consulting Engineers. In preparation of the report, AECOM have considered the Galway City Development Plan 2023-2029 Chapter 9, which focuses on Environment and Infrastructure.

The objective of the *Site-Specific Flood Risk Assessment* prepared by AECOM is to assess all types of flood risk pertaining to the subject site and the proposed development. The assessment investigates potential sources of flood risk and includes for the effects of climate change. The assessment examines the impact of the development and the effectiveness of flood mitigation and management procedures proposed. It also presents the residual risks that remain after those measures are put in place, as required by Section 5.9 of the Guidelines.

Justification Test - Section 5.15 of the Guidelines sets out that “where a planning authority is considering proposals for new development in areas at a high or moderate risk of flooding that include types of development that are vulnerable to flooding and that would generally be inappropriate as set out in Table 3.2, the planning authority must be satisfied that the development satisfies all of the criteria of the Justification Test as it applies to development management outlined in Box 5.1.”

When considering proposals for development, which may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2, certain criteria must be satisfied:

See below the relevant criteria and the applicants response:



Criteria	Response
1. The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of these Guidelines.	As set out above, the subject site is zoned ‘CI’ (Enterprise, Light Industry and Commercial) and ‘RA’ (Natural Heritage, Recreation and Amenity). The ‘CI’ zoning provides for the following objective: <i>“To provide for enterprise, light industry and commercial uses other than those reserved to the CC Zone”.</i> Uses which are compatible with and contribute to the zoning objective include the development of regeneration and opportunity sites. The zoning objective specifically identifies that the ‘CI’ zoning should allow for the development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential. Furthermore, Policy 10.2 of the Development Plan supports the development of this regeneration and opportunity site setting out the following: <i>“1. Facilitate and enable the redevelopment of strategic Regeneration and Opportunity Sites in the city to support the sustainable and compact growth of the city which will add value and create more attractive places in which people can live and work and achieve alignment with the National Strategic Outcomes of the NPF and the Regional Policy Objectives of the RSES and implementation of the Core Strategy.</i> <i>2. Give priority to the development of the strategic Regeneration and Opportunity sites in line with core strategy, in particular to deliver new residential neighbourhoods, on lands supported by a number of land use zonings including CC and CI, as referenced in the land use zoning objectives in Chapter 11.”</i> We note that the ‘Dyke Road Car Park Regeneration Site’ is identified as one of three ‘Headford Road Regeneration Sites’ as set out in Section 10.7 of the Development Plan. The regeneration of these lands is an identified growth enabler in the National Policy Framework and the Dyke Road site specifically is identified within the Development Plan as a national priority site for delivery of housing and other uses in collaboration with the City Council. The Development Plan sets out that as an LDA project, the residential element of the development at the Dyke Road site will include for affordable housing options. Other uses may include office/commercial uses as well as provision for civic and cultural arts infrastructure. The site is also identified as offering potential to explore innovation and research uses allied to the University of Galway given the linkage to the university made possible by the new pedestrian and cycle bridge. In summary, the subject site is very clearly zoned for development and residential use is specifically supported by





	the CI zoning objective governing this particular site, the core strategy and Policy 10.2 of the Development Plan. It is therefore proven that the subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of the Guidelines and therefore meets the criteria.
2. The proposal has been subject to an appropriate flood risk assessment that demonstrates: (i) The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk;	The proposed development has been subject to a comprehensive site specific flood risk assessment, which has demonstrated that the development will not increase flood risk elsewhere and, where possible, will reduce overall flood risk in the area. The site is located within an area identified as at risk of flooding, however, the development proposal includes several key measures to mitigate flood risk. Firstly, the ground levels surrounding the proposed building will be maintained at approximately 5.0m OD, with the building itself elevated on stilts. Only the cores and essential structural elements will extend to the lower ground level, allowing for the required compensatory flood storage to be integrated into the design. In addition, the development will incorporate measures to reduce surface water runoff rates, including sustainable urban drainage systems (SuDS). This will ensure that the site does not exacerbate existing flood risks by increasing surface water flow into surrounding areas. The flood compensatory storage provided, combined with the reduction in runoff, will result in a net benefit to the local floodplain. The existing Coirib go C��sta Flood Relief project model has been used as the baseline model for the LDA Corrib Causeway Project Hydraulic Assessment. The Assessment was undertaken by Arup and the findings are included in Appendix D of the Site Specific Flood Risk Assessment and the scope and findings from the modelling are included in Section 6 of the Site Specific Flood Risk Assessment. The 1D/2D model was developed to assess the existing flood risk and proposed Flood Relief Scheme for the River Corrib and its main tributaries in the Galway Area. The hydraulic model demonstrates that there are no changes in offsite flood extents between the pre-development and post-development scenarios for the Q100_MRFS event. The proposal, therefore, meets the requirement that it will not increase flood risk to surrounding properties or infrastructure.
(ii) The development proposal includes measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible;	The development proposal includes several strategic measures to minimise flood risk to people, property, the economy, and the environment, as far as reasonably possible. The Finished Floor Level (FFL) of the residential accommodation has been designed to be above the 1% Annual Exceedance Probability (AEP) flood level of 6.48m, with allowances made for climate change (+0.50m) and freeboard (+0.30m). As such, the FFL will be set at 7.28m, which provides a sufficient buffer against both current and future flood risks.





	In addition to the elevated FFL, flood resilience measures have been integrated throughout the design to safeguard against potential flood impacts. These measures include: • Watertight external electrical, mechanical, and communication ducting and chambers below the 7.28m FFL to prevent water ingress during flood events. • The installation of anti-flood valves on foul and stormwater connections below the 7.28m level, to prevent backflow and mitigate the risk of flooding from drainage systems. • Smart, self-sealing airbricks and vent-guards will be employed below the FFL to prevent floodwater from entering the building. • Any infrastructure / objects below the design level are at risk in a flood event. Mitigation measures are included in the Evacuations / Emergency Strategy Plan. • Emergency evacuation routes will be provided above the 7.28m level, ensuring safe access for residents in the event of a flood. By implementing these flood mitigation and resilience measures, the development will reduce the vulnerability of people and property to flooding, while protecting the surrounding environment from the impacts of potential flood events. The proposed design ensures that the development will be as flood-resistant as reasonably possible, minimising any adverse effects on the local community and the broader economy.
(iii) The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design, implementation and funding of any future flood risk management measures and provisions for emergency services access; and	The development proposal incorporates comprehensive measures to manage residual flood risks to both the development and the surrounding area. These measures ensure that any potential risks, even those beyond the design's current scope, can be mitigated to an acceptable level. A Flood Emergency Plan has been prepared for the proposed development and is included in Appendix E of the Site Specific Flood Risk Assessment. Emergency plan and evacuation procedures can be summarised as follows: 1. <u>Flood warning systems and evacuation plans:</u> Clear procedures will be put in place to ensure residents are aware of potential flood risks. This information will be provided to new occupants through a welcome pack and will include clear evacuation instructions. 2. <u>Coordination with emergency services:</u> Emergency response plans will be coordinated with relevant local authorities, including Fire & Rescue, Civil Defence, and An Garda Síochána, ensuring a unified and rapid response in the event of flooding. 3. <u>Protection of infrastructure below the design flood level:</u> Any infrastructure located below the design flood level, such as bike storage areas, will be safeguarded through appropriate flood protection measures, including flood-proofing and demountable barriers.





	4. <u>Evacuation routes</u>: The design includes flood evacuation routes that are above the 1-in-100-year flood level (FFL of 7.28m), ensuring safe egress for residents. These routes will be clearly marked and equipped with signage to guide residents during flood events. 5. <u>Flood awareness and communication systems</u>: A real-time flood warning system will be implemented, providing residents with up-to-date information on water levels in the River Corrib. This system will help ensure timely action can be taken if necessary. The Flood Emergency Plan also includes the following proposals: • Flood monitoring and warning systems • Door closures to prohibit access to space blow +7.28m. These measures demonstrate a commitment to managing flood risk and provide for the safety and resilience of the development and surrounding areas. In doing so, they ensure that residual risks are managed in a manner that is compatible with the broader planning objectives for the site, while maintaining the development's integrity as a vibrant, sustainable, and safe urban environment.
(iv) The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes.	The development proposal integrates flood risk management measures seamlessly with broader urban design objectives. The elevation of the Finished Floor Level (FFL) ensures that the development is protected from flooding while providing a contemporary built form. Further, the incorporation of resilience measures such as watertight infrastructure and emergency evacuation routes does not compromise the development's design, but rather complements it by ensuring both safety and accessibility. This approach aligns with the goal of creating a well-designed, flood-resilient urban environment that promotes liveability, walkability, and active street life. The proposed flood management solutions are incorporated into the landscape and built form in a way that enhances both environmental sustainability and urban vitality, ensuring that the development supports the long-term resilience of the area while contributing to a dynamic and active community. The existing use at this site is car parking with poor street frontage offered along Dyke Road. The current proposal to deliver a phase 1 development comprising 219 residential units and creche facility offers a significant opportunity to revitalise this section of Dyke Road and contribute to a more vibrant and active streetscape. The introduction of a new public open space, combined with a new pedestrian route, draws the public into the development, inviting interaction with both the site and the surrounding area. The landscape design incorporates high-quality planting, seating areas, and rest stops, all of which enhance the user experience and contribute to the overall sense of place. This combined with the key design feature of an elevated boardwalk, proposed new car parking, new



	pedestrian routes, and the presence of residential units provides for significantly improved passive surveillance offering and user experience in delivering a vibrant new urban environment and active streetscape. The proposed development's design is further enhanced by the inclusion of an elevated boardwalk, which provides both functional and aesthetic benefits by creating a visually interesting feature that links the various elements of the development. The proposed development will significantly improve the streetscape along Dyke Road, contributing to a more vibrant, active, and sustainable urban environment that enhances the quality of life for residents and visitors alike.
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Table 14 – Justification Test for Proposed Development

Key Technical Points: To ensure a precautionary approach, a number of flood risk factors have been carefully considered in determining the appropriate finished floor levels (FFL) for the development, the provision of compensatory storage, and the potential impact of the development on neighbouring properties.

1 - Hydraulic modelling, carried out by ARUP, forms a central part of this assessment. The results of this modelling are presented as an appendix to the FRA and includes simulations for the 0.1% AEP (1-in-1000-year) flood event, representing a worst-case scenario for flood risk assuming that the current embankment is not there. This modelling is fundamental in ensuring that the development is resilient to extreme flood events.

Based on the modelling, it has been determined that the predicted flood levels for the 1% AEP flood event, including a 300 mm freeboard, result in a minimum recommended FFL of 7.09m. The proposed development's FFL of 7.28 is appropriate and conservative. In addition, the proposed residential FFL of 7.28m also provides protection against the 0.1% AEP flood level (6.98m) plus 300mm freeboard.

The hydraulic modelling also confirms that there are no significant changes in offsite flood extents between the pre-development and post-development scenarios. The increase in water levels on neighbouring properties is minimal, with a maximum rise of approximately 3mm. Similarly, on Dyke Road, a slight increase of about 30mm in water level was observed, which is considered negligible in the context of the predicted flood depths for a 1% AEP flood event.

The flood modelling indicates that maximum flood extents (out of bank flooding) from the River Corrib is predicted to occur for approximately 9 days during the Q100 (1% AEP) event and 27 days during the Q1000 (0.1% AEP) event. However, it is important to note that these scenarios represent extreme, worst-case conditions.

2 - Appropriate mitigation measures have been integrated into the development design in response. The proposed measures include flood-resistant construction techniques, as well as proactive evacuation plans to ensure the safety of residents and users. These plans will provide clear procedures for emergency evacuation, with designated routes leading to safe areas above the 1% AEP and 0.1% AEP flood levels, ensuring that in the unlikely event of such extreme flooding, the potential risk to life, property, and the environment is minimised.

Thus, while the modelling provides an assessment of worst-case flood risk, the development has been carefully designed to incorporate robust flood management measures and emergency response protocols, making it resilient to even the most extreme flooding scenarios. Consideration has also been given to how the development will be serviced in both the 1% AEP and 0.1% flood event levels.

In accordance with the Flood Risk Management Guidelines, the sequential approach has been applied throughout the development process. The Sequential Approach Principle is illustrated in the accompanying figure and demonstrates that the development complies with these guidelines.



Figure 37 – Sequential Approach Principle in Flood Risk Management

Concluding Points: The accompanying Site-Specific Flood Risk Assessment prepared by AECOM concludes by noting that the potential flood risk at the site of the proposed development has been assessed and that hydrological, infrastructure and social risk have been assessed with the introduction of mitigation measures (specifically set out in Section 5.5) of the document will adequately manage these risks.

The report notes that the Planning System and flood Risk Management Guidelines classify vulnerability of different types of development from a flood risk perspective and that residential development is highly vulnerable development and should be located in Flood Zone C. The proposed development is located in Flood Zone A and as a result needs to satisfy the requirements of the justification test, which have been set out above in Table 14 and Site Specific Risk Assessment prepared by AECOM.

The proposed development has fully satisfied the Development Management Justification Test as outlined in the Guidelines for Planning Authorities on Flood Risk Management. The flood risk to the development has been shown to be manageable, with measures in place to mitigate impacts both on the development itself and on neighbouring areas. Therefore, it can be concluded that the proposed development will not exacerbate flood risk elsewhere and is consistent with both the guidance and the overall strategic planning objectives for flood risk management.

8.7 Guidance on Appropriate Assessment for Planning Authorities, 2009

**Appropriate Assessment of
Plans and Projects in
Ireland**

**Guidance for Planning
Authorities**

Under Article 6(3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e., SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Act, 2000 (as amended).

We confirm that an Appropriate Assessment Screening Report and subsequent Natura Impact Statement has been prepared by Scott Cawley and forms part of the application documentation.

9 Galway City Development Plan 2023-2029

The information set out below considers the site zoning and key development objectives and development management standards. The Galway City Development Plan 2023-2029 is the relevant statutory Development Plan governing the subject site. This is a relatively new Development Plan and this context, save for any variations to the Plan, will remain in force for 6 years.

9.1 Core Strategy

Section 1.4 of the City Development Plan sets out that the main focus of the Core Strategy is to demonstrate that there is a reasonable balance between the quantum of zoned, serviced lands included for residential use and the estimated demand for housing based on the projected population targets for the plan period.

