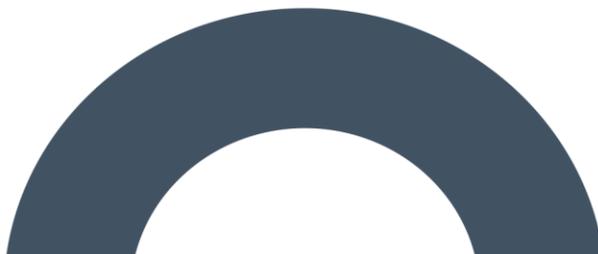




Statement of Response to the Notice of Pre- Application Consultation Opinion

Strategic Housing
Development -
Knocknacarra District
Centre, Gort na Bró,
Rahoon, Galway





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1. INTRODUCTION

Following consultation with Galway City Council, a request to enter into pre-planning discussions with An Bord Pleanála (ABP) was submitted on 5th June 2019 and a pre-planning consultation meeting was held on 18th July 2019. ABP issued a Notice of Pre-Application Consultation Opinion on 6th August 2019, which states that the documentation submitted –

‘requires further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.’

One specific item was identified to be addressed and was outlined by ABP as follows:

1. Design and Layout

Further consideration and/or justification of documents as they relate to the proposed development strategy for the site in particular the design and relationship between Block B and the Western Distributor Road, the public pedestrian pathway between Block B and Block A and the two communal open space areas to the side and rear of Block B including the courtyard and the MUGA. Particular regard should be has to the 12 criteria set out in the Urban Design Manual which accompanies the ‘Guidelines for Planning Authorities on Sustainable Development in Urban Areas (May 2009) and the ‘Urban Development and Building Heights Guidelines’ Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.’

The Board also requested, pursuant to Article 285(5)(b)(i) and (ii) of the Planning and Development (Strategic Housing Development) Regulations 2017, the provision of the following information:

1. Details of all materials proposed for buildings, open spaces, paved areas, boundary and retaining walls and a building life cycle report in accordance with Section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).
2. A comprehensive daylight and sun lighting analysis addressing proposed residential units and open spaces within the development.
3. A landscaping plan integrating and relevant recommendations from national and local guidance promoting native wildlife *inter alia* The National Biodiversity Action Plan and the All Ireland Pollinator Plan.
4. A detailed schedule of accommodation which indicates consistency with the relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) including a report which addresses the use of the residential support facilities and amenity areas.
5. Details of Public Lighting.
6. Details of Part V provision clearly indicating the proposed Part V Units.
7. A plan of the proposed open space within the site clearly delineating public, semi-private and private spaces.
8. Childcare demand analysis, including but not restricted to the justification for the sole use of the permitted creche in Phase 2, the likely demand and use for childcare places and the accommodation of additional requirement resulting from the proposed development.
9. A detailed phasing plan for the proposed development.

10. A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority and what areas are used for the density calculation.
11. A detailed map illustrating the proposed integration with necessary requirements for the road network, including the N6 Galway City Ring Road. .
12. A site-specific Management Plan which includes details on management of all communal areas and the public plaza.
13. Relevant consents to carry out works on lands both within the red line and others which are not included within the red-line boundary.
14. A site-specific Management Plan which includes details on management of the retail units, public plaza, residential amenity and apartments.
15. Additional CGI's/visualisations/3d modelling showing the proposed development relative to existing and proposed development, in particular the Western Distributor Road.
16. The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.
17. Where the applicant considers that the proposed strategic housing development would material contravene the relevant development plan or local area plan, other than in relation to the zoning of land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in Section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.

2. RESPONSE TO ISSUE RAISED

The following section sets out how the applicant has addressed the issue raised in the Board's 'Notice of Pre-Application Consultation Opinion', with reference to the accompanying documentation submitted, to ensure the subject application constitutes a reasonable basis for an application for Strategic Housing Development (SHD).

2.1 Issue No.1: Design & Layout Block B

The Board's response set out the following in relation to this matter:

'Further consideration and/or justification of documents as they relate to the proposed development strategy for the site in particular the design and relationship between Block B and the Western Distributor Road, the public pedestrian pathway between Block B and Block A and the two communal open space areas to the side and rear of Block B including the courtyard and the MUGA. Particular regard should be has to the 12 criteria set out in the Urban Design Manual which accompanies the 'Guidelines for Planning Authorities on Sustainable Development in Urban Areas (May 2009) and the 'Urban Development and Building Heights Guidelines' Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.'

