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APPENDIX 3-1

OPINION LETTER ISSUED BY GALWAY CITY COUNCIL ON THE 25TH OF MAY 2026

Comhairle Cathrach na Gaillimhe
Galway City Council

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PLEASE QUOTE YOUR PLANNING REFERENCE IN ALL CORRESPONDANCE WITH THE PLANNING DEPARTMENT
Contact 091 536400
Email: planning@galwaycity.ie

Kingston Stables Ltd.
C/O Ms. Evelina Sadauskaite
Planner Agent,
MKO,
Tuam Road,
Galway
H91VW84.

25th May 2026

Our Ref: LRD 02/2026

Re: Large Scale Residential Development - Kingston Stables, Knocknacarra, Galway.

A Chara,

Please find attached Notice of LRD Opinion in respect of the above.

Mise le Meas

EDEL FINAN

Senior Staff Officer,
Planning Department

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Fáiltítear roimh chomhfhreagras i nGaeilge.
Correspondence in Irish is welcome.

Halla na Cathrach, Bóthar an Choláiste, Gaillimh, H91 X4K8

City Hall, College Road, Galway, H91 X4K8

Galway City Council
Planning Department: Development Management
LRD Opinion
LRD 2 /26

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Prospective LRD Applicant: Kingston Stables Ltd
Prospective LRD Site address: Lands at Knocknacarra.
Prospective LRD Description:

1. Provision of 133 no. residential units in 2 no. development areas with a mix of apartment and house types on a site area of 2.9 ha. The buildings range between 2 no. and 3 no. storeys in height. The development will comprise the following:
    - 51 no. 3-bed townhouses;
    - 6 no. 4-bed townhouses;
    - 1 no. 1-bed duplex apartments;
    - 1 no. 2-bed duplex houses;
    - 37 no. 2-bed ground floor duplex apartments;
    - 37 no. 3-bed duplex houses.

2. Demolition of existing structures (387.9sqm);
3. Vehicular access to the proposed development from a permitted road (Planning Reference 24/60370 refers);
4. Upgrades to the permitted road (Planning Reference 24/60370 refers);.
5. Conversion and upgrade of an existing structure to a local centre (65.8 sqm);
6. The provision of public open space;
7. The provision of 192 no. bicycle parking spaces;
8. The provision of 142 no. car parking spaces;
9. Public lighting, bin stores, signage, services, ESB substation, site landscaping and all ancillary site development and enabling works.

LDR Opinion:
Having regards to the Planning and Development (Amendment) (Large Scale Residential Development) Act 2021 Section 32D (1), the planning authority's opinion is that there is a reasonable basis on which to make an application for permission for the proposed LRD, subject to the below outlined issues to be addressed, all of which is subject to Section 32E of the Planning and Development (Amendment) (Large Scale Residential Development) Act 2021, which states the following;

- "Neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the planning authority of its functions under this Act or any regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings".

Opinion Points:
Planning Department observations:

1. The Galway City Council Development Plan 2023 – 2029 adopted and in force from 4th of January 2023; any application under this process shall be accompanied by a report demonstrating how the proposal would comply with the requirements of the Galway City Development Plan 2023-2029.

2. The application shall demonstrate compliance with the Galway City Council Development Plan 2023 – 2029 in 5.3.1 European Designated Sites, including Appropriate Assessment screening

report, and if necessary, NIS, EIAR, noting requirements under the Galway City Council Development Plan 2023 -2029.

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3. The application shall demonstrate compliance of the Galway City Council 2023 -2029; Section 9.2, Flood Risk Assessment.

4. The application shall demonstrate compliance with regards to impacts of Climate Change for such developments, noting requirements under the Galway City Council Development Plan 2023 -2029.

5. Demonstrate compliance with the Galway City Council – Urban Density and Building Heights Study, Sept 2023, noting the requirement to comply with the Sustainable and Compact Settlement Guidelines with regards to density.

6. Demonstrate compliance with the requirements of the 'Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities, 2025'.

