



THORNTON O'CONNOR
TOWN PLANNING

Response to ABP Opinion

Planning Application

In respect of a Student Accommodation
Development at

Cúirt Na Coiribe,
Headford Road,
Terryland,
Galway,
County Galway

Submitted on Behalf of
Exeter Property Ireland III Limited

June 2020

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An Bord Pleanála
No. 64 Marlborough Street
Dublin 1
D01 V902

Tuesday, 16th June 2020

Dear Sir/ Madam,

RE: APPLICATION FOR PERMISSION FOR DEVELOPMENT OF HORIZONTAL AND VERTICAL EXTENSIONS TO THE EXISTING STUDENT ACCOMMODATION COMPLEX AT CÚIRT NA COIRIBE, HEADFORD ROAD, GALWAY, INCREASING THE QUANTUM OF BEDSPACES FROM 405 NO. TO 920 NO.

1.0 INTRODUCTION

1.1 Purpose of this Report

The purpose of this document is to respond to the issues raised by An Bord Pleanála in their notice of Pre-Application Consultation Opinion dated 13th September 2019 in relation to a proposed expansion of a student accommodation at Cúirt Na Coiribe, Headford Road, Terryland, Galway.

The Opinion states that it is the Board's determination that having considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the Planning Authority, that the documents submitted constitute required '*further consideration*' in relation to the design strategy and layout of Block Nos. 8 and 9. This report will outline the design team's response to these items and the design changes implemented for this application.

An Bord Pleanála has requested that 2 No. Statutory Consultees should be notified in the event of making an application (outlined in Section 2.0 of this Report). The Opinion also outlines specific information that An Bord Pleanála consider should be submitted with any planning application (outlined in Section 4.0 of this Report).

1.2 Changes to the Proposed Development following the Pre-Planning Consultation Stage

A number of changes were made to the proposed development subsequent to the Section 5 Pre-Planning consultation on the 27th August 2019 and the issuing of the Board's Opinion dated 13th September 2019. These changes are further expanded upon in Section 3.1.1 of this Report and in the Architectural Design Statement by TODD Architects. The following is a brief summary of the changes made to the proposed design:

- Changes to the height and massing of Accommodation Blocks, heights now range from 2 – 6 No. storeys (previous proposal sought 4 – 6 No. storeys).
- Reorientation of proposed windows, especially to Block Nos. 3 – 4 and 8 - 9.
- Expanded bicycle parking from 480 No. bicycle parking spaces (proposed at pre-application) to 656 No. spaces (proposed as part of this application).
- Further reduction in underground car parking to 43 No. car parking spaces (previously 69 No. at pre-application stage from 135 No. existing). A further 16 No. car parking spaces will be provided at surface level.
- Changes to the proposed cladding and materials on external elevations.



2.0 STATUTORY CONSULTEES

Pursuant to article 285(5)(a) of the *Planning and Development (Strategic Housing Development) Regulations 2017*, in their Opinion dated 13th September 2019 An Bord Pleanála stated that the following authorities should be notified in the event of the making of an application:

- Irish Water
- Transport Infrastructure Ireland (TII)

As requested, the Applicant has issued a copy of the application documentation to the above listed Statutory Consultees. We note that following enquiries we received confirmation that both parties only require soft copies of the application.

3.0 DESIGN CHANGES TO PROPOSED SCHEME

3.1 Design Response to the Board’s Opinion

The Board provided the following request for further consideration relating to the overall development and its specific impacts on neighbouring developments:

1. Interrelationship with adjoining amenities to the west and north east

'Further consideration of the design strategy and overall layout of Blocks 8 and 9 adjacent to the adjoining north-east boundary and blocks 3 and 4 adjacent to the western boundary, having particular regard to scale, massing, overlooking, and the relationship of these proposed blocks with established and potential future amenities of the neighbouring sites at these locations. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

Following this request there have been a number of amendments and alterations to the overall design of the development which seek to address these concerns and protect the amenity and development potential of neighbouring sites.

For a clearer understanding of the proposed design the following Figure 3.1 details the naming/ numbering of each component block of the proposed design.



Figure 3.1: Block Numbering System of the Proposed Cúirt Na Coiribe Development

(Source: TODD Architects, March 2020)

In regard to potential impacts on daylight/ sunlight please refer to Section 3.2.4 in response to a request for information in respect of Item No. 4 of the Board’s Opinion where these results are discussed in more detail.