Section 1.4.2 of the Development Plan states that the NPF sets out a targeted pattern of growth for Galway City and Suburbs to 2040 of between 40,000 – 45,000 people to have at least a population of 120,000 population in total. The RSES also sets out that a population growth target of at least 120,000 population over the next 20 years for the city. Galway City is expected to become a city of scale and a key driver of growth and prosperity for the Northern and Western Region.

Year	2016 (CSO Census)	2026 (Projection)	2031 (Projection)
Population	79,900	102,900 (+23,000)	114,900 (+12,000)

Table 15 – Population Projections for Galway City & Suburbs

The figure below identifies the Core Strategy areas for growth and enhancement. The subject site is identified as a Regeneration and Opportunity Site in part located within the City Centre Area. Section 1.9 of the Development Plan sets out that “the designated Regeneration and Opportunity Sites are deemed critical to the delivery of a compact, liveable city. These sites through regeneration, consolidation and delivery of a broad mix of uses can create new vibrant neighbourhoods, supported by community infrastructure, new public spaces, an offer of choice in house types and tenures and demonstrate the advantages of sustainable urban living.”



Figure 38 – Core Strategy Map with Subject Site in Red

Section 1.4.3 of the Development Plan estimates that there will be a need **at a minimum** for an additional **4,245** housing units in the city over the plan period up to the end of 2028. The table below sets out the estimated housing need taking into account an ‘existing’ unmet need for 186 units. A total demand of 4,433 housing units is estimated over the plan period.

	2023	2024	2025	2026	2027	2028	Total
Total Housing Need	776	743	702	713	711	790	4,433
Convergence Projections	744	711	670	681	679	758	4,245
Existing Need	31	31	31	31	31	31	186

Table 16 – Total Annual Housing Need 2023-2028

Section 1.5.2 provides a composite picture of lands zoned and identifies that zoned lands can accommodate the housing target of 4,433 for the period of the Plan as per the breakdown and allocation in the table below.

Zoning	Potential Development Yield Cumulative	Tier 1 / Yield	Tier 2 / Yield	Strategic Reserve
R – Residential Zoned Lands	5,381	4,421	440	520
Regeneration / Opportunity / Infill	1,590	1,390	200	1,820
Ardaun Phase 1	500	/	500	1,480
Ardaun Phase 2	2,660	/	/	2,660
R2 – Residential 2 Zoned Lands low density	60	/	/	/

Table 17 – Settlement Capacity Audit'

Further, Section 1.5.3 of the Plan states that “major potential exists in particular on the priority regenerations sites at Ceannt Quarter, the Inner Harbour, **Headford Road**, Sandy Road and Crown Quarter. The development of housing at these locations in conjunction with other mix of uses can improve the general environment and revitalise and transform these to vibrant, living locations. The location of the priority sites in the neighbourhoods of the City Centre and Inner and Established suburbs will contribute significantly to achieving the national and regional planning strategy...”



Figure 39 – Galway City Neighbourhood Areas

From the figure above, the subject site is within the 'Inner Residential Areas', straddling the 'City Centre Residential' areas. Therefore, for Core Strategy purposes, **it is our considered view that the subject site is located within the 'Inner Residential Area'.**

Table 1.9 of the City Development Plan sets out the residential unit yield attributed to Regeneration / Opportunity Sites. Chapter 10 of the City Development Plan identifies 19 no. regeneration / opportunity sites and we have broken them down into the corresponding neighbourhood areas as per Table 1 in Appendix III below.

The subject site designated as the 'Dyke Road Regeneration Site' and is one of five sites within the Inner Residential Area with an estimated yield of 250 no. residential units.

It is important to set out that these yields are overall 'targets' as opposed to 'upper' or 'maximum' limits.

Table 2 in Appendix III reviews the extant permission on all regeneration sites since September 2021 as the Core Strategy Chapter accounts for extant permissions up until September 2021 and reviews the remaining area yield. It is noteworthy that the Outer Suburbs (West) area has already exceeded the residential yield for infill development by 77 residential units through the Knocknacarra District LRD permission for 227 no. apartment units, which is clear precedent that these yields are targets as opposed to maximum limits. There is another regeneration site within this Outer Suburbs (West) area which is expected to provide a minimum of 50% of the entire development for residential uses. Should potential development proceed on this site, it would further exceed the residential yield target for this area.

Our review above identifies that there is an overall yield for 'Inner Residential Areas' of 250 units, which includes the Dyke Road Site. There are 5 regeneration sites identified as having the potential for delivery on this yield, some of which (sites 6 and 7) require the publication of an LAP before they can come forward. Notably, there is 1 recent permission in place for the delivery of 70 units at Site 9. We note also that there is no recent permission (since 2021) for a new residential development at Site 8. We are aware of a permission for a hotel development previous to 2021 for Site 8, Reg. Ref. 07/667 extended by 14/17 and this permission had expired in March 2019.

With the above in mind, there remains a target yield for 180 no. residential units in the Inner Residential area. The current proposal for the Phase 1 Corrib Causeway site delivers a residential yield of 219 units.

It is important to acknowledge that the Core Strategy and Settlement Capacity Audit were developed according to the now-outdated Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities (2009). These guidelines have been replaced by the recently introduced Sustainable Residential Development and Compact Settlement Guidelines (2024). Consequently, the City Development Plan Core Strategy is based on policies and guidelines that no longer reflect current standards and practices.

The main focus of the Core Strategy is to demonstrate that there is a **reasonable balance between the quantum of zoned, serviced lands included for residential use and the estimated demand for housing based on the projected population targets for the plan period as set out in the Development Plan.**

Given these considerations, it is submitted that there is considerable flexibility within the Core Strategy in terms of the delivery of additional units over and above the target figures set out in Table 17 above. The latest data indicates that there is scope to adjust the strategy to better meet the evolving housing demands and to align more closely with updated planning guidelines and policies. The First Revision to the NPF has been revised based on the Economic & Social Research Institute (ESRI) publication of *“Population Projections, The Flow of New Households and Structural Housing Demand,”* published on 2nd July 2024. This report provides estimates of structural (demographic) housing demand at a regional level. The report highlights that this recent data means that **many previous population scenarios for Ireland have underestimated population growth over the short term.**

As such, the targets established in the City Development Plan serve as broad guidelines rather than rigid limits, designed to accommodate a range of housing needs and to support the city’s overall growth strategy. The proposed development of 219 no. social and affordable apartment units on a site identified for regeneration, aligns directly with the core strategy of the Galway City Development Plan. The development supports the broader objective of accommodating population growth while ensuring that Galway City becomes a more compact, vibrant, and sustainable urban centre. The integration of a broad mix of housing types and tenures, along with the focus on creating a high-quality living environment, is fully in line with the strategic goals set out for the city’s future development.

9.2 Zoning

The subject site is primarily zoned **“Enterprise, Light Industry and Commercial” (CI).**

The ‘CI’ zoning objective sets out the following:

“To provide for enterprise, light industry and commercial uses other than those reserved to the CC Zone”.

Uses which are compatible with and contribute to the zoning objective include:

*‘Warehousing / Storage, Retail of a type and of a scale appropriate to the function and character of the area, Specialist offices, Offices of a type and of a scale appropriate to the function and character of the area, Light Industry, Accommodation for the Traveller Community, Childcare facilities, Community and cultural facilities, **Allow for the development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.***

Uses which may contribute to the zoning’s objectives, dependent on the CI location and scale of development include:

*‘General industry (small scale), Service retailing, **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 3. Exceptions can be***

accommodated on publicly owned lands on the Regeneration Sites at Headford Road and Sandy Road which can provided predominantly residential uses in accordance with national housing policy, Offices, Car Parks (including heavy vehicle parks), Waste management facility, Public transportation facility, Public utilities.'

For clarity, Section 11.2 of the Development Plan sets out that in conjunction with zoning objectives, additional requirements for development on Regeneration and Opportunity Sites are set out in Chapter 10, which are discussed in further detail below in Section 9.3.

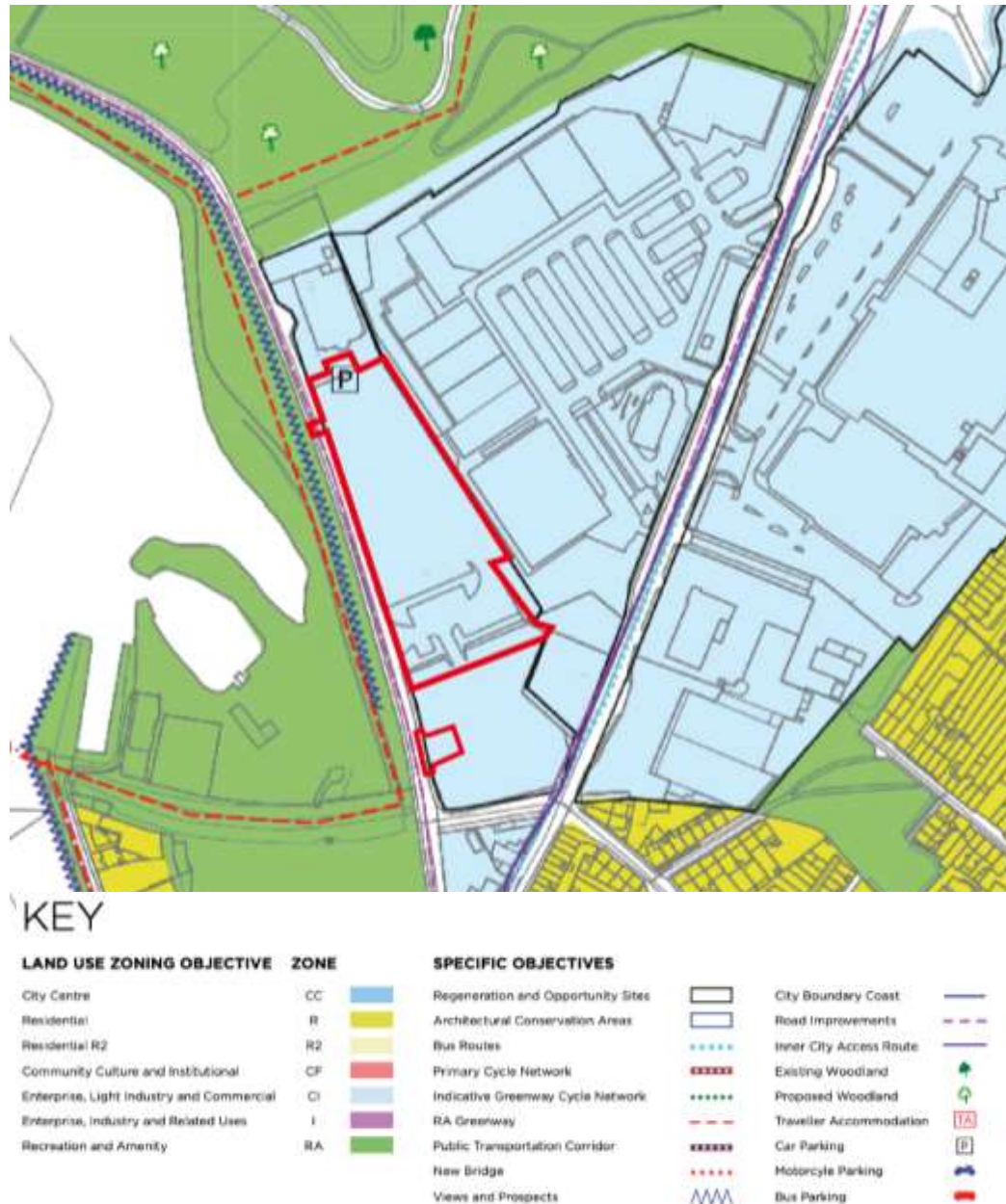


Figure 40 – Extract Zoning Map with Site outlined in Red

It is worth setting out that there are number of development objectives that apply to the site and the local area as follows:

- There is car parking identified for the Dyke Road site. It is considered that the Development Plan acknowledges the current use of the subject site as a public car park. There is no explicit policy or objective for the lands to remain in use as a car park.

We note that Chapter 4 of the Development Plan references the following:

“A replacement of the existing surface car park on the Dyke Road is accepted on lands included in the Headford Road Regeneration area where re-development accommodating the car parking in a multi-story format would enable more efficient use of the land.”

As such, there is potential for a multi-storey car park to be delivered as part of other future redevelopment phases of the Headford Road area. The subject site has the benefit of a regeneration and opportunity site designation which includes for the provision of residential development. In addition, in terms of supporting compact growth and the principle of the ‘15-minute city’, the subject site is located in a highly accessible location promoting sustainable modes of transport for future residents. In addition, the proposed development is a much more efficient use of lands than a surface or multi-storey car park.

This is marked by the ‘P’ on the map above.

- There is a protected view from the Dyke Road and Coolagh Road encompassing the River Corrib and Coolagh Fen. V2 refers. The proposed development is subject of a Landscape Visual Impact Assessment as part of the EIAR and this protected view was assessed.

This is marked by the blue line on the opposite side of the Dyke Road on the map above.

- There are road improvements identified for Dyke Road and Headford Road. The proposed development does not interfere with any future road improvement schemes.

This is marked by the purple/pink dashed line on the map above.

- There is Recreational Amenity Greenway located to the north of the site and on the opposite side of Dyke Road. The proposed development will provide greater interconnectivity for pedestrians to this greenway through the provision of a new pedestrian crossing at Dyke Road.

This is marked by the red dashed line on the map above.

- There is a pedestrian bridge over the River Corrib, which is of particular note given the connectivity it offers to the University. This future bridge will provide significant further accessibility for pedestrians and cyclists.

This is marked by the red arrows across the River Corrib.

- There is an Inner City Access Route and Bus Routes identified to the south of the site along the Headford Road.

These elements are marked by the purple line (Inner City Access Route) and broken blue line (Bus Route) respectively.

The proposed development is fully consistent with the subject site’s zoning objective which supports mixed-use development, including residential uses, within identified Regeneration and Opportunity Sites. In this context, residential development is considered compatible within the CI zone, provided it aligns with the specific objectives of the Regeneration and Opportunity Sites as detailed in the development plan. The proposal is fully aligned with this framework, as it is situated within the Headford Road Regeneration Area, which is explicitly identified as an area for sustainable residential development and urban regeneration. The development seeks to provide much-needed residential accommodation while also contributing to the revitalization of the area through the integration of mixed-use spaces, commercial uses, and community infrastructure, all of which are key elements in delivering a well-balanced, sustainable neighbourhood. Further, the proposal has taken into account the various development objectives and planning constraints that apply to the site and surrounding area.

