

SUBJECT TO CONTRACT/CONTRACT DENIED

WITHOUT PREJUDICE

From: Galway City Council
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Galway,
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To: The Land Development Agency
2nd Floor,
Ashford House,
Tara Street,
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FAO: Arlene van Bosch

Our Reference:

Your Reference: G003

Date:

Re: Letter regarding proposed Planning Application at the Phase 1 Site/ the Property

Site: Dyke Road Car Park, Dyke Road Galway

To Whom it May Concern,

This letter is intended to accompany the application for approval comprising a proposed phase 1 development of the Dyke Road Car Park site owned by Galway City Council. The application is being made on behalf of Galway City Council as the applicant and in partnership with the Land Development Agency as their agent. The intention of this letter is to outline the position of the City Council regarding flood risk and mitigation at the site having regard to the strategic nature of the lands and their potential to act as a catalyst for the regeneration of the wider Headford Road area.

Yours faithfully,



Eoghan Lynch
Senior Planner, Galway City Council

1. Introduction

The Dyke Road site forms part of a wider landbank including the existing Dyke Road car park and the Headford Road retail area (including the Galway Shopping Centre and the Retail Park). The area benefits from its close proximity to Galway City Centre, recreational facilities and open spaces such as the Terryland Forest Park and its visual connectivity with the adjacent River Corrib. Notwithstanding this, the area lacks cohesion and good place-making due to the poor layout of existing spaces, lack of permeability, dominance of surface parking and generally sub-optimal use of land. For these reasons, Galway City Council has long since identified this area for future regeneration.

The initial step in this regard was the publication of the Draft Headford Road Framework Plan in February 2009. Whilst the Plan was never formally adopted, it is of interest and prompted discussion around the area, informing the drafting of objectives and site -specific actions set out in the current Galway City Development Plan 2023 – 2029 (hereinafter the Development Plan).

In this regard, the Development Plan specifically requires that proposals for the Dyke Road lands will take cognisance of the integrated development strategy included for in the framework plan for the area. The Plan further identifies lands referred to as the ‘Dyke Road Car Park Regeneration Site’ as an emerging key regeneration site the Development Plan very clearly sets out that “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 liveable urban quarter. (page 259)”

The Development Plan anticipates that this site will come forward in advance of a statutory plan for the wider area, identifying the Dyke Road site as a ‘key emerging regeneration site’ and notes the potential development of the site is being progressed by the Galway City Council in collaboration with the LDA. The Plan notes the site can provide “opportunities for inclusion of high quality architecture and urban design in their development which can strengthen the urban *spatial structure, liveability, economic viability and support the sustainable of neighbourhood*” (Page 219). For this reason, the importance of the lands at Dyke Road in terms of acting as a first move in a wider redevelopment of major scale have been identified and provided for the in the current City Development Plan.

It is the intention of Galway City Council to prepare a statutory plan for the wider Headford Road area. There are two items that will advance before this happens, namely the finalising of the consent process for the Cross City Link – currently at judicial review stage, and the adoption of the Joint Retail Strategy – currently at advance pre-draft stage, it is anticipated that these items will be resolved by the end of 2025. However, the City Development Plan includes provision for the Dyke Road site to be brought forward for development in advance of the adoption of a statutory land use plan for the wider area, given the opportunity it holds to act as a catalyst for the wider regeneration. This is set out in Specific Objective 4 of Section 10.26 of the Development Plan. In addition, as GCC is working in partnership with the LDA, the development of the site will expediate the delivery of affordable homes within the City which is of utmost importance. Given the identified socio-economic benefits for the City, the Development Plan supports the early development of the Dyke Road site prior to the advancement of a statutory plan, subject to the preparation of a masterplan, which is included with this planning application.

Finally, given the configuration and location of the site, currently an underused surface car park, in close proximity to existing services and amenities, the rational for acting on the opportunity to progress these lands in a timely manner is overwhelmingly compelling. The Board is respectfully requested to consider these matters when determining this application.

2. Zoning of the Site and Flood Risk Management

As part of the preparation of the Development Plan, a Strategic Flood Risk Assessment was undertaken by JBA. The Headford Road and Dyke Road Regeneration Site was identified as being located within Flood Zones A, B and C and therefore a plan-making Justification Test was required to be undertaken. The Justification Test can be found in full within Section 7.7 of the Galway City Development Plan 2023-2029 Strategic Flood Risk Assessment. It was concluded that whilst a residual flood risk is identified in relation to the lands, having regard to the strategic nature of lands and the objective of GCC that they should be brought forward for development, the requirements of the Justification Test have been met and the lands could be zoned appropriately to facilitate their future development. Recommendations were included for further consideration within future Site Specific Flood Risk Assessments (SSFRA) including locating highly vulnerable development above the 0.1% AEP level with an appropriate freeboard, preparation of an emergency evacuation plan and discouragement of basements.