3.1.1 Summary of Design Changes

The following Figure 3.2 details how the proposed design differs to that provided at Pre-Application consultation stage. This demonstrates how the building form has adapted generally to the points raised by the Board with greater detail provided in the following sections.

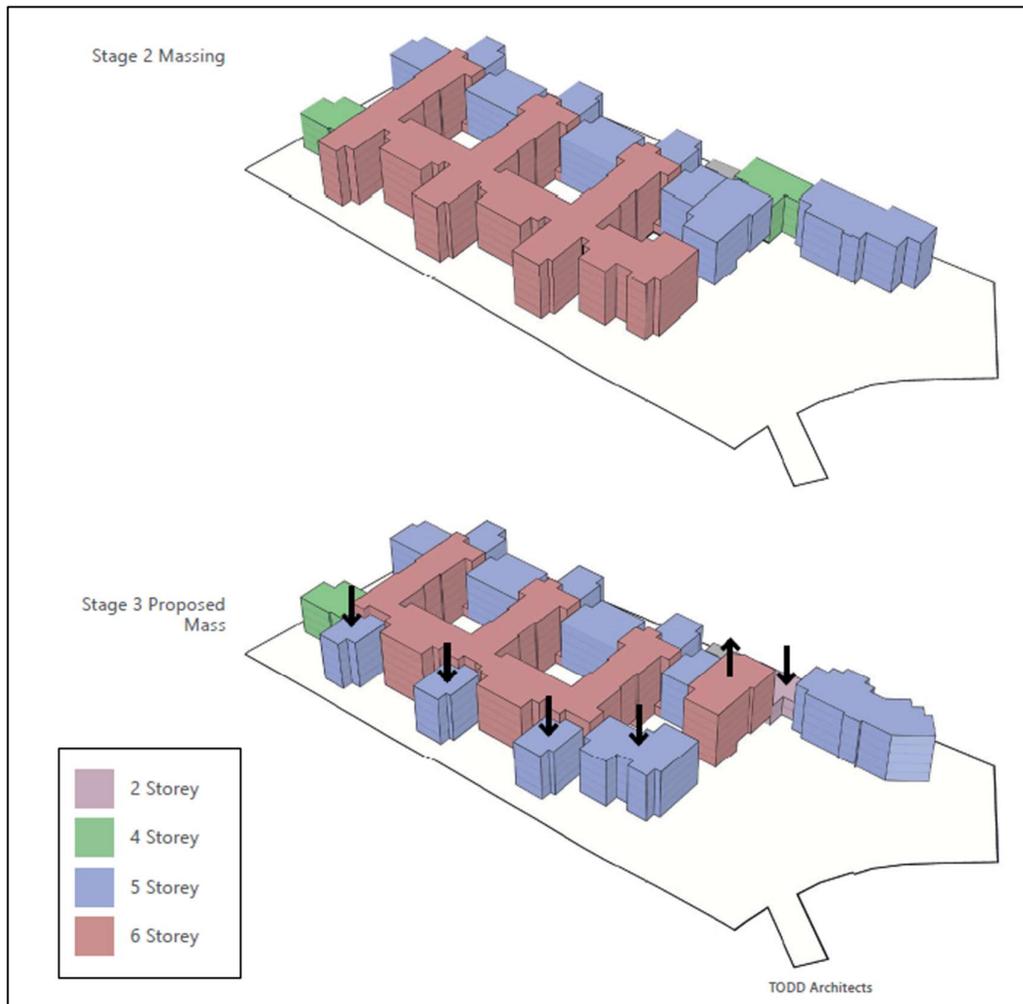


Figure 3.2: Design Changes to the Subject Scheme

(Source: TODD Architects, March 2020)

As demonstrated in Figure 3.2, there has been a reduction in height (1 No. storey) to several of the extension blocks, especially along the south-western boundary. The segment of Block No. 8 closest to the north-eastern boundary has also been reduced in height from 4 No. storeys to 2 No. storeys.