2.2 Response

The Design Team has given careful consideration to the matters raised by the Board, both at the meeting on 18th July 2019, and in the Notice of Pre-Application Consultation Opinion. In this regard, Block B has been redesigned to address the Western Distributor Road by elongating the building façade along the street to create a more unified street frontage.

This building now addresses the street in a more suitable manner, creates an urban edge and distinguishes between the development to the adjoining site reserved for a District Centre Use. The design of Block B has been amended to be a more linear block along the Western Distributor Road so that the space to the rear is enlarged to provide a more meaningful open space and also to allow sunlight to penetrate the public realm. This will ensure a clear definition between public, semi private, and private space. The open space will be overlooked, and this amenity is considered as a usable integrated element in the design of the development which will benefit the residents. The boundary treatments will be important at this location and provide defensible space.

For more information in relation to the design of the proposed development please see enclosed Design Statement and drawings prepared by the project architects Reddy A&U.

3. **RESPONSE TO SPECIFIC INFORMATION REQUESTED**

The Board have requested, pursuant to Article 285(5)(b)(i) and (ii) of the Planning and Development (Strategic Housing Development) Regulations 2017, a number of specific items to be submitted with the planning application. Information in relation to these matters is set out below.

3.1 **Item 1: Materials & Lifecycle Report**

ABP require the submission of:

‘Details of all materials proposed for buildings, open spaces, paved areas, boundary and retaining walls and a building life cycle report in accordance with Section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).’

3.1.1 **Response**

Please see enclosed with this planning application submission the following documentation:

- Knocknacarra Material & Finishes Reports prepared by Reddy A&U
- Landscape Report prepared by Ait Urbanism & Landscape

These 2 no. documents set out the material specification for the buildings, open spaces, paved areas, boundary and retaining walls as requested by An Bord Pleanála (ABP). In addition to the above please see enclosed in application submission a Building Lifecycle Report prepared by JAK Ltd. It is considered that these enclosed items address the requirements of ABP.

3.2 **Item 2: Daylight & Sunlight Analysis**

ABP require the submission of:

‘A comprehensive daylight and sunlighting analysis addressing proposed residential units and open spaces within the development.’

3.2.1 **Response**

Please see enclosed in the application submission the following document:

- Daylighting, Sunlight and Overshadowing Study prepared by IES Ltd.

This report sets out a comprehensive assessment of daylighting, sunlight and overshadowing in respect of the proposed development. It is considered that this report addresses the requirements of ABP in respect of this matter.

3.3 **Item 3: Landscaping Plan**

ABP require the submission of:

'A landscaping plan integrating and relevant recommendations from national and local guidance promoting native wildlife inter alia The National Biodiversity Action Plan and the All Ireland Pollinator Plan.'

3.3.1 Response

Please see enclosed the following documentation:

- Landscape Report prepared by Ait Urbanism & Landscape
- Biodiversity Management Plan prepared by MKO Ltd.

These documents have been prepared in a collaborative manner. The project ecologists and the project landscape architect have liaised to ensure that the proposed landscaping plan is appropriate in the context of national and local guidance promoting native wildlife *inter alia* The National Biodiversity Action Plan and the All Ireland Pollinator Plan. It is considered that these enclosed items address the requirements of ABP.

3.4 Item 4: Accommodation Schedule

ABP require the submission of:

'A detailed schedule of accommodation which indicates consistency with the relevant standards in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) including a report which addresses the use of the residential support facilities and amenity areas.'

3.4.1 Response

Please see enclosed in the application submission the following document:

- Housing Quality Assessment Report prepared by Reddy A&U.

The purpose of this document is to provide ABP with a comprehensive assessment of the proposed development which indicates consistency with the provisions of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018). It is considered that this report addresses the requirements of ABP in respect of this matter.

3.5 Item 5: Public Lighting

ABP require the submission of:

'Details of Public Lighting.'

3.5.1 Response

Please find enclosed the following item:

- Electrical Services, External Lighting Layout - Drawing No: GW3-ETH-ZZ-00-DR-E-SS1001 prepared by Ethos Engineering Ltd.

The drawing referred to above identifies the location and specification of all external lighting within the proposed development.

