

ABP 312236-21

Client: **LIMEHILL ESKER LTD**
Our Ref: **2521/WMG/RG**



Prepared By:

R. G. GREENE & ASSOCIATES
CONSULTING ENGINEERS
CAHER HOUSE, LOUGHREA,
CO GALWAY, H62 FF61
IN CONJUNCTION WITH
PLANNING CONSULTANCY SERVICES,
Suite Three, Third Floor
Ross House
Victoria Place
Eyre Square
Galway



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1. INTRODUCTION

This Planning Report & Statement of Consistency is prepared in fulfillment of the requirement for an application to be made on behalf of Limehill Esker Ltd with An Bord Pleanála, under the Planning and Development (Housing) and Residential Tenancies Act, 2016 and pursuant to a Notice of Pre-Application Consultation Opinion issued by the Board on the 12th May 2022, in respect of a proposed a Strategic Housing Development on the lands which are in their full ownership at Dunlo & Pollboy, Ballinasloe, Co Galway.

The objective of the Report is to demonstrate that all of the conditions can be fulfilled whereby a Decision from An Bord Pleanála can be issued under Section 9(4) of the Strategic Housing Provisions of the Planning and Development (Housing) and Residential Tenancies Act, 2016 to grant permission for the proposed development.

The proposed development shall consist of the provision of a total of 165 residential units, on a 6.6702 ha site, in a variety of typologies, including conventional dwellings in semi detached and in triplet arrangements. Duplex units are provided which consist of apartments and maisonettes.

The proposed development includes all of the provisions for vehicular, cycling and pedestrian linkage both through the development and access to the nearby Town Centre of Ballinasloe as well as all necessary car parking and landscaped open space and public park.

This Report includes a statement setting out how the proposal is consistent with the objectives of the Galway County Development Plan 2022-2028, the Ballinasloe Local Area Plan 2022-2028 and relevant Section 28 Ministerial Guidelines.

This Statement of Consistency Report should be read in conjunction with the following:

- Statement of Response (Article 297(3)) to ABP-312236-21 Opinion- Prepared by R.G. Greene & Associates
- Statement of Response to Specific Information-ABP-312236-21 Opinion- Prepared by R.G. Greene & Associates
- Statement of Response to PA Opinion- Prepared by R.G. Greene & Associates
- Statement on Development Strategy, Connectivity & Phasing- Prepared by R.G. Greene & Associates

- Material Contravention Statement- Prepared by Planning Consultancy Services
- Architectural Design Statement- Prepared by R.G. Greene & Associates
- Engineering Services Report- Prepared by R.G. Greene & Associates
- Landscape Design Report- Prepared by Cunnane Stratton Reynolds
- Traffic & Transportation Assessment - Prepared by CST Consulting Engineers
- DMURS Statement of Consistency - Prepared by CST Consulting Engineers
- Road Safety Audit - Prepared by CST Consulting Engineers
- Travel Plan - Prepared by CST Consulting Engineers
- EIA Screening Report- Prepared by Aster Environmental Consultants
- Ecological Impact Assessment Report- Prepared by Aster Environmental Consultants
- Natura Impact Statement - Prepared by Aster Environmental Consultants
- Bat Survey Report by VEON
- Hydrological Impact Assessment Report – Prepared by Hydros Consultants
- Statement on Article 299(B) - Prepared by Planning Consultancy Services
- Energy Statement & Building Lifecycle Report – Prepared by A-Tech Energy Engineering
- Daylight, Sunlight & Overshadowing Study – Prepared by Integrated Environmental Solutions
- CGI & Photomontage Views by GNet
- Archaeological Impact Assessment Report – Prepared by Gibbons Archaeologists

- Public Lighting Report – Prepared by VeeLite Lighting
- Childcare Demand Analysis Report- Prepared by Planning Consultancy Services

1.1 BRIEF DESCRIPTION OF PROPOSED DEVELOPMENT

The total area of the proposed development site is 6.6702 hectares and it is located within a larger tract of lands which are in the ownership of the Applicant located in the townlands of Dunlo & Pollboy, immediately to the south of Ballinasloe Town Centre.

The proposed development consists of residential development (c. 15,820 m² gross floor area), consisting of 165 No residential units and all associated and ancillary site development and infrastructural works, hard and soft landscaping and boundary treatment works, including:

The development will consist of :

- Block A1 and A2, each consisting of 6 No Two-Bed Ground Floor apartments, 1 No One-Bed ground Floor apartment, 6 No Three-Bed First Floor Duplex Units, and 1 No Three-Bed Second Floor apartment.
- Blocks B1 to B3 and B6 to B13 inclusive, each consisting of 2 No Two-Bed Ground Floor Duplex Units, 2 No Three-Bed Ground Floor Duplex Units, 1 No Two-Bed Second Floor apartment, and 1 No One-Bed Second Floor apartment,.
- Blocks B4 and B5 inclusive, each consisting of 1 No Two-Bed Ground Floor Duplex Unit, 2 No Three-Bed Ground Floor Duplex Units, 1 No Two-Bed Second Floor Apartment and 1 No One-Bed Second Floor apartment.
- House Type C : 32 No Two-Bed units in semi-detached pairs.
- House Type E : 27 No Three-Bed units in triplet arrangements.
- provision of 281 No. on-site car parking spaces incorporating 163 No. spaces for residents of the apartment/duplexes, and 118 No in-curtilage car parking spaces for the housing units.
- Provision of all water, surface water, foul drainage, utility ducting and public lighting and all associated siteworks and ancillary services.
- All ancillary site development works including access roadways, footpaths, cycle ways, pedestrian links, Bicycle Sheds, waste storage areas, communal and open space, site landscaping, and boundary treatments.

The proposed development shall include the construction of **two access roadways** through adjacent lands in the ownership of the Applicant to service the proposed development.

The proposal shall also incorporate the development of adjacent lands, which are in the ownership of the Applicant and which are zoned as **Open Space**, as an Open Space/ Public Park for the overall benefit of the neighbourhood area..

1.2 CONTEXT

There have been very low levels of housing constructed, both nationally and locally since the economic collapse in 2008. A total of only 16 No units (Sheltered Housing) have been provided in the Ballinasloe area within the past 13 years.

The recovery of the economy and increasing population and employment numbers have created a significant increase in demand for new homes to support a growing economy.

Under-provision of housing is the final remaining legacy of the economic collapse in this country. Accelerating delivery of housing for the private, social and rented sectors has been a key priority for the Government for the last number of years.

The response of the Government in **Rebuilding Ireland – The Government’s Action Plan on Housing and Homelessness**, as published 2016, seeks to ramp up delivery of housing across all tenures to help individuals and families meet their housing needs. The actions proposed under the first 4 pillars of this Action Plan are consistent with the provision of the proposed development in this case , and are as follows:

Pillar 1 – Address Homelessness Provide early solutions to address the unacceptable level of families in emergency accommodation; deliver inter-agency supports for people who are currently homeless, with a particular emphasis on minimising the incidence of rough sleeping, and enhance State supports to keep people in their own homes.

Pillar 2 – Accelerate Social Housing Increase the level and speed of delivery of social housing and other State supported housing.

Pillar 3 – Build More Homes Increase the output of private housing to meet demand at affordable prices- deliver over 25,000 units per annum on average over the period of the Plan (2017-2021).

Pillar 4 – Improve the Rental Sector Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents.

National Planning Framework (NPF) seeks to provide a strategy to successfully accommodate growth in a compact and sustainable manner and it states as follows:

Housing Demand *Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet people’s needs for well-located and affordable housing, with increasing demand to cater for one- and two-person households.*

More recently, the Economic and Social Research Institute (ESRI) published the research paper ***Regional Demographics And Structural Housing Demand At A County Level*** in December 2020, and concludes:

In the baseline scenario, the level of housing demand is around 28,000 per annum over the medium term, although it is higher in the short-run given recent net international migration inflows. Housing demand in the high international migration scenario is close to 33,000 per annum and is around 26,000 per annum in the low international migration scenario.

A Ministerial Letter released with this Report stated that, on the basis of the ESRI findings, there is a total projected new household demand for almost 31,000 new households per annum every year from 2020 to 2040.

Housing for All- A new Housing Plan for Ireland concludes “.... Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the National Planning Framework. ...”

A study of the **New Dwelling Completions** from the CSO indicates that the current rate of dwelling completions nationally is falling substantially below the 25,000 unit per year target set in the NPF, as shown in the following table of extracted data:

YEAR	NEW HOUSE COMPLETIONS	SHORTFALL BELOW 25,000 per annum
2018	18072	-6928
2019	17952	-7048
2020	20526	-4474
2021	20433	-4567

Accordingly, since the NPF was published in 2018, there has been almost a full years supply lost and this is exacerbated by the setback arising from Brexit, the Covid-19 pandemic and in recent times by the effects of the war in Ukraine and associated supply chain issues in all cases.

There were 69 New Dwelling completions in the Ballinasloe Electoral Area in 2021.

It is clear from the foregoing that, despite national policy to accelerate housing delivery, the provision of new housing is not keeping pace with demand and recorded population growth.

The proposed development would provide for a significant quantum and range of high-quality residential development on available, serviced and appropriately zoned lands, which will contribute towards Ballinasloe fulfilling its role as a Key Town as set out in the Galway County Development Plan 2022-2028.

2. SITE LOCATION & CONTEXT

2.1 SITE LOCATION

The site of the proposed development is 6.6702 hectares and it is located about 750m directly south of the centre of Ballinasloe Town.

It adjoins a partially developed commercial centre which was completed in about 2009.

The site is enclosed by existing residential development to the east and to the west, and partially to the southwest of the site.

A new residential housing project is under construction at present on the Applicant's lands to the north of the subject site.

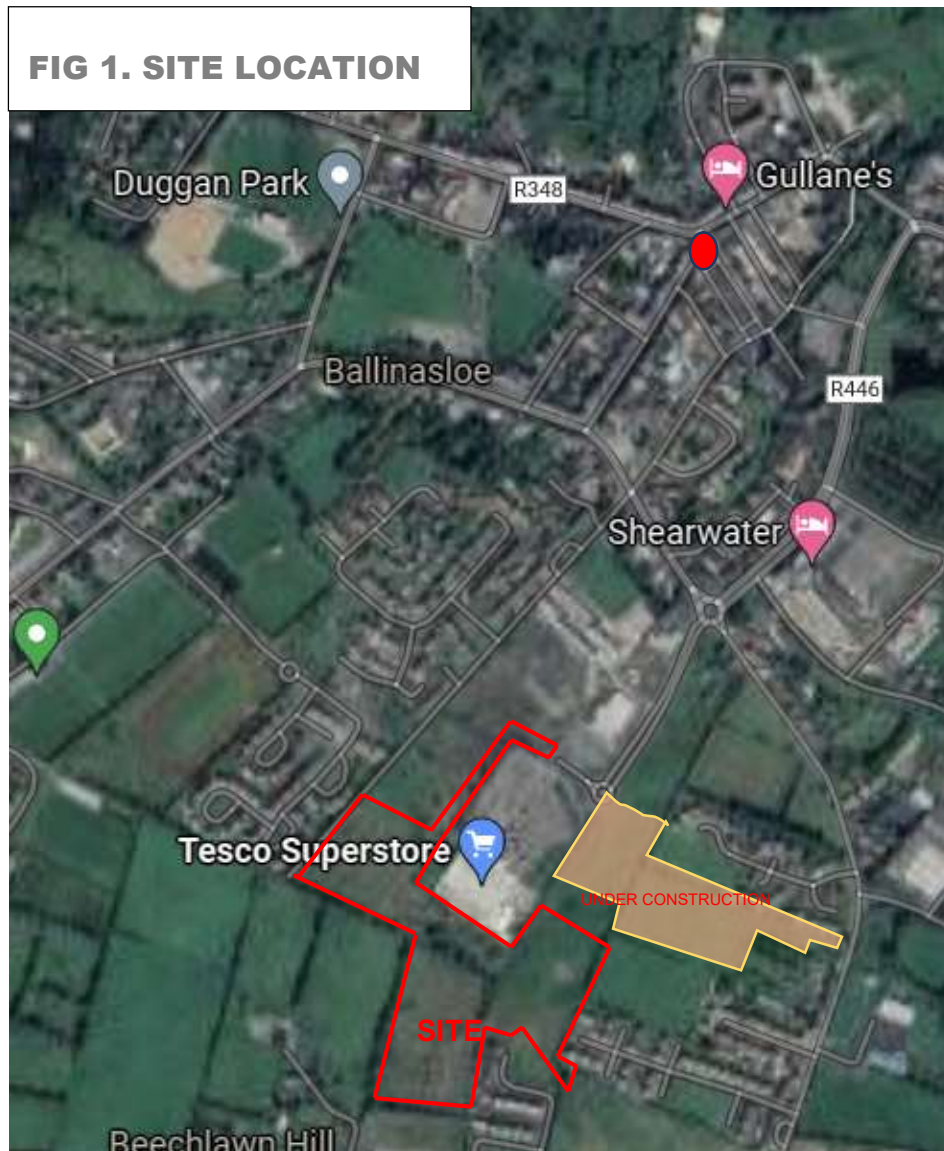
The commercial park to the north of the subject site is gradually being developed. The site directly adjoins the boundary of the Tesco Superstore immediately to the north, and this has been in operation since about 2009.

At present it also contains an ALDI supermarket and a petrol station. A 5-Screen cinema project is presently under construction.

Planning permission has recently been granted for the provision of a Costa Coffee Shop in the car park in front of Tesco.

Accordingly, the site is located in a central infill location within all of the above stated existing development.

FIG 1. SITE LOCATION



2.2 SITE DESCRIPTION

The subject site is contained within a much larger tract of land, 14.16 hectares, in the ownership of the Applicant at Dunlo & Pollboy. Access to the general area was provided in or about 2008 following the construction of a roundabout at the entrance off Harbour Road and the construction of internal estate roadways.

Extensive excavation and site preparation works were undertaken at that time over the entire area of the lands in anticipation of the provision of a large overall commercial/retail development.

Commercial development proceeded in or about 2009 with the construction of Tesco Superstore, Aldi Supermarket, and a Petrol Station. Further site development and

infrastructural works were being undertaken in 2009 for another commercial project on the western environs of the Applicants lands.

The western access roadway to the subject site and associated drainage infrastructure were under construction and were in a partly completed state at the time of the financial crisis in 2009

All development work on site ceased in 2010 with the advent of the financial crisis.



An internal estate roadway, about 250 metres in length, was fully completed in 2009 and terminates at a roundabout from which circulation was provided to the commercial developments on the site.

The subject site shall be accessed in two different directions from this central roundabout.

The low section of the site, along the western boundary where finished levels would range from about 43-46m O.D., will be primarily accessed to the south west from the central roundabout, along a roadway which was partially constructed in 2009 on foot of a development intention on the adjoining lands at that time.

The high section of the site, along the southern boundary, where finished levels would range from about 46-51m O.D., will be primarily accessed to the south east from the central roundabout via an access roadway which is presently under construction.

Interconnection is provided within the development between both sectors to facilitate vehicular, cycling and pedestrian connectivity and permeability in all directions for both the proposed development and the adjoining existing development such as Beechlawn Heights and Dun Esker.

The retention of the mature boundary vegetation along the southern and western fringes shall ensure that a biodiversity corridor is maintained throughout the site and that the proposed development will not significantly impact existing amenities of established neighbouring residential properties which back onto the subject site to the west.

The existing estate roadway provides direct connection to the Town Centre for both pedestrians and cyclists as well as vehicular traffic. Such connectivity can be readily extended to the proposed development along the access roadways.

The site is in close proximity to a residential development which is under construction. This development, which consists of 78 residential units, has been fully acquired by Galway County Council and Cluid Housing Association, and is due to be completed in mid 2023.

A Creche is also being provided as an element of the approved development and a submission is made in the **Childcare Demand Analysis Report**- Prepared by Planning Consultancy Services- on the adequacy and capacity of this facility to serve the needs of both the approved and proposed development in this case.

A cinema project is also under construction on the lands immediately to the west of ALDI supermarket.

The construction of a Café Building is due for commencement later in late 2022 on a site at the northern end of the Tesco Car Park at the entrance roadway to the proposed development.



Photograph No 1 show a view looking northwards over the high section of the site. This entire area consists of excavated and disturbed soil.



Photograph No 2 show a view looking southwards towards the low section of the site. This view shows that the entire area was under site development in 2009. Beechlawn Heights is visible in the background. Extensive road base and drainage works were being carried out on the central access through the site prior to the termination caused by the financial crisis. This roadway now forms the western access to the proposed development on subject site.



