

Planning Report

Proposed Social Housing &
Traveller Appropriate
Accommodation Development
– Lands at Keeraun, Ragoon,
Galway





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1.

INTRODUCTION

Our client Galway City Council is applying for planning permission under Part X of the Planning & Development Act (2000) for the construction of 71no. residential dwellings (comprising 63no. social housing units and 8 no. Traveller Appropriate Accommodation units) and all associated works on lands at Keeraun, Ballymoneen Road, Ragoon, Galway.

The development description as per the public notice is worded thus:

‘Pursuant to the requirements of Section 177AE(4)(a) of the Planning and Development Act 2000 (as amended) notice is hereby given that Galway City Council proposes to seek approval from An Bord Pleanála to carry out the following development at Keeraun, Ballymoneen Road, Galway.

Nature of Development: To construct a social housing development of 71no. units comprising – 4no. 1-bedroom units, 34no. 2-bedroom units, 22no. 3-bedroom units, 3no. 4-bedroom units, and 8no. TAA (Traveller Appropriate Accommodation) units, associated carparking and bicycle parking, green spaces & landscaping, connection to existing services and all ancillary/enabling site development works.’

This report will outline the context of the site, the relevant planning policies and objectives, and take into account the planning history of the site, before presenting a planning assessment and conclusion.

2. PROPOSED DEVELOPMENT

2.1 Site Location

The subject site is a green field and measures approximately 2.08ha. The site is located in the northwest of Galway City, due north of Knocknacarra. Specifically, the site is located on the eastern side of Ballymoneen Road, approximately 4.3km from the City Centre, and 1km from Knocknacarra Neighbourhood Centre.

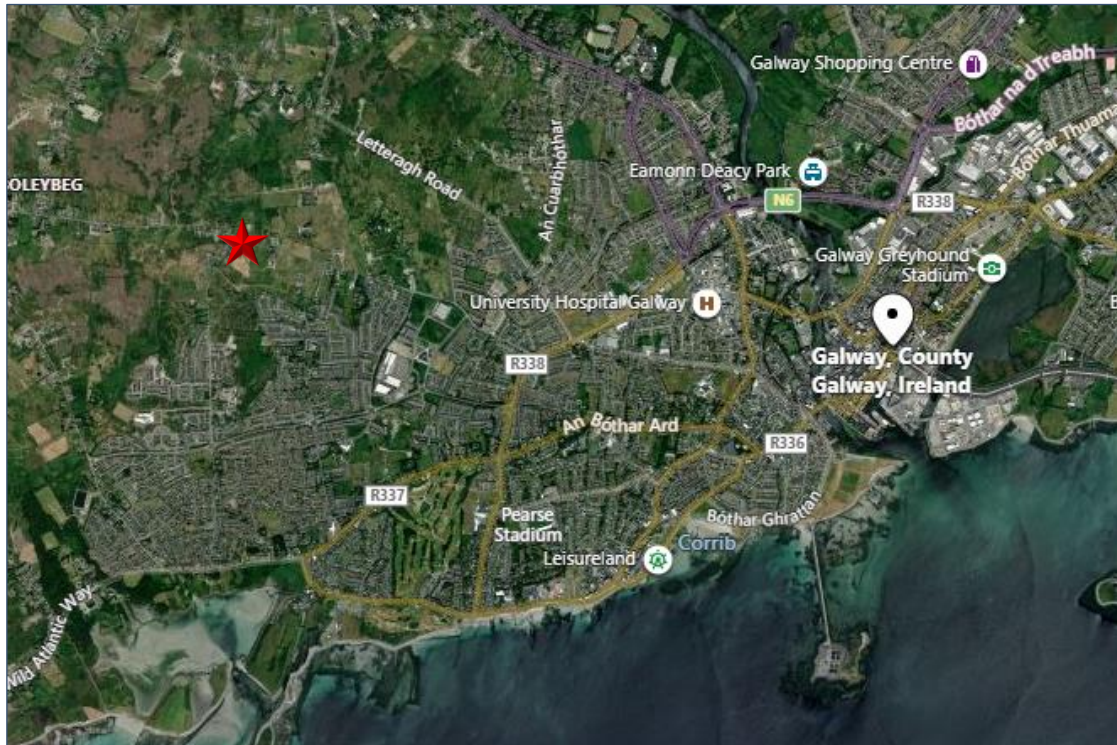


Figure 1 - Site Location (site at red star)

2.2 Site Characteristics

The site is bounded to the north, south and east by agricultural lands, the lands to the south are the subject of a live planning application for a residential development - Pl Ref **20/286**). The site is bounded to the west by Ballymoneen Road. It should be noted that the proposed route of the N6 Galway City Ring Road passes to the south of the subject site.

Overhead ESB lines traverse the site – 38kv and 10kv. These lines require diversion, which is elaborated upon later in the report.

An existing watercourse traverses the site from north to south. The nature of the ground conditions within the site are a mix of rocky outcrops (mostly granite), shallow topsoil and deep peat around the water course.