9.3 Development Plan – Specific Objectives

Section 10.36. of the Development Plan sets out a number of specific objectives that apply to various sites across Galway City. Specific Objectives 3, 4 and 5 apply to the Dyke Road Site as follows:

Specific Objective 3 – *Prepare a **Local Area Plan for the Headford Road Area** (south of the Bodkin junction) within the period of the plan.*

There is currently no timeframe for preparation of this document. However, it is anticipated that the process may begin sometime in 2025.

Specific Objective no. 4 – *“In advance of the adoption of the Headford Road LAP, any proposals to advance development of the **Dyke Road Regeneration site by the GCC/LDA**, having regard to the socio-economic benefits for the city, will be considered, subject to the **preparation of a masterplan.**”*

A comprehensive development framework has been prepared in collaboration with GCC and LDA. This development framework outlines the proposed development and includes contributions from a wide range of specialists, including architects, urban planners, engineers and transportation experts. The *Development Framework Document*, prepared by MOLA Architecture, is an essential part of the proposal and has been submitted as part of the planning application. The document presents a vision for the future of the Dyke Road Regeneration site, ensuring that it contributes positively to the urban fabric of Galway, aligns with the city’s growth objectives, and provides social and economic benefits to the local community. The proposal adheres to the guidelines of the Development Plan and provides a strategic framework for the regeneration of the site.

Specific Objective no. 5 – *“Require the **preparation of masterplans and spatial frameworks** to inform development proposals.”*

While no formal statutory masterplan process is currently required, this Phase 1 Corrib Causeway – Dyke Road Regeneration proposal fully adheres to the spirit of this objective by providing a detailed, well-considered development framework that outlines how the site can be developed in a way that maximises its potential and responds to the needs of the community.

This collaborative approach aligns with Galway City’s broader strategic goals of creating a compact, liveable, and well-connected urban area. It also supports the objectives set out in the Galway City Development Plan, helping to ensure that development on the Dyke Road site will contribute to the city’s growth and the creation of a vibrant, sustainable urban neighbourhood.

The proposed development is fully consistent with the specific objectives set out in Section 10.36 of the Galway City Development Plan. The preparation of a comprehensive development framework addresses Specific Objective 4 and Objective 5, while the development aligns with the broader vision for the city outlined in Specific Objective 3. The proposed development will contribute positively to the regeneration of the Dyke Road site and will support the socio-economic development of the surrounding area, enhancing Galway’s urban landscape in a sustainable and forward-thinking manner.

9.4 Strategic Regeneration / Opportunity Site

The subject site has been identified within the Galway City Development Plan 2023-2029 as a **“Regeneration and Opportunity site”**. The Core Strategy promotes the development of regeneration and opportunity sites. This section of the Development Plan sets out a clear vision for this site.

Policy 10.2 of the Development Plan sets out the following in relation to regeneration and opportunity sites:

“Facilitate and enable the redevelopment of strategic Regeneration and Opportunity Sites in the city to support the sustainable and compact growth of the city which will add value and create more attractive places in which people can live and work and achieve alignment

with the National Strategic Outcomes of the NPF and the Regional Policy Objectives of the RSES and implementation of the Core Strategy.

Give priority to the development of the strategic Regeneration and Opportunity sites in line with core strategy, in particular to deliver new residential neighbourhoods, on lands supported by a number of land use zonings including CC and CI, as referenced in the land use zoning objectives in Chapter 11.”

Section 10.7 of the Development Plan sets out the Headford Road Regeneration Sites.

“The regeneration of these lands is an identified Growth Enabler in the NPF. They have considerable advantages given their proximity to the city centre, the existing infrastructure available and the extent of natural heritage and amenity resources. Their regeneration offers a sustainable expansion of the city centre, linked in to the public transport and pedestrian network and has capacity to reinforce the prime role of the city centre in both Galway City and the MASP area and has potential to consolidate and enhance Galway’s position as a leading regional city. There is also an opportunity to support city centre living, with a new residential community.”

The Dyke Road Car Park Regeneration Site is identified as one of three Headford Road Regeneration Sites:

*“This City Council owned site measures approximately 1.79 hectares. **It is a Land Development Agency (LDA) national priority site for delivery of housing and other uses in collaboration with the City Council.** The site has the advantage of scale, at a location close to the banks of the River Corrib and Terryland Forest Park with potential to exploit good open aspect of the River. The site is currently occupied by the Black Box Theatre, an adaptive, multipurpose, performance space, and an extensive surface car park that supports the theatre, the adjacent retailing and provides commuter car parking. **The redevelopment of this site by the LDA has potential to transform this area and be a catalyst for regeneration of the wider Headford Road area.** Investment at this location can create a driving force for further similarly scaled projects on the adjacent regeneration sites. **The scale of the development could transform the character of this greater area, reversing the current sterile environment to one of a livable urban quarter.***

As an LDA project, the residential element of development will include for affordable housing options.** Other uses may include office/commercial use as well as provision of civic, cultural and arts infrastructure. There is potential to explore innovation and research uses allied to University of Galway with enhanced linkage to the university made possible with the proposed new pedestrian and cycle bridge. **Any development will be required to be an exemplar in architecture, urban design and placemaking and deliver a high-quality public realm linked to the wider green network.

In the event that opportunities arise to progress development proposals to planning consent stage in advance of the adoption of a LAP, these proposals will include for a Masterplan which will take cognisance of the integrated development strategy included for in the framework plan for this area. The Masterplan will be required to have regard to guidance set out in Chapter 8. Flood risk assessment of the lands was undertaken including detailed modelling and identification of possible flood mitigation measures in 2012 and will be required to be reviewed in the context of the Coirib go Cósta Galway City Flood Relief Scheme.”

The Development Plan clearly states that in advance of the adoption of an LAP for all 3 regeneration sites, proposals for this site will require a masterplan which will take cognisance of the integrated development strategy included for in the framework plan for this area. The subject application is accompanied by a Development Framework Document which satisfies the masterplan requirement. In addition, the accompanying Development Framework and Architectural Design Statement prepared by MOLA Architecture have had regard to the guidance set out in Chapter 8.

The proposed development is fully consistent with the vision and objectives set out in the Galway City Development Plan 2023-2029 for Regeneration and Opportunity Sites, particularly those identified within the Headford Road Regeneration Sites. The site's designation as a strategic regeneration area aligns directly with the core goals of supporting the sustainable and compact growth of Galway City, as outlined in Policy 10.2. This proposed development contributes significantly to the creation of a more attractive, vibrant residential neighbourhood while also adding value to the city's fabric by providing high-quality housing and public open spaces that enhance the quality of life for residents and visitors alike.

9.5 Policies

A comprehensive analysis and evaluation of the proposed development's alignment with the policies and objectives outlined in the City Development Plan can be found in Appendix IV of this report.

9.6 Development Standards

9.6.1 Unit Mix

Policy 3.1 of the Development Plan sets out that Planning applications for multiple housing units will be required to include a Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient range in unit sizes and types to satisfy community mix including the demographic trend of reduction in average household sizes. The needs of special groups such as older persons and persons with disabilities will be required to be considered as part of this process.

We refer An Bord Pleanála to the accompanying Statement of Housing Mix Report for a full demographic and existing housing analysis detailing how the proposed unit mix provides a sufficient range and size of units. The proposed unit mix is as follows:

- 109 x 1-bed (1- or 2-person household) units = 49.8%
- 22 x 2-bed (3-person household) units = 10%
- 78 x 2-bed (4-person household) units = 35.6%
- 10 x 3-bed (5-person household) units = 4.6%

This mix ensures that the development provides a sufficient range of unit types, from smaller 1-bed units suitable for singles or couples, to larger 2- and 3-bed units that accommodate families and households with more members. The inclusion of 1-bed units addresses the demographic trend of smaller household sizes, while the 2-bed and 3-bed units provide options for growing families or those who require more living space.

In addition, we note that there are no specific unit mix requirements for social and affordable housing set out within the Galway City Housing Need Demand Assessment.

As part of the proposed housing mix, careful consideration has been given to the needs of special groups, particularly older persons and persons with disabilities. A total of 22 no. universally designed units are proposed within the scheme. We refer An Bord Pleanála to the accompanying *Universal Design Statement* prepared by MOLA Architecture for further information in this regard.

9.6.2 Building Height and Density

With respect to building height, developments shall specifically have regard to the Galway Urban Density and Building Height Study (2021) which sets out the framework for density and building height in the city. Part D Spatial Strategy outlines the potential for appropriate building densities and heights for new development in each geographic zone and sub zone of the city.

Section 17.3 of the document states that the regeneration of the Headford Road area has the benefit of permission for development rising to **7 storeys in height**. However, there is **scope for greater height**.

Within the study the following development parameters are set for height and residential density generally:

- **Density** - Redevelopment of the Headford Road area provides significant opportunities. There is scope for greater density with a mixed-use development capacity to deliver 50+ dph. Application of density standards will be balanced with general criteria such as standards of layout and design, architectural quality and provision of open space.
- **Height** - Within the Headford regeneration area where large sites are capable of generating their own character, there is scope for greater height if designed carefully as demonstrated in approved developments.

Given the scope for increased residential densities and height within the Study for the Headford Road area, the proposed development is in line with the Urban Density and Building Height Study, 2021.

9.6.3 Site Coverage and Plot Ratio

Section 11.9.2 of Development Plan sets out that the following applies to CI zoned sites:

- Max Site Coverage 0.80
- Max Plot Ratio 1.25

The subject proposal provides a site coverage of 0.35 which is within with the Development Plan's maximum standard for CI zoned sites. A plot ratio of 1:1.90 is proposed which slightly exceeds the maximum site plot ratio of 1.25 stipulated by the Development Plan.

The slightly higher plot ratio supports the principle of sustainable urban living, maximising the use of available land in a location with excellent access to public transport, amenities, and services. The site's proximity to major transport links, including bus routes, train stations, and cycle paths, means that the development is ideally located for sustainable transport options. Encouraging higher-density development in such locations aligns with the Galway City Development Plan's objective of reducing reliance on private cars and promoting more sustainable forms of transport, such as walking, cycling, and public transit.

By increasing the plot ratio, the development supports the city's overarching goal of providing more housing within existing urban areas, thereby reducing pressure on peripheral greenfield sites and helping to protect Galway's surrounding natural landscape.

Despite the higher plot ratio, the proposed development ensures the provision of adequate public and private open spaces, enhancing the quality of life for future residents and users of the site. Public spaces, including landscaped areas, pedestrian paths, and cycle routes, have been carefully integrated into the site's design.

Further, we note that An Bord Pleanála had permitted a significantly higher plot ratio on the adjoining site with the permitted, but not yet constructed student accommodation development (for which the same max. plot ratio and site coverage standards apply) as set out in the table below:

Reg. Ref.	Permitted Plot Ratio
Reg. Ref. 20184 & ABP-309673-21	1:3.1
Reg. Ref. 22259	1:2.66

Table 18 – Permitted Plot Ratio of Adjoining Site

We note that the Inspector on consideration of the proposed plot ratio and site coverage for Ref. ABP-309673-21 had noted the following:

“On lands zoned CI the permissible plot ratio under the CDP is 1.25:1. The proposed development has a plot ratio of 3.1:1. The Development Plan standard for site coverage is 0.8/80% with the proposed development having site coverage of 50%. The GCDP does allow for

higher densities where development has regard to the prevailing pattern, form and density of the area. In this instance the overall quantum of development is higher than the prevailing density. However, as the scale of development is relatively modest in the context of the wider urban area, and having regard to the sites accessible urban location, I consider that refusal would not be warranted on the basis of density alone.”

As such, it is our respectful submission that the proposed development is wholly appropriate having regard to the prevailing pattern, form and density of the area, given this precedent example above and overall modest overall scale in the context of the wider urban area and having regard to the subject site’s accessible urban location.

9.6.4 Car Parking

Section 11.3 sets out that the approach to car parking for the purpose of assessment of planning applications is applied to developments based on spatial location, public transport services with flexibility to achieve performance-based outcomes, in particular for infill and brownfield developments.

This approach will be applied to the varying standards between the four defined neighbourhood areas and are centred on the following:

- Parking is set at a maximum level of provision.
- Flexibility is encouraged where grouped car parking is provided.
- Reduced requirement is encouraged in mixed use areas in particular where peak demands do not coincide and where multi-purpose trips are anticipated and in circumstances where mobility management measures are deemed satisfactory.
- Consideration of reduction in requirements will also apply along existing and planned strategic public transport corridors depending on the prevailing level of service at that time.

In the city centre area where the GTS includes for significant investment in sustainable modes and where the most strategic Regeneration and Opportunity Sites are located the requirements for car parking will be linked to performance-based outcomes. All developments will be subject to the standard traffic and transport assessments.

Section 11.3.4 (d) sets out that in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances.

1. **City Centre Location:** The site is located in close proximity to Galway's city centre, an area that benefits from excellent access to public transport, services, and amenities. As outlined in the development plan, the city centre is a strategic area for regeneration and compact growth, where the emphasis is placed on reducing reliance on car use and encouraging sustainable transport options. This location naturally supports a reduction in car parking provision, as residents and users of the development will have convenient access to public transport, cycling infrastructure, and local services within walking distance.
2. **Proximity to Public Transport and Sustainable Mobility:** The site is well-connected to existing and planned public transport corridors, including the future Connemara Greenway and Headford Road cycle routes. Additionally, the development is strategically located to benefit from the ongoing investment in sustainable mobility as part of the Galway Transport Strategy (GTS), which encourages a reduction in car use. As a result, the reduced car parking provision aligns with the city’s sustainable transport objectives, supporting the shift towards active travel and public transport as the primary modes of transport for residents.
3. **Regeneration and Opportunity Site:** The subject site is designated as a Regeneration and Opportunity Site within the Galway City Development Plan. The policy for these sites prioritizes sustainable and compact growth and encourages developments that are well-integrated with public transport and pedestrian networks. Given the site’s

strategic location, the proposal seeks to support the regeneration objectives by providing a reduced number of car parking spaces, thereby encouraging a more sustainable and walkable urban environment that aligns with the overarching goals of the regeneration strategy.