3.6 Item 6: Part V Provision

ABP require the submission of:

'Details of Part V provision clearly indicating the proposed Part V Units.'

3.6.1 Response

Please see enclosed Planning Report & Statement of Consistency Document. Appendix B of this document includes the following information:

- Part V Provision Map
- Part V Costings Calculations
- Memorandum of understanding from Galway City Council Housing Department in relation to the location and quantum of the proposed Part V provision.

It is considered that these items address the requirements of ABP in respect of Part V.

3.7 Item 7: Open Space

ABP require the submission of:

'A plan of the proposed open space within the site clearly delineating public, semi-private and private spaces.'

3.7.1 Response

Please see Figure 3.1 below:



Figure 3-1 – Open Space Demarcation

This Figure provides a clear demarcation of open space areas within the site that are public, semi-private and private. It is considered that this Item addresses the concerns of ABP in respect of this matter.

3.8 Item 8: Childcare Provision

ABP require the following:

‘Childcare demand analysis, including but not restricted to the justification for the sole use of the permitted creche in Phase 2, the likely demand and use for childcare places and the accommodation of additional requirement resulting from the proposed development.’

3.8.1 Response

The scheme that was presented at the Tri-Partite meeting did not incorporate a childcare facility. It was intended, at that time, to utilise the creche facility that forms part of the Gateway Retail Park Phase 2 development which is currently under construction (Pl. Ref. No: 17/158). That creche has been designed to accommodate 72 no. children.

In order to estimate the childcare requirements for the proposed development it is necessary to calculate a resident population figure. Based on an average household size of 2.7 people the proposed development will have a population of 895 people. Census data for the western suburbs of the City indicate that the typical creche going cohort make up approximately 15% of the overall population which equates to the requirement of 135 no. creche spaces to serve the proposed development. However, some account must be taken of the type of accommodation that is being provided and the predicted demographic makeup of future residents.

For example, it is considered reasonable to omit the 1 bed units and a proportion of the 2 bed units from childcare requirement calculations as these units are likely to be occupied by single people and/or young couples. Apartment living is not always attractive to couples with children and young families. Furthermore, future residents may place their children in childcare near their places of work or at existing facilities in the local area.

Following the Tri-Partite meeting and a meeting between the applicant’s representatives and the Galway City Childcare Committee the proposed development was amended to incorporate a creche. This facility is located on the ground floor of Block A and has a gross floor area of 174 sq.m. It has been designed to accommodate 40 no. children.

It is important to note the extension of existing childcare provision in Knocknacarra was discussed with the Galway City Childcare Committee (GCCC) as was the extent of childcare demand generated by the proposed development. GCCC advised the following, in an email dated 30th July 2019:

‘Given the floor space and the outdoor play area in the plan attached for the proposed creche, it would likely be adequate to cater for the needs of families in your client’s proposed apartment development close by.’

The proposed creche they are referring to in this instance is the one which is currently under construction in Phase 2 of the Gateway Retail Park which is currently under construction (Pl. Ref. No: 17/158). A copy of this correspondence is enclosed in Appendix D of the Planning Report & Statement of Consistency. The Phase 2 creche had a gross floor area of 444.4 sq.m. Notwithstanding that GCCC consider the Phase 2 creche to be adequate in size/capacity to cater for the proposed development the applicant has nonetheless included for the provision of a 174 sq.m creche in Block A. It is considered that the Phase 2 creche and the proposed creche will adequately accommodate the demand generated by the residential content of the proposed development. It is considered that the information set out above addresses the requirements of ABP in respect of this matter.

3.9 Item 9: Phasing

ABP require the following:

'A detailed phasing plan for the proposed development.'

3.9.1 Response

Please find enclosed the following item:

- Drawing No: 18-179_1016 (Rev A) Phasing prepared by Reddy A&U

The drawing referred to above identifies the proposed phasing associated with the proposed development. It is considered that the information set out in Dwg. No.: 18-179_1016 (Rev A) addresses the requirements of ABP in respect of this matter.

3.10 Item 10: Taking in Charge

ABP require the following:

'A site layout plan clearly indicating what areas are to be taken in charge by the Local Authority and what areas are used for the density calculation.'