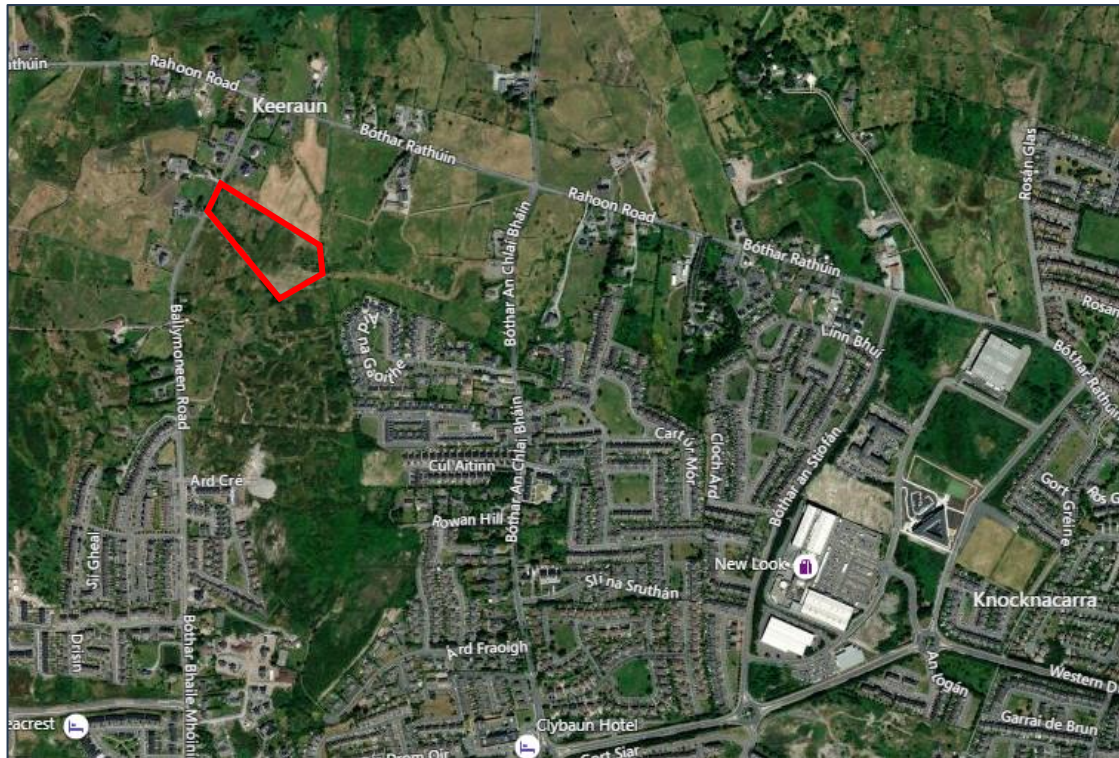


Figure 2 - Site Context

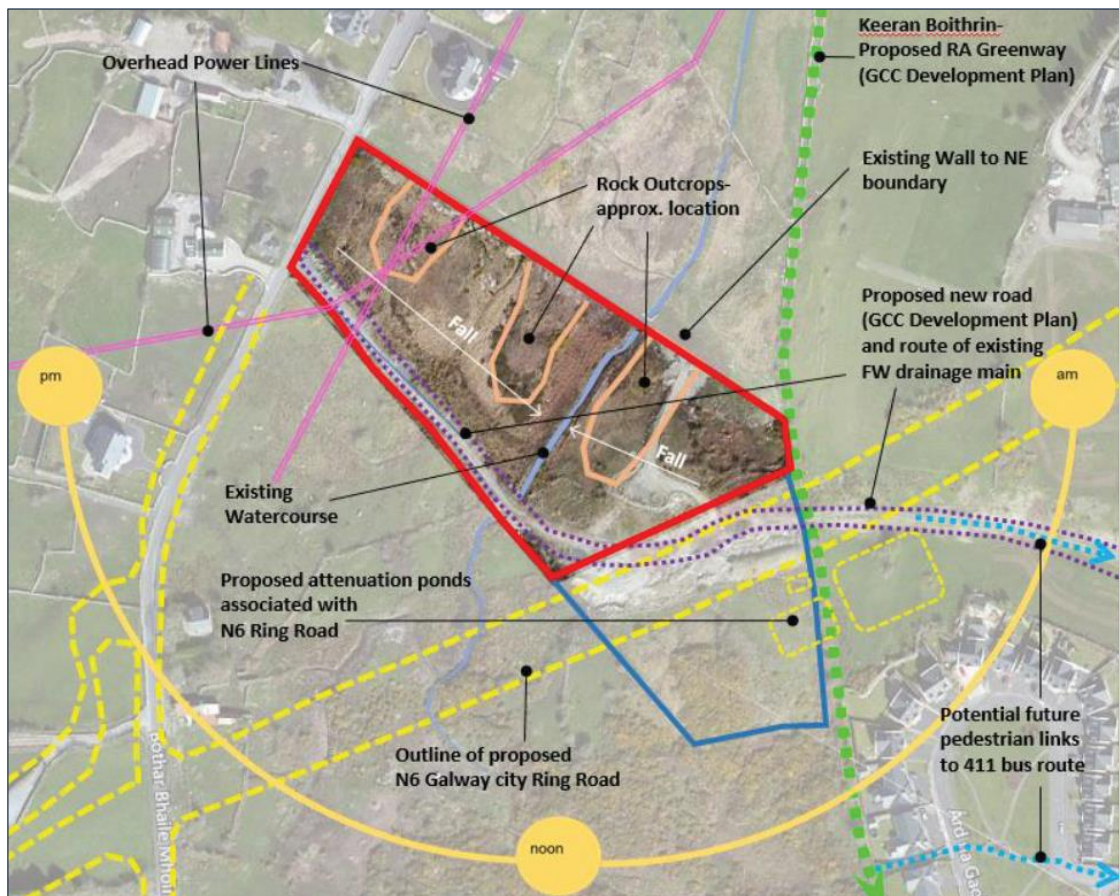


Figure 3 - Site Characteristics

2.3

Proposed Development

The proposed development involves the construction of a social housing scheme comprising a mix of standard residential units and Traveller-specific accommodation. The completed project will deliver high quality residential accommodation which will represent a positive intervention in the context of the existing sub-urban/rural location in a sustainable, efficient and cost-effective design..

All site services will form part of the development including connection to existing foul water sewer, connection to existing water mains, and connection to surface water drainage system in proximity to the site.

The design of the proposed development, and in particular the Traveller Appropriate Accommodation, has been the subject of extensive consultation with the Traveller Community Liaison Officer who has conveyed the requirements of the Traveller Community to the design team. This has resulted in a number of iterations to the design to this stage in order to meet the requirements of the Traveller Community while ensuring that this element could be provided as part of a cohesive and high-quality residential proposal for the entire site.

The proposed development comprises the following in terms of accommodation:

1. Social housing scheme of 63 no. dwellings; &
2. The Traveller Appropriate Accommodation scheme in the northwest quadrant of the site, comprising 8no. TAA dwellings.



Figure 4 - Site Layout

3.

PLANNING HISTORY

A search of Galway City Council's planning history reveals that there are no previous or extant planning applications on the specific site, but there are a number of relevant planning applications in the vicinity of the site which highlight the patterns and trends of development at this location.

Table 1 - Planning History

Ref No.	Applicant	Development Description	Decision
20286	O'Malley Construction Company	Permission for development which will consist of the following: 1) Demolition of disused two storey house on the site ; 2)Construction of 58 no. residential units comprising ; 22 no. two storey four bedroom houses, 6 no. two storey three bedroom houses, 2 no. three storey apartment blocks comprising 3 no. one bedroom apts and 27 no. two bedroom apts; 3) Shared communal and semi private open space, car and bicycle parking, bin stores, site landscaping and public lighting ; 4) A new pedestrian and vehicular access from Ballymoneen Road ; 5) Provision of all associated surface water and foul drainage services and all associated site development works. The application is accompanied by a Natura Impact Statement (NIS)	Not Decided
ABP 304762	O'Malley Construction Company	Demolition of existing house and associated outbuildings, construction of 238 no. residential units (113 no. houses, 125 no. apartments), childcare facility and associated site works.	Granted on 14th October 2019
ABP 302848	Galway County Council	Galway County Council ("the road authority") on its own behalf and on behalf of Galway City Council pursuant to an agreement under section 85 of the Local Government Act, 2001 (as amended) and as approved by Transport Infrastructure Ireland (the operational name of the National Roads Authority) pursuant to section 14(8) of the	Decision Pending – Expected October 2021

		Roads Act 1993 (as amended), has applied under section 51(2) of the Roads Act, 1993 (as amended by section 9(1)(e)(i) of the Roads Act 2007) to An Bord Pleanála ('the Board') for approval in relation to a proposed road development consisting of:- • A dual carriageway, consisting of 2 lanes and a hard shoulder in each direction divided by a segregating barrier • A single carriageway, consisting of 1 lane and a hard shoulder in each direction • New link roads The realignment / improvement of regional, county and local roads crossed by the proposed road development • Localised works to the existing electricity transmission and distribution networks (specifically comprising of the diversion of the 110kV and 38kV services) together with all ancillary and consequential works associated therewith.	
1454	Con Cronin & Roger Keogh Joint Statutory Receivers appointed by NAMA	E.O.D. on Pl. Ref. 08/32. Permission for the demolition of two existing houses, sheds and outbuildings, construction of creche, 3 No. retail units (225sq.m) and 3 No. office units (212sq.m), bar/restaurant (512sq.m) and 360 residential units (comprising of 78 No. apartments, 82 duplex units, 25 No. townhouses and 175 No. terraced, semi-detached and detached houses) in two and three storey blocks, bin storage, ESB substation, surface and basement car parking and all associated external and site development works including three vehicular access points and road widening along Ballymoneen Road	Extended to 18th July 2019
08/32	Declan Gardiner & Joe McGrath	Permission for the demolition of two existing houses, sheds and outbuildings, construction of creche, 3 No. retail units (225 sq. m) and 3 No. office units (212 sq. m), bar/restaurant (512 sq. m)	Granted 20.11.2008

		and 299 residential units in varying design and form, in two and three storey blocks, bin storage, ESB substation, surface and basement car parking and all associated external and site development works including three vehicular access points and road widening along Ballymoneen Road	
07/610	Declan Gardiner & Joe McGrath	Permission for the demolition of two existing houses, sheds and outbuildings, construction of crèche (189sq.m), 3 no. retail units (225sq.m), 3 no. office units (212sq.m.) bar/restaurant (512sq.m) and 383 residential units (comprising of 96 No. apartments, 91 duplex units, 46 No. townhouses and 150 No. terraces, semi-detached and detached houses) in two and three storey blocks, bin storage, ESB substation, surface and basement car parking and all associated external and site development works including road widening along	Refused 01.10.2007 <u>Refusal Reasons:</u> • 1no. access/exit point. • Unusable Open Space. • Lack of private open space. • Overlooking. • Inadequate mix of house type/size. • Inadequate childcare. • Distance between buildings. • Inadequate car-parking provision.

4. PLANNING POLICY CONTEXT

4.1 National Planning Framework: Project Ireland 2040

The Department of Housing, Planning, Community and Local Government published the *National Planning Framework* (NPF) entitled ‘Ireland 2040’ in February 2018 to succeed the *National Spatial Strategy* (NSS). The NPF comprises the Government’s proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions over the next 25 years.

The NPF is a strategic document which provides the framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy.

A key focus of the NPF is the need for compact growth. National Policy Objective 3a seeks to deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

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

- *National Policy Objective 11 which favours development that can encourage more people to live or work in existing settlements;*

Knocknacarra is a well-established suburb of Galway and the surrounding area in which the development is proposed is an established residential neighbourhood, with existing development and land zoned for residential development. This objective is therefore met.

- *National Policy Objective 27 which prioritises walking and cycling accessibility to existing and proposed development;*

The development is accessible on bicycle via Ballymoneen Road to the east of the site, and walking and cycling will be facilitated with the provision of future footpaths and pedestrian links to neighbouring developments. This objective is therefore met.

- *National Policy Objective 33 which is to prioritise the provision of new homes that can support sustainable development.*

This development is proposed in an existing residential neighbourhood on lands zoned for residential development and which are serviceable. It is therefore considered that this proposal supports sustainable development.

- *National Policy Objective 6 relating to increased residential population and employment in urban areas.*

The population of Ireland and specifically Galway is increasing. This proposal will meet demands generated by population increase. It is considered that this objective is met.

4.1.1 Design Manual for Urban Roads and Streets (DMURS) (2019)

The *Design Manual for Urban Roads and Streets* (DMURS) was first published by the Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government in April 2013. It has been subsequently updated with the latest update being 2019. It sets out design guidance and standards for constructing new roads and reconfiguring existing urban roads and streets in Ireland.

DMURS sets out an integrated design approach. Which means that design must be:

- Influenced by the type of place in which the street is located, and
- Balance the needs of all users.

A key aim of DMURS is to put well designed streets at the heart of sustainable communities. Well-designed streets can create connected physical, social and transport networks that promote real alternatives to car journeys, specifically walking. Guided by DMURS, this proposal encourages walking as a mode of transport, by delivering an attractive neighbourhood, with designated footpaths and pedestrian linkages to the surrounding neighbourhoods.