4. **Mixed-Use and Multi-Purpose Trips:** The proposed development is designed to accommodate a range of uses, including residential units and potentially community and commercial facilities. In accordance with the policy, flexibility is encouraged in mixed-use areas, where peak demands for car parking may not coincide and where multi-purpose trips are anticipated. The development is situated in an area where residents and visitors are likely to use a variety of sustainable modes of transport, further justifying the reduced provision of car parking spaces.
5. **Traffic and Transport Assessments:** As required by the development plan, a traffic and transport assessment has been carried out for the proposed development to ensure that the reduced car parking provision is appropriate for the site's context. The assessment confirms that the development is well-served by public transport, has access to key cycling routes, and is located within a highly walkable area, ensuring that the reduced parking provision will not compromise the functionality or accessibility of the site.
6. **Masterplan Alignment:** The development aligns with the broader masterplan for the Headford Road Regeneration Sites, which promotes higher density development, reduced car parking provision, and an emphasis on sustainable transport. The development's design, which minimizes car parking, supports this broader vision for a more sustainable, urban, and well-connected community.
7. **Census 2022 Travel Data:** 2022 Census data for means of travel to work, school or college for the District Electoral Divisions intersecting the subject site at 1 km radius showed that sustainable transport modes on foot, bicycle, bus, minibus, coach or train is the leading means of travel across the surrounding area at 43.3%. It is therefore reasonable to assume that future residents of the proposed development will exhibit similar commuting patterns, with a substantial proportion of residents opting to use public transport, walking, cycling, or car-sharing as their primary modes of travel. This data supports the rationale for reducing the number of private parking spaces provided. We refer An Bord Pleanála for further details on the Census Data in Section 8.1 of this report.

The proposed car parking provision is fully consistent with the guidance set out in Section 11.3 of the Galway City Development Plan. The reduction in car parking spaces is appropriate given the site's central location, its proximity to public transport, the site's regeneration context, and the proposed development's alignment with sustainable mobility strategies. The proposal not only supports the city's goal of reducing car dependency but also contributes to the creation of a more liveable, walkable, and sustainable urban environment.

9.6.5 Electric Vehicle Parking

Section 11.11.2 of the Development Plan sets out that:

- *New buildings or buildings undergoing major renovations (containing one or more than one dwelling), which has more than 10 car parking spaces, shall install ducting infrastructure for each car parking space to enable subsequent installation of recharging points for electric vehicles."*

We confirm that 10% of the proposed car parking spaces will have EV Charges and the remainder of the spaces will be ducted for future EV use.

9.6.6 Bicycle Parking

Section 11.3.1 (h) sets out the cycle parking standards. The Development Plan notes that all cycling facilities will be assessed in accordance with the NTA's National Cycle Manual.



Type	Standard for Apartments	Minimum Requirement	Proposed
Long Stay (Residential)	1 space per bedroom	109 x 1-bed = 109 spaces 22 x 2-bed = 44 spaces 78 x 2-bed = 156 spaces 10 x 3-bed = 30 spaces Total = 339 spaces	345 spaces incl. 15 spaces for cargo bike
Short Stay (Visitor)	1 space per 2 units	219 / 2 = 109.5	110 spaces incl. 8 cargo bike spaces and 2 universally accessible spaces + 10 no. spaces for childcare facility staff
Total		449	465

Table 19 – Bicycle Parking Minimum Requirement vs Proposed Development

9.6.7 Open Space

Section 11.4.4 of the City Development Plan outlines the open space requirement for the ‘City Centre Area’ as follows:

*“When residential content is proposed in the city centre, an area the **equivalent of 30% of the gross floor area of residential content shall be provided as open space or the standards as provided in the Design Standards for New Apartments - Guidelines for Planning Authorities (2020) shall be applied.** In situations where effective open space cannot be provided on site due to the location of existing buildings, inappropriate aspect, small scale or for other reasons, a relaxation in this standard may be considered. Innovative ways of providing open space will be open for consideration including roof gardens, winter gardens and balconies having considered the characteristics of the site and the capacity for the delivery of sustainable open space.”*

It is unclear if the above relates to communal or public open space provision, but it is assumed to be communal open space in that reference is made to the *Design Standards for New Apartments - Guidelines for Planning Authorities (2023)*, which contain standards for communal open space.

However, it is noted that Section 11.9.3 of the Development Plan states that **“the minimum open space requirement which will apply in CI zones is 5% of the total site area and 50% of the gross floor area of residential content where residential content is proposed.** In situations where effective open space cannot be provided on sites due to the location of existing buildings, inappropriate aspect, small scale or for other reasons, the Council may consider a lesser standard.

*On CI zoned lands, where it is proposed to provide, above ground level, **an amenity open space area in association with residential accommodation, this space may be accepted as open space for site coverage purposes** where it is designed in accordance with best practice guidelines and where the management regime is integrated into design proposals. Microclimate conditions shall be a factor in the design and layout.”*

It is also unclear if the above relates to the provision of communal open space or public open space. Based on the content of the current Development Plan, it is not specified or differentiated whether provision is for public or communal open space or both.

It is worth noting that the Sustainable Residential Development and Compact Settlement Guidelines published in January 2024 have set out guidelines on public open space, which are limited to a range between 10-15% of the net site area.

Therefore, it is considered that the site will be subject to the provision of a range of 10% - 15% public open space to comply with the new Compact Settlement Guidelines. The requirements of the



Design Standards for New Apartments - Guidelines for Planning Authorities (2023) be applied for communal open space.

The proposed development provides 1,813 sqm of public open space equating to 12.5% of the net site area (0.95 ha).

A total of 1,650 sqm of communal open space is proposed exceeding the minimum requirement of the Apartment Guidelines (2023).

Communal Open Space

Section 11.3.1 (c) sets out that communal open space in all types of residential development should:

- *Be visually as well as functionally accessible to the maximum number of dwellings within the residential area.*

Response:

The communal open space is located to the east of the subject site. The space is visually and functionally accessible to all of the proposed the residential units. The space is designed to be easily reached via the building cores and through dedicated pedestrian pathways at the north eastern and south eastern boundaries, ensuring that all residents, regardless of their location within the development, can access and use the space. The design of the open space incorporates a clear spatial hierarchy, ensuring that all areas are easily accessible, while also offering opportunities for relaxation and recreation.

- *Be overlooked by residential units.*

Response:

A key feature of the design is that the communal open space is overlooked by the surrounding residential units, which promotes natural surveillance and safety. The strategic placement of windows along the facades of the residential blocks allows for unobstructed sightlines into the open space, fostering a sense of security and encouraging social interaction. This arrangement also contributes to the overall safety and well-being of the residents, creating an environment where the space feels both safe and welcoming.

- *Integrate natural features (for example natural contours, outcrops of rock), where appropriate, as part of the open space.*

Response:

The design thoughtfully integrates natural features within the communal open space, taking inspiration from the nearby River Corrib and Terryland Forest Park. The space includes a variety of native plants, wildflower meadows, trees, and natural topography such as gentle slopes and mounds. These elements not only enhance the aesthetic appeal of the space but also encourage biodiversity, offering a habitat for local flora and fauna. The naturalistic design creates a harmonious connection between the built environment and nature, enhancing residents' experience of the space and contributing to the overall sustainability of the development. In addition, natural play features are proposed including natural logs and boulders.

- *Be viable spaces, linked together where possible, designed as an integral part of the overall layout and adjoining neighbouring communal open spaces.*

Response:

The communal open space is designed as a viable and integrated area, with a series of interconnecting spaces that allow for different types of activity. These spaces range in character, from more active play zones for children to quieter areas for relaxation and contemplation. The design ensures that these spaces are not isolated

but are connected through landscaped paths, promoting easy movement and interaction. The space functions as a cohesive whole, contributing to the sense of community and supporting a variety of uses for residents of all ages.

- *Not include narrow pedestrian walkways, which are not overlooked by house frontages.*

Response:

The design of the communal open space avoids the creation of narrow, unoverlooked pedestrian walkways. Instead, the space incorporates wide, open pathways that encourage movement and connectivity while ensuring that all areas of the open space are visible and accessible. This design ensures safety and convenience for residents and discourages the creation of hidden or isolated spaces, which could undermine the security and usability of the area.

- *Create safe, convenient and accessible amenity areas for persons of all abilities regardless of mobility or age.*

Response:

The communal open space is designed with universal accessibility in mind. All areas of the open space are level and easily accessible to residents with reduced mobility, including wheelchair users and parents with prams. The paths are wide and gently sloping, and seating areas are strategically placed for ease of access. The design ensures that the space is usable by all residents, regardless of their physical ability, promoting inclusivity and encouraging use by a diverse range of people.

- *Provide for quality hard and soft landscaping and incorporate urban greening and encourage biodiversity.*

Response:

The landscaping within the communal open space has been carefully considered to create an aesthetically pleasing and ecologically sustainable environment. High-quality hard and soft landscaping features are incorporated, including native trees, wildflower meadows, and pollinator-friendly plants, which will support local wildlife and enhance the overall biodiversity of the area. The space has been designed to not only be visually appealing but also to contribute positively to the environment and local ecosystem, providing a natural retreat for residents and promoting sustainable urban greening.

The design of the communal open space within the proposed development fully meets the objectives outlined in Section 11.3.1(c) of the Galway City Development Plan. The space has been designed to be accessible, overlooked, integrated with natural features, and inclusive for all abilities. It offers a variety of spaces for both active and passive recreation, encourages social interaction, and enhances the overall quality of life for residents. This well-designed space will not only serve as a focal point for the community but will also contribute to the sustainability and biodiversity of the development, creating a welcoming, vibrant, and high-quality public realm.

9.6.8 Childcare Facilities

Section 11.14 sets out that in general, childcare facilities will be assessed on the following:

- *The suitability of the site / premises for the type and size of the facility proposed, taking into consideration the effects on the existing amenities of the area.*

Response:

The proposed site is highly suitable for the childcare facility due to its location within a well-connected urban setting, close to both residential areas and public transport links. The facility is integrated within the overall development, allowing for easy access by local residents while minimizing disruption to surrounding amenities. The design ensures that

the facility is well-suited to the scale of the development, ensuring both functionality and compatibility with the surrounding residential context. It will be an asset to the community and meet the childcare needs of the future residents of the development.

- *Contribution to placemaking and to the '15-minute city' and walkable neighbourhood concepts.*

Response:

The childcare facility is strategically located within the development to support the concept of a 15-minute city. It contributes to the walkability of the proposed development, allowing parents and guardians to access childcare services within a short walk from their homes. This placement fosters the development of a self-sufficient community, where essential services are located within proximity to residential areas, reducing reliance on car travel and supporting the wider goals of sustainable urban planning.

- *Adequacy of vehicular / pedestrian access and parking provisions, which may be required to include satisfactory and safe collection / drop-off areas where appropriate, for both customers and staff where it is merited by the scale of the development and the resultant intensity of vehicular movements.*

Response:

The childcare facility has been designed with adequate vehicular and pedestrian access to ensure safe, efficient movement for both staff and parents. Dedicated drop-off and pick-up areas have been incorporated into the design, ensuring that vehicular movements do not negatively impact the flow of traffic within and outside the development. The layout has been planned to allow for safe access for both pedestrians and vehicles, with clear signage and traffic management provisions.

- *Availability of public transport facilities in the area.*

Response:

The site is located within an area that is well-served by public transport, making it easily accessible for both staff and parents who may rely on public transport. The proximity to key transport corridors ensures that the childcare facility is conveniently located for families who may not have access to private vehicles, supporting the sustainability and accessibility of the facility.

- *Provision of an adequate outdoor play area within the curtilage of all full day care facilities. This outdoor area should be located to have minimum impact on the amenity of surrounding properties, particularly in residential areas and should also be separate from car parking and service areas.*

Response:

The design of the childcare facility includes a dedicated outdoor play area within the curtilage of the facility, complying with the requirement for such spaces to be provided for full-day care facilities. The outdoor play area is designed to offer a safe, stimulating environment for children. It is positioned to minimise any potential impact on the amenity of surrounding residential properties and is also separated from any car parking or service areas, ensuring that children can play in a safe and protected environment.

- *The design of the structure and capability of it being assimilated satisfactorily into the built environment / site. In this regard appropriate purpose built facilities are encouraged.*

Response:



The proposed childcare facility is incorporated into the proposed building block. The design approach integrates the facility into the broader urban fabric, ensuring it is visually appealing and well-integrated with the proposed development and surrounding context.

- *Where new facilities are proposed, these should comply with all relevant legislation and regulations, in particular the Child Care (Preschool Services) Regulations 2006.*

Response:

The childcare facility is designed to comply with all relevant national regulations and legislation, including the Child Care (Preschool Services) Regulations 2006. This includes considerations for indoor and outdoor space, safety standards, staff facilities, and overall health and safety provisions.

The proposed childcare facility is fully consistent with the requirements set out in Section 11.14 of the Galway City Development Plan. The facility has been designed to serve the needs of the development's residents, contribute positively to the surrounding community, and be an integral part of the wider urban environment. It supports the walkable neighbourhood concept, provides high-quality outdoor play areas, ensures accessibility through public transport and safe vehicular access, and complies with all relevant regulations. This facility will be a valuable community resource, enhancing the quality of life for residents and contributing to the overall success of the development.

Having regard to the foregoing, it is considered that the proposed development aligns with the policies, objectives and standards of the Galway City Development Plan 2023-2029.



10 DRAFT Headford Road Framework Plan, 2009

The Galway City Development Plan 2023 clearly states that in advance of the adoption of an LAP for the Headford Road Area, proposals for all regeneration sites require a masterplan which will take cognisance of the integrated development strategy included for in the **framework plan** for this area.

The framework plan referenced is that of the *Draft Headford Road Framework Plan 2009*. This is a Draft Document that was published in February 2009. We understand that this document was never formally adopted nor has it any statutory basis in planning terms.

In its current context, the design team has taken cognisance of the document in terms of its integrated development strategy for the site. This is a requirement of the Development Plan as set out under Section 10.7 which states:

“In the event that opportunities arise to progress development proposals to planning consent stage in advance of the adoption of a LAP, these proposals will include for a Masterplan which will take cognisance of the integrated development strategy included for in the framework plan for this area.”

The key points to take from the framework plan are set out below.

10.1 Extent of Framework Lands

The lands subject of the framework plan extend to that shown below as outlined in red extending to approx. 30.8 ha.