3. Dyke Road Phase 1 SSFRA and Justification Test

An SSFRA has been prepared by Aecom to support the proposed Dyke Road Phase 1 development and addresses the requirements of a Stage 1, 2 and Stage 3 Flood Risk Assessment as per the requirements of the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG/ OPW, 2009). The SSFRA finds that the proposed site is located within Flood Zone A – High Probability of Flooding. Whilst the SSFRA should be consulted in full with regard to the consideration of flood risk within the site, GCC wishes to take this opportunity to provide additional detail and background having regard to compliance with the Box 5.1 Justification Test as set out by the requirements of the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG/ OPW, 2009).

Criteria 1 of Box 5.1 requires that the subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan. As discussed in Section 1 and 2 of this document, the Dyke Road lands have been zoned for development (having been subject to the plan-making Justification Test) in the current Development Plan and have been designated for redevelopment for a significant period of time. The Development Plan was adopted in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009. Notwithstanding this, to date, no significant progress has been made to realise the potential of these lands and it is now becoming critical to commence the first phase of this transformative regeneration project. The Dyke Road site offers a viable solution to unlock the potential of the Headford Road area to combat urban sprawl, promote modal shift and offers numerous environmental and economic benefits to the city. This is recognised within the Development Plan whereby it is recognised that the Dyke Road development could be brought forward in advance of the adoption of an LAP provided that a masterplan is prepared. Again, Specific Objective 4 of Section 10.26 of the Development Plan refers. GCC has been working in collaboration with the Land Development Agency in this regard and this draft masterplan or ‘Development Framework’ was published by the LDA in July 2024. The final Development Framework is submitted to An Bord Pleanála with this Phase 1 planning application.

4. Alternative Locations

The Development Framework builds upon the vision and principles for both the Dyke Road site and the wider area as initially set out within the Draft Headford Road Framework Plan (2009). The Development Framework prepared therefore delivers on Development Plan requirement to have cognisance of this Draft Headford Road Framework Plan. Within the Development Framework Plan, a series of Districts are identified which include uses and activities which are located for greatest benefit, complementarity with other uses and other practical considerations. As such, the southern portion of the Dyke Road car park (the Phase 2 site) is identified for civic, cultural and community uses due to its proximity to the city centre, the Headford Road thoroughfare and its existing cultural and civic functions. Residential uses are identified within the Phase 1 and Phase 3 sites and to the east adjacent to Terryland Forest Park, given that the setting

of the park and river is an intrinsically attractive environment in which to live within the city centre and providing passive surveillance over these valuable amenities.

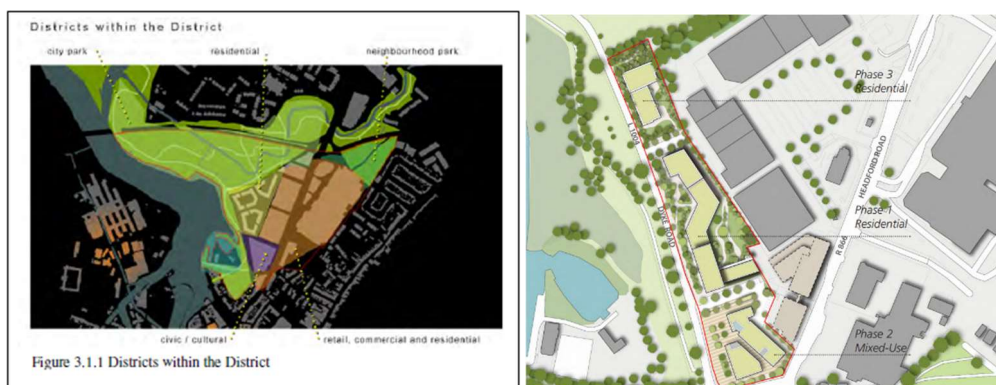


Figure 1: Extract from Draft Headford Road Framework Plan (2009) [left], and proposed LDA/GCC plan for Dyke Road site as per Development Framework [right]