7. Demonstrate compliance with the requirements of the Sustainable and Compact Settlement Guidelines.

8. With regards to the proposed naming indicated in the details submitted, the Galway City Council Development Plan 2023 – 2025 states in Section 7.4 - Bilingual City states;

- Policy 7.4 Bilingual City 1. Protect and promote the distinctive cultural and linguistic heritage of the city and continue to support Galway's status as a Bilingual City and recognise the importance of the Irish language as a cultural, community and economic resource. 2. Promote the use of the Irish language in the naming of new residential developments, public roads and parks and encourage the preferential use of Irish and bilingual signage in the commercial and public realm. 3. Support and facilitate the development of infrastructure, which promotes the cultural and linguistic heritage of the city, where appropriate. 4. Support the implementation of the Plean Tenga Chathair na Gaillimhe 2020- 2026 and the designation of the city as a Gaeltacht Service Town. Support the implementation of language plans for Bearna & Cnoc na Cathrach LPA, Galway City East LPA and the Eachréidh LPA. 5. Support infrastructure and interventions in Gaeltacht areas of the city that preserves and promotes Irish in the Gaeltacht, conserves and protects the heritage, culture and richness of the language as well as strengthens the position of the Irish Language in the public realm.
  In this case you are advised to revise the naming proposals for this area to be in line with the above requirements.

9. The pedestrian and cycle access to Millers Lane shall be included and provided for and constructed as part of Phase 1 of the development.

11 A shadow profile plan for the entire development should be submitted with any application.

12 Visitor bicycle parking should be spread out and located in rational locations.

13 The proposed application should include a movement strategy and demonstrate how the proposed layout has been designed to ensure the provision of a sustainable pedestrian and cycle circulation plan for the entire site, and this should include how this development and its connection points will interface with the wider surrounding area, such as recreational facilities, schools, cycle paths and pedestrian connections.

14 The provision of connection point/s to the western RA zoned lands should be provided for including access points for pedestrians, cyclists and service vehicles where required.

15 As the development exceeds 75 units the provision of a creche is required, demonstration that the size of the unit proposed would cater for the demand generated by this entire development is required, and that the unit proposed would be in accordance with the Galway City Council Development Plan 2023 – 2029 Section 11.14.

16 Having regards to the proximity of adjacent residential housing the inclusion and that rock breaking will be likely required the preparation and submission of a Noise Impact Assessment would be required.

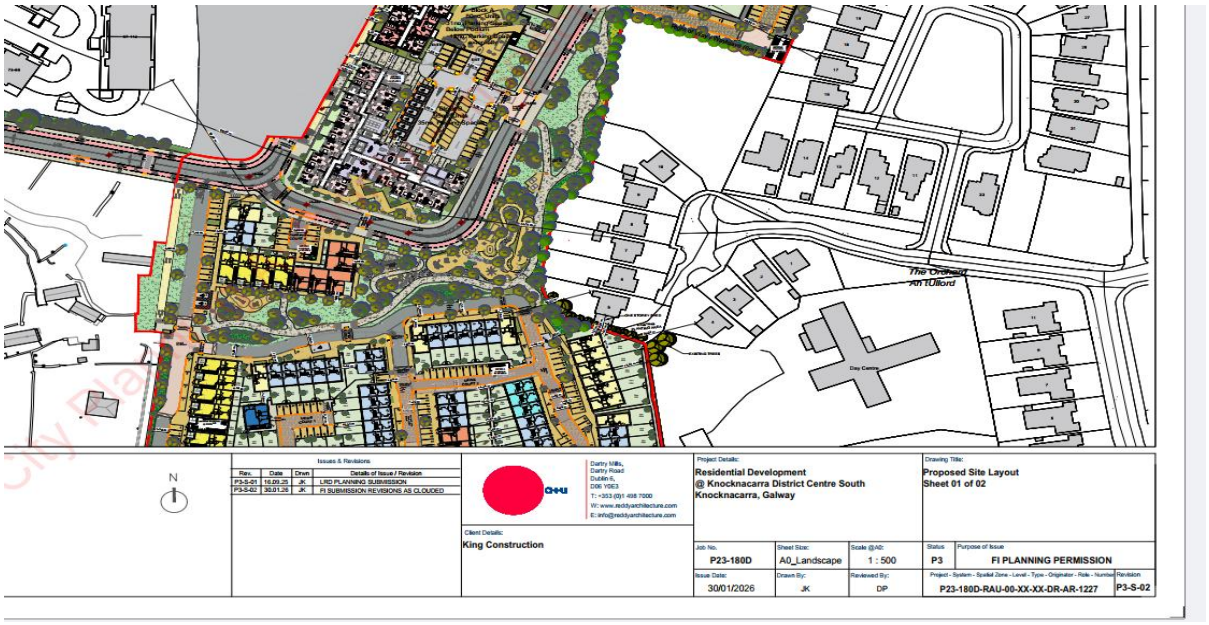
17 In addition to the above there is a necessity in particular to also submit reports on the following:
   a. Scheme Sustainable Statement
   b. Climate Action Statement
   c. Statement of Housing Mix
   d. Design Statement
   e. Bat report and any Derogation for impacts upon Bats must be provided with any application.

