Our Case Number: ABP-322166-25

Your Reference: Galway Retail Park CLG



RW Nowlan and Associates 37 Lower Baggot Street Dublin 2

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,

Lauren Griffin

Executive Officer

Direct Line: 01-8737244

AA01

Email

From: Kirsty McDonnell < kirsty@rwnowlan.ie>

Sent: Tuesday 19 August 2025 10:28

To: LAPS < laps@pleanala.ie>

Subject: File 322166 Submission in Response to Invitation

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.

Hi there,

Please find attached submission in response to an invitation to our client, Galway Retail Park (Management) CLG issued on the 30th of July in relation to proposed development at Corrib Causeway, Dyke Road, County Galway. ACP reference ABP-322166-25.

The invitation confirmed that no additional fee was required to make this submission.

Please let me know if there are any queries on the attached.

Kind regards, Kirsty

Kirsty McDonnell Senior Planning & Development Consultant

Basement Office, 54 Fitzwilliam Square North Dublin 2

Phone: 01 873 3627
Email: <u>kirsty@rwnowlan.ie</u>
Website: <u>www.rwnowlan.ie</u>

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Basement Office

54 Fitzwilliam Square North

Dublin 2

D02 X308

An Coimisiun Pleanala,

64 Marlborough Street,

Dublin 1

D01 V902,

Our Ref: 91.08/25

Date: 19th August 2025

RE: Invitation to Submit Observation on Applicants Response to Observations at Corrib Causeway, Dyke Road, County Galway. ACP File Ref ABP-322166-25.

Dear Sir/Madam,

We are writing in response to the invitation letter dated 30th July 2025 from An Coimisiun Pleanala for further submissions following the applicant's response to submissions in relation to Planning File Ref ABP-322166-25.

It is appreciated that the applicant has provided a response to the concerns raised within our original observation submitted on behalf of the Galway Retail Park (Management) CLG of Headford Road, Galway. However, there remains significant concern in relation to the proposed development and the resulting impact on the neighbouring retail park as outlined below.

The proposed development includes the removal of 389 no. of the existing 511 no. car parking spaces neighbouring the retail park. The proposal also includes 33 no. car parking spaces for the proposed residential units.

PUNCH Consulting Engineers carried out car parking surveys of the neighbouring car park from the 16th to the 18th of November 2023 as part of the Traffic and Transportation Assessment. Critically, the survey did not include any information in relation to the existing use of the retail park car park. The results for the surveyed areas are described within the response document as follows:

The maximum occupancy rates were recorded as follows:

- Weekday Carpark 1 maximum occupancy = 16%
- Weekday Carpark 2 maximum occupancy = 88%
- Weekend Carpark 1 maximum occupancy = 42%
- Weekend Carpark 2 maximum occupancy = 69%

The overall surveyed maximum capacity of the combined overall carpark area was 263 on the weekday and 350 on the weekend.

The combined maximum carpark use on the weekend date surveyed was 350 no. spaces of the 511 no. spaces available. The proposed development includes the removal of 389 no. car parking spaces resulting in only 122 no. car parking spaces remaining on the site. As such, there is a clear underprovision of car parking remaining on the site to provide for the existing day-to-day demand. This also does not take in to account the significant demand for car parking increasing during peak periods such as December.

The Response document refers to the existing car park as a 'surface-level commuter car park'.

However, the survey results from PUNCH Consulting Engineers recorded occupancy on the weekend

survey day as 42% in carpark 1 and 69% in carpark 2. The weekend days would be outside of standard commuting days which would generally be Monday through Friday. It is clear that the car park has a much more broad demand than simply commuter car parking and is in demand throughout the full week.

Additionally, the proposed development proposes only 33 no. car parking spaces for the 219 no. proposed residential units. While a move towards reduced car parking in residential developments is acknowledged, it is considered that a provision of 0.15 car parking spaces per unit is unacceptably low. This is an unacceptably low provision in relation to the subject residential development proposal for a number of reasons including the substantial removal of existing car parking spaces which are in demand and also the location of the proposed development directly neighbouring an existing retail park where many of the existing retailers are bulky goods stores for which the availability of car parking is essential.

Of significant concern to our clients is the anticipation of significant car parking overflow into the existing retail park as a direct result of the proposed development. The submitted response from the applicant contains a response to this concern. This response concludes the following;

"In conclusion, the potential for overflow parking into the neighbouring retail park has been comprehensively assessed and is not expected to materialise. The combination of existing underutilised parking capacity, the reduction in trip generation, the modal shift anticipated from the change in land use, and the provision of retained on-site parking collectively address the concerns raised".

It is unclear how the applicant has arrived at this conclusion. The existing demand within the retail park car park was not included within the traffic survey undertaken by PUNCH Consulting Engineers and the car parks that were included in the survey show greater car parking space usage than the number of spaces remaining should the proposed development proceed (350 no. of 511 no. spaces in use at one time during weekend survey and only 122 no. spaces to remain after development). Given

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the lack of data in relation to this issue, the conclusion presented within the response documentation is not accepted.

At present, it remains absolutely clear that there will be significant overflow of parking from residents into the retail park further reducing the available car parking for retail customers. The applicant states that a strategy to manage parking will be put in place which is appreciated but without this being available before determination of the planning application, combined with no survey data in relation to the existing demand for the retail car park, concern remains around how this will actually be managed in practice upon completion of the proposed development and occupation of the residential units.

The loss of the proposed 389 no. car parking spaces poses a serious risk of creating an overflow situation, where the reduced capacity of the car park could lead to parking difficulties for the retail park's customers. This overflow could disrupt customer access to businesses within the retail park, potentially leading to a decline in footfall and, consequently, a negative impact on the revenue of the businesses operating there.

Given the importance of sufficient parking facilities for the viability of the retail park, our clients are concerned that the proposed development, as currently outlined, does not adequately address the potential repercussions of the proposed reduction in parking capacity. They are particularly worried about the lack of alternative parking arrangements or mitigation strategies to prevent the overflow of vehicles into the surrounding areas, which could exacerbate traffic congestion and create further issues for local community.

We appreciate this opportunity to provide a submission in relation to the response made by the applicant. Please contact us if you have any queries in relation to this submission.

Yours Sincerely,

Corrib Causeway, Galway

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RW Nowlan & Associates