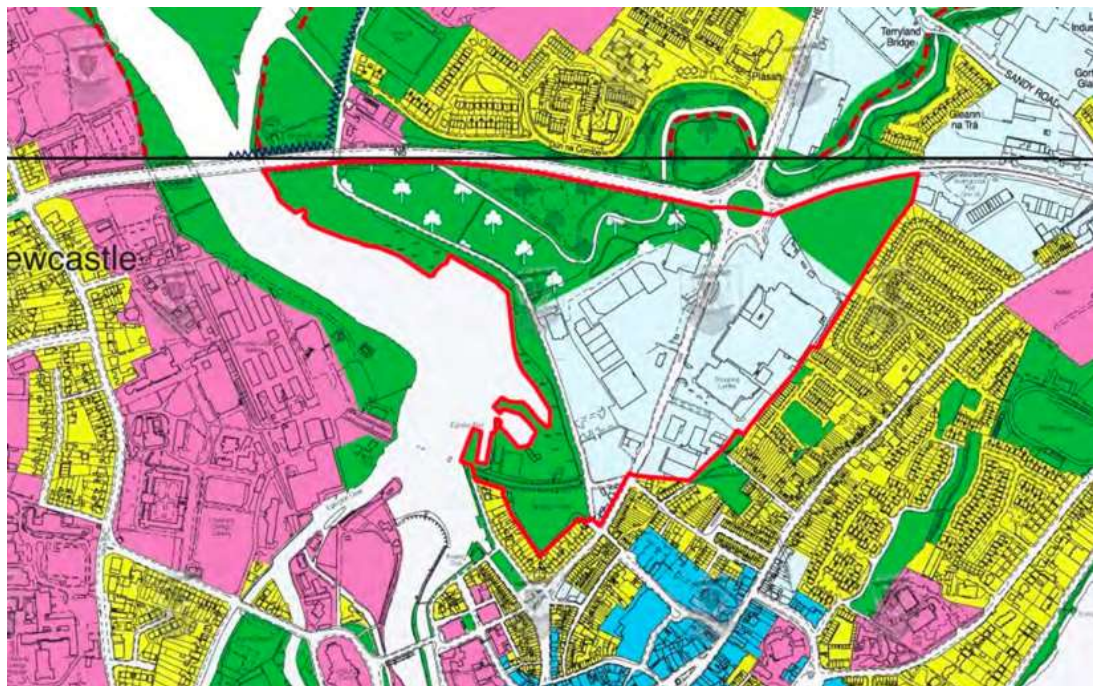


Figure 41 - Extract from Headford Road Framework Plan 2009

The framework lands include a much wider site area including CI and RA zoned lands.

10.2 Vision

The key vision of the Headford Road Framework Plan is to provide for “the comprehensive regeneration and transformation of the Plan area into a vibrant, mixed-use edge of city centre district, and the enhancement and improved utilisation of existing green spaces with proposals that will improve their utility, amenity and ecological value.”

10.3 Key Principles

The Plan draws together and applies the principles of best practice with regard to urban design, landscape design, facilitating sustainable modes of movement, land use planning, energy efficiency, universal access, designing for residential communities, play and recreation, and conservation and enhancement of biodiversity.

Guidance FP1 – Flexibility of the Framework Plan

*“Whilst the provisions of the Framework Plan, including the mix of uses, urban grain, building heights, block format, the streets hierarchy and positioning of streets are policy aims, objectives and targets that the Planning Authority requires adherence to, the Council recognises that **a degree of flexibility is desirable**. However, it is stated that the level of flexibility shall not undermine the policy aims, objectives or targets of the Framework Plan. The overriding consideration is to ensure that the urban design framework, as set out in the Plan, is achieved, including strong levels of permeability through the Plan lands and connectivity between the Plan lands and the city centre.”*

It is evident from the above that there is flexibility in terms of the delivery of the framework proposed.

10.4 Context Plan

The following context plan is set out as the key plan governing the full extent of the LAP lands.



Figure 42 - Framework Context Plan

10.5 The Overall Framework

The overall framework is broken down into primary and secondary elements summarised as follows:

Primary

The primary elements must be implemented in full:

- Headford Road to be regenerated as Headford Street, a wide tree lined boulevard. It will be wide enough to accommodate quality bus corridors, traffic lanes and generous pedestrian areas, and (potentially) the introduction of an on street light rail system.
- The frontage along Headford Street is to be broken into a series of blocks with frequent side streets to facilitate permeability.

- Retail and office based employment uses are to be concentrated in the blocks adjoining Headford Street. The primary retail frontages are those facing Headford Street along its entire length from Bodkin junction to Bothar na mBan.
- An arts/cultural/civic block is to be located at the southern end of Headford Street, overlooking the river and facing the Street. The block will incorporate a new arts centre. The arts centre will also provide a permanent home for local creative arts group(s).
- The urban blocks adjoining the park will be predominantly residential use.
- Terryland Forest Park is re-conceived as the City Park and extends to the river bank.
- Bohermore Neighbourhood Park is to be redeveloped to enhance its utility and amenity value.
- The Plots Local Park is redeveloped to enhance its utility and amenity value.
- Connectivity.
- Sustainability.

Secondary

The secondary elements can be delivered where there is scope for re-interpretation at the detailed design stage.

- Corrib Square and linkages through to the City Park and the river.
- Cafes and shop units located on the ground floor level of the residential blocks, on particular corners and overlooking the river and the Corrib Square.
- Dedicated crèche facilities provided to service the residential community (these must be provided but the locations are, to a degree, flexible).
- Community facilities provided for the residents. This can be in the form of a single community centre on the west side of Headford Street or community spaces provided in each residential block. The purpose of the community facility will be to provide a facility and location for community events and meetings and as a resource available for the residents e.g. a space that can be hired for children's parties.

These key principles are set out below in terms of an overall framework map:



Figure 43 – Overall Framework Map

The proposed development and wider Development Framework Area as evidenced by the accompanying Development Framework has taken cognisance from the Draft Headford Road Framework Plan. The following points are noted in relation to the primary/secondary element requirements:

Primary Elements

- As part of the wider Headford Road Regeneration Area, Headford Road has the potential to be regenerated as Headford Street as part of any future proposals. The proposed development and Development Framework will not will not impact on the width of the Headford Road for the accommodation of quality bus corridors, traffic lanes and pedestrian areas.
- The frontage along Headford Road is envisaged to be broken down into a series of blocks with frequent side streets as per the Development Framework. Phase 2 of the Development Framework will provide an active frontage along the Headford and Dyke Road and has the opportunity to introduce a new street between the site and the adjoining permitted student accommodation site. This approach is in accordance with the primary elements of the Draft Framework.
- Phase 2 of the Development Framework is envisaged to be a mixed-use scheme which can incorporate multiple uses which can include community uses, civic uses, offices and retail as per the primary elements of the Draft Framework.
- As per the Headford Road Framework Plan, the proposed development (Phase 1) provides for residential use closest to the park. Phase 3 of the Development Framework explores the conservation of the Black Box theatre or relocation of the theatre to another location and development of a residential block facing Terryland Forest Park. Both options are in line with the Primary elements.
- Phase 3 of the Development Framework, should the Black Box Theatre be relocated, has the opportunity to create a large public open space and pathway connecting to the Terryland Forest Park.
- The proposed Development Framework prioritises both connectivity and sustainability in line with the primary elements.

Secondary Elements

- The proposed development and wider Development Framework will provide an attractive public realm with pedestrian and cyclist linkages from the Terryland Forest Park to the river. As part of the proposed development (Phase 1) a new pedestrian crossing is introduced (northern portion of site) across the Dyke Road to facilitate a safe crossing at this section of the road linking the proposed development to the River.
- In the formulation of the Development Framework, it was considered that any cafes / shop units would be most appropriate in Phase 2 fronting onto the Headford Road or future public plaza as this location would have the most footfall.
- The proposed development (Phase 1) also provides a childcare facility with capacity to cater not only for the proposed development but with sufficient headroom to cater for the wider community as per the secondary elements of the Draft Framework. The Framework Map indicated a childcare facility at the Phase 3 Development Framework site noting that the locations are, to a degree, flexible. This application front loads the delivery of a childcare facility as part of the first phase of development.
- Phase 2 of the Development Framework is envisaged to be a mixed-use scheme which can incorporate multiple uses including community / civic / office / arts / retail and is in line with the secondary element which envisages community use on the west of Headford Street.

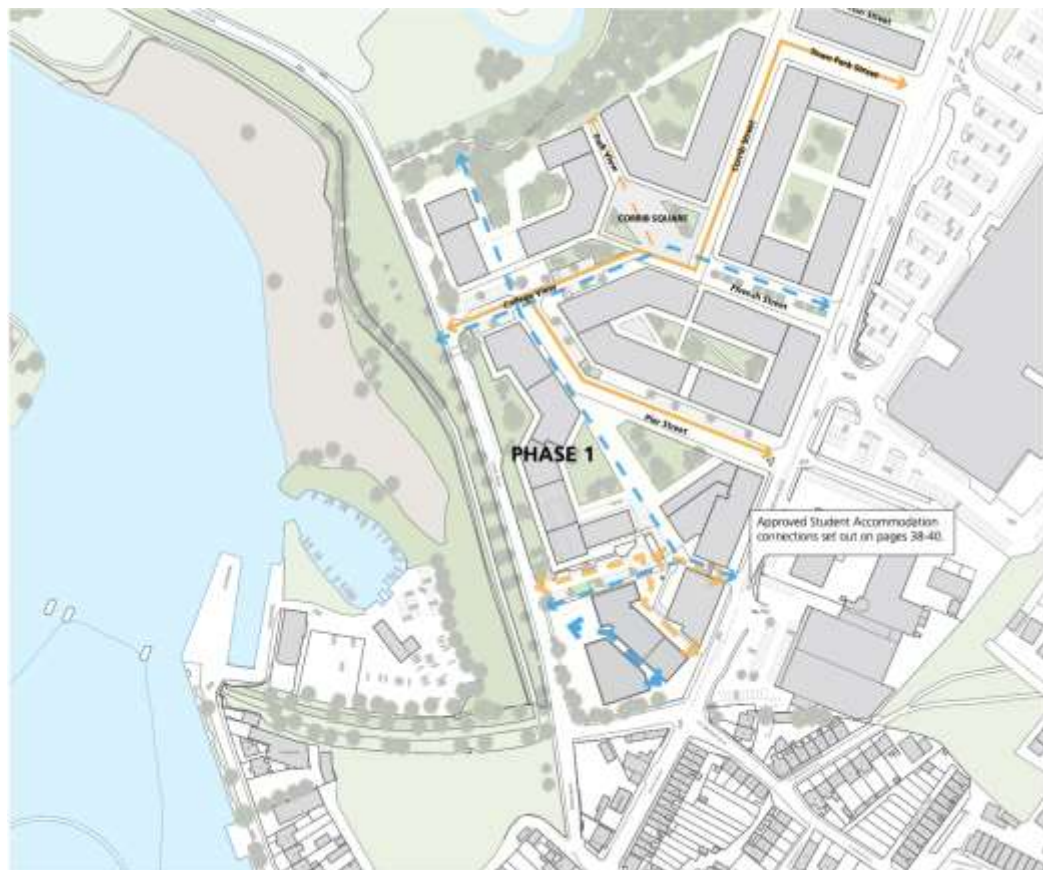


Figure 44 – Potential Indicative Framework Plan

We note that the Development Framework document enclosed with this application prepared by MOLA Architecture provides further details on how the phase 1 and wider site have had cognisance to the requirements of the Draft Headford Road Framework Plan 2009.

10.6 Transportation

Car Parking

The Plan recognises that the Dyke Road car park delivers 537 car parking spaces and provides day long parking for €4 for mostly commuting motorists. Following detailed surveys this is confirmed to be 554 spaces.

The Plan sets out that in order to advance the objective of Galway City Council to reduce dependency on the private car the most effective restraint on car use is the imposition of reduced parking provision. A reduction of 35% of parking spaces is recommended with the Framework Plan delivering a total of 1,300 spaces across all framework lands.

10.7 Phasing

The Framework Plan envisages a 2-phase development of the framework lands as follows:



Figure 45 – Phasing

The proposed development has given due regard to the principles outlined in the Draft Headford Road Framework Plan, a non-statutory plan. The development aligns generally with the framework's objectives, particularly in terms of the creation of a vibrant, mixed-use district and the enhancement of green spaces. A detailed Development Framework has been developed for the Dyke Road site, which adheres to the key planning principles set out in the framework. The proposed scheme is designed to act as a catalyst for the wider regeneration of the area, supporting the vision of transforming the Headford Road area into a sustainable and well-connected urban environment. We refer An Bord Pleanála to the accompanying Architect's Design Statement for further details in this regard.

11 Conclusion

We invite An Bord Pleanála to positively consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- The subject site is located at the Dyke Road, a large, underutilised site (currently occupied by a public car park) that is opportunely located, in terms of proximity to public transport and local amenities/services, to deliver much needed residential accommodation.
- The proposed development involves the construction of 219 no. residential apartment units as part of one block ranging in height from 5 – 9 storeys.
- This site is identified at both a national, regional and local level for residential development and it has the potential to act as a catalyst for the redevelopment of future phases 2 and 3 of a 3 phase Development Framework and also the redevelopment of the wider Headford Road regeneration sites.
- 197 no. apartments (90%) will be provided under the cost rental model and 22 no. apartments (10%) will be provided under the Social Housing scheme.
- The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities.
- The proposed layout of the development has been meticulously designed to optimise the quality of sunlight and daylight for both the residential units and communal open spaces, while simultaneously minimising any potential adverse impact on the surrounding built and natural environment. This careful balance ensures that future residents will benefit from a high standard of living, with ample natural light enhancing the overall quality of life, without impacting the surrounding built and natural environment.
- The proposed communal open space within the development is designed to be a vibrant, multifunctional area that fosters a strong sense of community and enhances residents' quality of life. Located on the eastern side of the building, this area is sheltered from the road and traffic, providing a peaceful, car-free environment where residents can relax, play, and interact. Access is strictly controlled through secure gates along the eastern site boundary, ensuring privacy and safety for the community. This added layer of security, coupled with passive surveillance from the apartments, promotes a sense of exclusivity and safety, while encouraging social interaction among residents. The total area of the proposed communal space is approx. 1,650 sqm, exceeding the required 1,313 sqm for the development.
- The proposed Public Open Space is located to the west of the site, along the Dyke Road, and is envisioned as a linear park that spans approx. 1,313 sqm. This public open space is designed to serve as an inviting and inclusive space, accessible to both residents and the broader public. Its central location along a main thoroughfare ensures that it will be a vibrant community asset, providing a welcoming green retreat in the heart of the urban landscape.
- A key feature of the Public Open Space is a raised pedestrian boardwalk, which runs along the entire length of the park in a north-south direction. This elevated structure serves both a functional and aesthetic purpose, providing visitors with a scenic route to explore the park and its surrounding environment. The boardwalk will offer expansive views of the nearby River Corrib and its natural surroundings, connecting park visitors with the wider landscape and offering an elevated perspective on the local ecology.
- A childcare facility of approx. 241 sqm is proposed at ground floor level at the eastern elevation with a dedicated outdoor play area and drop off facilities.
- The proposed development prioritizes accessibility and permeability, ensuring that both vehicular and pedestrian movement are seamlessly integrated into the surrounding infrastructure, while fostering a connection to the broader urban fabric.