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Active Travel observations:

Please see attached the comments of the Active Travel Unit in relation to a proposed Residential Development at Kingston Phase 2,

• I refer to submitted drawings for planning reference 25-60320 (under appeal to ACP) and attach extract of drawing submitted as part of planning permission. The road and shared surface route (Proposed Active Travel Surface) are included with this planning application together with open space areas to east and west of shared surface as indicated.

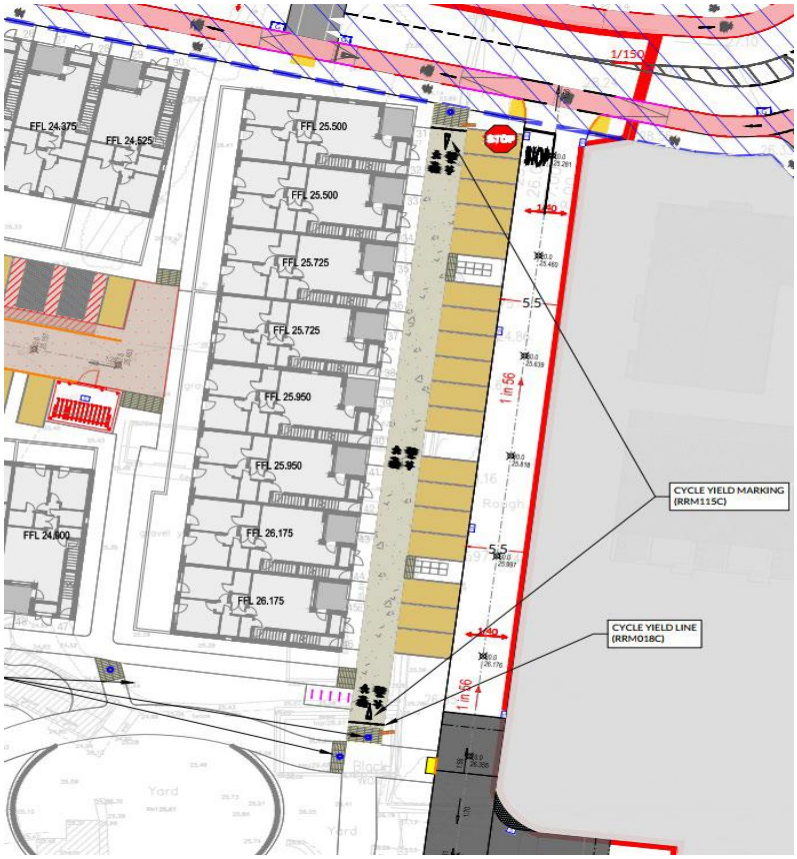


This proposed development (Stage 2 Kingston Phase 2) includes areas that was included with previous planning permission. This includes the road, shared surface route (Proposed Active Travel Surface) and car parking is now indicated to the east of the shared surface instead of open space area as shown in previous planning application. The open space area shown to the west of the shared surface in previous application is now omitted.



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Furthermore, the active travel office would have concerns with the width of path between building line of housing units and the shared surface particularly with doors opening outwards as appears as appears to be indicated on attached extract.



