Our Case Number: ABP-322166-25 Your Reference: Cleverson Ltd



MKO Planning & Environmental Consultants Tuam Road Galway · Co. Galway H91 VW84

Date: 21 August 2025

Re: Proposed residential development for Corrib Causeway, Dyke Road Corrib Causeway, Dyke Road, County Galway

Dear Sir / Madam.

An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter.

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

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Commission at laps@pleanala.ie

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

Yours faithfully,

Executive Officer

Direct Line: 01-8737244

AA01

Glao Áitiúil Facs Láithreán Gréasáin Ríomhphost

LoCall Fax Website Email

(01) 858 8100 1800 275 175 (01) 872 2684 www.pleanala.ie communications@pleanala.ie

Baile Átha Cliath 1 D01 V902

64 Sráid Maoilbhríde 64 Marlborough Street Dublin 1 D01 V902

From: Evelina Sadauskaite <esadauskaite@mkoireland.ie>

Sent: Monday 18 August 2025 17:21

To: LAPS < laps@pleanala.ie > Subject: ABP Ref - 322166-25

Caution: This is an External Email and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Good afternoon,

On behalf of our client, please see attached response to the submission by GCC. Please revert with confirmation of receipt.

Thank you.

Best regards, Evelina

Evelina Sadauskaite

Project Planner

MKO

9C Beckett Way, Park West Business Park, Dublin, D12 XN9W



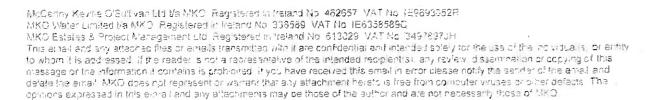
Offices in Galway and Dublin mkoireland.ie | +353 (0)91 735 611

ENVIRONMENTAL SERVICES

Do you know...

Our Environmental team offers a range of services, including EIARs, EPA Licensing, Environment Due Diligence, Strategic Environmental Assessment and Nature Restoration Design.

Click here for further details





Our Case Number: ABP-322166-25 Your Reference: Cleverson Ltd



MKO Planning & Environmental Consultants Tuam Road Galway Co. Galway H91 VW84



Date: 30thJuly 2025

Re: Proposed residential development for Corrib Causeway, Dyke Road

Corrib Causeway, Dyke Road, County Galway

Dear Sir / Madam.

I refer further to the above mentioned proposed road development. .

The Commission has considered the case and hereby notifies you that it has decided to determine the application without an oral hearing. In this regard, please be advised that the Commission has absolute discretion to hold an oral hearing and has concluded that this case can be dealt with adequately through written procedure.

Accordingly, the Commission hereby considers it appropriate to invite you to make a submission in accordance with section 217B of the Planning and Development Act 2000, as amended, in relation to the submission dated 29th July 2025 received from Galway City Council. A copy of the submission can be found on the Commission's website at https://www.pleanala.ie/en-ie/case/322166 under the heading 'Response to Submissions and Objections'. This submission together with the application documentation is also available for public inspection at the following locations:

- 1. An Coimisiún Pleanála, 64 Marlborough Street, Dublin 1
- 2. Galway City Council, City Hall, College Road, Galway H91 X4K8

Please be advised that any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations received by the Commission.

Any submission in relation to the above must be received by the Commission within 3 weeks from the date of this letter, not later than 19th August 2025.

You may make your submission via email to laps@pleanala.ie, or by hand or post to the offices of the Commission. No additional fee is required for making a submission. Please do not use the Commission's online submission portal to make a submission, as the submission portal is for submissions that require a fee.

Glac Áitiúil Facs Láithreán Gréasáin Ríomhphost

LoCall Fax Website Email

(01) 858 8100 1800 275 175 (01) 872 2684 www.pleanala.ie communications@pleanala.ie

Baile Átha Cliath 1 D01 V902

64 Sráid Maoilbhríde 64 Marlborough Street Dublin 1 D01 V902

Please quote the above mentioned reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Oriffin Executive Officer

Direct Line: 01-8737244

AA01

Teil Glao Áitiúil Facs Láithreán Gréasáin Ríomhphost

Tel LoCall

(01) 858 8100 1800 275 175 (01) 872 2684 www.pleanala.ie communications@pleanala.ie

64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902 D01 V902



An Coimisiún Pleanála 64 Marlborough Street Dublin 1 D01 V902 Our ref:

250459

Your ref:

ACP Ref:

322166

Date: 19th August 2025

Re: Submission - Corrib Causeway - Dyke Road, Galway (ACP Ref: 322166)

Dear Sir/Madam,

MKO (Tuam Road, Galway, H91 VW84) have been instructed by our client Cleverson Ltd (C/O Frank Ford,12 Oldfield Kingston, Galway, H91TY0P) to prepare this submission in respect of the planning application for the Corrib Causeway Development, Dyke Road, Galway (ACP Ref: 322166) and the submission from Galway City Council (GCC) date 29th July 2025, in accordance with Section 217B of the Planning and Development Act 2000 (as amended).