Photograph No 3 show a view looking across the southern high section of the site towards Beechlawn Heights. This view shows that the entire area was under site development in 2009.



The above Google image shows the disturbed condition of the entire site area arising from the 2009 partially completed site development works.

2.3 PLANNING HISTORY

There have been no planning applications in respect of the subject site. However, the southern portion of the site was disturbed as a result of excavation works carried out in conjunction with the construction of Tesco supermarket under the following approval:

PLANNING REF 07/7104 Grant Date: 12/05/2008/Subject :Permission for a Retail Park Development at Dunlo Townland, Ballinasloe, Co. Galway. The site will be accessed via a roundabout at Harbour Road and road network granted under PL. Ref. Nos. P.D 06/090 and 07/9022. The development shall consist of the following:- Discount store (unit 1 - gross floor area 1629 sq m), Circa 750 seat five screen cinema (unit 9 - gross floor area 1864.4 sq m), Drive through restaurant (unit 11 - gross floor area 336 sq.m), Foodstore (unit 12 - gross floor area 5489m²).

PLANNING REF 09/9009 Grant Date: 30/07/2009/Subject Permission for the following developments: demolition of existing agricultural shed and construction of: circa 600 seat Four Screen Cinema (Unit 1 - gross floor area circa 1,518 sq.m), 4 No. retail units, - Unit 2 - floor area circa 107.80 sq.m, Unit 3 - floor area circa 91.16 sq.m, Unit 4 - floor area circa 99.90 sq.m, Unit 5 - floor area circa 107.80 sq.m, 2 No. Office Units, - Unit 6 - floor area circa 220.55 sq.m, Unit 7 - floor area circa 220.55 sq.m, E.S.B. Sub-station and Meter Room. The development shall include ancillary roads, car parking, building signage and all associated site development works at Dunlo Townland, Ballinasloe, Co. Galway

PLANNING REF 07/9022 Grant Date: 14/09/2007/Subject Permission for demolition of 1 no. dwelling and construction of new entrance road including roundabout at junction with N6 at Harbour Road, construction of internal site roads, car parking and ancillary site services to service future commercial development at Harbour Road, (Dunlo Townland), Ballinasloe, Co. Galway

The roadbase, a sub-station and meter room, and surface water infrastructure for the western access to the proposed development in this case was constructed in 2009/10 under this approval. A footpath, kerbing, road gully chambers and an attenuation area were also constructed.



Photograph No 4 show a view west over the partly constructed roadway which will be the western access roadway to the proposed development on the subject site. Note the surface water manhole and kerbing.



Photograph No 5 show a view looking north over the partly constructed roadway which will be the western access roadway to the proposed development on the subject site. Note the completed footpath and the gully chamber which has been blanked for health and safety reasons.

Planning permission was recently granted on lands directly to the north and adjoining the subject site in respect of the following development:

PLANNING Ref 191978 Grant Date: 07/09/2020 **Description:** for the following development on lands at Dunlo, Ballinasloe: Provision of (1) BLOCK A consisting of 1 No. One-bed apartment, 1 No. Three-Bed apartment, 4 No Two bed apartments, and a **creche** (321 Sq.m). (2) BLOCKS B1, B2, B3, B4, & B5 consisting of a total of 19 No Two-bed apartments and 19 No Three-bed maisonettes in a duplex arrangement (3) 7 No Three-bed detached two storey dwellings. (4) 2 No Two-bed detached single storey dwellings. (5) 4 No Two-bed semi-detached single storey dwellings. (6) 21 No Three-bed two storey dwellings. (9) All associated site development works and connection into existing services. Gross floor space of proposed works: 9354 sqm (Residential Dwellings - 9022 sqm, Creche - 332 sqm)

This development is now at construction stage and would facilitate the proposed development in this case by the construction of the initial 185m length of the

eastern access roadway, up to and partly into the zoned Open Space lands, from the existing internal roundabout to serve the proposed development on the subject site.

3. DESCRIPTION OF DEVELOPMENT

The initial scheme concept was prepared in November 2021 in anticipation of entering into Stage 1 consultation with An Bord Pleanála in respect of a proposed application for a Strategic Housing Application.

The scheme design was informed at that time by the Galway County Development Plan 2015-2021 and the Ballinasloe LAP 2015-2021.

However, in the interim, the new Galway County Development Plan 2022-2028 and the Ballinasloe LAP 2022-2028 were adopted in June/July 2022. Accordingly, the scheme had to be re-evaluated for consistency with the new Plans.

3.1 PROPOSED DEVELOPMENT

It is proposed that the development be provided in two separate sectors having regard provision of direct connectivity to Ballinasloe Town Centre and to the variation in level of the subject site and this was originally consistent with the Roads Objective **TI 25** of the Ballinasloe LAP 2015-2021 which was in force at the Stage 1 phase of this application. The southern sector of the site accommodates 85 dwelling units, arranged as follows:



The northern sector of the site accommodates 80 dwelling units, arranged as follows:



The proposed development provides for a wide range of unit types including apartments and maisonettes in duplex units, semi-detached and triplet dwellings. A breakdown of residential units is provided in Table 3.1 below.

Block A1 & A2 (2 No. Blocks)											
Apartment 01	2 Bed / 4P	31.3	13.0	11.6		24.6	20.0	7.2	79.9	2	Ground
Apartment 02	2 Bed / 4P	32.6	13.5	13.6		27.1	42.0	7.3	90.9	2	Ground
Apartment 03	2 Bed / 4P	36.4	15.5	12.2		27.7	19.0	7.2	92.1	2	Ground
Apartment 04	2 Bed / 4P	36.4	15.5	12.2		27.7	19.0	7.2	92.1	2	Ground
Apartment 05	2 Bed / 4P	32.6	15.5	12.2		27.7	42.0	6.9	90.9	2	Ground
Apartment 06	1 Bed / 2P	26.8	12.1			12.1	26.5	3.0	56.1	2	Ground
Apartment 07	2 Bed / 4P	33.1	13.2	11.7		24.9	10.0	8.0	96.7	2	Ground
Duplex 01	3 Bed / 5P	40.1	14.9	13.5	10.2	38.6	10.2	9.3	126.6	2	First & Second
Duplex 02	3 Bed / 5P	40.1	14.9	13.5	10.2	38.6	10.3	9.3	126.6	2	First & Second
Duplex 03	3 Bed / 5P	40.1	14.9	13.5	10.2	38.6	10.3	9.3	126.6	2	First & Second
Duplex 04	3 Bed / 5P	40.1	14.9	13.5	10.2	38.6	10.3	9.3	126.6	2	First & Second
Duplex 05	3 Bed / 5P	40.1	14.9	13.5	10.2	38.6	10.4	9.3	126.6	2	First & Second
Duplex 06	3 Bed / 5P	40.1	14.9	13.5	10.2	38.6	10.3	9.3	126.6	2	First & Second
Duplex 07	3 Bed / 5P	40.1	14.9	13.5	10.2	38.6	10.4	9.3	126.6	2	First & Second
Apartment 08	3 Bed / 5P	36.7	13.0	11.4	7.1	31.5	10.2	8.1	118.2	2	Second
Total per block:									1603.1		
Block B1-B3 & B6-B13 (11 No. Blocks)											
Duplex 01	2 Bed / 4P	31.7	14.3	11.4		25.7	13.6	5.2	86.0	11	Ground & First
Duplex 02	2 Bed / 4P	30.0	14.3	11.4		25.7	14.0	5.0	86.0	11	Ground & First
Duplex 03	3 Bed / 5P	36.8	14.6	13.1	7.3	35.0	13.8	8.8	116.0	11	Ground & First
Duplex 04	3 Bed / 5P	39.6	13.0	11.5	7.2	31.7	12.4	10.5	116.0	11	Ground & First
Apartment 01	2 Bed / 4P	39.0	14.2	11.4		25.6	7.0	6.1	94.0	11	Second
Apartment 02	1 Bed / 2P	23.0	12.0			12.0	5.0	3.0	49.9	11	Second
Total per block:									547.9		
Block B4 & B5 (2 No. Blocks)											
Duplex 02	2 Bed / 4P	30.0	14.3	11.4		25.7	14.0	5.0	86.0	2	Ground & First
Duplex 03	3 Bed / 5P	36.8	14.6	13.1	7.3	35.0	13.8	8.8	116.0	2	Ground & First
Duplex 04	3 Bed / 5P	39.6	13.0	11.5	7.2	31.7	12.4	10.5	116.0	2	Ground & First
Apartment 01	2 Bed / 4P	39.0	14.2	11.4		25.6	7.0	6.1	94.0	2	Second
Apartment 02	1 Bed / 2P	23.0	12.0			12.0	5.0	3.0	49.9	2	Second
Total per block:									461.9		
House Types											
House Type C	2 Bed / 4P	32.6	14.0	12.0		25.9	70.2 (min.)	0.9	83.9	32	Ground & First
House Type E	3 Bed / 5P	31.4	19.3	10.5	8.4	38.2	57.9 (min.)	0.0	104.5	27	Ground & First



The overall layout of the scheme is shown above. The **Access Roadways** to each sector of the development extend from the roundabout at the end of the existing estate roadway.

The subject site incorporates a tract of land which is zoned **OS- Open Space/Recreation & Amenity**, as outlined in yellow above, and which is being partly developed in conjunction with the approved development on the adjoining site to the north. The construction of part of the eastern access roadway has also been approved over these lands.

The development consists of **DUPLEX/TOWNHOUSE STYLE UNITS** :A total of 76 No. units in 13 No. 3 storey L-shaped corner blocks- denoted Block B1 to Block B13.

The basic block accommodation for Block B1-B3, and Block B6-B13 inclusive is 6 units. Each consists of a 1Bed and a 2Bed single storey apartment, accessed via a common stair, over 2 No. 3-Bed duplex/townhouse style units and 2 No. 2-Bed duplex/townhouse units. All four ground level units are 2 storey own door units and are in a terraced arrangement.

The basic block accommodation for Block B4-B5 inclusive is 5 units. Each consists of a 1Bed and a 2Bed single storey apartment, accessed via a common stair, over 2 No. 3-Bed duplex/townhouse style units and 1 No. 2-Bed duplex/townhouse units. All three ground level units are 2 storey own door units and are in a terraced arrangement.

The basic 6 unit blocks, with variations, are arranged to create streetscape in the southern sector of the scheme.

The development consists of standard **DUPLEX UNITS** :A total of 30 No. units in 2 No. 3 storey terraces- denoted Block A1 and Block A2. These terraces consist of 2 storey 3-Bed maisonettes over either a 1-Bed or 2-Bed ground floor apartment.

The development consists of **HOUSES** : A total of 59 No. units in 2 No. principal house types – denoted Type C , 2-Bed and a Type E, 3-Bed, in various semi-detached, and triplet arrangements.

Details of house, apartment/townhouse and duplex sizes are set out in Table 3.1 above.

3.2 LAYOUT AND DESIGN

The location and extent of the proposed layout evolved from a comprehensive masterplanning process which was undertaken at the request of Galway County Council over the course of their adjudication on the development proposed under Planning Ref No 19/1978.

The scheme was initially designed around the desired alignment of link road spines which were defined by Objective TI-25 of the Ballinasloe LAP 2015-2021, and which would facilitate access and interchange between the various land zonings to the south of the town. This similar desire is reflected in the Ballinasloe LAP 2022-2028 by the provisions of Objectives BKT 32, BKT 33,BKT 34 and BKT 37.

The overall vision is to satisfy housing demand in the area by forming a sequential extension to the existing urban grain. The subject site is one of the most proximate residentially zoned lands to the Town Centre and adjoins lands which are zoned BE- Business & Enterprise in the current LAP.

The proposed scheme has been designed to integrate with the Town Centre as well as with existing and emerging residential development to the south of the town.

The layout seeks to provide a legible and permeable movement network away from the Town Centre to the extensive tract of residentially zoned lands to the south. The main roadways towards the town centre facilitate direct and proximate pedestrian and cyclist connectivity.

The entire development would be situated within the 10-15 minute Walking Buffer Zone , as determined in Fig 15 & 16 of the Ballinasloe Local Transport Plan.

The scheme consists of a wide range of dwelling types and formats to address the future trends identified in the ***The Galway County Council Housing Need and Demand Assessment (HNDA)*** which has been incorporated into Chapter 2 of the Galway County Development Plan 2022-2028.

The block typologies have been arranged to front onto roadways and are arranged in a manner to create a sense of place as well as providing good passive surveillance.

Low rise mono-typology housing has been kept away to the rear from roadway edges where it can form quiet residential neighborhoods in conjunction with the duplex typologies.

Each neighborhood is centered around an open space where landscaping and materiality can be employed to reinforce a sense of place.

This arrangement achieves density and housing mix consistent with national planning policies and it complies with the underlying requirements of the LAP as regard the consequences of height on visual amenity and context.

The proposed development provides for 4 distinctive character areas across the site which are influenced by topography, form, and streetscape. Each character area is predominantly south facing.

A detailed description of each character area and the distribution of the various unit typologies throughout the scheme are described in detail in the **Architectural Design Statement** which has been prepared in support of this application.



Table 3.2 – Development Parameters	
Land Area Description	Area - ha
Total Residential Zoned Area – R(Phase 1)& R(Phase 2)	5.2331
Zoned OPEN SPACE- within curtilage of subject site	1.1218
Access Road West (BE-Business & Enterprise)	0.3253
Access Road East	0.1504
Public open space within R(Phase 1) & R(Phase 2) Lands (not less than 15%)	0.7999 (15.29%)
Residential Density within R(Phase 1) & R(Phase 2) Lands (units/ha)	32
Plot Area Ratio (0.1-0.5 PAR)	0.306
Site Coverage (50%)	12.76 %

3.3 OPEN SPACE

A tract of land adjacent and to the north of the development site is zoned **OS Open Space/Recreation and Amenity** in the Ballinasloe Local Area Plan 2022-2028.

All of these lands are in the ownership of the Applicant.

Part of these lands were included within the curtilage of the development approved under Planning Ref No 19/1978 and will be developed in conjunction with this site which is currently at commencement stage and due for completion in 2023.

It is proposed that the remainder of these lands are included for development as a recreation and amenity open space within the curtilage of the subject site in this case.

However, as part of the development proposals in this case, an access roadway is proposed along the eastern edge of this recreation and amenity open space.

It is to be noted that a 185m long section of access roadway is being constructed up to and partly over the zoned recreation and amenity open space as part of the approved development which is now at construction stage on the adjacent lands.

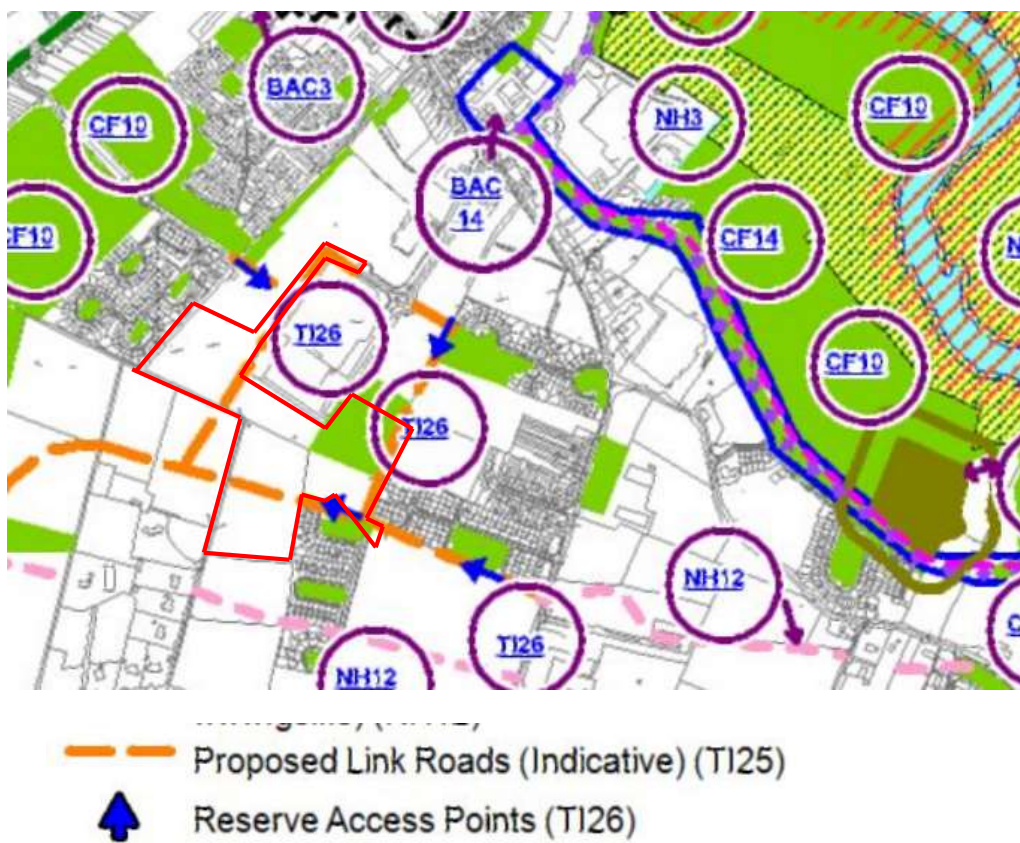
The construction of the roadway across lands which are zoned recreation and amenity open space was originally determined by the requirements of specific **Objective TI 25** and **TI 26** of the Ballinasloe Local Area Plan 2015-2021, as extracted below:

Objective TI 25 – Link Roads (Indicative) (Refer to Specific Objective Maps 2A/2B)

1. Complete the provision of a link road from Beechlawn Road to Town Centre at Harbour Road and another link road from Brackernagh to Pollboy using sections already granted and by determining the final alignment of the remaining sections;
2. Provide a link road in order to provide clarity on the access arrangements to these lands and to provide a division between Business & Enterprise and Residential/other zonings. The road objective will only provide for access to the interchange with the agreement of the NRA, if the access is onto the National Road Network.