- The proximity of the site to public transport and local amenities and services means the site is opportunely located to provide for higher residential density and additional height in compliance with the national policy mandate.
- The subject site is zoned ‘CI’ (Enterprise, Light Industry and Commercial). The zoning objective specifically identifies that this ‘CI’ zoning should allow for the development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.
- The proposed development inherently complies with principles of compact growth.
- The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal. Furthermore, the proposed heights and density for this scheme is well founded in the context of national planning policy.
- The delivery of housing is currently the subject of a significant national policy mandate with mounting political pressure now accruing to deliver. We note specifically the ambitious targets published by the government on the 5 November 2024 and contained in the Draft Programme for Government 2025, published on 15 January 2025, which seek to deliver 50,500 homes per year until 2029 and scaling this up to 60,000 homes in 2030. It should be highlighted from the outset of this report that the subject site is identified as a key regeneration and opportunity site within the National Planning Framework clearly defining the site as a critical landbank to deliver social and affordable housing within the Galway city area.
- The proposed development has fully satisfied the Development Management Justification Test as outlined in the Guidelines for Planning Authorities on Flood Risk Management. The flood risk to the development has been shown to be manageable, with measures in place to mitigate impacts both on the development itself and on neighbouring areas. Therefore, it can be concluded that the proposed development will not exacerbate flood risk elsewhere and is consistent with both the guidance and the overall strategic planning objectives for flood risk management.
- In summary, this infill, brownfield site offers a significant opportunity for the delivery of social and affordable apartment units within Galway City. This planning report will set out that the current Phase 1 Corrib Causeway proposal is appropriate to the site, the surrounding area and is well founded in planning terms.

We ask that these points are considered in the review of the proposal, and we trust that this planning application will be viewed as a positive move towards the delivery of sustainable development on suitably zoned, underutilised lands.



Appendix I – Adjoining Student Accommodation Planning History Review

REG. REF. 20184 & ABP-309673-21

This application was lodged on 10/07/2020 for the following development:

‘Demolition of an ESB enclosure and construction of a seven/eight storey development comprising 4 retail units, a gymnasium and student accommodation (254 beds).’

A decision was made to grant permission for this application on 11/02/2021. A third party appeal was made to An Bord Pleanála. The grant of permission was subsequently upheld.

The proposed site layout for the development is identified below. In terms of boundary treatment between this proposal and the subject site of the Part X application, the drawings identify a 1.8 powder coated fence with a note that this shall be removed in the event that adjoining lands are developed.



Figure A1 - Site Layout Plan

The following key points are notable in terms of An Bord Pleanála's assessment of this proposal:

- The Inspector noted that **a proposal for the site should be considered on merit in the absence of an LAP for the area.** Notably, it was stated that given the zoning of the land under the Development Plan, there was no reason why the proposed development cannot be assessed on merit and on the basis of the criteria included within the GCDP. Ultimately, it was set out that the objective to provide and LAP of the area **does not preclude consideration of development at this location. The development is being assessed on its merits under various categories.**
- Reference was made to the Headford Road Framework Plan in brief within the Inspector's report but no significant consideration was given to this document in terms of how the proposed development complied with its content.
- It was noted by the Inspector that on lands zoned CI, the permissible plot ratio under the relevant City County Development Plan at the time was 1.25:1. The proposed development was noted as having a **plot ratio of 3.1:1.** It was further noted that the City Development Plan standard for site coverage is 0.8/80% with the proposed development having site coverage of 50%.



- It was noted by the Inspector that the Development Plan does allow for higher densities where development has regard to the prevailing pattern, form and density of the area. The inspector noted that the overall quantum of development was higher than the prevailing density in the area. However, as the scale of development is relatively modest in the context of the wider urban area, and having regard to the sites accessible urban location, the inspector considered that refusal would not be warranted on the basis of density alone.
- The Inspector further noted that the area was characterised by commercial development with an existing retail park to the north and a five-storey commercial development on the opposite side of the Headford Road. It was further stated that the proposed development exceeds the prevailing 2-5 storey building heights at this location but that the City Development Plan in place at the time of assessment did not identify maximum building heights.
- In the case of buildings that are taller than the prevailing benchmark heights, the Inspector noted that the relevant plan states that consideration will be given to the impact of any proposal on built and natural heritage, residential amenity, legibility, views and character; and to the promotion of higher densities at a centres / nodes, on large infill sites and along public transport corridors. In this regard, the Inspector considered that the main issues for consideration relate to the impact of the proposed development on views and on the character and amenities of the area. The proposal was assessed and approved on this basis.
- The Inspector noted that there are no built heritage designations or protected views within the immediate area. The Inspector was of the view that the overall design and scale of the proposed development would be acceptable in the context of the visual amenities of the area and the provision of a structure of more forceful character in the area would be beneficial at this location and was satisfied that the photomontages illustrate that the design and scale of the proposed development could be absorbed at this location without any adverse impact on visual amenity or the architectural character of the area.

REG. REF. 22259

This application was lodged on 29/09/2022 for the following development:

*‘Minor amendments to previously approved development **Reg. Ref. 20184 & ABP-309673-21**’*

A decision was made to grant permission for this application on 06/01/23 subject to conditions.

The key development statistics and comparison with the parent permission are as follows:

	Parent Permission	Amended Proposal
Site Area	0.4282 ha	0.4282ha
Gross Floor Area	11,798 sqm	11,542 sqm
Plot Ratio	2.76:1	2.66:1
Site Coverage	57%	c. 55%
Height	7 storeys (26.4 m)	7 storeys (26.4 m)
No. of Student Beds	223 no. student beds	272 no. student beds
Retail Floorspace	4,630 sqm	3,099 sqm + 530 sqm office space at first floor level

A site location plan and site layout plan for this development are set out below.





Figure A2 - Site Layout Plan

This application has set the following precedent in terms of plot ratio, site coverage and building height:

- A plot ratio of 2.66 and site coverage of 55% was delivered.
- Heights of 7 storeys are permitted.
- In terms of boundary treatment, this application proposed to modify the originally agreed / permitted 1.8m boundary treatment under Ref. 20/184. This application proposed to erect a 2.4m metal palisade fence around the side / rear perimeter with the exception of the eastern site boundary. The Planning Authority considered this 2.4m high boundary treatment to be inappropriate and excessive considering the potential future development of the adjacent lands (GCC site). The Planning Authority sought an agreement to be reached on an alternative, more appropriate boundary treatment for the site by way of condition.

To date, no compliance submissions have been submitted for this application and as a result, no boundary treatment has yet been agreed between the applicant and the Planning Authority.

**Appendix II – Building Height Guidelines 2018 – Development Management Criteria**

At the scale of the relevant city / town	
Assessment Criteria	Response
<i>“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.”</i>	The subject site is exceptionally well served by public transport with high capacity, frequent services and good links to other modes of public transport. • The site is 300 meters from bus stops at Headford Road and Woodquay Court (served by the 407 route), and 550 meters from Saint Francis Street with 8 bus routes. • Other nearby stops include Bóthar Bhreandán Uí Eithir (600 meters) with multiple bus routes. • A <i>Public Transport Capacity Assessment</i> has confirmed that bus network can accommodate the development, with most buses operating at 75% capacity. • The site will be served by the recently permitted BusConnects Cross City Network. • Ceannt Train Station (800 meters) and Fairgreen Coach Station (700 meters) offer connections to major cities. Ceannt Station provides services to Dublin, Limerick, and Athenry. • There are excellent links between these modes of transport with bus and train stations located side by side. It is therefore considered that the subject site is suitable for higher density development and increased building heights. The proposed 5-9 storey heights will create a focal point and act as a place-maker enhancing the new identity of the area.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	While the site is not within a designated sensitive or protected architectural area, it is strategically positioned within an urban context where topography, views, and the setting of key landmarks are essential considerations. The proposed building height and design have been developed with careful attention to these factors, ensuring that the new structure complements and enhances the existing urban fabric rather than overwhelming or detracting from it. The height of the building has been considered in relation to the surrounding landscape, ensuring a gradual transition in scale, form, and massing that respects the topography of the area. The site is identified in planning policy as a regeneration and opportunity site. The proposal represents a positive and thoughtful revitalisation of the site. It will contribute to the enhancement of the area’s urban character, both through the introduction of modern architectural design and the careful handling of the building’s relationship with the surrounding urban environment. In terms of cultural context, the proposal respects the broader urban heritage and significance of the area while introducing a contemporary architectural language that complements the city’s ongoing development. The design does not interfere with the setting of key landmarks or significant cultural features of the area, as it is located in a more dynamic part of the city with ongoing growth and urban renewal.





	A Landscape and Visual Assessment (LVIA) has been undertaken by Murray and Associates, chartered landscape architects to evaluate the potential impacts of the proposed height on the landscape character and key views and forms part of the accompanying EIAR Chapter 12. The proposed development will result in a change to the landscape, which will give rise to landscape and visual effects. The likely extent of the impact within the landscape context is considered to be very significant as there will be intensive changes to landscape character within this localised area, which will be visible from surrounding areas. The magnitude of change will vary depending on the viewpoint from which it is viewed and how visible the proposed buildings are in that view. With regard to quality of change in the landscape, the proposed development is generally considered positive. In reaching this conclusion regard has been had to the following considerations: • The new building and landscape spaces of architectural merit are all considered positive changes or improvements to the landscape, which currently consists in a car park. • The new use creates a higher quality of space. This positive quality of landscape will be seen from the local context, as it provides an improvement in the landscape amenity value of the site for users and there is increased vegetation and tree cover which is considered inherently positive. • Low landscape / visual value associated with the existing car park. • From a planning perspective, this development has the potential to act as a catalyst to kick-start the regeneration of the wider area and revitalise underutilised lands in accordance with the Headford Road Regeneration Sites through the implementation of a fully integrated and sustainable development. • In terms of urban design, the building proposed creates a landmark on the entrance to Galway City, which emerges from the wooded landscape of Terryland Forest Park. It is considered that the proposed building height strategy for the scheme successfully manages to both consolidate the development through carefully considered increased buildings heights whilst also working sensitively with the existing context and prevailing pattern of development within the area.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.”	The proposed development is designed to contribute positively to the overall place-making of the area, while ensuring that the visual amenity of the surrounding environment is preserved. The proposal carefully considers the existing surrounding context, including the scale and massing of nearby buildings, to ensure that the new development integrates harmoniously with the urban fabric. Setback distances from adjoining properties have been thoughtfully applied to maintain privacy, light, and air quality, thereby ensuring that the amenity experienced by surrounding buildings is not diminished. A variety of unit types and heights are provided across the development site offering a variety in scale and form while





	also providing an appropriate density for the site given its location and scale. Further, this proposal is part of a broader development framework for the area, which considers the long-term regeneration potential of the site and its surroundings. The development has been designed with future-proofing in mind. The development also anticipates the evolving nature of the wider area taking cures in terms of permitted heights of 8 storeys from the adjoining student accommodation site. With ongoing urban renewal and regeneration initiatives, the proposal helps set a positive precedent for future development, ensuring that the site will contribute to the growth and revitalisation of the locality in a coherent and sustainable way. In this respect, the proposed increased building heights have delivered a more efficient use of underutilised lands and enabled the delivery of a more appropriate residential density for the lands. The proposed development is considered to be of an appropriate scale, height and massing that complements the existing urban form, will establish a more appropriate height context for the wider Headford Road area whilst successfully introducing a high quality element of architecture to the site, making optimal use of the brownfield lands.
At the scale of district/ neighbourhood/ street	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal responds to both the natural and built environment in a thoughtful and context-sensitive manner. Significant consideration has been given to how the development interacts with the surrounding area, with particular focus on the integration of the streetscape, nearby development, and the proximity to the River Corrib and Terryland Forest Park. This sensitive approach ensures that the proposal not only complements but enhances the existing environment, respecting the established character of the area while introducing a modern and high-quality architectural design. The high-quality design of the development is a key element in ensuring that the proposal makes a positive contribution to the urban neighbourhood and streetscape. It has been carefully crafted to harmonize with the existing surrounding development, while also contributing a distinct and modern architectural presence that will serve as a positive precedent for similar future developments in the area. The use of materials, massing, and layout has been designed to respect the existing built form while introducing elements that contribute to the visual and functional vitality of the streetscape. Moreover, the development makes a positive contribution to the wider urban environment by revitalising a currently underutilised site, thus providing much-needed housing in line with national policy objectives aimed at increasing housing supply. By delivering a high-quality residential development in a well-connected location, the proposal responds to the demand for new housing while enhancing the urban fabric of the area. It ensures that the site, which is currently underdeveloped, is put to a more productive and sustainable use, contributing positively to both the local community and the broader urban neighbourhood.





