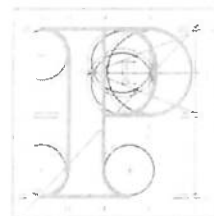


Our Case Number: ABP-322166-25

Your Reference: Galway Retail Park CLG



An
Bord
Pleanála

RW Nowlan and Associates
37 Lower Baggot Street
Dublin 2

Date: 12 May 2025

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

Dear Sir / Madam,

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

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

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

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

Yours faithfully,

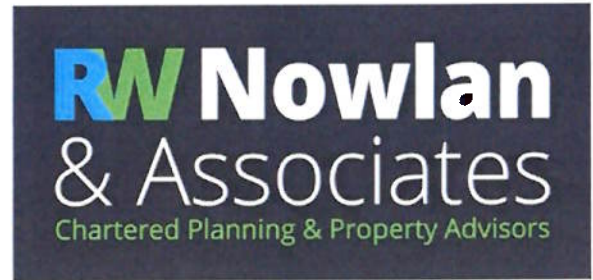
Lauren Griffin
Executive Officer
Direct Line: 01-8737244

JA02

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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



Planning Observation

RE: Application made to An Bord Pleanala for a 219 no. apartment units and a childcare facility (approx. 241 sq m) on a site area of 1.144 ha at Corrib Causeway, Dyke Road, Terryland, Galway. An Bord Pleanala Reg Ref: JA61.322166.

DATE: 12th May 2025

on behalf of: Galway Retail
Park (Management) CLG,
Headford Road, Galway

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1.0 Introduction

RW Nowlan & Associates have been retained by Galway Retail Park (Management) CLG, Headford Road, Galway, to prepare this observation in relation to an application made by Galway County Council in Partnership with the Land Development Agency to An Bord Pleanála under Section 175 (3) and Section 177AE (3) of the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended) to carry out the following proposed development on a site of approx. 1.144 ha at Corrib Causeway, Dyke Road, Terryland, Galway. The site is bounded by the Black Box Theatre to the north; an existing car park to the south; Dyke Road to the west; and Galway Retail Park to the east.

This report sets out the concerns of our client in relation to potential disruption to the businesses within the Galway Retail Park during both construction and operational phase of the proposed development. Their concerns can be summarised under the following headings which will be discussed within this observation;

- Loss of Surface Level Parking Spaces and Public Walkway;
- Management of Parking During Construction and Operational Phase.

We enclose a payment of the prescribed observation fee of €50 made out to An Bord Pleanála.

2.0 Proposed Development

The proposed development is described in the statutory notices as follows:

'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:
(i) public open space (approx. 1,183 sq m) to the west of the proposed building fronting onto Dyke Road, accommodating outdoor seating, planting, a sunken garden, and pedestrian pathways and connections; *and*

(ii) 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 a dedicated external play area (approx. 61 sq m) 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 northwest and southwest 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.

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development'.

3.0 Galway Retail Park

Galway Retail Park is one of the most popular shopping destinations in Galway city, offering a variety of stores, services and entertainment options for visitors, mainly retail warehousing outlets. The retail park is located on the Headford Road, just 1km from Eyre Square. The retail park is easily accessible by car, bus, bike or on foot and has free parking spaces for customers.

Some of the brands that operate at the retail park include Woodies, Aldi, Smyths Toys, Halfords, Currys and Elverys, McDonald's and the IMC cinema. The Galway Retail Park is located directly adjoining the subject site as shown in Figure 1 below.



Figure 1: Aerial View of the Application Site Outlined in Red With Galway Retail Park Outlined in Yellow

As a result of the heavy, bulky and/or unwieldy nature of many products sold within the Retail Park, surface level car parking is fundamental to the businesses to allow for the safe transport of goods from the individual stores to awaiting vehicles. It is imperative for the continued operation of our businesses within the Galway Retail Park that sufficient surface level carparking is available nearby the retail units.

4.0 Loss of Surface Level Parking Spaces and Public Walkway

The proposed development site is currently in use as a public surface level car park. As confirmed within the Traffic and Transport Chapter of the EIAR (Chapter 13) as prepared by PUNCH

Consulting Engineers and submitted with the application documents, there are currently 554 no car parking spaces spread across the northern and southern car park areas of the site. In total, 389 no. of the existing spaces, 70% of the total provision, would be removed to facilitate the proposed development.

Additionally, only 33 no. car parking spaces are proposed for the 219 no. apartment units. As such, the subject application proposes to provide 0.15 car parking spaces per dwelling unit. It is considered that the proposed car parking ratio for the residential development is not sufficient. Within the Galway City Development Plan 2023-2029, the subject site is identified as an 'Inner Residential Area' which has a parking standard of maximum 1 space per dwelling. While the proposal is asserting compliance as it is below the *maximum* standard, it is completely unreasonable to assert that 33 no. car parking spaces is adequate to accommodate 219 no. new housing units.