Objective TI 26 – Reservation of Access Points (Indicative) (Refer to Specific Objectives Maps 2A/2B)

Reserve access points for future development and the development of backlands including those indicated on the **Specific Objectives Map 2A/2B** and any other access points that may be identified for reservation by the Planning Authority during the plan period, to ensure adequate vehicular, pedestrian and cycle access to backlands, in order to facilitate efficient development of these lands and to ensure connectivity and accessibility to lands with limited road frontage.



The subject site is lined in red and the **Zoned OS** is coloured green on the above extract from Map 2A of the LAP-2015-2021.

Land Zoned OS within the subject site

1.1218 ha

In addition, as outlined in Table 3.2 above, there would be 3 principal open spaces provided within the Residential Development Site totalling **0.7999 ha** and designed to cater for active and passive needs of future residents .

An additional total area of **0.7346 ha** is provided as communal open space/pocket parks at about 5 separate locations. These informal areas are different sizes and shapes and will be landscaped to maximise their amenity value.

All open spaces are provided in central locations to facilitate surveillance from the surrounding dwellings in each case.

A key objective of the landscape strategy, particularly in respect of the **Zoned OS** lands, will be to provide opportunities for passive and active recreation, by way of fitness areas/outdoor gyms, kick-about areas, play facilities and pathways through the open space. These proposed pathways will also promote connectivity within the overall scheme and adjoining existing and developing areas.

The curtilage and extent of the lands **Zoned OS-Open space/Recreation & Amenity** remain unchanged in the Ballinasloe LAP 2022-2028.

It is submitted that the objectives for the reservation of access points to the lands to the south of the town for future development, as formerly expressed above- through lands Zoned **OS-Open space/Recreation & Amenity**, are now implicitly expressed in **Objective BKT 37-Reservation of Access Points** of the Ballinasloe Local Area Plan 2022-2028. The consistency of this proposal is set out in detail in Chapter 5.2 of this Report. However, in the interests of due diligence, and to respond to the validation requirements of ABP, a **Material Contravention Statement** has been prepared by Planning Consultancy Services in support of this application.

3.4 PERMAEBILITY AND PARKING

It is noted that pedestrian/cycle desire routes from the existing development surrounding the subject site(Dun Esker and Beechlawn Heights) tend to be through the site itself in a general northerly direction towards the adjoining commercial facilities or the town centre.

The layout of the scheme on the development site has been designed to preserve and extend the desired pedestrian/cycle routes for both existing and future residents.

It is also the case that the proposed main roadways on the subject site have been designed for consistency with the transportation objectives as expressed in various LAPs from 2003 onwards and as realized by their incorporation into approved developments which have been completed. The provision of these roadways will facilitate access to as well as future expansion and development of the remaining residentially zoned lands to the south of the town.

Car parking provision on site meets the requirements of the **DM 28** as set out in the Galway County Development Plan 2022-2028. The distribution and location of parking spaces is illustrated on the accompanying layout drawings on the basis of :

- Residential 1-3bed -1.5 space per dwelling , 108 units x 1.5 = **162 Spaces**. (163 Provided).
- Residential Houses 3bed – 2 spaces per dwelling , provided in form of on-site parking - 59 units x 2 = **118 Spaces**

Accordingly, the total number of spaces provided = 163+118 = **281 Spaces**.

All of the detached, semi detached and triplet dwellings shall be provided with on-site parking.

3.5 SERVICES INFRASTRUCTURE

The subject site will generally be serviced from an extension of the existing services from the adjacent estate roadways, which are in the full ownership of the Applicant.

3.5.1 DUCTED SERVICES

Electricity, telecommunication and broadband services, which are currently laid into the Dunlo lands as far as the internal roundabout, shall be laid in underground ducts. These services can readily be extended from there in underground ducting beneath the main access roadways to service the proposed development.

3.5.2 FOUL SEWAGE

A gravity foul sewerage system services the existing development, and will service the residential development which is under construction in the Applicants other lands adjacent to the subject site.

The existing gravity foul sewerage system outfalls to an existing pumping station location on lands which are in the full ownership of the Applicant. Sewage is then pumped up into the Ballinasloe Sewerage Scheme on Harbour Rd.

Datum at the inlet to the pumping station is 36 metres OD and the general ground levels on the subject site vary between 44 and 51 metres OD

Accordingly, a gravity foul sewerage scheme has been designed to service the proposed development on the subject site, and is shown on the Engineering Drawings which have been prepared for this submission. The existing gravity foul sewer system extends to the boundary of the subject site at both the east and west access roadways and is directly available to receive the connection from the foul sewerage system serving the subject site.

A Confirmation of Feasibility is attached from Irish Water which confirms that there is adequate treatment capacity to service the proposed development, as presented in Appendix A of this Report. Following further engagement, A Statement of Design Acceptance has also been obtained from Irish Water in respect of the foul sewerage system, including the upgraded pumping station, which is necessary to proposed development on the subject site, and this is also presented in Appendix A.

It has been confirmed that no new and/or upgrades of Irish Water infrastructure are required to service the proposed development on the subject site. It has been further confirmed that there shall be no build over of infrastructural assets and that separation distances comply with Irish Water Standard COPs.

3.5.3 WATER SUPPLY

The existing development at Dunlo is provided with a water supply from a connection at Harbour Road.

It has been determined, over the course of recent pre-connection inquiries with Irish Water in respect of the adjacent development which is at construction stage, that an additional connection was necessary to Irish Water's water network to service the overall water requirements of the area.

An extension from this connection now services the water requirements of the proposed development on the subject site. The location of the proposed connection is shown on the Engineering Drawings which have been prepared for this submission. Accordingly, it is the case that the water service for the proposed development is already in place on the western access road to the development site.

A Confirmation of Feasibility is attached from Irish Water which confirms that there is adequate water network capacity to service the proposed development, as presented in Appendix A of this Report.

Following further engagement, A Statement of Design Acceptance has also been obtained from Irish Water in respect of the water supply network which is necessary to proposed development on the subject site.

It has been confirmed that no new and/or upgrades of Irish Water infrastructure are required to service the proposed development on the subject site. It has been further confirmed that there shall be no build over of infrastructural assets and that separation distances comply with Irish Water Standard COPs.

It is the case that a 150mm watermain was laid along the full length of the western access road to the subject site in 2009 as part of a previous development scheme. This watermain was recently connected to Irish Water infrastructure, under a recent Self-Lay Agreement- CDS2100198801, to serve both existing development and development under construction on adjacent lands.

Irish Water have approved the adequacy of this infrastructure to service the proposed development on the subject site.

Accordingly, the existing watermain system extends to the boundary of the subject site at the eastern access roadway and is laid along the full length of the western access roadway within the subject site.

3.5.4 SURFACE WATER

The topography of the site facilitates the collection of surface water drainage and would result in four catchments each with a separate discharge point.

SUDS principles will be employed in the dissipation of surface water as outlined in the Engineering Report which accompanies this application.

Surface water runoff from each catchment would be collected in a piped network draining to the discharge location where it would be treated via a petrol interceptor prior to discharge to a soakpit in each case.

Each soakpit has been designed to comply with BRE 365 and shall be located beneath the various green areas as shown on the Engineering Drawings which have been prepared for this submission.

3.6 TRAFFIC AND TRANSPORTATION

The proposed development would include a new interconnected internal roadwork extending both from extension of the eastern leg and from the western leg of the existing roundabout within the retail park.

The internal road layout arrangements and geometry would be compliant with the requirements of both the Recommendations for Site Development Works for Housing Areas, 1998, and the DTTAS Design Manual for Urban Roads and Streets.

The eastern access road extends from the roundabout at the entrance to the development and extends clockwise southwards.

The western access road extends from the roundabout at the entrance to the development and extends anti-clockwise southwards.

These roads would be provided with a 6.3 m wide roadway and with 1.8 m cycle lanes on each side.

The remaining roads throughout the estate are 6 m wide, and they are designated as local roads in accordance with DMURS.

The roundabout at the junction of the entrance roadway to the Dunlo lands with Harbour Road was designed in 2005 by RPS Consulting Engineers.

The conclusions of the Traffic Impact Assessment prepared by RPS at that time stated :

“... The proposed Roundabout will cater for all traffic growth to a design year 2023 with the N6 Galway to Ballinasloe dual carriage way in place at which time the proposed roundabout we have a significant degree of reserve capacity.... ”

A Traffic and Transportation Assessment has been prepared by CST Consulting Engineers in respect of the proposed development to accompany this application.

A Road Safety Audit has also been prepared for the proposed development layout by CST Consulting Engineers to accompany this application.

3.7 ENVIRONMENTAL IMPACT

The following Reports have been carried out by Aster Environmental Consultants for submission in support of this application:

- Appropriate Assessment Screening Report
- Ecological Impact Assessment Report, and
- An Environmental Impact Assessment Screening Report.
- A Natura Impact Statement

A Statement on Article 299B has been prepared by Planning Consultancy Services in respect of this application.

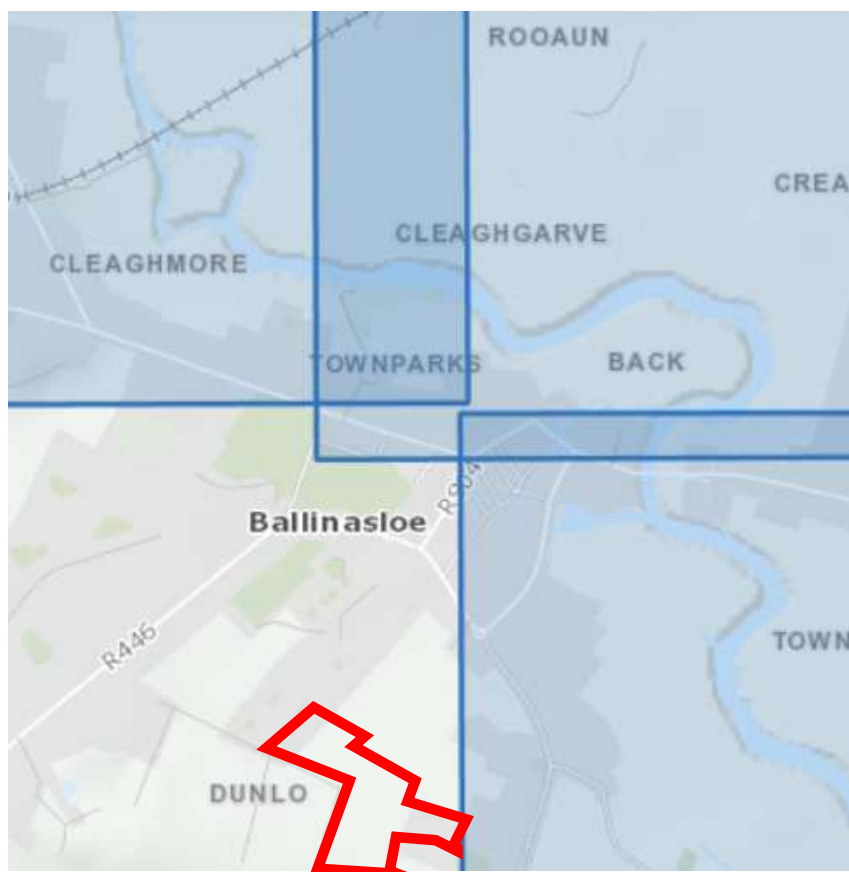
3.8 HYDROLOGY

The relevant catchment Flood risk assessment and management maps for the Ballinasloe area are superimposed on the town in the extract below.

The subject site consists of elevated lands which range from 51 metres OD in a northerly direction down to 38 metres OD beyond the curtilage of the lands.

The entire area of the lands in Dunlo & Pollboy, which are in the ownership of the Applicant, outside the extent of the CFRAM Study area for Ballinasloe.

It is to be noted that the entire development site is outside the area of the 0.1% AEP Fluvial Flood Extent.



A **Hydrological Impact Assessment Report** has been prepared by Hydros Consultants in support of this application.

3.9 ARCHAEOLOGY

An Archaeological Impact Assessment Report has been prepared by James Gibbons Archaeologist in support of this application.

The conclusion of this report reads as follows:

“ No recorded monuments, protected structures or NIAH structures are located within the proposed development site and no impacts to the recorded archaeological resource have been identified.

A potential direct impact to sub-surface archaeological finds, features or deposits, should they exist within the site, has been identified. Mitigation in the form of pre-development archaeological testing of the proposed development site has been recommended in order to ameliorate this potential impact.”

3.10 PART V

It is intended to comply with Part V of the Planning and Development Act, 2000 (as amended) by the transfer of built units on site. Based on the layout submitted herewith, it is envisaged that a total of 16 no. one, two and three-bed units, would be transferred to the Planning Authority in compliance with Part V requirements.

Consultations have taken place with the Housing Section of GCC and the Letter of Understanding from Daithi Flood A/Senior Executive Engineer, Housing Capital Galway County Council and it confirms that the Part V proposals submitted to the GCC are acceptable in principle.

A site layout and corresponding Schedule identifying the units that have been identified for transfer in compliance with Part V is submitted as part of the architectural drawings (see Drawings No. 2521-010).

The balance of the submission, including supporting documentation, methodology for calculating values of land, site costs, normal construction and development costs and profit on those costs and other related costs, is set out on a Part V Proposal which has been prepared by CuddyQS in support of and accompanies this application.

4. NATIONAL & REGIONAL PLANNING CONTEXT

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- National Planning Framework
- Regional Spatial and Economic Strategy – Northern & Western Regional Assembly (2020-2032);
- Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities 2020
- Sustainable Residential Development in Urban Areas Guidelines 2009 & Urban Design Manual – A Best Practice Guide 2009
- Urban Development and Building Height Guidelines 2018;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009), and the accompanying Urban Design Manual
- Housing for All, A new Housing Plan for Ireland

- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines – Quality Housing for Sustainable Communities;
- Design Manual for Urban Roads and Streets (2013);
- The Planning System and Flood Risk Management (2009);
- Birds and Habitats Directive – Appropriate Assessment
- Guidelines for Planning Authorities on Childcare Facilities (2001);

4.1 NATIONAL PLANNING FRAMEWORK

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of the country out to the year 2040. It is a national document that will guide the strategic planning and development of the country over the next 20+ years, so that as the population grows, that growth will remain sustainable (in economic, social and environmental terms).

The NPF calls for a major new policy emphasis on renewing and developing existing settlements. A shared set of goals for every community across the country, expressed in the Framework as the National Strategic Outcomes, are set out. One of the key goals is to achieve 'compact growth' and this is reflected throughout the NPF and through its policies and objectives.

Compact growth is to be achieved by:

- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.
- Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.

The NPF acknowledges that the Northern and Western region justifies a particular focus within this Framework. This is due to a historically lower level of urbanisation compared to other regions, proximity to the border and risks posed by Brexit.

The NPF sets out that the Northern and Western region will, by 2040, grow by over c. 180,000 on its current population to around 1 million people.

The regions ability to accommodate this growth in a sustainable manner, that will safeguard 'liveability' or quality of life of urban places, is predicated on achieving the goal of compact urban growth. With this in mind, National Policy Objectives (NPOs) such as NPO3a and NPO. 3c are established:

NPO 3a -‘Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements’.