3.10.1 Response

Please find enclosed the following item:

- Drawing No: 18-179_1015 (Rev A) Taking in Charge prepared by Reddy A&U

The drawing referred to above identifies the extent of the area that it is envisioned will be taken in charge by Galway City Council. It is considered that the information set out in Dwg. No.: 18-179_1015 (Rev A) addresses the requirements of ABP in respect of this matter.

3.11 Item 11: Proposed N6 Scheme

ABP require the following:

'A detailed map illustrating the proposed integration with necessary requirements for the road network, including the N6 Galway Bypass.'

3.11.1 Response

Please find enclosed the following item:

- Drawing No: 5168265/ATK/HT/0102 – General Arrangement prepared by Atkins

The drawing referred to above illustrates the interaction of the proposed development and the surrounding network and the proposed N6 scheme. Drawings and Reports prepared by Atkins sets out additional details in relation to the interaction of the proposed development and the existing road network. It is considered that the information set out above addresses the requirements of ABP in respect of this matter.

3.12 **Item 12: Management Plan**

ABP require the following:

‘A site-specific Management Plan which includes details on management of all communal areas and the public plaza.’

3.12.1 **Response**

Please see enclosed in the application submission the following document:

- Estate Management Strategy Report prepared by JAK Consulting Engineers

The purpose of this document is to provide ABP with a comprehensive overview of how the proposed development, including all communal areas, will be managed in a post development scenario. It is considered that the enclosed Estate Management Strategy Report addresses the requirements of ABP in respect of this matter.

3.13 **Item 13: Letters of Consent**

ABP require the following:

‘Relevant consents to carry out works on lands both within the red line and others which are not included within the red-line boundary.’

3.13.1 **Response**

All relevant letters of consent are enclosed with the application submission. It is considered that the applicant has sufficient legal consent to undertake the proposed development in the event of a successful outcome to the planning process.

3.14 **Item 14: Management Plan**

‘A site-specific Management Plan which includes details on management of the retail units, public plaza, residential amenity and apartments.’

3.14.1 **Response**

Please see enclosed in the application submission the following document:

- Estate Management Strategy Report prepared by JAK Consulting Engineers

The purpose of this document is to provide ABP with a comprehensive overview of how the proposed development, including all communal areas, will be managed in a post development scenario. It is considered that the Estate Management Strategy Report addresses the requirements of ABP in respect of this matter.

3.15 **Item 15: CGI's & Visualisations**

ABP require the following:

‘Additional CGI’s/visualisations/3d modelling showing the proposed development relative to existing and proposed development, in particular the Western Distributor Road.’

3.15.1 Response

The project team have prepared additional CGI’s in line with the advice received by ABP. These CGI’s are enclosed with this application submission. It is considered that the CGI’s provide a comprehensive visualisation of the proposed development and allow for an assessment of its impact on the landscape and general visual amenity.

3.16 Item 16 – Environmental Impact

ABP require the following:

‘The information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 should be submitted as a standalone document.’

3.16.1 Response

The planning submission made to An Bord Pleanála prior to the tri-partite meeting incorporated an EIA Screening exercise within the Planning Report & Statement of Consistency. In the interim it has been decided to prepare a full Environmental Impact Assessment Report (EIAR) in respect of the proposed development. This EIAR is enclosed with the planning application submission.

3.17 Item 17 – Material Contravention

ABP require the following:

‘Where the applicant considers that the proposed strategic housing development would material contravene the relevant development plan or local area plan, other than in relation to the zoning of land, a statement indicating the plan objective(s) concerned and why permission should, nonetheless, be granted for the proposed development, having regard to a consideration specified in Section 37(2)(b) of the Planning and Development Act 2000. Notices published pursuant to Section 8(1)(a) of the Act 2016 and Article 292 (1) of the Regulations of 2017, shall refer to any such statement in the prescribed format.’

3.17.1 Response

The applicant is of the view that the proposed development contravenes a provision of the Galway City Development Plan. For this reason, the planning application submission is accompanied by a Statement of Material Contravention.

4.

CONCLUSION

This document sets out how the items outlined in the pre-application consultation opinion from An Bord Pleanála in relation to the proposed development have been addressed in full by the applicant and the design team prior to the lodgement of the planning application.

The layout and design of the proposed development are considered to result in a scheme with a high-quality design. It is considered that the proposed development is consistent with the proper planning and sustainable development of the area and is consistent with all relevant national, regional and local planning policies and guidelines.