DMURS encourages designers to give due consideration to creating a ‘sense of place’. It identifies four interlinked characteristics (all of which can be found in this proposal) that influence the sense of place within a street as follows:

- *Connectivity: The creation of vibrant and active places requires pedestrian activity. This in turn requires walkable street networks that can be easily navigated and are well connected.*

A walkable and navigable street network is proposed at the site, with careful consideration given to connection to and through future adjoining developments.

- *Enclosure: A sense of enclosure spatially defines streets and creates a more intimate and supervised environment. A sense of enclosure is achieved by orientating buildings toward the street and placing them along its edge. The use of street trees can also enhance the feeling of enclosure.*

The Landscape Plan submitted illustrates an attractive, tree-lined development. The Landscape Plan has been guided by the provisions of DMURS by proposing trees and planting which offer spatial definition, enclosure and greening.

- *Active Edge: An active frontage enlivens the edge of the street creating a more interesting and engaging environment. An active frontage is achieved with frequent entrances and openings that ensure the street is overlooked and generate pedestrian activity as people come and go from buildings.*

High quality streetscapes and building frontage with extensive passive surveillance are proposed as part of this development.

- *Pedestrian Activity/Facilities: The sense of intimacy, interest and overlooking that is created by a street that is enclosed and lined with active frontages enhances a pedestrian’s feeling of security and well-being. Good pedestrian facilities (such as wide footpaths and well-designed crossings) also make walking a more convenient and pleasurable experience that will further encourage pedestrian activity.*

Pedestrian and cycles facilities are proposed, with the provision of connectivity to the adjoining development. The layout and orientation of residential blocks within the development is intended to facilitate the creation of streets and active frontages. The layout provides a safe and pleasant environment for pedestrians navigating the proposed development.

DMURS emphasises that these four characteristics represent the basic measures that should be established in order to create people friendly streets that facilitate more sustainable neighbourhoods. Each of these four characteristics informed the design process for the proposed development and it is considered that the provisions of DMURS are met in the proposal. This is demonstrated in the enclosed Traffic and Transport Assessment.

4.1.2 Social Housing Strategy - 2020

The Social Housing Strategy 2020 aims to support the realisation of a new vision: that to the greatest extent possible, every household in Ireland will have access to secure, good quality housing suited to their needs at an affordable price and in a sustainable community. It will: Provide 35,000 new social housing units, over a 6-year period, to meet the additional social housing supply requirements as determined by the Housing Agency, Support up to 75,000 households through an enhanced private rental sector; and Reform social housing supports to create a more flexible and responsive system.

The three pillars underpinning the Social Housing Strategy are as follows:

- Pillar 1: Provision of New Social Housing Supply - Provision of 35,000 new social housing units through a range of delivery mechanisms over the lifetime of the Strategy;
- Pillar 2: Providing Housing Supports Through the Private Rental Sector - Supports for eligible low-income households through the private rental sector. This Pillar includes the new Housing Assistance Payment which will aim to provide housing support for up to 75,000 households; and, innovative measures that the State, as a significant funder and regulator of the rental market, can take to help ensure that future supply is more stable, affordable, secure and cost effective; and
- Pillar 3: Reform Creating More Flexible and Responsive Social Housing Supports -This Pillar includes the implementation of reforms— a new rent framework, a new tenant purchase scheme, expanded powers to counter antisocial behaviour and housing services plans— and an on-going commitment to monitor and review the Strategy to refresh and drive reform and policy development.

In summary the Strategy is focused on three key numbers: 90,000 households on the current waiting list; 35,000 new housing units to be provided by local authorities and AHBs; and Up to 75,000 households moving onto HAP or RAS.

The proposed development is intended to assist in realising the aims of the social housing strategy by providing high quality, social housing in an area of Galway City which is zoned for residential development.

4.2 Regional Planning Policy

4.2.1 Regional Spatial and Economic Strategy 2020-2032 (Northern & Western Regional Assembly)

The Regional Spatial & Economic Strategy for the Northern & Western Regional Assembly (RSES NWRA) was adopted on 24th January 2020. The principal purpose of the (RSES) is to support the implementation of the National Planning Framework 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. Section 3.6 of the RSES sets out the Galway Metropolitan Area Strategic Plan (MASP). The Vision of this MASP is that Galway will be a leading global city, renowned as a successful, sustainable, competitive, compact and accessible city of scale that supports a high quality of life, maintains its distinctive identity and supports its rich heritage, language and cultural experience.

The primary centre identified for growth in the region is Galway City through its designation as a Metropolitan Area in the NPF. Section 3.6 of the RSES sets out the Galway Metropolitan Area Strategic Plan (GMASP), which provides a strategic focus on the City and environs and sets out how it is envisaged the NPF will be implemented in the regional context of the RSES. The GMASP outlines the aim to

consolidate key neighbourhoods which have the potential to develop c.170ha of residentially zoned land suitable for higher density development. Relevant objectives outlined in the GMASP include:

- RPO 6.3.2: The Assembly supports the proposition that 50% of new homes for the population targets will be constructed within the existing city development envelope, 40% of these shall be located on infill and/or brownfield sites.
- RPO 6.3.10: Support the provision of Childcare, Education and Health Services within the same timeframes as the residential and employment uses outlined above.

With regard to growth ambitions for the region, the RSES NWRA notes the importance of compact growth in order to create more compact settlements:

‘Compact growth will be pursued to ensure sustainable growth of more compact urban and rural settlements, supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth.’

The policy framework of the RSES aims to meet projected demand through promoting the development of sustainable high-quality neighbourhoods, sustainable densities incorporating high design standards and key urban design principles. The strategy is to provide for integration of housing with transportation infrastructure fostering sustainable transport patterns. The strategy must also promote a range of house types, sizes, and tenures suitable for households with different income levels or those who may have specific requirements. A number of strategic locations have been identified that present the opportunity and capacity to deliver the necessary quantum of housing to facilitate targeted growth.

The RSES has also set out the ambition to improve quality of life in the region. Relevant objectives to meet this ambition include:

- RPO 7.9: Promote the provision of high-quality, accessible, and suitably proportioned areas of public open spaces and promote linkage with social, cultural and heritage sites and buildings. In this process prioritise access for walking and cycling.
- 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 7.18: Support the development of housing to meet the population targets in this strategy using as wide a variety of funding mechanisms as possible including regeneration funds, Part V, direct public funding and Public/Private Partnerships.

The proposed development includes social housing and Traveller appropriate housing of high design quality, in an area zoned for residential development. Accordingly, the proposed development is considered to be consistent with the pertinent regional planning policy.

4.3 Local Planning Policy Context

4.3.1 Galway City Development Plan 2017-2023

The current statutory planning policy document for the subject site is the Galway City Development Plan 2017-2023 (GCDP), which was adopted by the City Council in December 2016 and came in to effect on the 7th January 2017. The GCDP includes a Core Strategy and Settlement Strategy that notes the need to accommodate continued population growth, in line with the City’s designation as a ‘Gateway’, in a sustainable manner. In this regard, the adopted Settlement Strategy is primarily based on consolidating the urban form of the City. The strategic goals of the GCDP include the following:

- Promote balanced and sustainable economic development that will enable Galway City to fulfil its role as a National Gateway and a Regional Centre, providing sufficient employment opportunities and appropriate services.
- Use the role of the Gateway to harness the strengths and maximise the economic development of the region.
- Provide for a built and natural environment that is of high quality and that contributes to providing a good quality of life for residents and visitors and affords sustainable transportation opportunities.

The Development Plan sets out a co-ordinated and integrated spatial framework for the continued development of Galway City in a sustainable and inclusive manner. It is set within the overall national and regional planning contexts, taking into account relevant national guidelines published by the Department of Housing, Planning, Community and Local Government.

4.3.1.1 Zoning Objectives

The subject site is zoned in the Galway City Development Plan 2017-2023 R: Residential, which is accompanied by the following zoning objective:

‘To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.’