NPO 3c -Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints

RESPONSE: It is within this high-level strategic context, that the proposed development at Dunlo & Pollboy is positioned to provide 165 No. new dwelling units within walking distance from Ballinasloe Town Centre, recognised as a key town within Galway County.

The proposed development at Dunlo & Pollboy, Ballinasloe, presents an opportunity to provide high- quality housing, designed to cater to a wide spectrum of the housing market, from families to downsizers. In doing so, the development will contribute to NPO 4 and NPO 5:

NPO 4 ‘ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being’.

NPO 6 ‘Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area

RESPONSE: The NPF highlights that rural town living requires a proportionate and tailored approach to residential development. This means that it is necessary to tailor the scale, design so that a residential development responds to the character, scale and density of the town.

The NPF notes that opportunities exist to create the conditions to support residential development in rural towns, whether through parking and streetscape improvements, traffic diversions, the provision of small-scale urban amenities such as open spaces or playgrounds, the acquisition of key sites and/or the opening up or amalgamation of ‘backlands’ for residential development and the provision of services such as waste-water treatment.

It is submitted that the proposed embraces the principles set out in the above National Policy Objectives.

The following National Policy Objectives are also of particular relevance to the proposed development:

NPO 18a - ‘Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services’.

NPO 27 -‘Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages’.

NPO 32 - 'To target the delivery of 550,000 additional households to 2040'.

NPO 33 - 'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'.

NPO 34 - 'Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time'.

NPO 35 - 'Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

RESPONSE: Through a carefully considered design process, a scheme layout has been prepared which responds to the character of the site topography, site connectivity to the town centre and existing residential setting. This medium density development will provide an excellent standard of amenity for its future residents.

A mix of two and three storey building height has been proposed to develop a sense of place and to confer street definition to this emerging suburb of Ballinasloe town. The overall density and height of the development is considered appropriate for the location of the site and the scheme will ensure the delivery of a suitably scaled new housing development.

The incorporation of pedestrian connections to promote walking and cycling shall also enhance connectivity to Ballinasloe town centre for both the proposed and the existing surrounding development.

The development of a new park as part of this scheme will provide a substantial gain to the wider community. It is also considered that the mix of housing proposed as part of this proposed scheme will cater to a varied demographic that that can accommodate the changing needs of a household over time.

The delivery of 165 No. residential dwellings on the most proximate Residential zoned land within the town of Ballinasloe is considered to be sequential and balanced development and would be fully consistent with the relevant policies and objectives of the NPF.

4.2 REGIONAL SPATIAL AND ECONOMIC STRATEGY 2020-2032 (RSES) FOR THE NORTHERN AND WESTERN REGIONAL ASSEMBLY

The principal purpose of the Region Spatial and Economic Strategy (RSES) is to support the implementation of the NPF and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the regions.

The long-term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.

The RSES acknowledges that –‘The population living in rural towns, villages and the countryside (i.e. other than the Cities and Regional Growth Centres and Key Towns) are home to almost 80% of our region’s population and as such represent a sizeable cohort of the population and land area.’

The RSES states housing continues to present a significant challenge for Ireland, both in terms of meeting the current demand, as well as a growing concern around the affordability of housing, in particular in Galway City, Sligo, Letterkenny and Athlone. The current scheme is considered to fully align with this RPO given it seeks to deliver a substantial uplift in housing on residential zoned land within an existing settlement. The following RPOs of the RSES are of particular relevance to the subject proposal:

RPO 3.2(c) –‘Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints.’

RPO 7.17 -‘Ensure that the housing delivered meets the needs of the community in terms of social, affordable, private and sheltered in both urban and rural areas’.

RPO 7.19 -‘Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time’.

RPO 7.20 -‘Increase population living within settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, in-fill development schemes, area or site-based regeneration, service site provision and increased building heights appropriate to the settlement, together with infrastructure provision’.

RESPONSE: The proposed development is fully consistent with the policy objectives of the RSES. The proposal provides for the creation of 165 No. new residential dwellings on a site zoned for residential development and located proximate to an existing urban centre which provides a range of services and facilities which are located proximate to the subject site.

Given that the site is bounded by existing housing development on each side, it will constitute an infill between these adjoining similar uses. The form, shape and scale of the proposed units, their height, and the palette of materials proposed, will establish the development as a place with its own specific identity and as a modern high quality scheme.

The site represents the optimal location for the natural expansion of development closest to the town centre.

The range of housing types will thereby provide a valuable contribution towards much needed housing demand in the area linked to population growth and varying cohort size as identified in the HNDA Report. The dwellings are also designed to be adaptable should the needs of residents change in the future.

4.3 SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS 2020

The Sustainable Urban Housing: Design Standards for New Apartments Guidelines (Apartment Guidelines) 2020 are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

These Guidelines recognise suitable locations for apartments as being *-Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres.*

In addition, the Guidelines recognize the need for greater flexibility in terms of building height and building separation distances to achieve increased apartment accommodation within developments.

The Apartment Guidelines update previous guidance in the context of greater evidence and knowledge of current and likely future housing demand in Ireland taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government's action programme on housing and homelessness Rebuilding Ireland and Project Ireland 2040 and the National Planning Framework, published since the 2015 Guidelines.

The Apartment Guidelines include a range of specific planning policy requirements (SPPR's) to which the Board are required to have regard. SPPR's relevant to the proposed development, and compliance with same, are as follows:

Specific Planning Policy Requirements 3 Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (5 persons) 90 sq m

Specific Planning Policy Requirement 4- Dual Aspect

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in.
- (ii) In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme

Specific Planning Policy Requirements 5- Floor to Ceiling Height

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.

RESPONSE: The subject site is within the 1000m or 10 minute Pedshed zone from Ballinasloe Town Centre, so it is a suitable location for apartment-type living. The apartments which are to be provided within the proposed scheme comply with the above specific planning policy requirements.

The blocks which contain apartments within the development would also fully comply with the requirements in respect of:

- internal storage
- private amenity space
- refuse storage requirements
- community amenities space and children play areas
- bicycle parking.

The provision of apartments within the development greatly assists in the alleviation of the recognized national deficit of 1 and 2 person households.

All of the apartments in the proposed development are designed as dual aspect and with 2.7m floor to ceiling heights.

All of the apartments, and duplex units within the proposed development have been designed to comply with the required minimum floor areas and associated standards as listed in Appendix 1, such as minimum aggregate floor areas for a living/dining/kitchen rooms, and minimum bedroom floor areas and widths.

All of the Apartments/ duplex units to be provided in the proposed development are dual aspect, so there is 100% compliance under SPPR 4.

All of the above provisions are set out in detail in the **Architectural Design Statement** which accompanies this application.

Based on the foregoing, the proposed apartments to be provided within the development would be consistent with the requirements of the **Sustainable Urban Housing: Design Standards for New Apartments 2020**.

4.4 SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS GUIDELINES 2009 & URBAN DESIGN MANUAL – A BEST PRACTICE GUIDE 2009

The Sustainable Residential Development in Urban Areas Guidelines, 2009 contain specific policies and objectives in relation to the scale and location of new residential development, the need for high quality design of residential areas and the use and development of infill, greenfield and brownfield sites.

Chapter 3 of the Guidelines identifies core principles of design as including place-making, environmental responsibility, social equity and economic viability that are required when creating places of high quality and distinct identity. Box 2 in the Guidelines identifies 12 'Best Practice Design Manual' criteria which should be incorporated in the new residential as follows.

1. Context: How does the development respond to its surroundings?
2. Connections: How well is the new neighbourhood / site connected?
3. Inclusivity: How easily can people use and access the development?
4. Variety: How does the development promote a good mix of activities?
5. Efficiency: How does the development make appropriate use of resources, including land?
6. Distinctiveness: How do the proposals create a sense of place?
7. Layout: How does the proposal create people-friendly streets and spaces?
8. Public realm: How safe, secure and enjoyable are the public areas?
9. Adaptability: How will the buildings cope with change?
10. Privacy / amenity: How do the buildings provide a high-quality amenity?
11. Parking: How will the parking be secure and attractive?
12. Detailed design: How well thought through is the building and landscape design?

RESPONSE: All of the above measures have been considered in the design process and have been discussed in broad outline in Chapter Three of this report, where the design rationale is set out.

A detailed consideration of these criteria is set out in the **Architectural Design Statement** which accompanies this application.

4.5 URBAN DEVELOPMENT AND BUILDING HEIGHT GUIDELINES 2018

The Urban Development and Building Heights Guidelines 2018 (Building Height Guidelines) outline that generic maximum height limits, if inflexibly or unreasonably applied, can undermine wider national policy objectives to provide more compact forms of urban development as outlined in the National Planning Framework and instead continue an unsustainable pattern of development whereby cities and towns continue to grow outwards rather than consolidating and strengthening the existing built up area.

A comment in the Foreword to this document reads as follows:

There is an opportunity for our cities and our towns to be developed differently. Our urban centres could have much better use of land facilitating well located and taller buildings, meeting the highest architectural and planning standards. These guidelines are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of our cities and towns upwards, rather than ever outwards.

Furthermore, the Guidelines provide that blanket limitations can also hinder innovation in urban design and architecture leading to poor planning outcomes. On this basis the Guidelines outline wider and strategic policy considerations and a more performance criteria driven approach that planning authorities should apply alongside their statutory development plans in securing the strategic outcomes of the National Planning Framework and in particular compact urban growth.

The guidelines state, in Section 3.4 and 3.5 that:

Newer housing developments outside city and town centres and inner suburbs, i.e. the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments also address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation. These forms of developments set out above also benefit from using traditional construction methods, which can enhance viability as compared to larger apartment-only type projects.

And,

The forms of development set out above can, where well designed and integrated, also facilitate the development of an attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community as in the case of the award winning Adamstown Strategic Development Zone in South Dublin County Council

The Guidelines advocate that such development patterns are generally appropriate at suburban edges of towns and cities, for both infill and greenfield development and should not be subject to specific height restrictions.

Specific Planning Policy Requirements 4 (**SPPR4**), which takes precedence over any conflicting policies and objectives of Development Plans or Local Area Plans, states :

SPPR 4

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;
2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and
3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

RESPONSE: The adherence to these guidelines has been the fundamental philosophy on which the design of the scheme has been based. The proposed building heights provide a mix of two and three storey buildings, with three storey duplex units. The introduction of three storey elements assists in ensuring a broad range of building typologies in line with wider demographic and household formation trends.

Taller elements have been sensitively located proximate to the corners, adjacent to the principal routes through the site, and to assist in creating a strong sense of urban neighbourhood.

4.6 GUIDELINES FOR PLANNING AUTHORITIES ON SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS (2009)

The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas is to ensure the sustainable delivery of new development throughout the country. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one's way around
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions.

Section 5.11 refers to suitable locations for such development and states:

"These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares."

RESPONSE: The proposed development provides for a net density of 32 no. units per hectare including both apartments, duplex units and housing type units. It is considered that, given the location of the site at the edge of the built up area of Ballinasloe and the existing surrounding context, the proposed density on site is appropriate in this instance.

In order to achieve a sustainable density, the proposed development entails a range of unit types consisting of apartment, townhouse style units and duplex units in two and three storey format.

Furthermore the proposed development seeks to avoid the dominance of car parking at surface level and provides a series of well connected public open spaces.

4.7 HOUSING FOR ALL, A NEW HOUSING PLAN FOR IRELAND

This is the Government's new plan (superseding 'Rebuilding Ireland') to boost the supply of housing to 2030; to increase availability and affordability of housing; and to create a sustainable housing system into the future.

The aim of the plan is that everyone should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life. The plan contains a range of actions and measures to ensure over 300,000 new social, affordable, cost rental and private homes are built by 2030. The actions outlined in the Plan are backed by over €4 billion in annual guaranteed State investment in housing over the coming years, including through Exchequer funding,

the Land Development Agency and Housing Finance Agency investment. The plan commits to over €20 billion in State investment in housing over the next five years.

The plan is set out across four pathways to address the pressing housing challenges facing the State:

- “Pathway to supporting homeownership and increasing affordability
- Pathway to eradicating homelessness, increasing social housing delivery and supporting social inclusion
- Pathway to increasing new housing supply
- Pathway to addressing vacancy and efficient use of existing stock”

RESPONSE: The proposed development will support the achievement of this Plan by providing housing at an appropriate scale and location including social housing. While the detail of this plan has yet to be fully understood, the proposal for housing development outlined in this submission is in accordance with the intention and ambition of the plan.

4.8 DELIVERING HOMES, SUSTAINING COMMUNITIES (2008) AND THE ACCOMPANYING BEST PRACTICE GUIDELINES – QUALITY HOUSING FOR SUSTAINABLE COMMUNITIES

The Departments policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is stated as being central to creating a sustainable community.

Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places in which people desire to live.

This policy statement is accompanied by **Best Practice Guidelines entitled ‘Quality Housing for Sustainable Communities’**. The purpose of these Guidelines is to promote high standards in the design and construction and in the provision of residential and services in new housing schemes. The guidelines encourage best use of building land and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of new housing scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

RESPONSE: Chapter 2 and 3 of this Report together with the associated documentation contained in this submission demonstrate consistency of the

intention with the relevant standards in the **Quality Housing for Sustainable Communities**.

4.9 DESIGN MANUAL FOR URBAN ROADS AND STREETS (2013)

The Design Manual for Urban Roads and Streets (DMURS), 2013, sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

RESPONSE: The principle design guidance of DMURS has been considered in the design of the proposed development. The proposed development seeks to prioritise pedestrian and cyclists throughout and around the site in accordance with the policies set out in DMURS.

All of the main roadways would be provided with cycle lanes and pedestrian connectivity within the site and towards the town centre is facilitated by the adequate provision of permeable footway networks.

An assessment of the compliance of the scheme layout with DMURS is detailed in the **DMURS Compliance Statement** which has been prepared by CST Consulting Engineers in support of this application.

4.10 THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT (2009)

The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Planning system and flood risk management guidelines require the planning system at all levels to avoid development in areas at risk of flooding.

As outlined in Chapter 3.8 above, Flood Risk Assessment Maps contained within the CFRAM Study show that the maximum predicted flood levels for the River Suck in the vicinity of the site are well below the minimum finished floor level within the proposed development. The OPW flood records show that no historic flood events have been recorded in the vicinity of the site.

A **Hydrological Impact Assessment Report** by HYDROS Engineering Hydrology Consultants accompanies this application.

4.11 BIRDS AND HABITATS DIRECTIVE – APPROPRIATE ASSESSMENT

Under Article 6 (3) of the EU Habitat Directive and Regulation 30 of SI no. 94/1997 “European Communities (Natural Habitats) Regulations (1997)” any plan or project

which has the potential to significantly impact on the integrity of a Natura 200 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under in the Planning and Development Acts (2000 – 2010).

As set out in Galway County Development Plan, the Council will ensure that an Appropriate Assessment is carried out in respect of any plan or project not directly connected with or necessary to the management of the site, but likely to have a significant effect on a Natura 2000 site(s), either individually or in combination with other plans or projects, in view of the sites conservation objectives.

RESPONSE: Refer to the Environmental Reports as prepared by Aster Environmental Consultants for this submission and as discussed in Chapter 3.7 of this Report.

- Appropriate Assessment Screening Report
- Ecological Impact Assessment Report, and
- An Environmental Impact Assessment Screening Report.
- A Natura Impact Statement

4.12 GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES (2001)

Childcare Facilities- Guidelines for Planning Authorities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with **20 places** for each **75 dwellings**. However the threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed, and the Guidelines do permit flexibility in their application to reflect the particular circumstances in any given area in terms of supply and demand.

RESPONSE: The proposed development consists in total 165 No. residential units. Accordingly, the childcare spaces therefore is calculated as $[(165/75)*20 = 44 \text{ spaces}]$.