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The applicant is requested to comment on locating car parking spaces at the road junction/stop line of access road at northern end of proposed development (see above).
• All vehicular, pedestrian and cycling infrastructure to be in compliance with Design Manual for Urban Roads & Streets
• Preliminary Design Stage 1 & Detailed design, a stage 2 Road safety audit shall be undertaken and recommendations adopted into the design prior to construction.
• All cycle infrastructure and facilities proposed, including cycle parking, shall comply with the requirements of the NTA Cycle Design Manual (NTA and Department of Transport 2023).
• The applicant should examine the width of footpaths/access routes within the proposed development and consider advice of publication Building for Everyone: A Universal Design Approach which outlines that - a clear width of 2000mm is recommended to enable people to walk alongside each other and for two wheelchair users or parents with strollers to pass comfortably and demonstrate compliance with this recommended footpath/access route width

• To get an overview of pedestrian/cycle permeability routes for this development and other developments within the Kingston masterplan, the applicant shall submit an appropriately merged drawing to clearly demonstrate the pedestrian/cycle permeability links of the various developments within the Kingston masterplan.

Water and Drainage Observations:

1. A Stage 1 Storm Water Audit should be submitted as part of the planning submission. A Stage 2 audit is required post grant/prior to construction. A Stage 3 audit is required post construction. Further information in relation to the Storm Water Audit Procedure can be requested from GCC. The Consultant/Engineer carrying out the audit must be independent of the Design Team.

2. Any proposed surface water drainage discharging to the existing surface water network is subject to the relevant road opening licences and storm water connection application being submitted.

3. As-built drawings shall be provided to Galway City Council upon completion of the project. Drawings are to be submitted in AutoCAD compatible (dwg/dxf) format and pdf, with the surface water infrastructure shown on a separate layer and a standard legend included. All Drawings to be geo-coordinated & scaled to OS.

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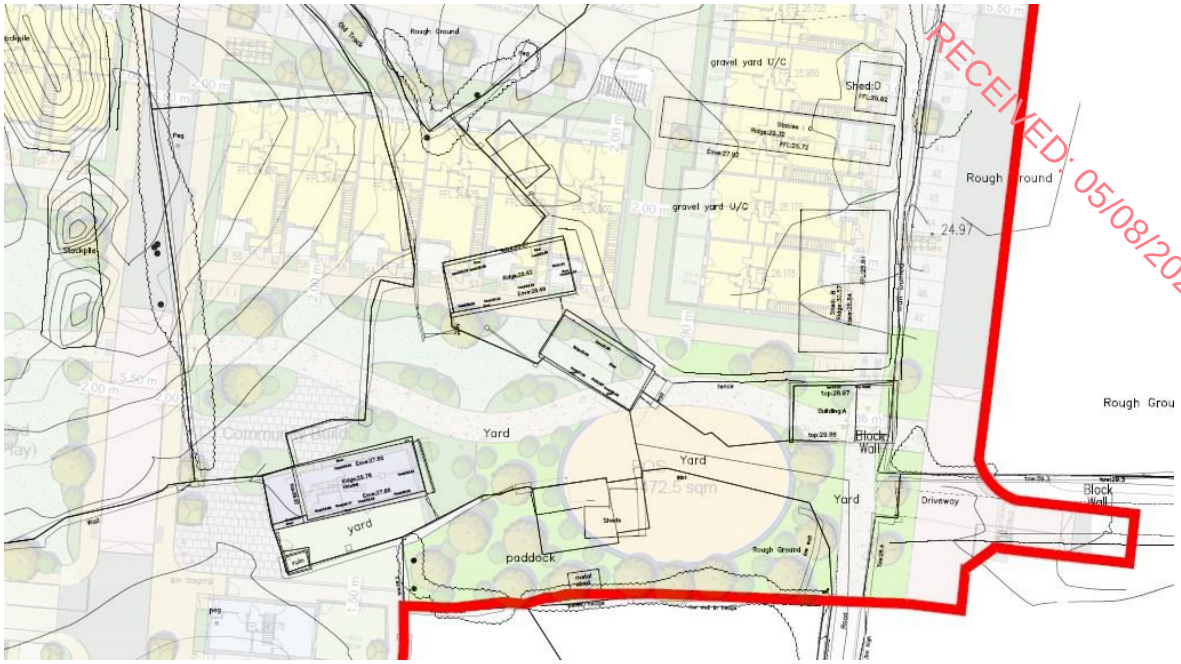
Heritage:

- The below comments are made with reference to Section 8.4 - Vernacular Heritage of the Galway City Development Plan 2023-2029, noting Policy 8.3.1: *Encourage the conservation and rehabilitation, renovation and reuse of existing structures that contribute to the character of the city*.