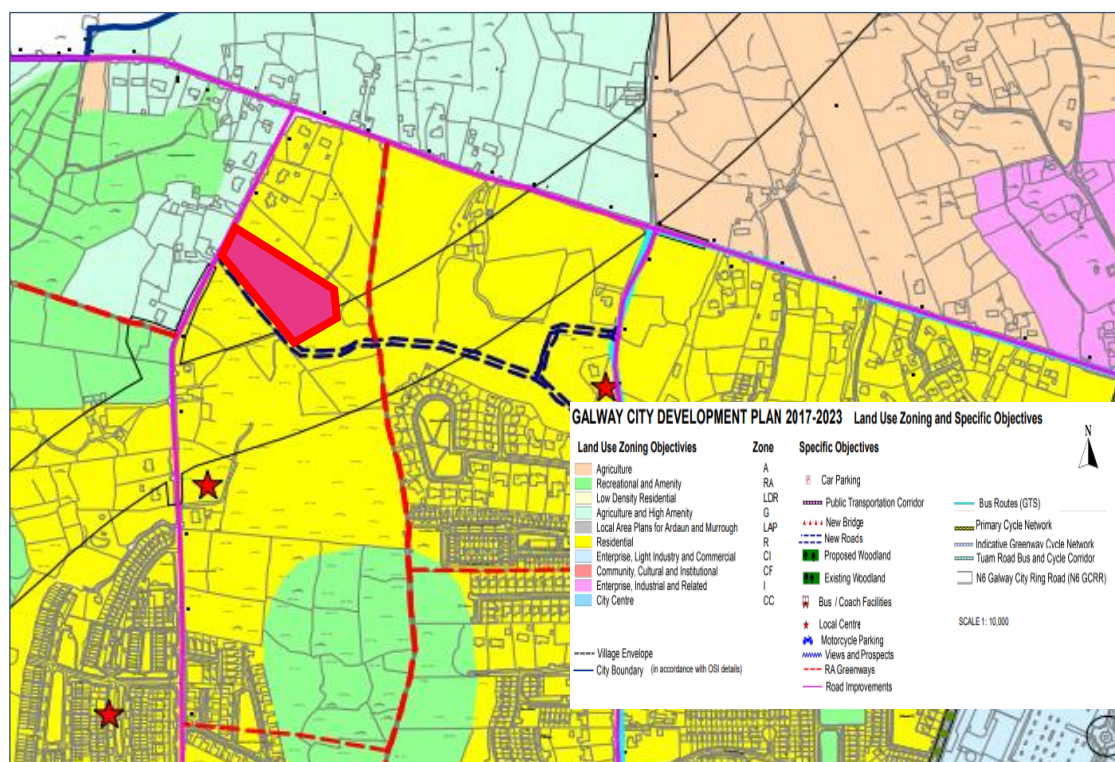


Figure 5 - Land-use Zoning Map (Subject Site in Pink)

4.3.1.2 Housing

Section 2.2 of the GCDP relates to ‘Neighbourhood Concept’ and states that the Council will protect and enhance the character of residential neighbourhoods through development standards and through the implementation of environmental improvements.

Policy 2.4 Neighbourhood Concept sets out to:

- *Encourage the development of sustainable residential neighbourhoods, which will provide for high quality, safe, accessible living environments which accommodates local community needs.*
- *Encourage sustainable neighbourhoods, through appropriate guidelines and standards and through the implementation of local area plans, framework plans/masterplans.*
- *Protect and enhance new/existing residential neighbourhoods through appropriate guidelines and standards, preparation of framework plans, development briefs and design statements.*
- *In the design of residential developments regard shall be had to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and the accompanying Urban Design Manual–A Best Practice Guide and the Design Manual for Urban Roads and Streets (2013).*

Section 2.4 of the GCDP sets out the framework of residential neighbourhoods in the city and divides the neighbourhoods into indicative areas as follows:

- Outer Suburbs;
- Established Suburbs;
- Inner Residential Areas and
- City Centre Residential

As illustrated on the map below, the application site is situated within the areas indicatively zoned for residential development. The site is specifically located in the ‘outer suburbs’, according the framework above.

Policy 2.5 – Outer Suburbs

Encourage higher residential densities at appropriate locations especially close to public transport routes and routes identified in the Galway Transport Strategy as suitable for high frequency, public transport services.

The site is located on the Ballymoneen Road, which is serviced by Galway City Services, the most frequent service being the no. 411 which stops at 2no. locations on the Ballymoneen Road at a frequency of approximately 20-30 minutes. The bus destination is Eyre Square, passing through Rahoon, Shatalla, Gleann Dara, NUIG, and Galway Cathedral. The bus journey from Ballymoneen Road to Eyre Square is approximately 20 minutes.

Ensure that sustainable neighbourhoods are places where housing, streets, open spaces and local facilities come together in a coherent, integrated and attractive form.

The design of the proposal has undergone many iterations to ensure that each of the principles in this policy are met. The final design represents a sustainable, attractive neighbourhood, with ample open space which is integrated with and connected to surrounding proposed developments.

Ensure the layout of residential developments has regard to adjoining developments.

There are currently no existing adjoining developments, however to the south of the site, a residential development is currently as detailed in the Planning History section of this report). It is intended that the proposed development has regard to this permitted adjoining development to ensure integration and connectivity across the two developments.

Encourage a mix of housing types and sizes within residential developments.

A mix of housing types and sizes based on a ‘need assessment’ is proposed.

Require residential developments of over 10 units to provide recreational facilities as an integral part of the proposed open space.

The proposed development is over 10 units, therefore a suite of recreational facilities is proposed, such as an informal play area, a basketball play area, and several green open spaces for residents to use an amenity space.

Ensure a balance between the reasonable protection of the residential amenities of the outer suburbs and the protection of the established character and the need to provide for sustainable residential development.

Both the established character of the area, and the surrounding residential amenity have been carefully considered and protected as part of this proposal.

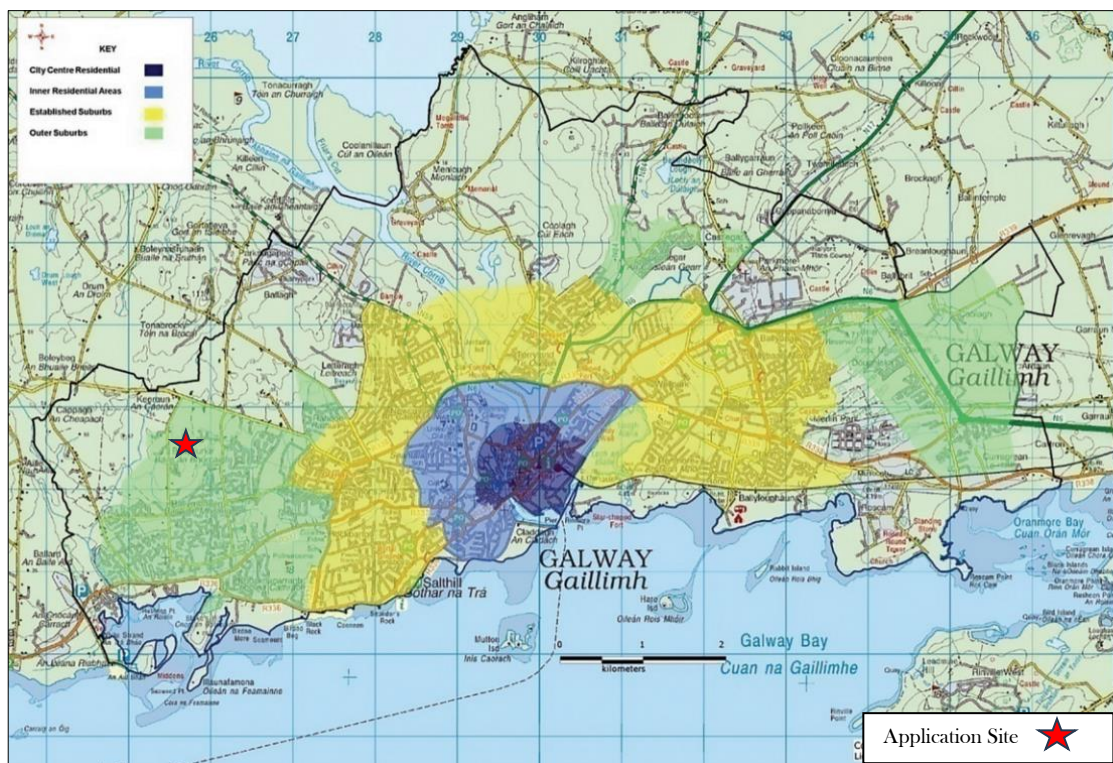


Figure 6: Framework of residential neighbourhoods in Galway City

4.4

Traveller Accommodation

Section 2.3 of the GCDP sets out the policies and objectives relevant to development of Traveller accommodation. A mandatory requirement of the Development Plan is inclusion of objectives for the provision of accommodation for Travellers and for the use of particular areas for that purpose.

Through zoning objectives for different land uses, the Development Plan can facilitate achieving the recommendations contained in the Traveller Accommodation Programme 2019-2024 and any subsequently adopted recommendations.

Policy 2.3 Traveller Accommodation

Have regard to the Traveller Accommodation Programme 2014-18 and any subsequent plan in the provision of accommodation for the Travelling community.

The proposal has had regard to the Traveller Accommodation Programme 2019-2024, which supersedes the previous Programme. As demonstrated later in the report, significant engagement with the Traveller Community was undertaken as part of this project and has informed the design detail of this element of the proposed development.

4.4.1

Traveller Accommodation Programme 2019-2024

The Traveller Accommodation Programme (TAP) was drafted in compliance with the Housing (Traveller Accommodation) Act 1998, which requires each Housing Authority to adopt a programme for its functional area. The Programme was adopted by Galway City Council on 8th July 2019. The Traveller Accommodation Programme outlines the accommodation requirements of the Traveller Community over a five-year period from 2019 – 2024.

An ‘Assessment of Need’, formed part of the TAP. The Assessment was carried out specifically for the Galway City Council functional area. The results of the Assessment of Need guided the Traveller Accommodation aspects of this proposal and are set out below.

265 Traveller families were assessed as being in need of housing in Galway City Council’s administrative area. This figure captures all Traveller households assessed as having a Social Housing need and incorporates all households that have been approved for a transfer.