It is submitted that the requirement under this heading can be accommodated within a creche facility which is to be provided as part of the development approved under **Planning Permission Reference No 19/ 1978**. This approval was obtained by the Applicant in this case, on the 7th September 2020, on lands which are in the full ownership of the Applicant, as indicated on the C3 below:

C3

GALWAY COUNTY COUNCIL

PLANNING AND DEVELOPMENT ACTS 2000-2010

DECISION under SECTION 34 of the ACT of 2000

Ref No. in Planning Register: 19/1978

Date of Receipt of Application: 19/12/2019

Limehill Esker Ltd
c/o R. G. Greene & Associates
Office 2, Unit 33
Kilkerrin Business Park
Liosbaun, Tuam Road
Galway

I hereby give you NOTICE that the Galway County Council has by order dated 07 SEP 2020 granted PERMISSION

to the above named, for development of land, in accordance with documents lodged, namely:

for the following development on lands at Dunlo, Ballinasloe: Provision of (1) BLOCK A consisting of 1 No. One-bed apartment, 1 No. Three-Bed apartment, 4 No Two bed apartments, and a creche (321 Sq.m). (2) BLOCKS B1, B2, B3, B4, & B5 consisting of a total of 19 No Two-bed apartments and 19 No Three-bed maisonettes in a duplex arrangement (3) 7 No Three-bed detached two storey dwellings. (4) 2 No Two-bed detached single storey dwellings. (5) 4 No Two-bed semi-detached single storey dwellings. (6) 21 No Three-bed terraced two storey dwellings. (7) 2 No. Four-bed end-of-terrace two storey dwellings. (8) 8 No Two-bed semi-detached two storey dwellings. (9) All associated site development works and connection into existing services. Gross floor space of proposed works: 9354 sqm (Residential Dwellings - 9022 sqm, Creche - 332 sqm) in the townland of Dunlo

and subject to the condition(s) set out in the schedule hereto.

Main reasons and considerations on which the decision is based:-

This development is at construction stage and is due to be completed in November 2023.



The area of the proposed creche, on the left in the above photomontage view, will be 332m².

The ultimate capacity of this creche is determined by the General Standards, as set out in Appendix 1- Childcare Facilities- Guidelines for Planning Authorities (2001), as extracted below:

It is submitted, and proposed, that the Creche which will be constructed by the applicant on his lands, as approved under **Planning Permission Reference No 19/1978** will satisfy the requirements of the Childcare Facilities- Guidelines for Planning Authorities (2001) for the development proposed on the subject site in this case.

A justification for the above strategy is discussed in the **Childcare Demand Analysis** which has been prepared for submission with this application by Planning Consultancy Services.

5.0 LOCAL PLANNING POLICY

Consistency with the following plans was considered at Stage 1 of the current SHD proposal:

- **Galway County Development Plan 2015-2021**
- **Ballinasloe Local Area Plan LAP 2015-2021, and**
- **Galway County Council Housing Strategy & Housing Need Demand Assessment (HNDA) May 2021**

Section C.2 – Strategic Assessment: Principle & Development Strategy of the PA Opinion, as submitted to ABP on the 21st January 2022, references the above documents.

However, during the interim Stage 2 of the process, the following plans were adopted in June/July 2022:

- **Galway County Development Plan 2022-2028**
- **Ballinasloe Local Area Plan LAP 2022-2028.**
- The **Galway County Council Housing Strategy & Housing Need Demand Assessment (HNDA) May 2021** has been incorporated into **Chapter 2** of the **Galway County Development Plan 2022-2028**

Accordingly, it is now intended to demonstrate the consistency of the proposal with the equivalent Policies and Objectives as contained in the new and current statutory plans.

5.1 GALWAY COUNTY DEVELOPMENT PLAN 2022-2028

The **Galway County Development Plan 2022 – 2028** (referred to herein as the GCDP) is the statutory land-use plan governing the subject site.

Table 2.11 Core Strategy of the GCDP identifies Ballinasloe as a 'Key Town' . Over the lifetime of the GCDP (i.e. 2022-2028), the Core Strategy estimates that the settlement of Ballinasloe can accommodate an increase in population of 1999 people, with an associated requirement for 805 new homes.

An average household size of 2.5 persons is used in the calculations in the Core Strategy Table. Accordingly, a quantum of 23 ha of greenfield land is required for residential development to meet the needs of the Core Strategy within the plan period.

The strategy for the development of Ballinasloe, which includes *“realising the town’s potential as a ‘County Town’, ensuring a balance of development in the town centre of Ballinasloe, and providing for compact growth and brownfield development,.....”* is expressed in Policy Objective CS 2 :

Policy Objective- CS 2 Compact Growth

To achieve compact growth through the delivery of new homes in urban areas within the existing built up footprint of settlements, by developing infill, brownfield and regeneration sites and prioritising underutilised land in preference to greenfield sites

RESPONSE: The quantum of recently permitted residential development in Ballinasloe amounts to about 150 units. The current proposal for the provision of 165 units on the subject site in combination with the recently permitted residential development amounts to a total of 317 units on greenfield land within the Ballinasloe LAP boundary.

This quantum, in itself, represents- on the one hand- only 39.38% of the amount of units identified in the Core Strategy of the GCDP. Accordingly, the provision of 165 units on the subject site - on the other hand- represents a significant contribution to residential settlement in a location which is consistent with policy objective for compact growth of greenfield land

- most proximate to the Town Centre,
- and is also in accordance with the principles of sequential development,
- is to be provided on land which is already serviced , and
- facilitates connectivity to the Ballinasloe Town Centre .

The proposed development is consistent with the requirements of the Core Strategy and the Settlement Strategy which seeks to support the development of the County Town.

The proposed development will make a significant contribution to this housing allocation by providing 165 No. new residential dwellings in a range of typologies to reflect the trends towards smaller size households, as identified in Chapter 2.3.9 of the GCDP.

Policy Objective- CS5 Compact Growth

It is a policy objective of the Planning Authority to support the delivery of the population projections within the different settlement tiers of the Core Strategy. Where individual settlements are not progressing to reach their population allocation at the half way point in the lifetime of the plan the population allocation may be redistributed within the individual tier subject to servicing and the proper planning and sustainable development of the area.

RESPONSE: The population projection or allocation for Ballinasloe town is set out in Table 2.11 – Core Strategy Table of the CDP. This identifies a “*Core Strategy 2022-2028 Core Strategy Population Allocation*” of 1,999 persons for Ballinasloe. Using the Core Strategy average household size of 2.5 persons, the proposed development of 165 units would generate a population increase of 413 persons. Therefore, it is considered that the proposed development will support the delivery of the population projection for Ballinasloe, in compliance with Policy Objective CS5 of the CDP.

Policy Objective- CGR 1 Compact Growth

To require that all new development represents an efficient use of land and supports national policy objectives to achieve compact growth in towns and villages. Development of lands with no links to the town or village centre will be discouraged.

RESPONSE: The proposed residential development with a density of 32 units to the hectare¹, within the built up area of Ballinasloe, represents an efficient use of residentially zoned lands, which will support the national policy objective to achieve compact growth within the town. Furthermore, given that the proposed development will provide for vehicular and pedestrian links with the town centre, it is consistent with the provisions of Policy Objective CGR 1 of the CDP.

Policy Objective Part V Provision - PV1 Part V Provision

It is a policy objective of the Planning Authority to secure implementation of the Part V provision of the Planning and Development Act 2000 (as amended), through the reservation of 20% of all lands zoned for residential uses, or for a mixture of residential and other uses, shall be made available for

¹ It should be noted that there is no policy objective contained in either the County Development Plan or the Local Area Plan, which specifically prescribes residential densities for Ballinsalloe.

the provision of social and/or affordable housing in order to address the requirement for social and affordable housing under Part V, thus promoting tenure diversity and socially inclusive communities within the County. Outlined in the Housing Circular 28/2021, the Part V contribution applicable to a grant of planning permission remains at 10% (to be applied to social housing only) where land already has planning permission or until 31 July 2026 for all land purchased in the period between 1 September 2015 and 31 July 2021. The applicable percentage will be 20% in all other cases

RESPONSE: As part of the proposal, it is intended to provide 16 No. dwellings to fulfil the Applicant's 10% Part V obligation. A Part V submission has been prepared in support of this application.

Policy Objectives Placemaking- PM 1 Placemaking

To promote and facilitate the sustainable development of a high-quality built environment where there is a distinctive sense of place in attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise

RESPONSE: Chapter 3 of this Statement of Consistency Report together with the **Architectural Design Statement** and the **Landscape Planning & Design Report**, submitted in support of this application, clearly set out how the scheme promotes the use of sustainable urban design principles and approaches which will ensure that a high quality built and natural environment appropriate to the context and landscape setting is created on the subject site.

It is reiterated that the layout of the proposed scheme has been designed to create neighbourhoods with a distinctive sense of place, and constitute an efficient use of zoned and serviced land which is most proximate to the town centre.

PM 3 Town and Village Centre Management Plans

To promote the preparation of town and village centre management plans across the county that accord with proper planning and sustainable development.

RESPONSE: A masterplan for the lands in the ownership of the Applicant was submitted in conjunction with the adjudication of the local authority on an adjoining development under Planning Ref No 19/1978, and this showed additional lands which now constitute the subject site and which were entirely located on Residential (Phase 1) lands in the previous LAP 2015-2021. These lands were some of the nearest zoned Residential (Phase 1) lands to the Town Centre. Accordingly, it is clear that the proposed development would amount to a sequential development of the existing urban edge and would provide a significant contribution to meeting the housing targets as set out in Core and Settlement Strategies .

PM 9 Vitality in Towns and Villages

(a) To provide an appropriate mix of uses and densities in settlements that are responsive to the needs of people and market demand to support delivery of sustainable, viable and thriving walking neighbourhoods;

(b) To encourage a greater usage of backland areas and to promote the redevelopment of sites in the town or village centre where development will positively contribute to the commercial and residential vitality of the town or village settlement.

RESPONSE: The proposed development provides for an appropriate mix of house types which is responsive to market demand, whilst achieving a sustainable residential density. The proposed development provides for vehicular and pedestrian connectivity to adjoining lands and towards the town centre. The subject site is within walking distance of a range of services and amenities within the town of Ballinasloe and the density of the scheme as proposed is entirely appropriate to this location, especially having regard to National and Local Policy, as confirmed in the Chapter 3 of the PA Report . The layout of the scheme has been optimised to deliver compact growth whilst providing an excellent standard of amenity for future residents through the provision of safe pedestrian walkways and high quality communal and public open space. The proposed development could be described as a backland area.

Therefore, the proposed development of these areas, in order to contribute to the residential vitality of the town, is supported by the Policy Objective PM9 of the GCDP.

UL 2 Layout and Design

To comply with the principles of good placemaking in delivering residential developments within the towns and villages of the county.

RESPONSE: Chapter 3 of this Statement of Consistency Report together with the **Architectural Design Statement** and the **Landscape Design Report**, submitted in support of this application, clearly sets out how the scheme complies with the principles of good placemaking for residential development.

UL 3 Housing Mix

To promote a mix of house types and sizes that appeal to all sectors of the community and contribute to a healthy neighbourhood.

RESPONSE: The proposed development on the subject site is an integrated response to the context and setting of its proximate location to the south of the existing Town

Centre. The scheme forms an infill between adjoining existing residential developments to the east and west of the site.

The layout of the scheme affords opportunities for the provision of future connection to both zoned lands to the south and permeability/connectivity for pedestrian and cyclists from the adjoining estates through the development towards the Town Centre.

The layout of the scheme incorporates a network of pedestrian connections which will facilitate the movement of people in a walkable neighborhood.

A Planning Authority “shall include in any development plan a strategy for the purpose of ensuring that proper planning and sustainable development of the area of the development plan provides for the housing of the existing and future population of the area in the manner set out in the strategy” under Section 94(1)(a) of the Planning and Development Act 2000 (as amended). Accordingly, The Galway County Council Housing Need and Demand Assessment (HNDA) was prepared in May 2021 and is incorporated into Chapter 2 of the new GCDP, and provides estimates of future housing need and demand in County Galway over the six-year Development Plan period from 2022 to 2028.

This document provides results of current research into house size cohort in County Galway. This information is a particular relevance in the design of housing schemes for future needs.

A relevant extract is presented below and this shows consistency of the relevant house cohort sizes over the years 2022 to 2028.

This information formed a basis for the composition of the unit typologies within the various elements of the proposed scheme.

It is to be noted that one-person and two-person households are stated to account for over 50% of the projected household size cohorts over the years ahead.

This is an indication that there will be a future demand for smaller sized houses and apartments

The results of the estimation of household size cohorts are summarised in Table 36.



Figure 26. Projection of Household Size Cohorts Trending over the Plan Period

The indication of anticipated households in each cohort shows that four-person households are expected to have approximately 17% of the overall households followed by three-person households (15%). Comparing these outputs with Census 2016 indicate that the 2-person households are expected to have the greatest growth rate (28%), followed by single-person households (25%).

This indicates that a growing demand for apartments and smaller-size houses are expected, while the bigger size houses are still having a steady market in the County which by considering the dominant characteristics of the County is not unexpected.

The scheme contains a broad range of unit typologies in keeping with the findings outlined in Chapter 2 Core Strategy, Settlement Strategy and Housing Strategy of the GCDP, as generally scheduled below:

HOUSING MIX:			
Apartment	1 Bed / 2P	15	9.09%
	2 Bed / 4P	25	15.15%
	3 Bed / 5P	2	1.21%
Duplex	2 Bed / 4P	24	14.55%
	3 Bed / 5P	40	24.24%
House	2 Bed / 4P	32	19.39%
	3 Bed / 5P	27	16.36%
Total		165	100.00%

Accordingly, it is submitted that the proposed scheme on the subject site is entirely consistent with the objectives of the GCDP in respect of layout and design and housing mix.

UL 5 Open Space

To provide well planned and considered open space that is of sufficient size and in locations that respond to the identified needs of people in accordance with best practice and the scale and function of the surrounding area

RESPONSE: The open space to be provided within the proposed scheme varies from pocket parks close by the various blocks to provision of a large centrally located park.

A large central area of zoned open space is incorporated within the subject site and is intended to be developed as a Central Park for the amenity of all residents in the vicinity at this location south of the Town Centre of Ballinasloe. The detailed design of this park is submitted in the **Landscape Planning & Design Report** prepared by Cunnane, Stratton Reynolds in support of this application.

The various units typologies within the scheme are designed around centrally located open space areas and pocket parks.

Own site residential units are arranged around centrally located and landscaped open space areas which facilitate surveillance.

Townhouses and duplex units are located in close proximity to pocket parks for the amenity of local residents.

Private amenity open space is provided to all of the units within the proposed development in accordance with the requirements of the GCDP and the Ballinasloe LAP.

5.2 BALLINASLOE LAP 2015-2021

The scheme was initially designed for consistency with the various objectives of the Ballinasloe LAP 2015-2021, and a supporting Statement of Consistency was submitted to ABP for the Stage 1 of the SHD process, and a PA opinion was presented to ABP on the 21st January 2022 in response to the Stage 1 submission.

All of the lands in the subject site (to accommodate residential units) were zoned Residential (Phase 1) in Map 1B- Town Centre of the current Ballinasloe LAP 2015-2021.

Lands adjacent to the subject site, and deemed to be included within the curtilage of the subject site for development purposes, are zoned OS - Open Space/Recreation & Amenity.

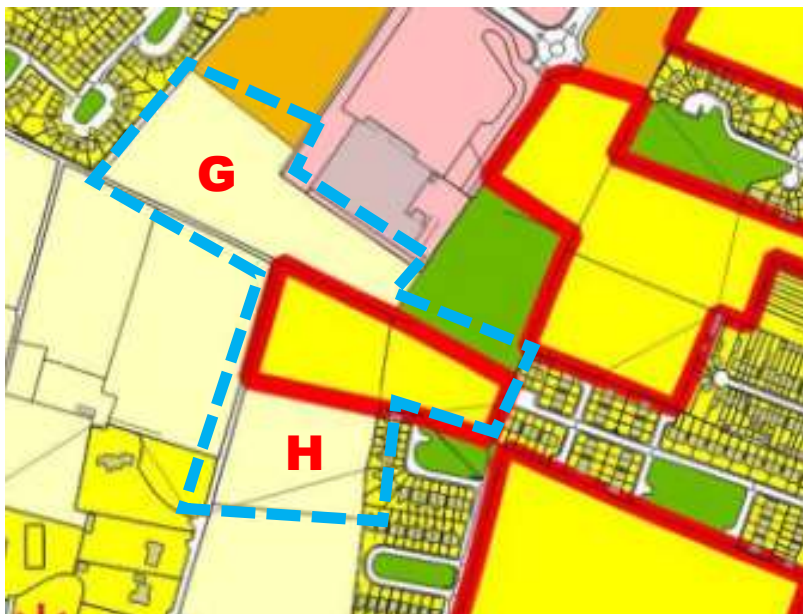
The R1 zoned lands in the subject site are outlined in the dashed blue line on the attached extract from Map 1B- Town Centre of the Ballinasloe LAP 2015-2021.