Noting with regards Vernacular Heritage, in addition to structures of special interest included in the RPS and designated ACAs, the city contains a wide variety of structures and features, that contribute to local heritage and the distinctive character of the city. That character can be extensively diminished by their loss through demolition and replacement. The Council will encourage the retention and continued use of such structures recognising their contribution to local identity and a continuing sense of place.
The proposed development includes for the reuse of a vernacular structure as a *Local Centre Café Building*, which is welcome.

Historic / local heritage / built heritage interest
The development however includes for the demolition of a number of other vernacular structures which form part of this farm complex. Historic mapping analysis (included further in this referral) strongly indicates that two structures (noted as building E and A on the demolition drawing) proposed for demolition are of pre Great Famine origin (as recorded in the 1838 Ordnance Survey first edition mapping), and are therefore of local heritage / historical / built heritage interest, noting that much vernacular heritage has been lost within close proximity to the city / this area.

Vernacular built heritage morphology
The significance, heritage value, and character of vernacular built heritage are intrinsically linked to the spatial arrangement, functional interrelationship, and collective integrity of associated structures. This holistic appreciation is substantially diminished where a single building is isolated from its contextual setting through the demolition of the wider building complex (including walls and enclosures).



Overlay of proposed development (P23-180D-RAU-00-XX-XX-DR-AR-1003) and existing survey drawing (P23-180D-RAU-00-XX-XX-DR-AR-1002).



Overlay of existing survey drawing (P23-180D-RAU-00-XX-XX-DR-AR-1002) and the Ordnance Survey 6 Inch, surveyed 1838.



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Overlay of existing survey drawing (P23-180D-RAU-00-XX-XX-DR-AR-1002) and the Ordnance Survey 25 Inch, surveyed 1894.



Overlay of existing survey drawing (P23-180D-RAU-00-XX-XX-DR-AR-1002), proposed development (P23-180D-RAU-00-XX-XX-DR-AR-1003), and the Ordnance Survey 6 Inch, surveyed 1838.



Retention of vernacular buildings
It is recommended that buildings E and A are retained in the interest of protecting the historic / local heritage / built heritage interest and cohesion of the complex. It is acknowledged that Building A has been heavily altered, and that an acceptable approach to its retention (suitably maintained and wall tops capped) as an unroofed structured potentially as a landscape feature or cycle storage etc). Whilst building F is a later structure it provides spatial coherence / enclosure to building E and the proposed retained structure, with a potential use as cycle storage. The stone lean to on the retained building should also be retained in its form.

The retention of these buildings offers the opportunity to create a unique community centre / open space to the development, providing the often sought after sense of place to new developments.

Landscaping
It is recommended that the proposed landscaping respond to the vernacular structures in a form which reflects the historic arrangement of walls and enclosures.

Materiality
Regarding the overall materiality of the site, the design statement makes reference to the use of materials which reflect Galway built and vernacular traditions. It is noted that the extensive use of brick is not reflected in Galway's built heritage, which is primarily render and stone. It is suggested that the use of render (napped and / or roughcast) is a more appropriate material for the scheme, with limestone / granite utilised at key areas.

Reuse of boundary stone
It is recommended that field boundary walls are reused within the scheme, potentially in landscaping or building cladding.

Recreation and Amenity observations.

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Open space connectivity to Kingston Public Park
The applicant is required to provide detailed sections of how the change in level between the open space and Kingston Park is resolved, including details of boundary treatments such as walling, railing, fencing, retaining walls (and their facades) and planting. The applicant needs to provide details of how raised areas of planting (especially grassed areas) will be accessed for maintenance purposes. Access to the footpaths, ramps and stepped areas connecting the open space to the public park will remain open and will not be gated, in the interests of pedestrian permeability from the public park to Millars Lane in the north east.