3.1.2 Changes to Blocks Nos. 8 and 9

A change in the articulation of Block No. 9 has also aided in providing a change to the window arrangement along the north-eastern boundary. Where previously windows were proposed facing the boundary directly, they have now been moved to staggered and off-set angles which now redirect views inward. This has reduced the possibility of overlooking and is demonstrated in the following Figure 3.3:

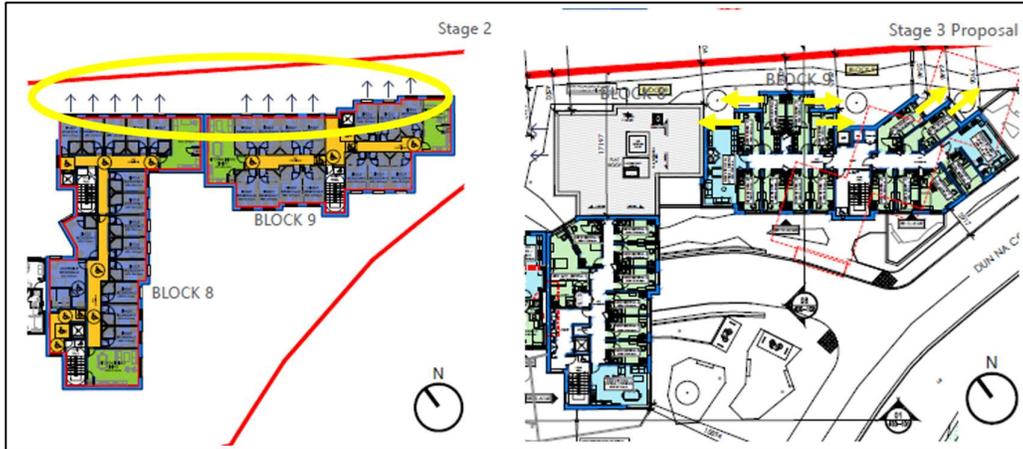


Figure 3.3: Changes in Design of the Proposed Block Nos. 8 and 9

(Source: TODD Architects, annotated by Thornton O'Connor Town Planning, 2020)

As can be seen within Figure 3.3, there are arrows demonstrating the direction of views available to each window along the north-eastern boundary. Additional gable treatments are now proposed along this frontage to limit direct overlooking of the neighbouring development. An additional reduction in height of the north-eastern segment of Block No. 8 to 2 No. storeys provides a gap in the overall massing and reduces any potential overbearing by the new proposed blocks.

The height and general length of Block No. 9 has not been altered due to the presence of sewage infrastructure underground, to the east at the entrance to Gort Na Coiribe (please refer to Figure 3.4 below). This foul water pumping station serves Gort Na Coiribe, Cúirt Na Coiribe and Dun Na Coiribe.



Figure 3.4: Boundary between Cúirt Na Coiribe (Left) and Gort Na Coiribe (Right)

(Source: Google Maps, Street View)

3.1.3 Changes to Block Nos. 3 and 4

The proposed extensions of Block Nos. 3 and 4 are directly adjacent the north-western boundary and further to the Opinion of the Board, there have been a number of changes provided through the design iterations of the proposed development.



Figure 3.5: Changes to Blocks 3 and 4 over the Course of the Development of this Proposed Development

(Source: TODD Architects, March 2020)

The proposed window opens for the new extension areas to Block Nos 3 and 4 have been narrowed to avoid overlooking. Of concern are rear gardens of properties to the west within Dun Na Coiribe which could be visible at an angle to any windows facing north-west. These windows are narrow feature windows provided to relive the rear façades. Additional light to the Living/ Kitchen/ Dining room areas is via windows on the north-east and south-west elevations. This in turn further limits the potential for overlooking.