This figure includes all the families residing on the Transient Halting Site in Carrowbrowne, including families requiring larger or smaller properties. This highlights the differing levels of need – those without any local authority provision and reliant on private rented accommodation, those whose need is being temporarily met and those whose need had been met by Galway City Council but has changed over time, either due to change in family size or accommodation preference.

As part of the need assessment, 265 letters were issued requesting all families to indicate their accommodation choice in preference order for halting site accommodation, culturally appropriate Traveller accommodation, standard group housing or standard local authority/voluntary housing. First preferences are set in the pie-chart below and show that the majority of respondents prefer to live in Local Authority housing, as evident in the chart, the preferences are otherwise evenly distributed across the remaining options.

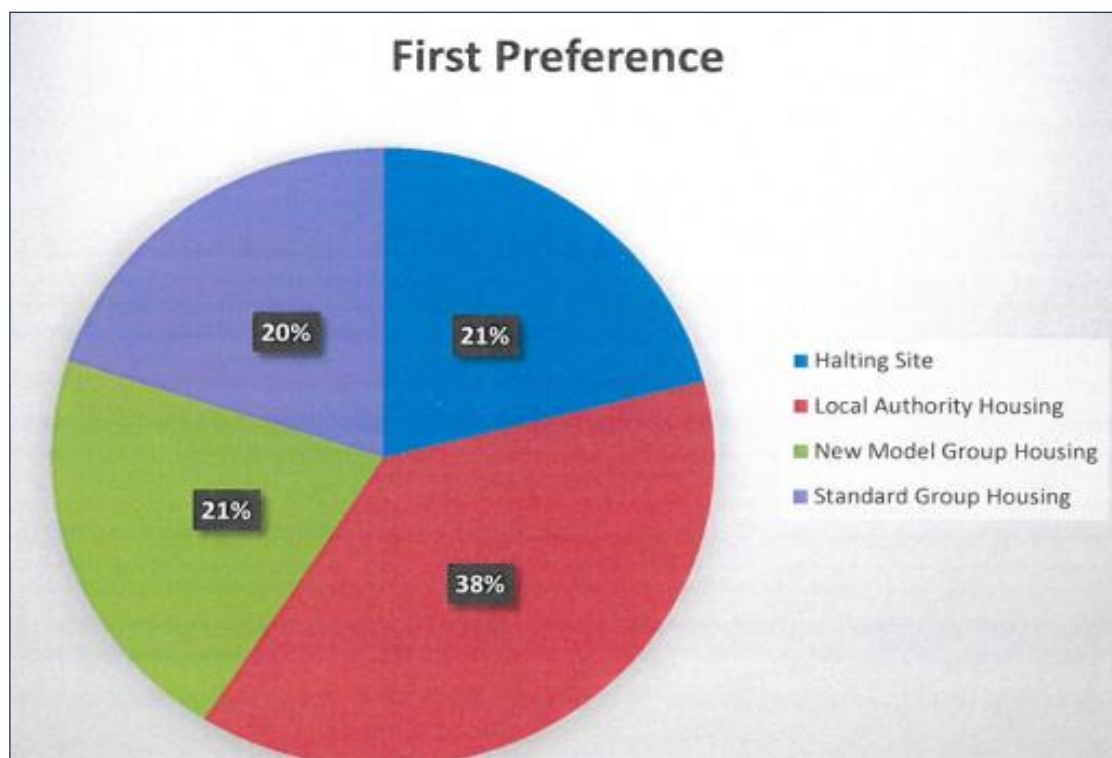


Figure 7 - Traveller Accommodation Preferences

The proposed development will provide Local Authority Housing for Travellers in line with the assessed demand/preference of the local travelling community. Therefore, the proposed development is considered to accord with the provisions of the TAP.

4.5

Urban Design

Section 8.7 of the GCDP sets out the principles of good urban design which are required to be implemented into new developments:

- Character: The promotion of character by reinforcing the local distinctiveness, identity and sense of place. The typology of streets, layout of parks, open spaces, the natural heritage and the urban morphology contributes to character which evolves over time. New development should enhance this character.
- Legibility: The creation of places that are easily recognisable, and while part of the overall city, they have their own identity through recognisable landmarks and/or streets. New development should enhance the legibility of the surrounding place.
- Ease of Movement and Connectivity: The promotion of accessibility, permeability and universal access making places easy to get to and move within. Ease of movement within a city centre may be through pedestrianisation schemes, creation of new streets, permeability through shops. In the wider area it may be through enhanced public transport, provision of greenways and linkages from residential areas to local services and facilities. New development should ensure maximum permeability and accessibility for all.
- Quality of the Public Realm: The promotion of streets and public spaces that are attractive and safe and that allow for social interaction. The design of the public realm in any new development requires careful consideration in terms of its layout, function and use of materials such as surfaces and street furniture.
- Continuity and Enclosure: The promotion of the continuity of street frontages and the enclosure of spaces by clearly defined edges which distinguish public and private areas.
- Diversity and Adaptability: The creation of places that have variety and choice through a mix of uses which are compatible and viable and which can adapt to changing socio-economic conditions.
- Environmental Responsibility: The creation of places which foster sustainable energy consumption and reduced carbon footprint through enhancing sustainable transportation, utilising renewable energy technologies and SUDs, enhancing biodiversity and climate adaptation measures.

Each of the Urban Design Principles set out above, have been considered in the design process of this proposal and have informed the design conclusions presented. The scheme represents a high design-quality urban form, with a contemporary character sympathetic to its surrounding environment. The scheme is designed to be legible and is future-proofed for connectivity and permeability to and through permitted adjacent developments. Landscaping provides attractive green spaces and a sense of enclosure for residents with a high-quality public realm and open space provision, over and above the minimum requirement. Please refer to the enclosed Architects Design Report for further detail on this.

4.6

Galway Transportation Strategy

The Galway Transportation Strategy (GTS) 2016 represents a partnership approach between Galway City Council, Galway County Council, and the National Transport Authority. It includes a series of measures which will address the transport problems experienced across the city particularly during peak hours, over a phased and co-ordinated basis over the next 20 years, based on priority needs. The GTS has established that the reduction in traffic congestion requires both improvements to public transport, cycling and walking networks and the provision of a new orbital route.

The proposed measures were arrived at following transport modelling which included defining the existing transport problems, predicting future travel demands, access mode share and assessing their mutual impacts and interdependencies. The strategy includes traffic management, giving priority to walking, cycling and bus movements, modifications to the traffic network, management of parking activities and heavy goods vehicles, improvements to the public realm and use of ‘smarter mobility’.

The intentions within the GTS have been considered throughout the design process of this proposal. The N6 Galway City Ring Road runs along the south-eastern edge of the application site, providing excellent connectivity opportunities for the site in the future. In addition, the site is designed to be cycle and pedestrian friendly, the 411 City Bus route runs along the Western Distributor Road to the south of the site, all of which should serve to reduce car dependence and assist in the realisation of the Galway Transportation Strategy’s aims.

4.7

N6 Galway City Ring Road

Galway County Council, on behalf of itself and Galway City Council, is proposing to develop the N6 Galway City Ring Road (N6 GCRR) around Galway City. The N6 GCRR is a key component of the Galway Transport Strategy (GTS) which realises Galway City and County Council’s vision of all elements of transport working together to achieve an integrated sustainable transport solution. The proposed trajectory of the N6 GCRR is in close proximity to the proposed development site and has potential to transform the area. The N6 GCRR aims to resolve a number of significant transport problems that Galway City experiences. These problems include:

- Peak hour congestion and journey time unreliability
- Over reliance on private cars
- Lack of alternative transport modes
- Lack of road space for the development of Smarter Mobility and Public Transport

The most recent design of the N6 GCRR is proposed to run from Bearna West Roundabout to Doughiska via Knocknacarra Ragoon, Dangan, Menlo, Castlegar, Ballintemple, Ballybrit and Ballybane. The proposed N6 aims to create connectivity between regions, remove bottlenecks that obstruct access to markets and promote a sustainable multi-modal network. The N6 will support the economic and social development of the region and improve connectivity and accessibility to the city and areas surrounding the city. It will also focus on supporting trips that cannot be facilitated by measures such as city-bound, cross-city and cross county movements. This will relieve congestion in the city and, in turn, improve the quality of the city environment and increase opportunities for reallocation of existing road space for sustainable transportation.

The N6 GCRR is supported by the Galway City Development Plan, with a strategy to “Support the N6 GCRR project in conjunction with Galway County Council and Transport Infrastructure Ireland in order to develop a transportation solution to address the existing congestion on the road network and reduce the negative impact of vehicular traffic on the functioning of the city centre and to facilitate city bound, cross –city, cross- county and strategic east – west movements”.

The N6 Galway City Ring Road has influenced the design and infrastructural elements of the subject application. The coming forth of the N6 Ring Road will provide excellent opportunities in this area of Galway by connecting residential zoned land with pedestrian and cycle access to the Western Distributor Road to the south.

4.8

Keeraun Boithrin Greenway

A Greenway is proposed in the vicinity of the application site. The Greenway is intended to run directly along the southeastern boundary of the site, providing further connectivity linkages for the development.