The Land Development Agency (LDA), in partnership with GCC have lodged a Part 10 Planning Application to An Coimisiún Pleanála for the development of 219 no. apartments, a childcare facility and all associated ancillary works at Dyke Road, Terryland, Galway, referred to as the 'subject site' for the purposes of this submission. Our client, Cleverson Ltd, are the owners of adjacent lands to the east/southeast of the subject site. Our client's lands have the benefit of planning permission for a mixed-use development, comprising student accommodation and retail floorspace (Pl. Ref. 20/184 & ACP Ref. 309673).

It should be noted that our client is in full support of the principle of the proposed development and welcomes the proposed provision of new residential development to service the needs of Galway City. The purpose of this submission is to acknowledge the 'Response to Observations Report', submitted by GCC, and further highlight the two pertaining issues.

Separation Distances

Enclosed Drawing No: P-300 prepared by Coyle Kennedy Consulting Engineers illustrate the location of the proposed wastewater pumping station that forms a part of our client's permitted development on the adjoining site (Pl. Ref. 20/184 & ACP Ref. 309673). The Coimisiún should note that this wastewater infrastructure forms part of a connection agreement between Uisce Eireann and our client (UE Ref: CDS2100601701).

The proposed Corrib Causeway development positions new residential blocks only 6–7 m from the permitted Cleverson pumping station, falling short of the 15m implied separation required under Uisce Éireann's Code of Practice for Wastewater Infrastructure (Section 5.5). Reliance on window levels, diagonal dimensions or internal layouts cannot substitute for this logical implied prescribed clearance. We would respectfully request that the Coimisiún acknowledges the proximity of habitable buildings within the proposed Corrib Causeway development to the permitted wastewater pumping station and

Galway - MKO, Tuam Road, Galway, H91 VW84 (Correspondence address)
Dublin - MKO, 9C Beckett Way, Park West Business Park, Dublin, D12 XN9W

^{+353 (091) 735 611 |} mkoireland.ie | info@mkoireland.ie

satisfies itself that sufficient mitigation measures are being taken to ensure that no issues may arise as a result

A practical solution may include for Causeway pumping station to be designed with sufficient capacity and storage to also serve the Cleverson development, allowing the permitted Cleverson station to be omitted. This would resolve the compliance issue, prevent the construction of two stations in close proximity and deliver a single, efficient and future-proofed drainage solution. Such an approach reflects good planning practice and aligns with Uisce Éireann's preference for efficient and consolidated infrastructure delivery.

Should the proposed wastewater pumping station be permitted as currently designed, our client is keen to ensure that the principle established by a grant of planning permission for the Corrib Causeway development, in the location proposed, would not prejudice any potential future amendment or standalone planning applications, on our client's lands, which may seek to provide a pumping station at the location permitted under Pl. Ref. 20/184 & ACP Ref. 309673. It is assumed that, in the event that An Coimisiún Pleanála grant planning permission for the proposed Corrib Causeway development, this will enshrine the principle of the provision of a pumping station on the Cleverson site within 6-7m of habitable elements of the Corrib Causeway development (subject to the principles of proper planning and sustainable development), in the event that future planning applications are made by our client.

Connectivity

Following a review of the Response to Observations report, as submitted by GCC, we wish to again highlight that provision is made for future connectivity between the subject and Cleverson sites, and which specifically identifies <u>pedestrian and vehicular access</u> through the adjoining permitted student accommodation development (illustrated in Figure 1 below).

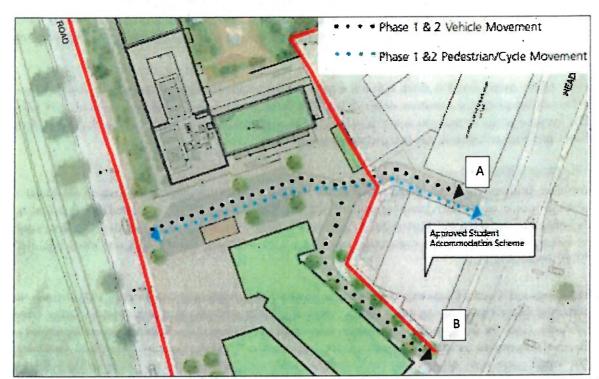


Figure 1 Abstract from the Design Statement, prepared by MOLA and submitted as part of the Corrib Causeway planning application (Route A&B annotations added in by MKO)

Galway - MKO, Tuam Road, Galway, H91 VW84 (Correspondence address) Dublin - MKO, 9C Beckett Way, Park West Business Park, Dublin, D12 XN9W