However, in the interim during the Stage 2 process, a new Ballinasloe LAP 2022-2028 was adopted on the 6th July 2022.

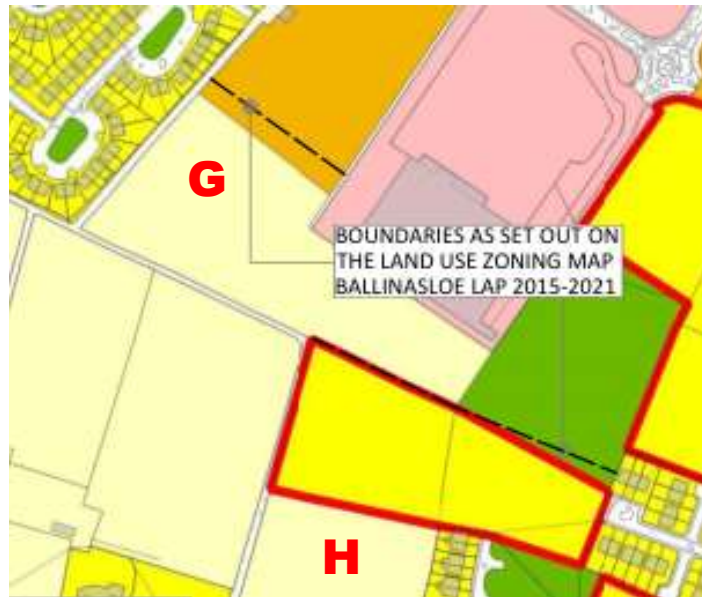
The impact of the new LAP on the proposed scheme on the subject site may be summarized as follows:

- The zoning of two separate tracts of the subject site was changed from **R Residential(Phase 1)** to **R-Residential(Phase 2)** . These tracts are denoted **G** and **H** on the extract from the new zoning map below:



There was an additional impact, due to drafting errors, whereby the convention of inlining the boundary of the zoned tracts in Redline on the old LAP map was not

observed in the new LAP zoning map , and there was a consequent drifting of the zoned boundary, as shown on the extract map below:



The rezoning of tracts of land on the subject site from R-Residential(Phase 1) to R-Residential(Phase 2) was as follows:

- Area G – 2.2543 ha
- Area H – 1.1742 ha

Accordingly, a total of 3.4285ha of land on the subject site was rezoned from **R- Residential(Phase 1)** to **R- Residential(Phase 2)** . The associated impact is that the residual tract of land zoned **R-Residential(Phase 1)** on the subject site has been effectively landlocked .

- The Transportation Objectives TI 25 and TI 26 were eliminated and were replaced by the **Ballinasloe Local Transport Plan** , as prepared by SYSTRA Consultants. Accordingly, the stratagem upon which the consistency of the provision of an access roadway through the tract of land zoned Open Space was diluted and made more non-prescriptive.

In view of the foregoing, the Applicant has prepared a Material Contravention Statement, which demonstrates, inter alia, that the roads/access objectives in the Ballinasloe Development Plan are not clearly stated. This **Material Contravention Statement** has been prepared by Planning Consultancy Services in support of this application.

Furthermore, the provision of a vehicular road via the Open Space zone is established by the Planning History of the area, and is in fact partly constructed within the OS zone. Furthermore, in the absence of the proposed vehicular road linkage, via the OS Zone, it would render all of the serviceable residential development lands (including the Phase 1 lands to the east, in separate ownership) essentially landlocked and undevelopable.

5.3 BALLINASLOE LAP 2022-2028

The Core Strategy in the GDCP sets the context and parameters for the development of Ballinasloe as a 'County Town' in the County. Based on population projections forecast by the West Regional Authority and set out under the Core Strategy, the amount of zoned residential land required to meet this target is set at 23ha for Ballinasloe.

Objective BKT 1 – Consistency with Core Strategy

Ensure that developments permitted within the plan area are consistent with the zoned land allocations in the Core Strategy and associated provisions in the current Galway County Development Plan 2022-2028

RESPONSE: A development on the subject site consisting of 165 residential units would constitute a significant contribution to the demand as identified in the Core Strategy and as set out in the table below. Accordingly, it is submitted that the proposal is entirely consistent with the objective of the Core Strategy to locate an orderly and sequential development on greenfield lands which are zoned residential within the LAP Plan boundary.

It is further submitted that the design of the scheme on the subject site is consistent with the policies set out in the Chapter 2 HNDA of the GDCP for the provision of unit typologies which will meet the future housing needs.

Settlement Typology	CSO 2016	Core Strategy Allocation	Residential Units to be Delivered on Greenfield Sites	Density	Quantum of Greenfield Land Required for Residential Development	Residential Units to be Delivered on Infill/Brownfield Sites
Ballinasloe Key Town	6,662	1,999	805	35	23	345

Table 1: Core Strategy

Given that the proposed development complies with the provisions of Core Strategy Policy Objectives CS2 & CS5 of the County Development Plan (discussed above), it would follow that the proposed development complies with Objective BKT1 of the Ballinasloe Plan.

Accordingly, it is concluded that the proposed development on the subject site is consistent with the Core Strategy in every respect.

Objective BKT 2 Service Led Development

Development shall only be permitted where there is satisfactory water and wastewater provision to service same, either existing or to be provided in tandem with the development.

RESPONSE: The water supply infrastructure from which the water service for the development will be obtained already traverses the western access roadway to the proposed development on the subject site.

A gravity foul sewage system has been designed for the proposed development on the subject site. This entire system outfalls to a pumping station Is situated on lands which are in the ownership of the Applicant. This pumping station has recently been upgraded and new pumping equipment has been installed to facilitate both existing development and the proposed development on the subject site.

The foul trunk sewers are laid to the boundary of the subject site along both the eastern and western access roadways. Accordingly, the foul sewage services to serve the proposed development can be readily extended from the existing system.

Thus, it can be concluded that the proposed development on the subject site is consistent with the objective for the provision of service led development.



PHOTOGRAPH No BKT 2-A shows view looking north over the partially completed western access roadway The incomplete roadbase is visible on the right, and extends down along the western edge of TESCO, where a footpath is completed . Note the 150mm PVC watermain in the foreground.

Accordingly, it is the case that the water service required for the proposed development is already in existence on the western approach to the subject site. The water service for the eastern element of the proposed works will be provided directly from the service which has

been constructed right up to the site boundary as part of the project which is presently under construction.

A Confirmation of Feasibility has been issued by Irish Water in respect of the proposed development on the subject site. The applicant has engaged with Irish water over the course of the preparation of this application, and a confirmation of Irish Water Design Acceptance has been issued, and is enclosed in Appendix A and with the Engineering Services Report which has been prepared in support of this application.

BKT 3 Environmental Assessments

To require the preparation and assessment of all planning applications in the plan area to have regard to the information, data and requirements of the Appropriate Assessment Natura Impact Report, SEA Environmental Report and Strategic Flood Risk Assessment Report that accompany this LAP. There shall be a requirement of Ecological Impact Assessment as appropriate in plan area.

RESPONSE: Consistency with the requirements of this objective have been outlined in detail in the reports prepared by Aster Environmental Consultants which have been prepared in support of this application.

Owing to the fact the OPW flood records show that no historic flood events have been recorded on or in the vicinity of the site, and given that the subject site is located outside any indicative future flood risk areas. However, in the interest of due diligence a site specific Flood Risk Assessment accompanies the application.

BKT 6 Residential Development Phasing

Support the development of lands designated as Residential (Phase 1) within the lifetime of the Plan, subject to normal planning, access and servicing requirements, and reserve the lands designated as Residential (Phase 2) for the longer-term growth needs of Ballinasloe. **Residential (Phase 2) lands are generally not developable** for housing within the lifetime of this Plan, with the exception of the following developments, which may be considered by the Planning Authority, subject to a suitable evidence based case being made for the proposal: a) Single house developments for local family members on family-owned land, subject to a 7-year occupancy clause. b) Non-residential developments that are appropriate to the site context, residential amenities, the existing pattern of development in the area and the policy objectives in the Plan. c) Where it is apparent that Residential (Phase 1) lands cannot or will not be developed for residential purposes within the plan period, residential development may be considered in limited cases in a phased manner on suitable Residential (Phase 2) lands, in exceptional circumstances:

- Development on Residential (Phase 2) lands will normally only be considered where 50% of the lands in Residential (Phase 1) are committed to development.
- Residential developments on Residential (Phase 2) lands will be subject to compliance with the Core Strategy, the principles of proper planning and sustainable development, connectivity, including infrastructure and public footpath and lighting to the town centre, the sequential approach, avoidance of leap-frog developments, and subject to meeting normal planning, environmental, access and servicing requirements. **Developments will only be permitted where a substantiated evidence-based case has been made to the satisfaction of the Planning Authority and the development will not prejudice the future use of the lands for the longer-term growth needs of each settlement.**

RESPONSE: Objective BK6 provides that Residential (Phase 2) lands are “*generally not developable*” for housing within the lifetime of this Plan. It must be emphasised that the term “generally” allows for a certain level of flexibility to this objective, in the assessment of housing within “R-Phase 2” lands.

Moreover, this Objective allows for the *“Exception of the following developments, subject to a suitable evidenced based case being made for the proposal; Where it is apparent that Residential (Phase 1) lands cannot or will not be developed for residential purposes within the plan period, residential development may be considered in limited cases in a phased manner on suitable Residential (Phase 2) lands, in exceptional circumstances.”*

In response, an evidence based ‘exceptional circumstances’, to enable the consideration of housing within the Phase 2 lands of the subject site, is outlined below.

Non-development will prejudice the future use of R-Phase 1 & R-Phase 2 Lands at this location

The current 2022 Ballinasloe Local Area Plan, has been adopted since the Stage 1 SHD Pre-Application was submitted to ABP.

The Council decided to Rezone 3.4285ha of land within the subject site from R-Residential (Phase 1) to R-Residential (Phase 2), inexplicably, as part of the newly adopted Plan, without any clear access objectives to facilitate development lands at this location in the future.

The location of these rezoned areas are marked **G & H** on the map below. The associated impact is that, in the event that the subject R-Phase 2 lands are not allowed to be developed within the lifetime of the Plan, and if the vehicular access link is not allowable within the “OS” zone, the remaining R-Residential (Phase 1) lands within the subject site i.e. 1.805ha, will remain effectively landlocked.

Furthermore, in the event that ABP consider that the proposed vehicular access link is not allowable within the “OS” zone, the neighbouring R-Residential (Phase 1) lands to the east of the “OS” zone, will also remain landlocked. The latter area is marked as ‘F1’ below and consists of 3.02ha.

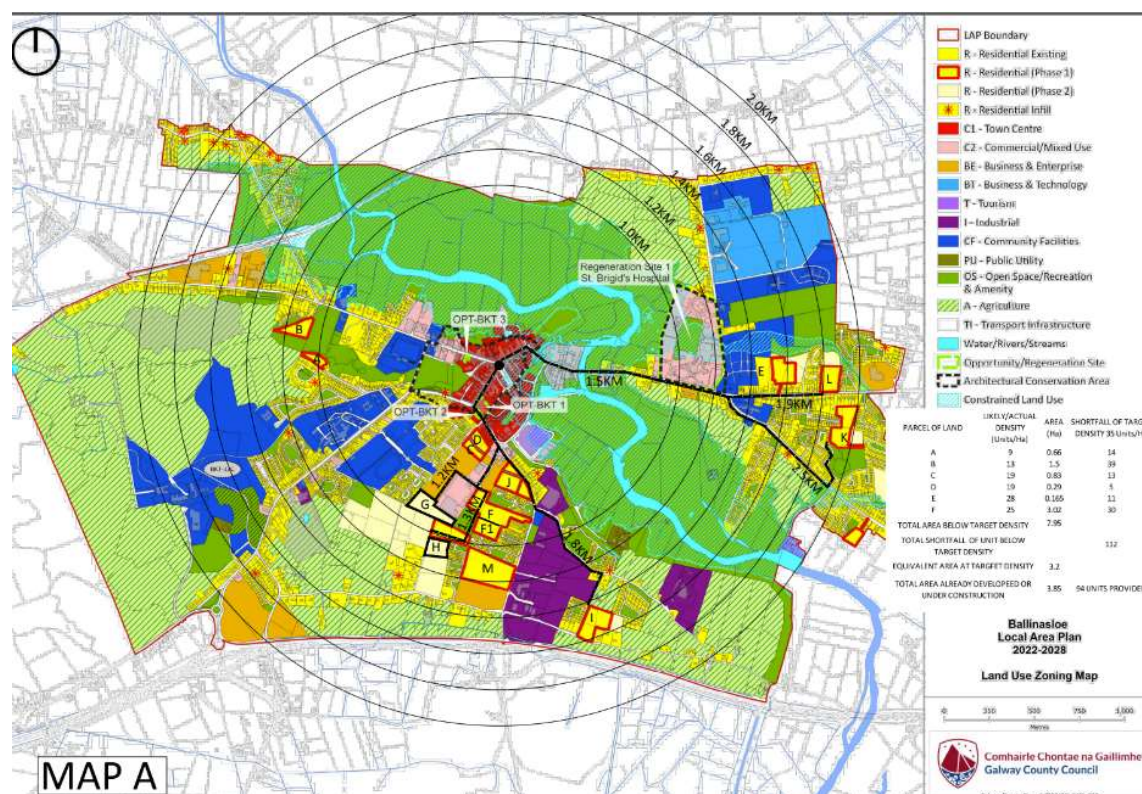
The layout of the proposed development, provides for access to the R-Phase 1 lands on site and onto the neighbouring R-Phase 1 lands to the east.

The layout also provides for future access to the neighbouring R-Phase 2 lands to the west and the neighbouring R-Phase 2 lands to the south.

In the absence of the proposed connections, it is difficult to envisage how the neighbouring R-Phase 1 & R-Phase 2 lands could be accessible/and or developable in the future.

Therefore, the proposed development will not *“prejudice the future use of the lands for the longer-term growth needs of the settlement.”* In fact, it would serve to enable the delivery of these lands in the future.

Owing to these ‘exceptional circumstances’, the proposed development on lands which are partly zoned “R-Phase 2” can be considered in this case.



Reliance on Phase 2 lands to comply with Core Strategy

It is readily demonstrated that a large proportion of the lands zoned “R-Phase 1” have already received permission for development, at low densities, or would be unable to achieve the 35 units to the hectare figure utilised in the Core Strategy calculations.

Therefore, if residential development is not allowable on a certain amount of R-Phase 2 lands within the lifetime of the Plan, the household allocation for Ballinasloe as set out in the Core Strategy will not be achieved.

In other words, residential development on a certain amount of “R-Phase 2 lands” must be considered to ensure compliance with the Core Strategy.

The total area of the “R-Phase 1” parcels denoted A to M on the map above (other than G and H) amounts to 23 hectares as set out in the Core Strategy of the GCDP and the LAP. The Core Strategy “Household Allocation” of 805 residential units for Ballinasloe, is to be satisfied on 23 hectares at a density of 35 units per hectare over the lifetime of the LAP.

An analysis of these parcels reveals the following inefficiencies:

- **Parcel A** (0.66 ha) has been granted permission (Planning Ref No 21/1931) for 10 dwellings and is committed to development. The permitted density is 15 units/ha.

Therefore the shortfall on the Core Strategy density for this tract alone is 20 units /ha. (equivalent area at Core Target Density (35/ha) = 0.57ha).

- **Parcel B** (Area 1.5 ha) is unlikely to be developed at the Core Target density of 35 units/ha due to its location, triangular shape and the exigencies of the site. Therefore, at a development density of about 15 units /ha- as adjoining Parcel A- the shortfall on the Core Strategy density for this tract alone would be about 48 units (equivalent area at Core Target Density (35/ha) = 1.37ha).
- **Parcel C** (0.83ha) was developed in 2018(Planning Ref 18/174), and is therefore committed to development. The equivalent density was 19 units/ha, so it is not available to meet the needs of the Core Strategy over the lifetime of the LAP. This is shown in the aerial view of the completed development below:



- **Parcel D** (Area 0.29 ha) may be taken at an equivalent density of 19 units/ha. Due to size and shape it is unlikely to be developed at the Core Target density of 35 units/ha. (equivalent area lost at Core Target Density (35/ha) = 0.142ha).
- **Parcel F** (Area 3.02 ha) is presently under construction (Planning Ref No 19/1978)) and is therefore committed to development. This has a density of 28 units/ha. This amounts to a shortfall of 21 units on the Core Target density of 35 units/ha(equivalent area 0.6ha). Furthermore, this scheme was purchased in its entirety in 2021 by Galway County Council (40 units) and CLUID (38 units) respectively, so it is not available to meet the needs of the Core Strategy over the lifetime of the GCDP or the LAP 2022-2028.
- **Parcel F1** (Area 1.23 ha) is under the control of the Wards of Court Office, and in the absence of the proposed development, it is landlocked. Therefore, at present it is not

available to meet the needs of the Core Strategy over the lifetime of the GCDP or the LAP 2022-2028.