The greenway has informed the design of the overall scheme and the following elements are designed into the scheme in order to connect the two:

- Provision of 3.6m wide shared surface cycle and pedestrian path through the north-eastern corner of the site.
- Path separated from the end-of terrace unit by a landscaped privacy strip and from the N6 by boundary railing and landscaping.
- The end-of-terrace unit is orientated such that the front door addresses the greenway link, with fenestration on gable end for passive surveillance and articulation of the facade
- A removable fence is provided for the full width of the boundary to the future greenway to allow for maximum connectivity.

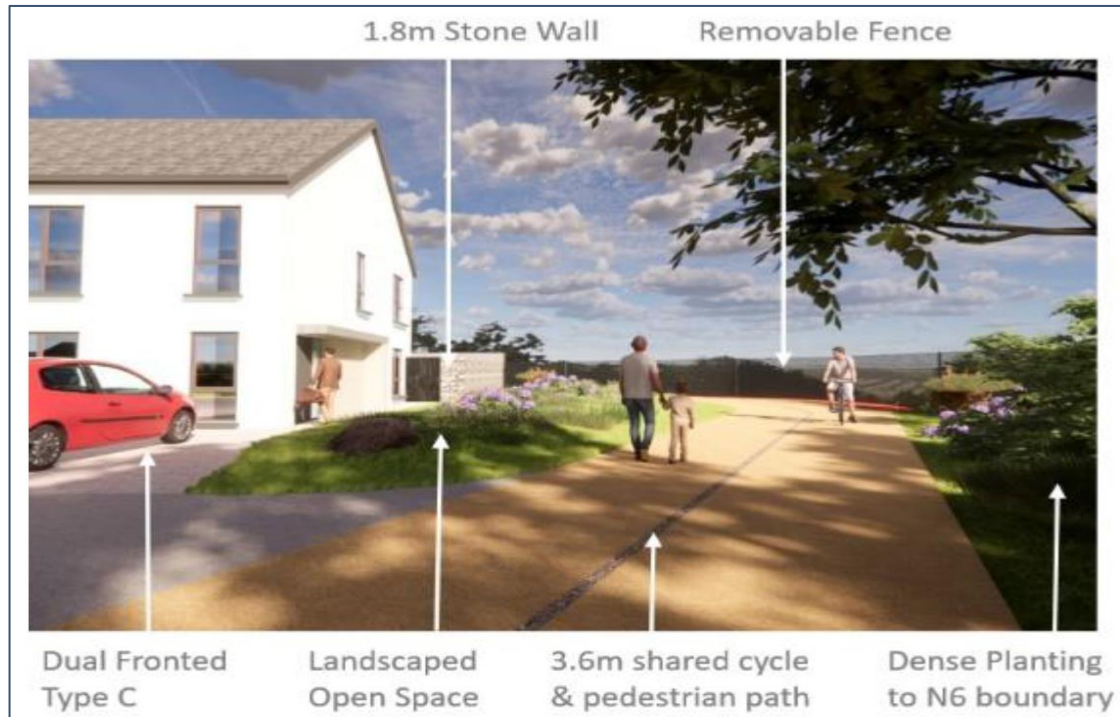


Figure 8 – Connection of Scheme to Greenway

5. PLANNING ASSESSMENT

5.1.1 Compliance with Core Strategy

Located on greenfield lands zoned for residential development in a suburb of Galway City which is undergoing much development and in proximity to existing and permitted residential development, the proposed development is acceptable in view of the strategic policy for Galway City, as evidenced in the policy section and commentary above.

The Galway City Development Plan predicts a population increase in Galway of 23,171 between 2011 and 2022. This represents a need for 8,510 further houses during this period. Conversely, between 2011 and 2016, a total of 467 houses were built in the administrative area of Galway City. This pace is not rapid enough to keep up with demand, and it is accepted both in Galway and across the country that there is a severe deficiency of housing stock. The proposal presented here aims to contribute towards this deficiency of housing stock by providing a sustainable social and Traveller-appropriate housing scheme on residentially zoned land.

Furthermore, this proposal has been cognisant of local policy, as set out in the Galway City Development Plan wherein policies and objectives for housing, social housing, and Traveller appropriate accommodation are listed. This application has shown that the principles and provisions of the relevant policies have guided the design process of this proposal.

The proposed development also provides for consolidation and compact urban development in accordance with the National Planning Framework objective to seek a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas. As illustrated above, the subject site is located in close proximity to both existing and forthcoming residential developments.

In summary the proposed development is consistent with the local, regional and national objectives which support compact urban growth and with the Core Strategy of the Galway City Development Plan which seeks to support the development Galway City and its suburbs.

5.1.2 Compliance with Zoning Objective

The application site is zoned for 'Residential' use under the operative GCDP. The zoning objective is:

'To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods'

In accordance with the operative Development Plan, the proposed scheme includes 71 no. residential units. Residential uses are considered to be compatible with, and contribute to the zoning objective, in accordance with Chapter 11 (Part A) of the GCDP. The proposed development will assist Galway City Council in meeting its commitment to provide for residential development which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.

5.2 Principle of Development

The Galway City Development zones the lands specifically for Residential development as illustrated in the zoning maps above. Clearly, the Authority have identified a need for housing in Galway, specifically Knocknacarra, and have identified the subject lands as an area where this housing need can, in part, be met. This proposal therefore represents a provision of housing to address an identified need, in an area which has been deemed suitable and sustainable.

The subject site is located conveniently close to services, roads and infrastructure on the Western Distributor Road. As shown above, the 411 bus services the site at a frequency of approximately 20-minute intervals from c.6.30am until c.11.30pm. The site is also located in close proximity to Knocknacarra District Centre, which hosts a range of retail uses which are within easy walking distance of the application site.

The land is bounded by a Residential-zoned site to the south which is currently the subject of a planning application for 58no. dwelling units. Ard na Gaoithe residential development is located 70m south of the southernmost corner of the subject site, and Ballymoneen Road bounds the western edge of the site. Additionally, the other undeveloped parcels of land surrounding and in proximity to the site are all zoned *residential*, therefore further consolidation of residential development in the neighbourhood is anticipated in the future.

5.2.1 Housing Quality Assessment

The proposed scheme has been developed in a manner which employs best practice in urban design and having regard to the following policy documents:

- *Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)*
- *Sustainable Residential Development in Urban Areas (2009)*
- *Sustainable Urban Housing: Design Standards for New Apartments (2018)*
- *Quality Housing for Sustainable Communities (2007)*
- *Design Manual for Urban Roads and Streets (2013)*
- *Urban Design Manual – A Best Practice Guide (2009)*
- *Galway City Development Plan 2017-2023*

The **Housing Quality Assessment** completed by Coady Architects demonstrates that all the residential units meet the design standards outlined in the documents listed above. The majority of the units exceed these standards. This provides flexibility and adaptability which are key components of sustainable development.

Within each apartment block the units are designed to maximise daylight and sunlight penetration, taking advantage of favourable orientation, and eliminating north facing living rooms and private amenity spaces.

For further details please refer to the **Housing Quality Assessment** which is included with the application.

5.2.2 Traveller Accommodation Site Design

Overcoming the specific site constraints of a complex site, while facilitating a project brief informed by consultation with the Travelling Community has presented challenges in terms of reaching a sustainable and policy-compliant design conclusion. This has created a unique design challenge in terms of meeting the requirements of a specific cohort who require accommodation in a manner that is sensitive to their needs and cultural preferences. It is considered that the proposed development successfully achieves this.

The proposed scheme is the result of a lengthy design process informed by reference to local area objectives, local and national planning policy, and extensive consultation between GCC Housing personnel and Traveller representatives. Through the consultation process and interrogation of precedent Traveller accommodation developments, a series of fundamental design parameters emerged. These informed the location, layout, and design of the Traveller houses resulting in an overall development comprised of a cluster of 8no. Traveller specific detached houses closely related to but respectfully separated from a more typical arrangement of 1-3 bed social houses, apartments, and duplexes.

Through Traveller consultation, it was communicated that there was a strong preference for the Traveller houses to be grouped so as to retain a sense of community.

Locating 8no. large, detached dwellings at the narrowest front portion of the site posed a significant design challenge, further complicated by avoiding a back-to-back arrangement. The design solution arrived at has been to accept that the Traveller cluster will back onto the main estate road. This requires a high enclosing wall to avoid overlooking of the private amenity space, while the Traveller houses are designed as single aspect at first floor so that only bathroom and circulation windows are located to the rear.

To reduce the visual impact of this boundary wall, the design approach adopted was to treat this boundary as a natural field boundary, clad in dry stone random rubble native stone on its public face. The wall is set back from the footpath edge by a minimum of 2.4m to allow a reasonable depth of planting along its base and is further cranked at intervals along its length to allow for occasional deep, dense pockets of planting comprised of a semi-mature tree species amid dense ground cover, creepers, and leafy foliage.

An active streetscape along the estate road is provided by a continuous streetscape of terraced houses along its southern edge fronted by perpendicular shared parking interspersed with pocket planting. The visual effect over time will be of a tree lined avenue opening onto an expansive community green towards the rear of the site.