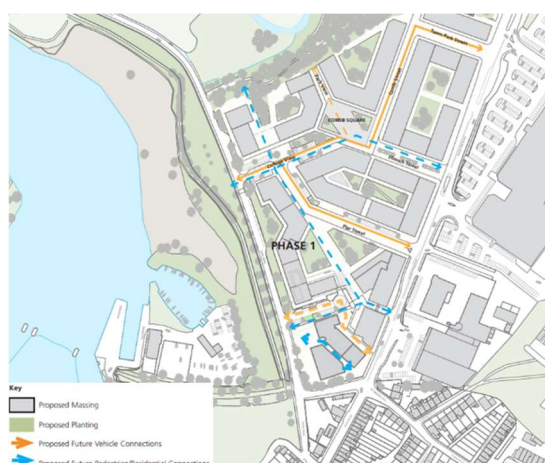


Figure 2: Indicative wider Headford Road redevelopment as presented in LDA/GCC Development Framework.

It is within this context that the location of the proposed residential development has been decided notwithstanding that the identified flood risk is lower within the Phase 2 site (Flood Zone B). The development of residential uses within the Phase 2 site would represent a missed opportunity to weave the Headford Road area into the wider urban fabric of the City and would undermine the significant work undertaken to date to guide the development of the Headford Road lands. The City Council confirms that the Phase 2 site is not currently available for residential uses and will be redeveloped as part of a mixed use development which will likely include civic, cultural and community uses, subject to wider consideration in a future statutory plan.

As per the requirements of the Justification Test as set out in Box 5.1 of the *Flood Risk Management Guidelines for Planning Authorities* (2009), it is clear that the development of the site aligns with Criterion 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”. It is again noted that the current Development Plan was adopted in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices*, 2009. For further detail in relation to criteria 2 (i) to (iii), please see the accompanying Site Specific Flood Risk Assessment and appended Flood Evacuation Strategy as prepared by Aecom. In relation to Criterion 2 (iv) which relates to good urban design and vibrant and active streetscapes, please see Section 4.7.4 of the Architectural Design Statement as prepared by Mola. It is the opinion of Galway City Council that the development of the site as proposed fully satisfies the Justification Test for development Management as set out by the Guidelines.

5. Core Strategy and Delivery of Housing Targets

The Dyke Road Car Park site is identified as a Regeneration and Opportunity Site in the City Centre Area within the Galway City Development Plan Core Strategy. 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 3: 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. A total demand of 4,433 housing units is estimated over the plan period. Section 1.5.2 provides a composite picture of lands zoned and identifies that zoned lands can accommodate the housing target of 4,433. A significant quantum of these homes are targeting for delivery in Regeneration/Opportunity/Infill sites. 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...”*

There are five regeneration sites identified as having the potential to deliver on the unit yield proposed for regeneration sites within ‘Inner Residential Areas’ of the city (Dyke Road Regeneration Site, Galway Retail Park Regeneration Site, Galway Shopping Centre Regeneration Site, Former Connacht Laundry Opportunity Site and Shantalla Road Opportunity Site). Two of these (Galway Shopping Centre Regeneration Site and the Galway Retail Park Regeneration Site) require the preparation of an LAP before redevelopment proposals can come forward. As outlined above, the Dyke Road Car Park site is identified for early delivery prior to adoption of an LAP subject to provision of a masterplan. Again, Specific Objective 4 of Section 10.26 of the Development Plan refers.

At this time, the site at Dyke Road is the only identified 'regeneration' site within the Inner Residential Area which is subject to advanced plans for development and thus having the capability to contribute to the delivery of homes on regeneration sites as identified in the Core Strategy. The project is consistent with Galway City Housing Delivery Action Plan, *Housing for All* targets and the objectives of the Compact Growth Guidelines. As such, the Dyke Road Car Park site is a priority site for delivery of housing over the Development Plan period generally, and specifically regarding housing delivery on Regeneration and Opportunity Sites within Inner Residential Area.

6. Conclusion

The Dyke Road site represents a crucial first step in developing the wider Headford Road lands and is currently the only site available within these wider lands for the development of critically required housing. The proposed development will act as a catalyst for further regeneration and aligns with the Core Strategy of the Development Plan in respect of the targeted delivery of new homes within vibrant and active neighbourhoods. Galway City Council and the LDA have worked collaboratively with the design team in order to ensure that the proposed development provides for a flood resilient design which will not increase flood risk elsewhere and incorporates robust measures to minimise flood risk to people, property, the economy and the environment. GCC look forward to progressing this development and to unlocking the further opportunity which the wider Headford Road lands present.



Eoghan Lynch

Senior Planner

Galway City Council