The combined “inefficient” R-Phase 1 lands which are unavailable for development as outlined above adds up as follows:

$$A(0.57 \text{ ha}) + B(1.37 \text{ ha}) + C (0.83 \text{ ha}) + D(0.142 \text{ ha}) + F(3.02 \text{ ha}) = \mathbf{5.93 \text{ ha}}$$

Furthermore, it should be noted that:

- 1.23ha of R-Phase 1 land located within Parcel F1 is unavailable for development, because it is currently landlocked.

The inclusion of Parcel F1 would increase the area of Phase 1 land unavailable to meet the needs of the Core Strategy over the lifetime of the LAP 2022-2028 to **7.16 ha** .

Using the Core Strategy density of 35 units to the hectare, this would amount to an equivalent shortfall of 251 units, below the Core Strategy Household Allocation target for Ballinasloe. By applying the Core Strategy average household size of 2.5 persons per unit, this equates to a Population Allocation shortfall of 627 persons.

The equivalent “unavailable” area of Phase 1 represents a shortfall of 31% of the 23 ha total Phase 1 area as set out to meet housing demand, as identified in Chapter 2 HNDA of the GCDP and set out in Table 2 above.

This means that Residential Development on the subject R-Phase 2 lands needs to be considered, in order to meet the Core Strategy target household allocation for Ballinasloe. The consideration of the subject R-Phase 2 lands will also enable compliance with the Core Strategy Policy Objective CS5 which sets out to *“support the delivery of the populations projections within the different settlement tiers of the Core Strategy”*

Accordingly, it is submitted that the above analysis constitutes a substantiated evidence based case, that the proposal to seek planning permission for the proposed development on the subject site(which includes 3.42ha of R-Phase 2 lands), is consistent with the requirements of Objective BKT 6.

It is further submitted that, notwithstanding an approval by the Board to grant planning permission for the proposed development on the subject site(Total R1 & R2 Area 5.2331 ha), a residual shortfall will remain in Ballinasloe to meet the needs of the Core Strategy over the lifetime of the LAP. This is demonstrated below:

The Core Strategy states that the amount of *“Residential Units to be Development on Greenfield sites”* is 805. The amount of units granted within Phase 1 greenfield lands to date is calculated below;

Parcel A (10 units) + Parcel C (17 Units) + Parcel F (78 units)

It follows that a total of 105 no. residential units have been granted on Phase 1 greenfield lands to date.

Therefore, having regard to the relevant core strategy figure of 805 units, minus the 105 units granted to date, minus the proposed development of 165 units, this would leave a residual shortfall of 535 units remaining in Ballinasloe to meet the needs of the Core Strategy.

Connectivity benefits of proposed development

The proposed development provides for optimum connectivity to adjoining lands. This includes;

- Vehicular and pedestrian access to the residential development under construction to the north and onto the town centre,
- Completion of the planned access road along the existing footpath to the west of Tesco and onto the town centre,
- Provision for future vehicular and pedestrian access to the R-Phase 1 lands to the east.
- Vehicular and pedestrian access to the existing “Beechlawn Heights” estate to the south-east,
- Provision for pedestrian connectivity to the Dun Esker estate to the east,
- Vehicular and pedestrian access to the undeveloped “R-Phase 2 lands” to the south,
- Vehicular and pedestrian access to the undeveloped “R-Phase 2” lands to the west.

Therefore, the proposed layout which forms part of this formal Stage 3 SHD application, addresses the Planning Authority’s concerns with reference to “*dendritic characteristics*” of the Stage 1 layout.

It is important to note that in the absence of the proposed development and the inherent connectivity proposals, accessibility to the above mentioned zoned lands would be entirely compromised.

As set out in the Confirmation of Feasibility from Irish Water, the proposed development will be supported by all relevant public water and sewerage infrastructure. Furthermore, the proposed development will have the benefit of continuous public footpaths (with public lighting) connectivity to the town centre.

Sequential Approach & Avoidance of Leapfrogging

As per Map A above, this readily demonstrates that the subject site, is one of the most significant and proximate tracts of residentially zoned land to the town centre. As noted above;

- Parcels A, C & F (closer to the Town Centre) are already committed to development,
- Parcel F1 is currently landlocked,

- Parcel B has a difficult shape/ configuration to facilitate higher density development, and
- Parcel D consists of a very limited site size.

Therefore, Parcel J is the only tract of Phase 1 Residential land located closer to the town centre. Given that the proposed development on the subject lands will represent a sequential extension to the existing residential development under construction directly to the north, and given that the site is located on serviced lands within the built footprint of the town, it is considered that the proposed development on the subject lands is consistent with the recommended sequential approach for residential development within the town.

It is not considered that the proposed development would constitute “leapfrogging” especially as all other “available” R-Phase 1 lands (with the exception of Parcel J), are located further away from the town centre, compared to the subject site.

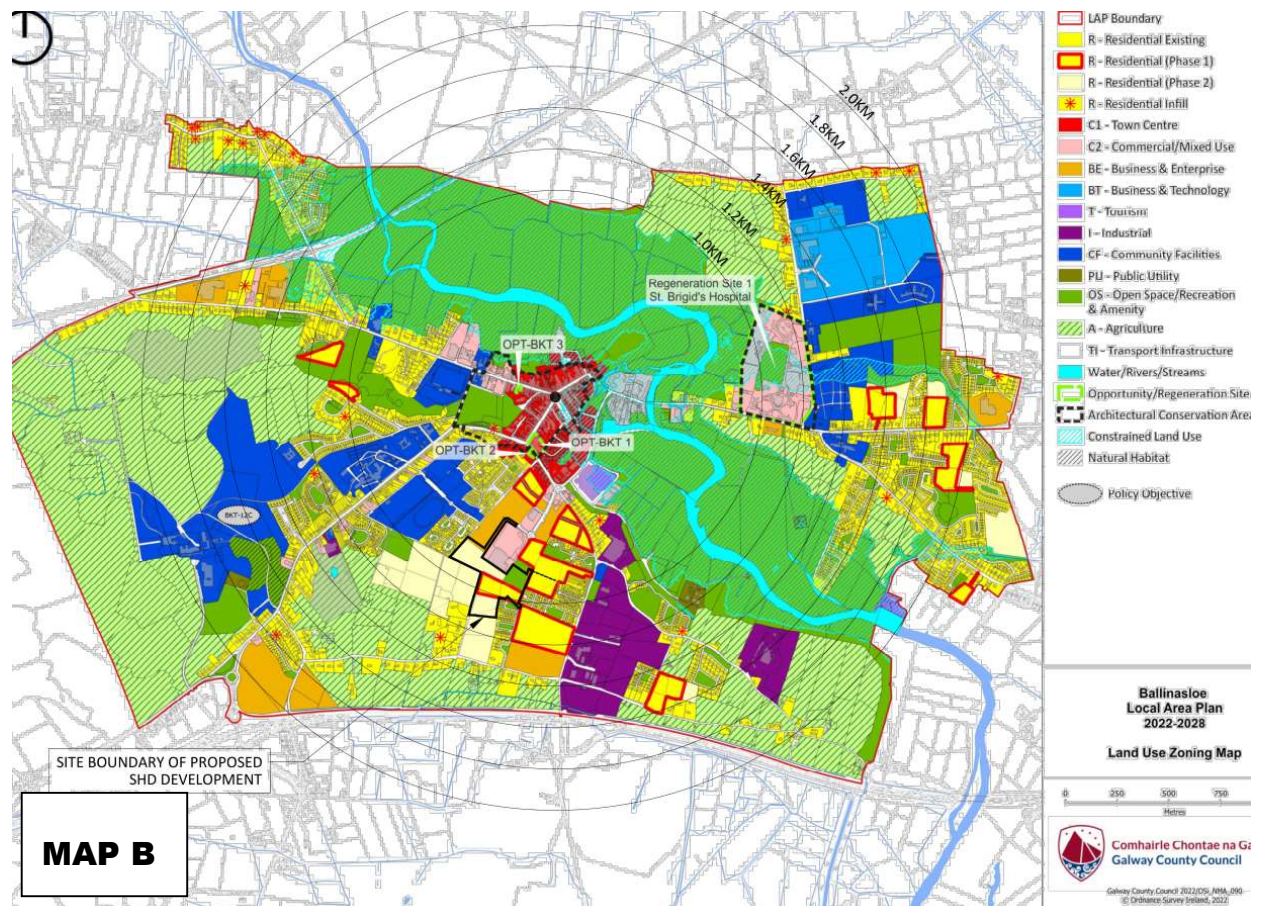
It is submitted that the proposed development on the subject site is consistent with the Core Strategy, the principles of proper planning and sustainable development in regard to connectivity, including infrastructure and public footpath and lighting to the town centre, the sequential approach, it does not involve a leap-frog over more proximate lands, and fulfills all requisite access and servicing requirements.

It is submitted that the proposed development on the subject site will facilitate access to the residual zoned residential lands to the south in the future and will promote the permeability and connectivity to all of these lands towards the Town Centre.

BKT 8 Sequential Development

Endeavour to promote the orderly and phased development of residential development in accordance with the principles of the sequential approach as set out in the Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) Guidelines 2009 (or as updated). This shall include a presumption in favour of the sequential development of suitably serviced Residential (Phase 1) lands emanating outwards from the town core and/or sequential extensions to the existing residential fabric of suitably serviced Residential (Phase 1) lands within the LAP boundary, subject to the principles of proper planning and sustainable development and the current County Development Plan.

RESPONSE: As denoted on MAP B below, the subject site (outlined in black), is one of the most significant and proximate tracts of residentially zoned land to the town centre. It is further the case that the subject site is the next sequential development site beyond the development which is under construction on the adjoining lands to the north under Planning Permission Ref No 19/1978. Accordingly, development proposal on the subject site forms a sequential extension to the existing residential fabric and is located on lands which are suitably serviced up to their boundaries.



The subject site enjoys the benefit of existing pedestrian, cycling and vehicular connectivity directly to the Town Centre. It is further the case that this connectivity extends through the subject site to the surrounding existing residential development to the South and east.

BKT 16 Open Space, Recreation and Amenity

Promote the sustainable management, use and/or development, as appropriate, of open space/recreation and amenity lands. This will include: a) Development of open spaces and recreational activities, in accordance with best practice and on suitable lands with adequate access to the local community and retain existing open space and recreational facilities, unless it can be clearly demonstrated to the satisfaction of Galway County Council that these uses are no longer required by the community; b) Appropriate management and use of any flood risk areas within the OS zone to avoid, reduce and/or mitigate, as appropriate, the risk and potential impact of flooding; c) Appropriate management and use of any areas of high biodiversity value.

RESPONSE: The proposed development on the subject site is consistent with the residential development objectives set out under **Objective BKT 16** and as explained in Chapter 3 and 4 of this report. It is also submitted that the proposal to develop the zoned OS- Open Space/Recreation & Amenity lands as part of the scheme is a significant community gain to the town of Ballinasloe.

BKT 23 High Quality, Contextually Sensitive Design

Ensure that new developments are responsive to their site context and in keeping with the character, amenity, heritage, environment and landscape of the area. New development proposals will be required to complement the existing character of the area in terms of scale, height, massing, building line, urban grain and definition and through high quality design proposals for buildings/structures/shop fronts, the use of high quality, appropriate materials and the provision of appropriate signage, lighting, landscaping proposals and other such details.

RESPONSE: Consistency with this objective is demonstrated in Chapter 2 and 3 of this report and in the **Architectural Design Statement** which accompanies this application.

BKT 24 Universal Access

Ensure that housing developments, community facilities, public spaces, public roads, public footpaths and transport services give due consideration to the needs of disabled or mobility impaired people and the requirements of the Disability Act 2005, the Council's Disability Action Plan 2007-2015 (and any updates to this document), the Traffic Management Guidelines 2003, the Department of Arts, Heritage and the Gaeltacht (DAHG) and National Disability Authority (NDA) advice notes titled Access: Improving the Accessibility to Historic Buildings and Places 2011 (and any subsequent reviews/updates to these documents).

RESPONSE: Consistency with the requirements of this objective are set out in the **Architectural Design Statement** which accompanies this application.

BKT 27 Social and Affordable Housing

Require that a minimum of 20% of all new eligible residential sites are set aside for the development of new social and affordable housing units, unless addressed through suitable alternative arrangements by agreement with the Planning Authority, in accordance with the Galway County Council Housing Strategy and Part V of the Planning and Development Act 2000 (as amended) and any subsequent amendments to the Part V provision to reflect Government policy.

RESPONSE: Consistency with the requirements of this objective are demonstrated in detail in Section 3.10 of this Report and in the **Part V Compliance Methodology** which has been prepared by CuddyQS in support of this application.

BKT 35 Traffic and Transport Assessment (TTA) and Road Safety Audits (RSA)

Require all significant development proposals to be accompanied by a Road Safety Audit and Traffic & Transport Assessment carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring developments on the road network, in accordance with the requirements contained within the TII's Traffic & Transport Assessment Guidelines (PE-PDV-02045) 2014 (including any updated/superseding document) and 'Road Safety Audit' (GE-STY-01024) December 2017.

RESPONSE: The following Reports and Statements were prepared by CST Consulting Engineers in support of this application:

- Traffic & Transportation Assessment Report
- DMURS Compliance Statement
- Road Safety Audit

- Mobility Management Plan (Travel Plan)

Accordingly it is submitted that these documents confirm that the requirements of this objective have been fulfilled, and that the application for the proposed development on the subject site is consistent with this objective.

BKT 36 Preservation of Routes, Road Upgrades and Infrastructure Provision

Prohibit development on lands which are reserved for proposed road/street corridors and associated buffers and where development would affect a route, line, level or layout of any proposed new roadway or any junction required between a proposed and existing road.

AND

BKT 37 Reservation of Access Points

Reserve access points for future development and the development of backlands that may be identified for reservation by the Planning Authority during the plan period, to ensure adequate vehicular, pedestrian and cycle access to backlands, in order to facilitate efficient development of these lands and to ensure connectivity and accessibility to lands with limited road frontage.

RESPONSE: The desire to reserve access to the lands that are south of the town centre has been a long term objective of successive Local Area Plans, as expressed in Objective RT5 of the Ballinasloe Local Area Plan 2003-2009 below:

***Objective RT5-** To provide a link road that runs from the Beechlawn Road to the town centre inner relief road and another link from Brackernagh to Poolboy using the sections already granted and by determining the final alignment of the remaining sections*

This objective has been expressed in successive plans by representation as in indicative route on various LAP Land Use Maps.

The realization of these access routes has been expressed through various planning permissions which have been granted for developments in Dunlo over the past 15 years, and construction of the initial phases of these access routes has been completed.

At present, the subject lands can be categorised as backlands. In this regard, it is noted that the current Ballinasloe Local Area Plan does not now show any such mapped “access point reservation” road objectives for the development lands at this location. Therefore, as the provisions of Policy Objective BKT37 is not clearly stated, this is discussed in the **Material Contravention Statement**, which accompanied this application.

BKT 44 Flood Risk Management and Assessment

It is a Policy Objective of the Council to comply with the requirements of the DoEHLG/OPW The Planning System and Flood Risk Management Guidelines for Planning Authorities and its accompanying Technical Appendices Document 2009 (including any updated/superseding documents). This will include the following: (a) Avoid, reduce and/or mitigate, as appropriate in accordance with the Guidelines; (b) Development proposals in areas where there is an identified or potential risk of flooding or that could give rise to a risk of flooding elsewhere will be required to carry out a Site-Specific Flood Risk Assessment, and justification test where appropriate, in accordance with the provisions of The Planning System and Flood Risk Management Guidelines 2009 (or any superseding document); Any flood risk assessment should include an assessment of the potential impacts of climate change, such as an increase in the extent or probability of flooding, and any associated measures necessary to address these impacts; (c) Development that would be subject to an inappropriate risk of flooding or that would cause or exacerbate such a risk at other locations shall not normally be permitted; (d) Galway County Council shall work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the County, from risk of flooding.

RESPONSE: A flood risk assessment has been carried out HydroS Hydrology Engineering Consultants in respect of the proposed development on the subject site.