Regarding the layout of the Traveller cluster, a simple cul-de-sac arrangement has been developed with houses grouped around a centrally located public amenity / vehicular circulation area adjacent to the northern site boundary. This area will be predominantly hard surfaced with perimeter planting and a small, landscaped seating area. The layout is somewhat dictated by the requirement to divert existing high voltage power lines that traverse this part of the site. A number of diversion options were considered in consultation with ESB networks. The most efficient solution arrived at was to locate a new triple pole with stay wires immediately inside the northern site boundary, allowing the power lines to be diverted underground around the front of the site. This required a 15m exclusion zone where no built form could exist around the proposed poles, which has been logically utilised as public amenity space/vehicular circulation for the Traveller houses.

The extent of hard surfacing in this area is dictated by the practicality of manoeuvring space required by large vehicles, as requested by the intended occupants. Likewise, the parking provision for this cluster is an on-curtilage parking space for a large van and touring caravan.

As regards house design, an efficient four-bedroom plan has been developed to a specific brief developed through consultation with the intended user group. A large open plan living space is provided to accommodate potentially large family units and facilitate large family gatherings. The living space is dual aspect to create a feeling of permeability and connection with the outdoor environment. A ground floor bedroom with adjacent shower room has been provided both for adaptability and to cater for elderly relatives that are commonly cared for by younger generations.

The private amenity space as communicated by the intended occupants is seen more as a utility space than a recreational amenity that should require little maintenance, and as such has been provided as a hardscaped yard area.

It is expected that these subtle design strategies will achieve two similar but distinct residential typologies within one coherent and integrated suburban development.



Figure 9 - Notional Illustration of Traveller Appropriate Accommodation

5.3 Connectivity

The site benefits from connection directly on to the Ballymoneen Road to the west. As part of the N6 Ring Road improvements, the Ballymoneen Road is earmarked for upgrade from the proposed roundabout and the application site. This road enhancement will provide pedestrian and cycle access from Ballymoneen Road to the Western Distributor Road, which leads to the city and provides multiple bus stops to the city and suburbs. As highlighted above, it is intended to connect the scheme to the proposed Greenway which runs parallel to the south-eastern boundary of the site as well as to the proposed development to the south (GCC Ref: 20/286), providing further pedestrian and cycle linkages for future residents.

In addition to this, there are a number of developments permitted directly south of the site, which will provide excellent connectivity opportunities for the subject site. As demonstrated in the map below, the subject site can connect directly to residential development site Pl Ref 20/286 (currently pending a Planning Decision). The Design Teams for each of the projects have liaised to incorporate connectivity options into both sites. This then provides pedestrian and cycle access to the developments further south (see drawings and table below for further detail).

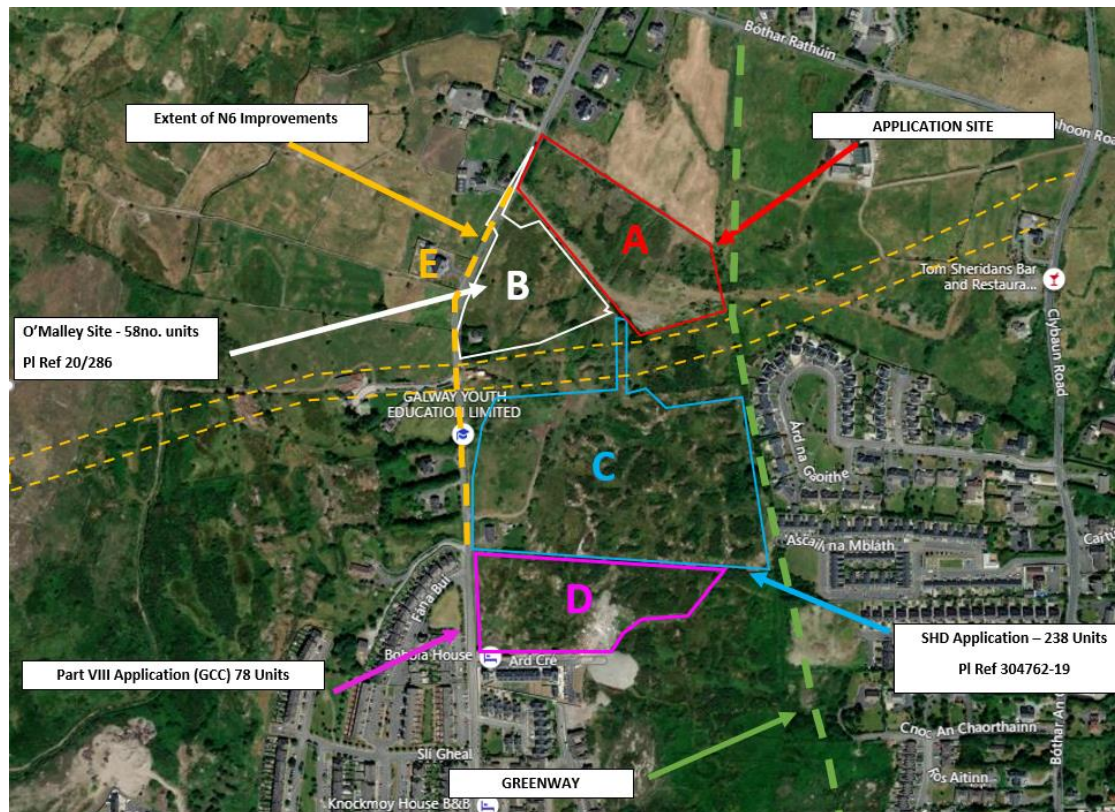


Figure 10 - Permitted Developments Connected to Subject Site

Table 2 - Permitted/Existing Developments Nearby

Site	Description	Comment
A	Proposed Development (the subject of this application)	
B	O'Malley Construction PI Ref – 20/286	Currently on Further Information
C	O'Malley Construction SHD ABP Ref 304762-19	Granted on 14.10.2019
D	Phase 2, Ard Cre, Part 8 Development	Complete
E	Galway City Ring Road Upgrades	Pending Decision (Expected October 2021)
F	Keeraun Boithrin Greenway	High-level Objective

5.4

Traffic Safety

A Road Safety Assessment and Traffic and Transport Assessment have been prepared and are submitted with this application. The conclusions of both reports find in favour of the proposed development and are synthesised below.

The Traffic & Transport Assessment shows that the impact of the proposed development on the surrounding road network is not significant but that there are likely junction capacity issues at the Ballymoneen Road/Rahoon Road and Ballymoneen Road/Western Distributor Road in future years should the GCRR not be constructed and traffic growth on the surrounding road network grow as per the growth rates in TII Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections May 2019.

It is noted that the surrounding road network will change following the construction of the GCRR. The Ballymoneen Road will benefit from a revised alignment and cross section which will include footpaths following the construction of the GCRR. This revised alignment will include revised junction arrangements which will increase the capacity and reduce queuing.

The area of the proposed development site and surrounding road networks are within an area included in the Galway Transport Strategy (GTS). The continuous implementation of GTS is likely to reduce traffic congestion on the road network within Galway City which may improve junction operation, particularly at the Ballymoneen Road/Western Distributor Road junction which has good pedestrian and cyclists' facilities to encourage modal shift in this area.

In conclusion and following this assessment the construction of 60 housing units (mix of 1 – 4 bed housing units) and 8no. culturally appropriate traveller specific units at Keeraun in Galway City will not have a negative impact on the surrounding road network. There may be a need for junction improvements on the surrounding road network in the future should traffic growth grow as per the growth rates in TII Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections May 2019.

RPS and Coady Architects met with GCC's Transportation Department on 26 November 2020 and 4 March 2021 to discuss traffic and access. It was agreed at these meetings that approximately 116 spaces are to be provided including TAA requirements and that construction stage access will be taken via the road frontage on Ballymoneen Road.

5.4.1

Open Space

The GCDP standard for 'Residential' zoned land requires 15% of the total site area be allocated to open space. The open space requirements and provisions for this development are set out in the below table.

Table 3 - Open Space Calculation

Site Measurement	Open Space Requirement	Open Space Provision
2.08ha	15%	17.75% (0.36ha)

Please also see Site Areas Plan below, illustrating the open space provision at the proposed development. There are several open spaces within the development however, the space coloured in green below has been solely used in the open space calculation, as it is a high-quality, large scale open space which benefits from passive surveillance. The other green spaces are certainly useable and can be considered complimentary to the primary open space area.