Given the proximity of the subject site to the Galway Retail Park, it is considered highly likely that any parking demand overflow from the new residential development would inevitably result in residents parking in the retail park and further reducing the number of available parking spaces available for customers. Should this occur, it will significantly 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. This would apply significant pressure on the retail park particularly during peak times such as Christmas etc.

Given the importance of sufficient parking facilities for the viability of the retail park and for the city centre, our clients are deeply concerned that the proposed development, as currently outlined, does not adequately address the potential repercussions of this significant reduction in parking capacity. They are particularly concerned about the lack of alternative parking or transport arrangements and what impact this will have attracting customers into the city centre. Our clients are also concerned about the lack of mitigation strategies to prevent the overflow of vehicles into

the surrounding areas, which will exacerbate traffic congestion and create further issues for local community.

At present, there is a public walkway from the Galway Retail Park directly connecting to the subject site, between the IMC Cinema and Intersport Elverys units. This access provides positive connectivity from the Retail Park for customers. As part of the proposed development, the subject site will include boundary fencing and increased hedgerows which will completely sever the existing connectivity at this location and reduce the accessibility of the Galway Retail Park. It is considered that this should be reassessed and pedestrian connectivity prioritised within the proposed development.

The application documents do not consider the above concerns in relation to the existing retail park and the related requirements for retail warehousing retail parks. The proposal is both removing significant car parking and also not providing sufficient new car parking for the proposed 219 no. apartment units which would inevitably result in overflow car parking being required and inevitably sought within the neighbouring Galway Retail Park.

5.0 Management of Parking During Construction and Operational Phase

The applicant has submitted an Outline Mobility Management Strategy with the application documents, prepared by PUNCH Consulting Engineers. The report provides a brief overview of the intended car parking management during operational stage of the development. The applicant has not submitted details of construction parking and management as part of the planning application.

In relation to construction stage traffic, given the proximity of the proposed development to the Galway Retail Park it is vital that construction traffic is strictly managed to ensure there is no undue negative impact on the day to day operation of the Galway Retail Park. Additionally, it is essential that construction works are not expected to park within the Galway Retail Park as this would

significantly reduce the available parking spaces for customers and cause significant disruption to the normal running of the Retail Park.

The submitted Mobility Management Plan does not include adequate mitigation strategies to prevent the overflow of vehicles from the proposed residential development into the surrounding areas, which could exacerbate traffic congestion and create further issues for local community.

The Mobility Management Plan states the following;

“The measures identified are a mixture of policies and incentives designed to encourage changes in travel behaviour and sustain a low rate of single-occupant car use. The measures are designed to be implemented over a period of time, allowing costs to be spread and ensuring that policies and incentives are implemented together.

While little may be observed in terms of travel behaviour in the short term, as implementation gains momentum so will the impact in terms of travel behaviour”.

The above statement includes long term incentives to reduce reliance on single-occupant car use. While long-term strategies are encouraged, that does not resolve the significant concerns raised for the short to medium term. This also does not go in to sufficient detail on what the long term incentives are and how they will be encouraged within the development. The submitted reports do not give any examples as to where such strategies have been successful in long term reduction of car dependence and in particular, this may not be realistic in the subject site as the public transport links are limited in this area and would take an extremely long time to provide the support required to significantly reduce car dependence in the area. It is considered that the submitted report does not provide the required clarity in relation to car parking management following completion of construction stage to ensure that the existing retail park is not unduly negatively impacted.

Additionally, there will be significant additional pressure on the parking area during drop off and collection times for the proposed creche. It is unclear where the designated parking will be located for the creche and whether this will be managed strategically or if parents will park in the retail park and drop/collect their children adding further pressure on the existing car parking provision. The application documentation does not appear to consider the parking requirements for a large creche on site. The proposed 33 no. parking spaces will also have to accommodate the staff on site such as building management and also visitors to residents. It is simply unrealistic to expect such a low level of parking provision would be adequate. The application documentation does not provide any information on where it is proposed for overflow car parking to be provided resulting in an inevitable ad hoc system whereby staff, residents and visitors would park within the neighbouring retail park.

The application documentation does not provide sufficient detail as to how the residential and commercial car parking provision will be managed during the operational phase of development. Considering the scale of the development proposed and the significant potential impact it would have on the adjacent existing retail park, this should be resolved prior to the granting of any permission.

6.0 Conclusion

In summary, it is considered that the applicant has not provided sufficient supporting documentation to address the concerns raised throughout this Observation Report. The proposed development in this location would inevitably result in a significant negative impact on the continued operation of the Galway Retail Park.

This report has outlined significant, reasonable, concerns in relation to this planning application in terms of the removal of substantial levels of surface level car parking and also the inevitable

overflow of residents parking within the Retail Park due to a significant under-provision of residential parking spaces within the proposed development.

It is therefore considered that planning permission should be refused in this instance pending review and consultation by the applicant with the existing business operators with the retail park to provide a sustainable solution to development at the subject site.

We look forward to hearing from you in due course.

Yours Sincerely,

A handwritten signature in black ink, appearing to be 'R.W. Nowlan', written in a cursive style.

R.W. Nowlan & Associates