Local Area Play facilities within the development
The applicant needs to demonstrate that the Local Areas of Play provision (play areas for young children) outside of the main open space area are located within 100 metres of homes as per the Green Spaces Strategy. This will reflect how the play provision is set out in phase 1 of the development. The Green Spaces Strategy provides that play facilities should be with walking distance from where children live. Every home should have access to play space within 100 metres. Local Areas of Play (LAPs) are designed to allow for ease of informal observation and supervision and primarily function to encourage informal play and social interaction for young children. It should provide a minimum area of 100 square metres, but this can be distributed within a development as part of playable routes.

Active Teen Spaces – Teen play provision
The proposed scheme does not meet the required standard for teen play. Rec & Amenity require the space to be **specifically designed for teenagers** with appropriate and novel elements and must be clearly **designated for teens**. Studies show that when teenagers congregate in areas not specifically designate for them, they are perceived as loitering. We require the provision of an Active Teen Space (ATS). Active Teen Spaces are defined in the Green Spaces Strategy as an area with a small group of facilities (3 or 4 elements to include self-directed play and passive recreation elements such as playful seating) designed for teenagers to provide a local space for teen peer-to-peer social interaction in a safe, well-lit space. The area is located on public transport, active travel routes, is fully accessible and has good passive surveillance. The applicant shall provide an Active Teen Space as defined above.

Boundary treatment and Corridors for Wildlife
From a very early stage in the planning of this scheme the Recreation & Amenity Section made concerns clear regarding the landscaping of the boundaries of the open space, which are required to function as a corridor for wildlife running from Millars Lane in the northeast into Kingston Park in the west. This discussion has shaped the development of the open space and the flow of pedestrian movement through the site – which is a positive development. However, there are serious concerns about the viability of the hedgerow and tree planting proposed on the boundary due to lack of sufficient space being left for planting on some of the key boundary areas.
Continuous tree canopy cover is requires through the open space and a minimum of 2-3m depth of hedgerow vegetation along the boundary wall to the open space.
There are concerns about the feasibility of planting along the southern and south-east and eastern boundaries (red arrows bellow) and the lack of plantable ground in some locations which can lead to a fragmented corridor for wildlife. The applicant shall provide a typical section through this area demonstrating the soil depth achieved. See image below.



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The applicant is required to provide details of boundary treatments to walls facing onto the public realm in key locations (see red arrows below). A landscape finish to these walls is required to soften the visual impact on the public realm. This could include climbing plants (native species) as a finish, which would also improve the boundaries as corridors for wildlife.

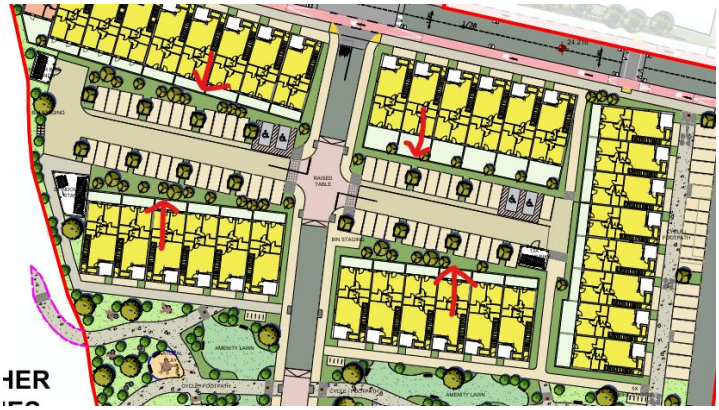


Underground services & landscaping

We require that the applicant demonstrates there are no clashes between the landscaping and the layout of the underground services. Clashes will result in the deterioration of the overall landscape finish compared to the submitted proposal. We require the layout of underground services to revised to accommodate the landscaping.

Future maintenance of open spaces if taking in charge by GCC
It is recommended that the landscaping to the rear of the duplexes is revised/ simplified to accommodate possible transfer of maintenance operations to GCC. The current proposal is not maintainable by the Council. A simple low hedgerow planted with species that will not get tall, and grass finish is required in these locations.