2

^{+353 (091) 735 611 |} mkoireland.ie | info@mkoireland.ie

McCarthy Keville O'Sulivan Ltd t/a MKO. Registered in Ireland No.: 462657 VAT No: (E9693052R MKO Water Limited Lip MKO Registered in Ireland No. 338389 VAT No: (E83585890 MKO Estates 3. Project Management Ltd., Registered in Ireland No: 613029 VAT No: 3497867JH

The Coimisiún will note, in the context of the permitted student accommodation development on our clients' lands, that the pedestrian/cycle movement illustrated in Figure 1 (route A) below traverses an area which comprises a 'back of house' service, delivery and staff car parking area for the adjoining Cleverson development. The Cleverson scheme is not designed to take vehicular traffic other than infrequent, controlled service vehicles to service the back of the Cleverson site. Galway City Council Road Department did not want a traffic junction at this location but accepted a single-lane width scenario for infrequent service access, which would be on a scheduled basis. This was established during the pre-planning consultation, planning application and post-planning stages of the student accommodation development with Galway City Council's Roads and Transport department. The initial site design for the student accommodation site, as agreed with Galway City Council, was for service vehicles access only due to the proximity of the access to the Lidl junction across the road and the Dyke Road Junction and to ensure low numbers of vehicles utilising the junction. Allowing through traffic movements at this location would pose a greater accident risk at the junction due to the intensification of use at the entrance onto what is essentially a 4-way priority junction. Thus, it is the understanding of our client, that the Galway City Council Road Department have not been consulted in relation to the Corrib Causeway development.

3

When the design and planning application process for the student accommodation development was progressing, there was no detailed design available for the neighbouring residential development which is the basis of the subject planning application. Given the absence of detail available, Galway City Council and An Coimisiún Pleanála decisions established a 'through route' from the Headford Road, via the student accommodation development, to the rear boundary of our client's application site to provide for connectivity/permeability. Subsequent discussions between our client and the Planning Authority in respect of the planning permission and associated conditions (Pl. Ref. No: 20/184) have established our client's operational and general security concerns associated with unfettered pedestrian and cyclist access to the rear of a student accommodation development into an area which effectively comprises a service yard, which will be used by large delivery/service vehicles associated with the Cleverson development, imposing substantial liabilities and insurance costs on our client. In addition, our client is concerned such access would place other unreasonable burdens on our client, including piling costs, maintenance and surveillance obligations to avoid antisocial behaviour at their sole expense.

Our client appreciates the importance of an integrated movement network, and Route B illustrated in Figure 1 above, and Masterplan 1 and Masterplan 2 drawings attached, represent an example of a more appropriate route, which would connect the users closer to the city, while benefiting from passive surveillance by both the Cleverson and Corrib Causeway (phase 1 and 2) developments. This enhanced visibility, and a route absent from delivery/service vehicles would significantly improve the security of the users, and has the potential to accommodate more than infrequent service vehicles, should it be desired to do. The proposed sketches show a revised scheme of the Cleverson site, which our client is willing to accommodate in order to alter the placement of the through route. We would respectfully request that An Coimisiún Pleanála take the revised proposal into consideration, and consider whether the design of the proposed development, specifically in terms of the provision of linkages through the Cleverson site, constitutes an optimum or appropriate arrangement.

We respectfully request that An Coimisiún Pleanála carefully consider the matters raised in this submission. Cleverson Ltd are happy to engage collaboratively with the LDA and Galway City Council should this be necessary for any further dealings in relation to the issues raised above, or the

Galway - MKO, Tuam Road, Galway, H91 VW84 (Correspondence address)
Dublin - MKO, 9C Beckett Way, Park West Business Park, Dublin, D12 XN9W



^{+353 (991) 735 811 |} mkpireland ie | info@mkpireland le

McCarthy Keville C Sulfivan Ltd t/a MKO. Registered in Ireland No: 462957, VAT No: IE3633052R MKO Water Limited U/a MKO Registered in Ireland No: 338569, VAT No: IE6358539Q MKO Estates & Project Management Ltd. Registered in Ireland No: 813029, VAT No: 14973972H

development in general. Should you require any further information, please do not hesitate to contact this office.

Yours sincerely,

Evelina Sadauskaite Project Planner

MKO

Enclosed

- > Sketch of Masterplan Stage 1 and Stage 2, prepared by Simon J Kelly Architects.
- > P-300 Site Drainage Drawing, prepared by Coyle Kennedy Consulting Engineers.

Galway - MKO, Tuam Road, Galway, H91 VW84 (Correspondence address)
Dublin - MKO, 9C Seckett Way, Park West Business Park, Dublin, D12 XN9W

+353 (991) 735 611 | mkoireland.te | info@mkoireland.te

McCarthy Kenzie D'Sultwan Ltd 1/a MKO. Registered in trefand No: 482657 VAT No: IE9893053R MKO Water Limited I/a MKO. Registered in trefand No: 338589 VAT No: IE6358586Q MKO Estates 3 Project Management Ltd. Registered in Ireland No: 913029 VAT No: 3497897.JH