The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	Careful consideration has been given to ensure that the proposal avoids a monolithic appearance through the articulation of the proposed building, the stepping up and down of the height and the material palette, breaks up the block. It is important to note from the outset that a variety of site configurations and potential alternative layouts were considered early on in the design process. The design evolution and specifically the alternatives considered for design are considered at length in the EIAR and Architectural Design Statement submitted with this application. The current design solution has come forward as the optimum design from this process and within the context that the site is long and narrow. The design incorporates a variety of materials and fenestration, alongside changes in massing across the site, which help to break up the uniformity and create visual interest. The use of contrasting textures, colours, and architectural detailing ensures that the development is visually dynamic and does not present a solid, uninterrupted facade. The variation in building height, ranging from 5 to 9 storeys, further enhances the townscape, introducing a sense of variety and scale that avoids a monotonous, one-dimensional feel. This variation in height creates an engaging skyline and provides a more human-scale experience at street level. Additionally, the design thoughtfully incorporates changes in volume and form, ensuring that no single block or elevation dominates the site, contributing to a more visually appealing and contextually appropriate urban design. Overall, the proposal avoids long, uninterrupted walls of building and instead introduces a well-considered and carefully articulated composition, contributing positively to the surrounding streetscape while ensuring that the development does not appear as a uniform or imposing slab block. The materials and design elements are carefully chosen to reflect the character of the area while providing a modern, vibrant addition to the urban fabric. The careful cranking of the building, variation to heights allow for the proposal to read as separate building forms which ensures an appropriate approach to building height and overall appearance of the building.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).	The proposed development includes the provision of high-quality landscaped public and communal open space as presented in this report. The public open space proposed along Dyke Road is particularly noteworthy in this context. The design approach to these areas has resulted in coherent and integrated public spaces that contribute to the creation of a sense of place and identity. The public spaces have incorporated a range of uses and features including natural play areas and passive recreation areas. A key feature of the proposed development is the scale of the site and its current condition, which presents a unique opportunity to elevate the quality and extent of the landscaping. The significant improvements to the site's open spaces will provide an amenity value that extends well beyond the development's immediate boundaries, enhancing the surrounding environment. By introducing greater height, the development can achieve an appropriate sense of scale and enclosure that enhances





	the urban environment, while still respecting the overall character and context of the surrounding area. The additional height supports the creation of a strong urban edge that helps to define and enclose the public spaces, providing a feeling of safety and identity for the residents and visitors. In terms of flood risk management, the proposal aligns with the principles set out in “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009). The design of the development has considered flood risk and incorporates appropriate mitigation measures, ensuring that the proposed height and landscaping strategy are in line with the Flood Risk Guidelines. This approach guarantees that the development contributes to the urban environment in a way that is sustainable, safe, and resilient, enhancing the overall quality of life for residents while mitigating flood risk and preserving the natural environment. For further details we refer to the enclosed Site Specific Flood Risk Assessment prepared by AECOM.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The high-quality design proposed will ensure that the development contributes positively to the legibility of both the site and the wider urban area. Thoughtful consideration has been given to the layout, architectural form, and the use of materials to ensure that the development is easy to navigate and visually engaging. The design creates clear connections between the site and surrounding areas, enhancing the sense of orientation and accessibility for both residents and visitors. A key element of this proposal is the inclusion of a pedestrian footpath and cycle path, which will improve connectivity within the site and to the wider urban area. These pathways will provide safe, convenient routes for pedestrians and cyclists, further enhancing the site's accessibility and contributing to the overall legibility of the area. The integration of these active travel routes encourages sustainable movement and supports the wider goals of enhancing public transport and active mobility options in the locality. Additionally, the development includes a public open space that will be centrally located along Dyke Road offering green space for residents and the broader community. This park will serve as a focal point within the development, enhancing both the aesthetic and social value of the site. It will also contribute to the improvement of public realm legibility, providing a clear, welcoming space that invites interaction and promotes community well-being.
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”	The proposed development will positively contribute to the mix of uses and dwelling typologies available in the neighbourhood by offering a diverse range of unit types and sizes that address the current gaps in the local housing market. The development includes a well-considered mix of 1, 2-, and 3-bedroom apartments, providing a variety of options to cater to different household types, from single occupants and couples to small families. This mix ensures that the development meets the housing needs of a broad demographic, enhancing the overall diversity and vibrancy of the neighbourhood. 197 no. apartments (90%) will be





	provided under the cost rental model and 22 no. apartments (10%) will be provided under the Social Housing scheme By introducing a range of dwelling sizes, the development provides flexibility for future residents, accommodating various lifestyle choices and family structures. This diversity in housing typologies will also complement the existing housing stock, which may be limited in terms of unit size or type, and offer new options in an area with growing demand for housing. The inclusion of both smaller units and larger family-sized apartments creates a balanced residential offering, contributing to the long-term sustainability and growth of the neighbourhood.
At the scale of the site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	The design of the proposed development has been carefully considered to ensure that the form, massing, and height are optimised to maximise access to natural daylight, ventilation, and views for future residents, while minimising the potential for overshadowing and loss of light. The orientation and placement of residential units have been specifically designed to allow for maximum natural light to penetrate into the interiors, ensuring well-lit living spaces throughout the day. The careful modulation of building massing and height across the site also ensures that the development does not create adverse impacts on the surrounding properties.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings - Part 2: Code of Practice for Daylighting'. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	A sunlight, shadow and daylight assessment has been carried out by 3DDB. Their assessment concludes that 97% of bedrooms and living / kitchen spaces will meet, or in most cases exceed, the recommended daylight factors outlined in British Standard 8206- 2:2008. As the building is predominantly a north-south aligned linear block, most apartments benefit from an east-west orientation and the internal units have been carefully planned to maximise the available daylight to living spaces. For open space, the proposed communal open space is predicted to receive a level of sunlight in excess of the level recommended by the BRE Guidelines therefore, offering residents with a high standard of open space to enjoy throughout the year.
Site Specific Assessment	
Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	A wind and micro-climate assessment has been prepared as part of Chapter 11 of the EIAR by IES Consulting. In addition, we refer An Bord Pleanála to the standalone Wind Microclimate Study Report prepared by IES Consulting. For the operational phase it was concluded that significant negative impacts on pedestrian comfort and / or safety are not predicted to occur as a result of the wind microclimate at the subject site. In addition, no adverse impacts are envisioned on the proposed balconies and general ground floor amenities.





In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	The application is accompanied by an AA Screening Report, Natura Impact Statement, Bat Survey and Assessment, Winter Bird Count, and Ecological Assessment prepared by Scott Cawley Ltd., the project ecologist. 6 no. bat boxes are proposed within the proposed development on trees to mitigate against any potential impacts the proposed development may have on bats in the area.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links	A <i>Telecommunications Report</i> prepared by ISM is enclosed as part of the application documentation to determine potential impact of the proposed development on existing microwave channels. Provision will be made in the proposed development for the inclusion of 2 no. telecommunications lattice towers to ensure that any impacts from the proposed development are addressed and mitigated.
An assessment that the proposal maintains safe air navigation.	The Irish Aviation Authority, HSE and the Aeromedical & Special Operations Sections and University Hospital Galway were consulted prior to the lodgement of this application. The Irish Aviation Authority and the HSE have also been notified of the lodgement of this permission with submissions and observations invited. The subject site is not located in close proximity to any airports or airfields. Furthermore, the proposed development with a maximum height of 38.18 m is considered to be of modest height and does not therefore have the potential to impact on air navigation as a result of the proposed building heights within the site.
An urban design statement including, as appropriate, impact on the historic built environment	We refer An Bord Pleanála to the accompanying <i>Architect's Design Statement</i> prepared by MOLA Architecture. The Design Report provides a comprehensive overview of the architectural proposal, detailing the site and its context, as well as the design response in terms of urban design, architecture, and landscape considerations. It also evaluates the proposal's impact on the surrounding area. Additionally, the report addresses the overall quality of the development, including the quantity, typology, spatial organisation, and design of the accommodation. This is reflected in the façade treatment, material selection, detailing, and the construction, services, and environmental sustainability strategies employed. There are no Protected Structures onsite, and the site is not located within an Architectural Conservation Area. The development proposes no potential impact on any nearby protected structures.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	As noted above this application is accompanied by the relevant environmental assessments including an AA Screening Report and Natura Impact Statement and EIA Report as required.



**Appendix III – Development Plan Core Strategy Review**

No.	Location	Zoning	Area	Area Yield
1.	Ceannt Station Quarter Regeneration Site	CC – City Centre	City Centre	295 (Regeneration)
2.	Inner Harbour Regeneration Site	CC – City Centre		
3.	Nun’s Island Masterplan Area	CF – Community Culture and Institutional and CI – Commercial / Industrial and R - Residential		
4.	Eyre Square East Regeneration Site	CC – City Centre and CF – Community Culture and Institutional		
5.	Dyke Road Regeneration Site	CI – Commercial / Industrial	Inner Residential	250 (Regeneration)
6.	Galway Retail Park Regeneration Site	CI – Commercial / Industrial		
7.	Galway Shopping Centre Regeneration Site	CI – Commercial / Industrial		
8.	Former Connaught Laundry Opportunity Site	CI – Commercial / Industrial		
9.	Shantalla Road Opportunity Site	CI – Commercial / Industrial		
10.	Seamus Quirke Road Regeneration Site	CI – Commercial / Industrial	Established Suburbs (West)	0 (Regeneration) 120 (Residential Zoned Lands)
11.	Sandy Road Regeneration Site	CI – Commercial / Industrial	Established Suburbs (East)	795 (Regeneration) 560 (Residential Zoned Lands)
12.	Crown Square Regeneration Site	CI – Commercial / Industrial		
13.	Corrib Great Southern Regeneration Site	CI – Commercial / Industrial		
14.	Royal Tara China Opportunity Site	I – Enterprise, Industry and Related Uses		
15.	Former Dawn Daireis Opportunity Site	R – Residential		
16.	Doughiska Road Opportunity Site	CI – Commercial / Industrial and R – Residential	Outer Suburbs (East)	100 (Opportunity / Infill) 2,000 (Residential Zoned Lands)
17.	Knocknacarra District Centre (North) Opportunity Site	CI – Commercial / Industrial	Outer Suburbs (West)	150 (Infill)





18.	Knocknacarra District Centre (South) Opportunity Site	CI – Commercial / Industrial		2,172 (Residential Zoned Lands)
19.	Eastgate Regeneration Site	CI – Commercial / Industrial	Does Not Fall Within Any Neighbourhood Areas Mapped – just north of established suburbs east	N/A

Table 1 – Core Strategy for Regeneration / Opportunity Sites by Area

No.	Location	Zoning	Extant Permission since September 2021	Identified for Residential Use in Chp 10	Area Yield	Remaining Yield
1.	Ceannt Station Quarter Regeneration Site	CC – City Centre	Ref. 20/47 / ABP 310568-21 229 no. apartments	Yes	City Centre 295 (Regeneration)	66 (Regeneration)
2.	Inner Harbour Regeneration Site	CC – City Centre	No Masterplan Developed	Mix of uses complemented by a water-related leisure		
3.	Nun's Island Masterplan Area	CF – Community Culture and Institutional and CI – Commercial / Industrial and R - Residential	No	Mix of uses supporting enterprise, innovation, education, tourism and community		
4.	Eyre Square East Regeneration Site	CC – City Centre and CF – Community Culture and Institutional	No	Appropriate uses not mentioned.		
5.	Dyke Road Regeneration Site	CI – Commercial / Industrial	No	Yes – LDA led affordable housing	Inner Residential 250 (Regeneration)	180 (Regeneration)
6.	Galway Retail Park Regeneration Site	CI – Commercial / Industrial	No	Yes 30% residential use (subject to LAP)		
7.	Galway Shopping Centre	CI – Commercial / Industrial	No	Yes		





	Regeneration Site			30% residential use (subject to LAP)		
8.	Former Connaught Laundry Opportunity Site	CI – Commercial / Industrial	No	Yes – primarily residential / full extent of site		
9.	Shantalla Road Opportunity Site	CI – Commercial / Industrial	Ref. 22/166 / ABP 315844-23 70 no. apartments	Yes – primarily residential		
10.	Seamus Quirke Road Regeneration Site	CI – Commercial / Industrial	Ref. 22/322 / ABP 318194-23 No decision from ABP yet. No residential use proposed.	Yes – mix of uses for residential primary healthcare, commercial and offices.	Established Suburbs (West) 0 (Regeneration) 120 (Residential Zoned Lands)	120 (Residential Zoned Lands)
11.	Sandy Road Regeneration Site	CI – Commercial / Industrial	No	Yes – LDA national priority site mix of resi and commercial		
12.	Crown Square Regeneration Site	CI – Commercial / Industrial	No	Yes – CDP acknowledges extant permission for BTR scheme		
13.	Corrib Great Southern Regeneration Site	CI – Commercial / Industrial	No	Yes – minimum of 50% for residential	Established Suburbs (East) 795 (Regeneration) 560 (Residential Zoned Lands)	795 (Regeneration) 560 (Residential Zoned Lands)
14.	Royal Tara China Opportunity Site	I – Enterprise, Industry and Related Uses	No	No		
15.	Former Dawn Daireis Opportunity Site	R – Residential	No	Yes – high density housing		
16.	Doughiska Road Opportunity Site	CI – Commercial / Industrial and R – Residential	No	Yes – mix of uses including residential. CDP acknowledges permission for 130 units.	Outer Suburbs (East) 100 (Opportunity / Infill)	100 (Opportunity / Infill) 2,000 (Residential Zoned Lands)





17.	Knocknacarra District Centre (North) Opportunity Site	CI – Commercial / Industrial	Ref. 23/3 / ABP 318687-23 227 no. apartments	Yes – 20% of all existing district floorspace	Outer Suburbs (West)	-77
18.	Knocknacarra District Centre (South) Opportunity Site	CI – Commercial / Industrial	No	Yes – minimum of 50% of residential	150 (Infill) 2,172 (Residential Zoned Lands)	
19.	Eastgate Regeneration Site	CI – Commercial / Industrial	No	No – commercial redevelopment	N/A	N/A

Table 2 – Core Strategy for Regeneration / Opportunity Sites by Area and Permitted Development Review