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Please see below the comments from the Biodiversity Officer:

Maintaining Ecological Connectivity Through the Site
It is noted from the landscaping plans submitted that the proposed layout some connectivity through the centre of the site has been maintained. However, further opportunities for maintaining ecological corridors, including connections to adjoining and previously permitted Phase 1 development and the nearby City Biodiversity Area CBA4: Cappagh/Knocknacarra Hill Heathland, shall clearly demonstrate on the final drawings. Such features will link on-site linear landscape features with the wider landscape and nearby biodiversity areas in accordance with Policies 5.4 and 5.5 of the Galway City Council City Development Plan 2023-2029.

- For this reason, we require to maintain and provide continuous ecological corridors through and beyond the site by retaining existing linear features and integrating green infrastructure to ensure biodiversity connectivity with the wider landscape.

Protection of Local Threatened Species
Records for brown hairstreak (*Thecla betulae*) occur to the north of the proposed development (source: NBDC). This species is considered one of Ireland's rarest and most range-restricted butterflies, with populations severely threatened by the loss of hedgerow habitats. The presence of Blackthorn (*Prunus spinosa*), the species foodplant, should be assessed in the ecological impact assessment.

- For this reason, Pre-construction surveys should be undertaken to inform the occurrence of this species and appropriate mitigation and compensation measures put in place should the species be recorded within the proposed development site. A species management plan, prepared by a suitably qualified ecologist, should be submitted to the city council.

Invasive species
Two invasive alien species (IAS) listed under the Third Schedule of the European Communities Regulations 2011 (S.I. 477 of 2011) and First Schedule of the European Union (Invasive Alien Species) regulations 2024 (S.I. 374 of 2024) were identified on site.

- For this reason an invasive species management plan should be prepared and submitted to the city council to avoid the spread of invasive species in accordance with the relevant legislation.

Bats

It is noted that two bat roosts occur within stone shed buildings located within the Proposed Development site. These buildings will be demolished to facilitate the construction of the Proposed Development.

On site compensatory bat roosts should be provided as part of the proposed development. This should include robust bat boxes that will last, positioned in a suitable aspect and in proximity of commuting features and ensure connectivity to the wider landscape. Such commuting corridors should also be incorporated into the landscaping and lighting plan. Post construction monitoring should be implemented to monitor occupation of the compensatory roosts and determine their effectiveness as a compensation measure. The results will be shared with the city council.

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The proposed development lighting plan will include a lighting design in accordance with the Institution of Lighting Professionals (ILP) Guidance Note (GN01/21) *The Reduction of Obtrusive Light*. This will avoid impacts on bat species locally, see the Galway City Biodiversity Acton Plan.

- On site compensatory at roosts should be incorporated into the proposed development. A species management plan should be submitted and agreed with the city council in advance of construction.
- Monitoring of at roost occupancy should be undertaken for 3 years post construction to inform the effectiveness of this measure. A report should be submitted to the city council yearly for consultation.
- The lighting plan for the proposed development should follow industry best practice for the avoidance of impact on local bat species.

General Opportunities for Habitat Enhancement

Protected Habitats

Fossitt (2000) habitats such as Dry calcareous and neutral grassland (GS1) and Dry Meadows and Grassy Verges (GS2) should be assessed for links with those listed under Annex I of the EU Habitats Directive such as 'semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometea) (*important orchid sites) (6210)' or 'Lowland hay meadows [6510]'. Relevant data should also be used to support an evidence-based assessment.

Biodiversity enhancement opportunities

The incorporation of additional biodiversity enhancement measure should be considered, such as the installation of Swift bricks, retention of hedgerows (including the possibility of hedgerow transplanting to maintain ecological genetic diversity, structural diversity and ecological processes) and use of species such as Blackthorn (*Prunus spinosa)* to support the locally occurring Brown hairstreak butterfly.

Signed:

_____ Signed: _____

John Doody
Executive Planner
Date: 22/5/26

Eimear O'Doherty
Senior Executive Planner
Date:22/05/26