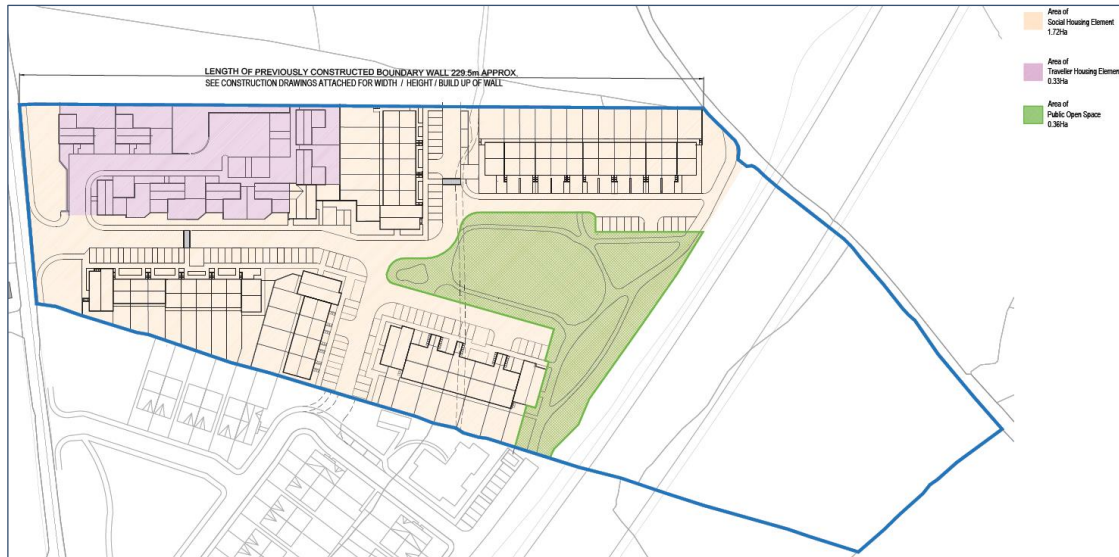


Figure 11 – Site Areas Plan

5.4.2 Landscaping

A Landscape Plan, Planting Schedule, and Site Furniture Plan have been prepared by Doyle & O'Troithigh and are submitted with this application. The suite of landscape documents demonstrates much consideration of the residential amenity of the finished development, in terms of visual appeal and how residents will experience living there.

As previously noted, there is a provision of 17.75% useable open space, with further open space areas at the gateway to the development to compliment this. Additionally, there are trees, hedges, shrubs and flowers planted throughout the scheme with the south-eastern edge of the site screened by a line of trees planting to provide a sense of enclosure and greening.

Please see below Landscape Plan and accompanying landscape documents submitted with the application.



Figure 12 - Landscape Plan

5.4.3 Landscape & Visual Impact

The subject site is currently an unused green field and is largely covered with grassland and scrub. There is currently no potential for recreation value in its current condition and no landmarks or features which represent a rare landscape character.

The nearest protected views are located approximately 2km south of the application site.

Given the existing and permitted pattern of development along Ballymoneen Road, it is submitted that the application site is tolerant of substantial change. Overall, the proposed development aims to improve the visual and recreational amenity of the wider area

5.4.4 Car Parking

Following a pre-planning meeting with Galway City Council Roads department, it was agreed that 116no. car parking spaces are proposed for the scheme, including TAA requirements.

Parking for Social Housing will be provided in accordance with GCC Development Plan Standards Section 11.3.1(g) at a rate of 1.5 grouped spaces per dwelling and 1 grouped visitor space per 3 dwellings.

Parking for Duplex/Apartments will be provided in accordance with “Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities Section 4.22 at a rate of 1 grouped space per dwelling and 2 grouped visitor spaces per 3 dwellings.

Parking for TAA Housing will be provided in accordance with specific client brief at 2 large, designated spaces per dwelling to accommodate large van and touring caravan.

5no. accessible spaces have been provided, 4no. of which are shared spaces associated with on-street grouped parking and 1 of which is directly assigned to the accessible ground floor 2-bedroom apartment.

The layout has been designed to ensure that parking spaces are evenly distributed throughout the site, are in close proximity to the dwelling units they serve and are all overlooked by a significant number of dwelling units.

Table 4 - Car Parking Figures

Development Type	GCDP Requirement	Required	Proposed
Residential	42 = 28no. Dwellings @ 1.5no. spaces per dwelling 35 = 35no. Apartments/Duplexes @ 1no. space per dwelling 16 = 8no. TAA Dwellings @ 2no. spaces per dwelling	116	116
Visitor	23 = 71no. Units @ 1no. visitor space per 3 units		

5.4.5 Bicycle Parking

The Galway City Development Plan states that in developments, where appropriate, a minimum of one cycle stand per 20 car spaces or over shall be provided. For every additional 50 car parking spaces, an additional cycle stand should be provided.

Table 5 - Cycle Parking Figures

Development Type	GCDP Requirement	Required	Proposed
Residential	4 = 4no. 1 Bed Apartments @ 1no. space per bedroom 8 = 4no. 2 Bed Duplex @ 1no. Space per bedroom 44 = 22no 2 Bed Apartments@ 1no. space per bedroom 15 = 5no 3 Bed Duplex@ 1no. space per bedroom 15 = 5no. spaces per 20 car spaces + 5no. spaces per each additional 50 car spaces	86	86

Cycle parking will be provided for the scheme in accordance with the provisions of the Galway City Development Plan – Section 11.3.1(h). Hence, 45no. cycle parking spaces for the upper floor units will be provided in shared storage rooms on the ground floor of the Type F buildings. The remainder of spaces required will be provided in individual rear gardens.

Visitor spaces will be provided in the form of shared bicycle racks distributed throughout the scheme.

5.4.6 Water Connection & Foul Water

Irish Water were contacted regarding water and wastewater connections at the site. A response was received from Irish Water on 5th August 2021 stating the following:

‘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.’

Existing foul water connection can be made to local network. However, some of the existing pipes will need to be diverted in order to facilitate the development, which has been agreed in principle by Irish Water.

Existing surface water connection can be made and will outfall to the diverted foul water network.

There is a water main owned by Irish Water located on the Ballymoneen Road. There is an existing watermain pipe which runs along Ballymoneen Road. Connection can be established to service the development.

5.4.7 Flood Risk Assessment

During a meeting with GCC Planning Department on 27 November 2020, John Doody, Senior Executive Planner, stated that a screening for FRA would be required for planning purposes. There have been no known anecdotal flood events on the site following consultations with members of the GCC project team. OPW and floodinfo.ie were consulted to find any instances of flooding at the proposed site. The mapping shows no such instances of flooding at the site. The closest instance of flooding is approximately 1.25km from the subject site. This event is associated with Kernaun River at Bolybeg, Bearn, Co. Galway (OPW Reference – Keeraun, Bolybeg, Bearn, Galway recurring (ID 2445)).

A site-specific Flood Risk Assessment has been prepared by RPS Consultants. The report is submitted with this application and concludes the following:

There is no evidence to show that the proposed site is liable to flooding. The site is located outside the fluvial areas as modelled under the PFRA and CFRAM programmes. There is also no evidence of groundwater flooding at the site. Any proposed drainage and culverting of the drain as part of the development is expected to be adequately designed to prevent any increase in flood risk to the site.

5.4.8 Ecology

A number of Ecological Reports have been prepared and are submitted with this application. Specifically, the enclosed Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect effects of the proposed development on the following European sites:

- Galway Bay Complex SAC
- Inner Galway Bay SPA

The above sites were identified by a screening exercise that assessed likely significant effects of a range of effects that may arise from the proposed development. The Appropriate Assessment investigated the potential direct and indirect impacts of the proposed works, both during construction and operation on the integrity and qualifying interests of the above European sites alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to help offset them. As a result of the Appropriate Assessment, it is concluded that, ensuring the avoidance and mitigation measures are implemented as proposed, the proposed development will not have a significant adverse effect on the above European sites.

As a result of the complete, precise and definitive findings in of this NIS, it is concluded, beyond reasonable scientific doubt, that the proposed development will have no adverse effects on the qualifying interests, special conservation interests and on the integrity and extent of Galway Bay Complex SAC and Inner Galway Bay SPA. Accordingly, the proposed development will not adversely affect the integrity of any relevant European site.

Additionally, the enclosed Biodiversity Report concludes that the potential residual impacts on ecological receptors will not be significant and no potential for the proposed development to contribute to any cumulative impacts on biodiversity when considered in-combination with other plans and projects was identified.

Provided that the proposed development is constructed and operated in accordance with the design described within this application, significant effects on biodiversity are not anticipated at any geographic scale.

6.

CONCLUSION

This Planning Report has been prepared to accompany a planning application for a social housing and Traveller Appropriate residential development on lands at Ballymoneen Road, Keeraun, Ragoon, Galway.

The proposed development is situated on lands zoned for residential (R) development with a stated objective *‘to provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods’*.

It is submitted that the proposed development fully accords with Galway City Council’s policies and zoning objectives relating to R zoned land, and with the proper planning and sustainable development of the area. It will provide an attractive, high quality, contemporary development which enhances the development of the western area of the city, as well as contributing some much-needed social housing units to the local and national stock as required by the Social Housing Strategy.

It is submitted that the proposed scheme includes planning gain for the area for the following reasons:

- The proposed development provides a total of 71 no. residential units on residential zoned land. It provides a response to Galway’s social housing needs in accordance with the adopted Housing Strategy 2017-23, which has been informed by the Core Strategy of the GCDP.
- The proposed scheme includes for linkage to Ballymoneen Road, developments to the south of the site, and to the Keeraun Boithrin Greenway. As such, the scheme is considered to be sustainably connected for all modes of transport.
- The applicant proposes to provide 8 no. Traveller Appropriate housing units in accordance with the requirements of the Traveller Accommodation Programme (2019-2024) and the GCDP, and in liaison with appointed spokespeople for the local Traveller Community.

We trust this application is in order to consideration by the relevant Authority.