**Appendix IV – Galway City Development Plan Policies and Response**

Policy	Response
POLICY 1.4 CORE STRATEGY	
1.4.3 <i>Support the compact growth of Galway City through appropriate policies that promote co-ordination between land use and location that can be served by public transport and the walking and cycling networks and enables the delivery of 50% of all new homes within the existing built footprint on lands as set out in the Core Strategy.</i>	The proposed development is located on an infill, brownfield site within the existing built up footprint of the City and will provide a high-density development in line with principles of compact growth. The subject site is proximate to a variety of services, facilities, amenities and public transport stops and walking and cycling networks in line with policy objective 1.4.3.
1.4.6 <i>Encourage new neighbourhoods and the consolidation of existing neighbourhoods to develop as sustainable, attractive, well-connected neighbourhoods at appropriate densities, with a high quality of design of buildings and spaces, supported by services, amenities and local enterprises.</i>	The proposed development aligns with Policy 1.4.6 by providing 219 social and affordable apartment units that contribute to the creation of a sustainable, well-connected neighbourhood. The development is strategically located with easy access to the city centre and public transport, ensuring high connectivity. Additionally, the design prioritises high-quality architecture, and the development is situated near a range of services, amenities, and local enterprises, supporting a vibrant, well-connected and functional community.
1.4.8 <i>Ensure that the future growth of the city is undertaken in a manner that strikes a balance between enabling development and protection of the environment and the built and natural assets of the city.</i>	The proposed development has been carefully designed with a focus on sustainability, ensuring that it balances the need for growth with the protection of both the natural and built environment. An Appropriate Assessment Screening Report, Natura Impact Statement and EIAR have been conducted to identify potential impacts, and appropriate measures have been incorporated to mitigate any adverse effects, safeguarding the city's valuable assets while enabling responsible development.
POLICY 3.1 HOUSING STRATEGY	
3.1.5 <i>Work in collaboration with the Land Development Agency to enhance delivery of the long term strategic needs for social, affordable and cost rental housing in the city. The delivery of social and affordable housing and cost rental housing on public lands will be prioritised.</i>	The proposed development is being brought forward by Galway City Council in collaboration with the Land Development Agency for the delivery of 219 no. social and affordable apartment units on Galway City Council owned lands in line with policy 3.1.5.
3.1.20 <i>Planning applications for multiple housing units will be required to include a Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient range in unit sizes and types to satisfy community mix including the demographic trend of reduction in average household sizes. The needs of special groups such as older persons and persons with disabilities will be required to be considered as part of this process.</i>	A Statement of Housing Mix has been prepared by Brock McClure Planning & Development Consultants, and we refer An Bord Pleanála to the report for further information in this regard. The proposed development provides a sufficient range of unit sizes and types to satisfy the demographic trends of the area.
POLICY 3.3 SUSTAINABLE URBAN NEIGHBOURHOOD CONCEPT	





3.3.1 <i>Promote the development of compact, well designed, safe and attractive neighbourhoods that deliver efficient use of land and have effective integration with social and physical infrastructure, including public transport, that will enable the development of successful communities and facilitate the growth strategy for Galway City as envisioned in the NPF and RSES.</i>	The proposed development aligns with the policy by promoting the creation of a compact, well-designed, and attractive neighbourhood. The design prioritises efficient land use while ensuring strong integration with essential social and physical infrastructure, including public transport. This will facilitate the creation of a successful community and support Galway City's growth strategy.
3.3.5 <i>Encourage higher residential densities at appropriate locations as guided by the Galway Urban Density and Building Height Study (2021). Such locations include strategic Regeneration and Opportunity Sites, and residential and mixed use zoned sites located close to public transport routes and routes identified in the Galway Transport Strategy as suitable for high frequency, public transport services.</i>	The proposed development has been designed in accordance with the Galway Urban Density and Building Height Study (2021), ensuring that the proposed density and building height are appropriate for the site's context. As outlined in the accompanying Architectural Design Statement, a density of 231 units per hectare (gross) has been proposed for this strategic Regeneration and Opportunity Site. This density is well-suited to its location, which is well-connected to public transport routes identified in the Galway Transport Strategy for high-frequency services. The development aligns with the objectives of encouraging higher residential densities in areas that support sustainable growth and efficient use of land.
3.3.8 <i>Support through policy and design standards the concept of a '15 minute city' where the daily needs of communities can be accessed within a 15 minute walk, cycle or by public transport.</i>	The proposed development supports the concept of a '15-minute city' by prioritising accessibility to essential services, amenities, and transport options within a 15-minute walk, cycle, or public transport journey. The site is strategically located with proximity to key amenities such as shops, schools, healthcare, and recreational spaces, as well as being well-connected to public transport networks. This design approach ensures that the daily needs of future residents can be easily met without the reliance on private vehicles, fostering a more sustainable, accessible, and resilient community.
POLICY 3.6 SUSTAINABLE NEIGHBOURHOODS: INNER RESIDENTIAL AREAS	
3.6.3 <i>Prioritise the provision of new homes on designated Regeneration and Opportunity Sites in the Inner Residential Areas at appropriate scales to enable the development of new sustainable communities.</i>	The proposed development is located within a designated Regeneration and Opportunity Site in the Inner Residential Area, in line with the policy's priority to provide new homes in these areas. The development is designed at an appropriate scale to contribute to the creation of a sustainable community, enhancing the existing urban fabric while fostering local growth and revitalisation. By focusing on regeneration, the project supports the overall objective of developing new, vibrant, and sustainable communities within the inner city.
POLICY 4.1 SUSTAINABLE MOBILITY & TRANSPORTATION – GENERAL	
4.1.1 <i>Develop a compact city, where sustainable land use and transportation are integrated and where there is choice and accessibility to a range of transport modes, with increasing support for a shift to more sustainable modes in line with national aims on climate action and where safety and ease of movement is provided to and within the City and onward to the wider area of the</i>	The proposed development aligns with the vision of a compact city by integrating sustainable land use with efficient transportation options. The site is well-connected to a range of transport modes, including public transport routes, cycling infrastructure, and pedestrian pathways, providing residents with a variety of sustainable transport choices. This supports the national aims on climate action by encouraging a shift toward more sustainable modes of travel. Additionally, the design prioritizes safety and ease of movement, both within the development and in terms of





MASP, County Galway and the Northern and Western Region.	connectivity to the wider City, the MASP, County Galway, and the Northern and Western Region. This approach contributes to creating a more sustainable, accessible, and resilient urban environment.
POLICY 4.2 LAND USE AND TRANSPORTATION	
4.2.4 Promote effective sustainable residential densities in the city particularly along and close to the existing and planned public and sustainable transport route network.	The proposed development fully aligns with the policy objective of promoting effective sustainable residential densities, particularly in areas well-served by existing and planned public and sustainable transport routes. The proposed density supports sustainable urban growth by: • Encouraging compact development that reduces urban sprawl. • Facilitating a critical mass of residents to support high-frequency public transport services, consistent with the Galway Transport Strategy. • Enhancing the viability of nearby amenities and services, contributing to a vibrant and walkable urban environment. By situating higher residential densities along a robust transport network, the development demonstrates a commitment to sustainability principles and the efficient integration of land use and transport planning.
POLICY 5.7 COMMUNITY SPACES: PROTECTED VIEW OF SPECIAL AMENITY VALUE & INTEREST	
5.7.1 Protect views and prospects of special amenity value and interest, which contribute significantly to the visual amenity and character of the city, through the control of inappropriate development.	The proposed development ensures the protection of views and prospects of special amenity value and interest, in alignment with the policy objective. The design has been carefully considered to avoid any adverse impact on significant views or the overall visual character of the city. The accompanying Landscape and Visual Impact Assessment (LVIA) within the EIAR, provides a detailed analysis confirming that the development respects and preserves key views and prospects.
POLICY 7.7 CHILDCARE	
7.7.2 Contribute to the provision of childcare facilities by requiring that such facilities be provided in conjunction with residential developments over 75 dwelling units. An exception can only be considered where it can be clearly established and professionally supported that adequate childcare facilities already exist to service the area and where acceptable alternative arrangements to support childcare, play and or other child specific facilities are deemed acceptable.	The proposed development provides dedicated childcare. The childcare facility has been designed to provide for the childcare needs of the proposed development. The facility has been scaled with additional headroom to accommodate not only demand arising from the proposed scheme, but also future phases of the Development Framework.
POLICY 9.1 FLOOD RISK	
9.1.1 Support, in co-operation with the OPW, the implementation of EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No. 122 of	The design of the proposed development was made in accordance with the latest Directives and Guidelines available to the design team in relation to flood risk.



2010) and the DECLG and OPW Guidelines for Planning Authorities, the Planning System and Flood Risk Assessment Management (2009), updated/superseding legislation or departmental guidelines and have regard to the findings and relevant identified actions of the Corrib Catchment Flood Risk Management (CFRAM) Study.	In particular, the design has taken into account the findings and recommendations of the Corrib Catchment Flood Risk Management (CFRAM) Study, ensuring that the proposed development adheres to best practice in flood risk management. The design team has implemented precautionary measures to ensure that any flood risks are addressed effectively, including raising the finished floor levels above the identified flood risk levels and incorporating compensatory flood storage.
9.1.2 Support and facilitate the implementation of the Coirib go Cósta Galway City Flood Relief Scheme in conjunction with the OPW to support a climate resilient city, protect against flooding and minimise the impact of future climate events. Support in general the associated mitigation and adaptation measures in order to prevent flooding and coastal erosion, subject to appropriate environmental, visual, built heritage and other relevant considerations.	The proposed development incorporates a range of mitigation measures to address flood risk in advance of the full implementation of the Coirib go Cósta Galway City Flood Relief Scheme. These measures are designed to reduce the potential impact of flooding on the site and surrounding areas, ensuring that the development remains resilient to flood risks in the interim period. Key flood risk mitigation measures include the raising of finished floor levels to an appropriate height above the identified flood levels, the inclusion of flood compensatory storage, and the design of the development to manage surface water runoff effectively. In addition, flood-resistant building materials, as well as smart infrastructure such as anti-flood valves and watertight ducting, have been incorporated to ensure the resilience of the development to flood events. These flood risk measures have been implemented in conjunction with careful planning to ensure they align with the long-term goals of the Coirib go Cósta Galway City Flood Relief Scheme. This includes ensuring that the development does not interfere with or hinder the implementation of the Scheme, while also supporting the overall objectives of creating a climate-resilient city. The development has been carefully designed to minimize the risk of flooding, reduce potential damage to property and infrastructure, and support the long-term goals of both the Galway City Flood Relief Scheme and wider flood resilience efforts. Further, the proposed flood mitigation strategies respect environmental, visual, and built heritage considerations, aligning with the objectives to protect and preserve these aspects while reducing the impacts of future climate events.
9.1.3 Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of developments in identified areas of flood risk and require site specific Flood Risk Assessment (FRA) and associated design and construction measures appropriate to the scale and nature of the development and the risks arising, in all areas of identified flood risk including on sites where a only small proportion of the site is at risk of flooding and adopt a sequential approach in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009).	A Site-Specific Flood Risk Assessment has been carried out by AECOM Consulting Engineers, in accordance with the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029. The FRA considers the potential flood risks specific to the site and provides detailed recommendations to ensure that the proposed development complies with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009). Importantly, the sequential approach has been adopted in line with the guidelines, ensuring that the most vulnerable parts of the site are protected, while the development is designed to minimise any risk of flooding. The site layout and the proposed construction measures have been carefully considered to ensure that flood risk is managed effectively,



	even for areas where only a small proportion of the site is at risk. Overall, the proposed development fully aligns with the recommendations of the SFRA and ensures that all necessary flood risk management measures are incorporated into the design to safeguard the development and surrounding areas. The approach taken not only complies with the relevant guidelines but also ensures a sustainable and safe development that contributes to the long-term resilience of Galway City against flooding.
9.1.4 <i>Protect and promote sustainable management and uses of water bodies and watercourses from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains.</i>	The proposed development has been carefully designed to avoid any adverse impacts on water bodies, watercourses, or associated riparian strips, wetlands, and natural floodplains. A thorough review of the site's location in relation to nearby rivers, streams, and other water features has been carried out to ensure that the development does not encroach on or negatively affect these sensitive areas. In line with best practices for sustainable development, appropriate measures will be implemented to protect and preserve the natural water environment. As such, the proposed development is not foreseen to have any negative impacts on water bodies or watercourses, and will contribute to the long-term sustainable management of water resources in the area.
9.1.5 <i>Ensure flood risk is incorporated into the preparation of any future local area plans, framework plans and masterplans in the city.</i>	Flood risk has been comprehensively incorporated into the Development Framework for the entirety of the Opportunity Site, in alignment with the policy requirements.
9.1.6 <i>Ensure any proposed measure designed to alleviate flooding/coastal erosion is subject to Appropriate Assessment in accordance with Article 6 of the EU Habitats Directive, where appropriate.</i>	An Appropriate Assessment (AA) Screening and Natura Impact Statement have been prepared for the proposed development, in full compliance with Article 6 of the EU Habitats Directive. These documents assess potential impacts on Natura 2000 sites and surrounding habitats, ensuring that any measures designed to alleviate flooding or coastal erosion are appropriately evaluated. The AA Screening and Natura Impact Statement demonstrate that the proposed development will not have significant adverse effects on the integrity of any protected sites or habitats, and any necessary mitigation measures have been incorporated to protect the environment. This approach ensures that the development aligns with the requirements of the Habitats Directive and environmental best practices.
9.1.7 <i>Continue to protect the coastal area and the foreshore and avoid inappropriate development in areas at risk of coastal erosion and/or would cause and escalate coastal erosion in adjoining areas.</i>	The proposed development is further removed from the coastal area and is not situated in any zone identified as being at risk of coastal erosion. As such, it is not anticipated to have any direct or indirect impact on the coastal area or contribute to the escalation of coastal erosion in adjacent areas. The design and location of the development have been carefully considered to ensure that it does not interfere with or exacerbate any coastal processes, in full accordance with the policy of protecting the foreshore and coastal zones. In addition, we note that the coastal flood risk at the subject site is low.
9.1.8	The proposed development is fully cognisant of the natural environment and has been designed with consideration for the protection of the River Corrib and its tributaries. The





<i>Protect and maintain, where feasible, undeveloped riparian zones and natural floodplains along the River Corrib and its tributaries.</i>	development will not encroach upon or negatively impact any undeveloped riparian zones or natural floodplains. Efforts have been made to ensure that the integrity of these important ecological features is maintained, and the development will not result in any adverse effects on the riparian or floodplain environments. The design respects the surrounding natural landscape and seeks to integrate with it in a way that minimises any potential disruption.
POLICY 10.2 STRATEGIC REGENERATION AND OPPORTUNITY SITES	
10.2.2 <i>Give priority to the development of the strategic Regeneration and Opportunity sites in line with core strategy, in particular to deliver new residential neighbourhoods, on lands supported by a number of land use zonings including CC and CI, as referenced in the land use zoning objectives in Chapter 11.</i>	The proposed development is located on a Regeneration and Opportunity, CI zoned site. The development will provide a total of 219 social and affordable apartment units, contributing to the delivery of much-needed housing in the area. This will play a vital role in meeting the demand for diverse and inclusive residential communities, in line with the city's broader housing strategy. The focus on social and affordable housing aligns with the core strategic objective of creating vibrant, sustainable neighbourhoods that offer accessible living options for all residents. Overall, this proposal strongly supports the vision for urban regeneration and sustainable development, while also fulfilling the social need for affordable housing in an area identified for growth and transformation.