Please refer to the **Hydrological Impact Assessment Report** which has been prepared in support of this application. This report concludes that residual effects of the specific tasks on the receptors, are imperceptible or insignificant after proposed mitigation measures have been carried out. Therefore the receptors, the River Suck, its flood plains- which drain to the South of Shearwater Hotel and the groundwater basin of Lower Suck have a imperceptible or insignificant effect from the proposed development.

BKT 45 Connections to the Public Sewer and Public Water Mains

Where public wastewater services are available, new development proposals shall be required to connect to same.

RESPONSE: See response to Objective BKT 2 above. A Confirmation of Feasibility has been issued by Irish Water in respect of the proposed development on the subject site. The applicant has engaged with Irish water over the course of the preparation of this application, and a Statement of Design Acceptance has been issued Irish Water, and is enclosed with in Appendix A.

BKT 48 Surface Water Drainage and Sustainable Drainage Systems (SuDs)

Maintain and enhance, as appropriate, the existing surface water drainage system in Ballinasloe. Ensure that new developments are adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems in all new developments. Surface water runoff from development sites will be limited to pre-development levels and planning applications for new developments will be required to provide details of surface water drainage and sustainable drainage systems proposals.

RESPONSE: A sustainable surface water collection system has been designed for the proposed development in the subject site. The disposal of surface water shall be by means of soakways located in the various sub-catchments throughout the development. The design of the soakways has been undertaken in accordance with

BRE 365, and surface water drainage shall be treated by means of oil/fuel interceptors before being discharged to ground, all in accordance with the mitigation measures recommended in the Hydrological Impact Assessment Report.

Full details of the surface water system are set out in the **Engineering Services Report** which accompanies this application.

BKT 57 Telecommunications & Broadband

To facilitate the sustainable delivery of a high capacity and high-quality ICT infrastructure within the plan area, including telephony and broadband services, to the requirements of the relevant service providers and in accordance with the principles of proper planning and sustainable development.

AND

BKT 58 Open Access Fibre Ducting

Facilitate and promote the installation of underground shared telecommunications physical infrastructure, where practicable, in line with the Department of Environment, Climate and Communications documents including 'Recommendations for Open Access Fibre Ducting and Interior Cabling for New Residential Buildings 'Making Homes Fibre Ready', 2011, Support and facilitate delivery of the National Broadband Plan and the National Digital Strategy for Ireland 2013, 'Doing more with Digital – Phase 1 Digital Engagement' and Galway County Digital strategy 2020-2023 (including any updated/superseding documents).

RESPONSE: Telecommunications and broadband services have already laid in underground ducting beneath the roadways on the applicant's lands. These services are presently being extended into the residential development site and the applicant lands which is under construction. Telecommunications and broadband services will also be laid in underground ducting throughout the roadways of the proposed development on the subject site.

BKT 59 Trees, Parkland/Woodland and Hedgerows

a) Protect important trees, tree clusters and hedgerows in the plan area and ensure that development proposals take cognisance of significant trees/tree stands. Ensure that all planting schemes use suitable native variety of trees. b) Seek to retain natural boundaries, including stone walls, hedgerows and tree boundaries, wherever possible and replace with a boundary type similar to the existing boundary where removal is unavoidable. Discourage the felling of mature trees where possible. All works to be carried out in accordance with the provisions of the Forestry Act, 1946 (as amended). c) Carry out a tree survey on important tree stands within the plan area by suitably qualified personnel.

RESPONSE: Trees, bushes and hedgerows are located principally along the southern and western boundaries of the subject site. An important hedgerow also exists along the central spine of the subject site. All of these features shall be retained and incorporated into the landscape scheme as set out in detail in the **Landscape & Design Report** by Cunnane, Stratton Reynolds.

BKT 60 Development Management Standards and Guidelines Ensure that the general development management standards and guidelines set out in the current Galway County Development Plan, or any subsequent variation or review shall apply as appropriate in the plan area. In addition, any specific development management guidelines set out within this Local Area Plan shall also be applied, as appropriate, to development proposals in the plan area.

RESPONSE: The relevant Development Management Standards , as set out in Chapter 15 of the Galway County Development Plan 2022-2028 have been integrated into the design of the proposed development on the subject site. Further details on the consistency of the proposed development with these management standards is set out in Chapter 2 and 3 of this Planning Report and in the **Architectural Design Statement** which has been prepared in support of this application.

6. CONCLUSION

This Planning Report & Statement of Consistency supports the application to An Bord Pleanála (ABP) under the Planning and Development Act 2000 (As amended by the Residential Tenancies Act 2016) for permission for a proposed Strategic Housing Development on lands situated in the townlands of Dunlo and Pollboy, Ballinasloe, Co Galway.

This Statement demonstrates that the proposed development on the subject site is consistent with the principles of

- Service lead development, where development can be located on land with readily available services.
- Sequential development, where the proposed scheme is a continuation and infill among adjoining residential developments on either side.
- Connectivity and accessibility, where the proposed scheme is most proximate to the Town Centre and facilitates pedestrian, cycling and vehicular access and permeability
- Permeability, where the proposed scheme facilitates pedestrian connectivity through the site to the local commercial facilities and generally towards the Town Centre

It is submitted that the proposed development would greatly assist Galway County Council in meeting its commitment to provide for residential development, as set out under its Core Strategy, for the Ballinasloe area over the term of the Ballinasloe LAP 2022-2028.

It is submitted that this outcome will arise from a 'do something' scenario whereby a decision to grant planning permission for the proposed development on the subject site will achieve a 25.8% completion of the Core Strategy allocation.

It is submitted that such a 'do something' scenario will improve the residential amenity for existing residents, and will contribute to sustainable residential neighbourhoods in the overall Dunlo area and environs.

It is submitted that a 'do nothing' scenario will have a significantly negative impact on the achievement of the Core Strategy for the provision of residential development, amounting to a depletion of 31% of the land allocation, over the term of the Ballinasloe LAP 2022-2028.

Accordingly, it is submitted that the proposed scheme on the subject site is a strategic housing development which would represent a significant planning gain for the Key Town of Ballinasloe and its southern environs in the Dunlo and Pollboy area.

APPENDIX A – IRISH WATER Confirmation of Feasibility & Statement of Design Acceptance

Ronnie Greene

Consulting Engineers, Unit 2
Kilkerrin Business Park
Liosban, Tuam Road
Galway

Uisce Éireann
Bosca OP 448
Oifig Sheachadta
Cathrach Theas
Cathair Chorcaí

Irish Water
PO Box 448,
South City
Delivery Office,
Cork City

www.water.ie

15 December 2021

Re: CDS21008081 pre-connection enquiry - Subject to contract | Contract denied
Connection for Housing Development of 181 unit(s) at Dunlo, Ballinasloe, Galway

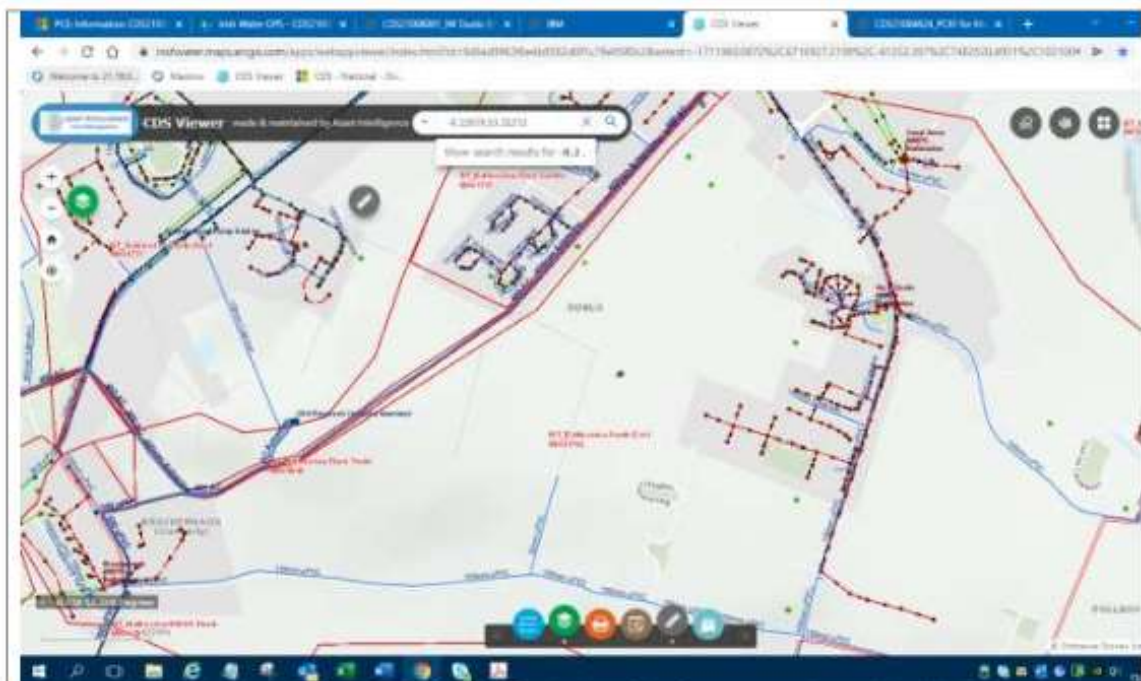
Dear Sir/Madam,

Irish Water has reviewed your pre-connection enquiry in relation to a Water & Wastewater connection at Dunlo, Ballinasloe, Galway (the **Premises**). Based upon the details you have provided with your pre-connection enquiry and on our desk top analysis of the capacity currently available in the Irish Water network(s) as assessed by Irish Water, we wish to advise you that your proposed connection to the Irish Water network(s) can be facilitated at this moment in time.

SERVICE	OUTCOME OF PRE-CONNECTION ENQUIRY <u>THIS IS NOT A CONNECTION OFFER. YOU MUST APPLY FOR A CONNECTION(S) TO THE IRISH WATER NETWORK(S) IF YOU WISH TO PROCEED.</u>
Water Connection	Feasible without infrastructure upgrade by Irish Water
Wastewater Connection	Feasible Subject to upgrades
SITE SPECIFIC COMMENTS	
Water Connection	<p>Based on current Irish Water records, there is a 150mm diameter water main planned to service the adjacent sites. A self Lay agreement was issued recently for the adjacent development to get a 150mm diameter connection from the existing 400mm Asbestos water main (CDS2100198801).</p> <p>Based on current records, the 150mm main will have the capacity to service the proposed development.</p>
Wastewater Connection	<p>Based on current Irish Water records there is an existing pumping station servicing the existing development of the petrol station, Aldi and Tesco. The pumping station is owned and managed by the developer of this proposed development of 181 units. A self lay agreement was issued to the same developer recently for 78 no. Units to connect to the existing pumping station. (CDS 2100198801) The agent identified that an upgrade to the pumping station is required for this proposed development but the rising</p>

	<p>main to the Ballinasloe WWTP is has sufficient capacity to cater for the entire development.</p> <p>Ballinasloe WWTP has capacity for the proposed development.</p>
<p>The design and construction of the Water & Wastewater pipes and related infrastructure to be installed in this development shall comply with the Irish Water Connections and Developer Services Standard Details and Codes of Practice that are available on the Irish Water website. Irish Water reserves the right to supplement these requirements with Codes of Practice and these will be issued with the connection agreement.</p>	

The map included below outlines the current Irish Water infrastructure adjacent to your site:



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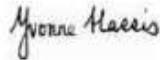
Whilst every care has been taken in its compilation Irish Water gives this information as to the position of its underground network as a general guide only on the strict understanding that it is based on the best available information provided by each Local Authority in Ireland to Irish Water. Irish Water can assume no responsibility for and give no guarantees, undertakings or warranties concerning the accuracy, completeness or up to date nature of the information provided and does not accept any liability whatsoever arising from any errors or omissions. This information should not be relied upon in the event of excavations or any other works being carried out in the vicinity of the Irish Water underground network. The onus is on the parties carrying out excavations or any other works to ensure the exact location of the Irish Water underground network is identified prior to excavations or any other works being carried out. Service connection pipes are not generally shown but their presence should be anticipated.

General Notes:

- 1) The initial assessment referred to above is carried out taking into account water demand and wastewater discharge volumes and infrastructure details on the date of the assessment. **The availability of capacity may change at any date after this assessment.**
- 2) This feedback does not constitute a contract in whole or in part to provide a connection to any Irish Water infrastructure. All feasibility assessments are subject to the constraints of the Irish Water Capital Investment Plan.
- 3) The feedback provided is subject to a Connection Agreement/contract being signed at a later date.
- 4) A Connection Agreement will be required to commencing the connection works associated with the enquiry this can be applied for at <https://www.water.ie/connections/get-connected/>
- 5) A Connection Agreement cannot be issued until all statutory approvals are successfully in place.
- 6) Irish Water Connection Policy/ Charges can be found at <https://www.water.ie/connections/information/connection-charges/>
- 7) Please note the Confirmation of Feasibility does not extend to your fire flow requirements.
- 8) Irish Water is not responsible for the management or disposal of storm water or ground waters. You are advised to contact the relevant Local Authority to discuss the management or disposal of proposed storm water or ground water discharges
- 9) To access Irish Water Maps email datarequests@water.ie
- 10) All works to the Irish Water infrastructure, including works in the Public Space, shall have to be carried out by Irish Water.

If you have any further questions, please contact Barry Butler from the design team by email barry.butler@water.ie For further information, visit www.water.ie/connections.

Yours sincerely,



Yvonne Harris

Head of Customer Operations



William Greene
R.G. Greene & Associates,
Caher House,
Caherlavine,
Loughrea,
Co. Galway,
H62 FF61.

Uisce Éireann
Bosca DP 448
Oifig Sheachadta in
Cathrach Theas
Cathair Chorcaí

Irish Water
PO Box 448,
South City
Delivery Office,
Cork City.

www.water.ie

26 August 2022

**Re: Design Submission for Dunlo SHD Ballinasloe Town Centre (the "Development")
(the "Design Submission") / Connection Reference No: CDS21008081**

Dear William Greene,

Many thanks for your recent Design Submission.

We have reviewed your proposal for the connection(s) at the Development. Based on the information provided, which included the documents outlined in Appendix A to this letter, Irish Water has no objection to your proposals.

This letter does not constitute an offer, in whole or in part, to provide a connection to any Irish Water infrastructure. Before you can connect to our network you must sign a connection agreement with Irish Water. This can be applied for by completing the connection application form at www.water.ie/connections. Irish Water's current charges for water and wastewater connections are set out in the Water Charges Plan as approved by the Commission for Regulation of Utilities (CRU) (https://www.cru.ie/document_group/irish-waters-water-charges-plan-2018/).

You the Customer (including any designers/contractors or other related parties appointed by you) is entirely responsible for the design and construction of all water and/or wastewater infrastructure within the Development which is necessary to facilitate connection(s) from the boundary of the Development to Irish Water's network(s) (the "**Self-Lay Works**"), as reflected in your Design Submission. Acceptance of the Design Submission by Irish Water does not, in any way, render Irish Water liable for any elements of the design and/or construction of the Self-Lay Works.

If you have any further questions, please contact your Irish Water Representative

Name: Barry Butler
Phone: 086 7776227
Email: barry.butler@water.ie

Yours sincerely,

Yvonne Harris

Head of Customer Operations

Stiúrthóirí / Directors: Cathal Marley (Chairman), Niall Gleeson, Eamon Gallen, Yvonne Harris, Brendan Murphy, Dawn O'Driscoll, Maria O'Dwyer
Oifig Chláraithe / Registered Office: Teach Colvill, 24-26 Sráid Thuibóid, Baile Átha Cliath 1, D01 NP86 / Colvill House, 24-26 Talbot Street, Dublin 1 D01 NP86
Is cuideachta ghléimhíochta ainmnithe atá faoi theorainn scaireanna é Uisce Éireann / Irish Water is a designated activity company, limited by shares.
Uimhir Chláraithe in Éirinn / Registered in Ireland No.: 530363

Appendix A

Document Title & Revision

- [Dunlo SHD - 2521-311 - Proposed Foul & Storm Sewers Layout]
- [Dunlo SHD - 2521-202 - Proposed Watermain Layout]

Standard Details/Code of Practice Exemption:

Not Used

For further information, visit www.water.ie/connections

Notwithstanding any matters listed above, the Customer (including any appointed designers/contractors, etc.) is entirely responsible for the design and construction of the Self-Lay Works. Acceptance of the Design Submission by Irish Water will not, in any way, render Irish Water liable for any elements of the design and/or construction of the Self-Lay Works.