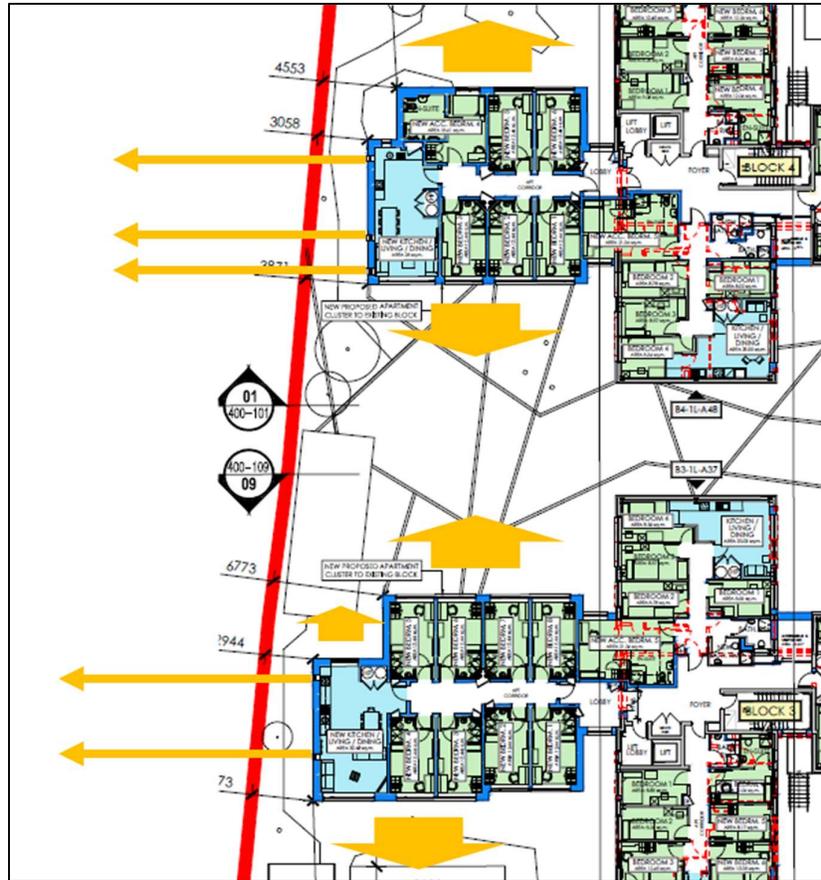


Figure 3.6: Views from Block Nos. 3 and 4 Extensions

(Source: TODD Architects, March 2020)

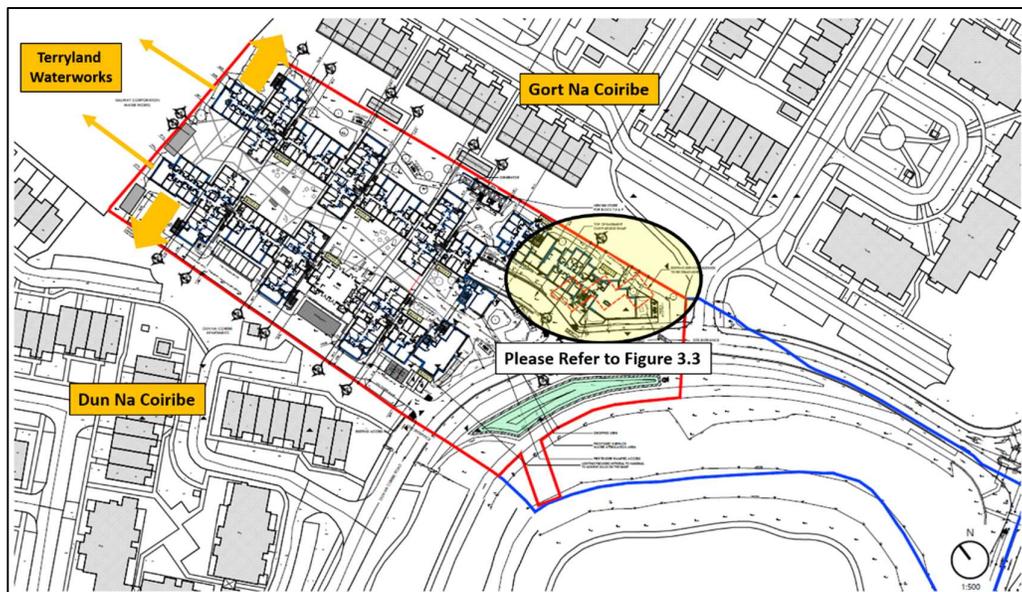


Figure 3.7: Site Layout with Views Highlighted

(Source: TODD Architects, March 2020)

3.1.4 Design Implementation and Overall Massing

How the massing of the development has been determined and amended is also informed by the stages of implementation of the proposed additions to the existing structure. The following stages describe how the new build elements are added to the existing structure and are also aligned to reduce overbearing, overlooking and massing.

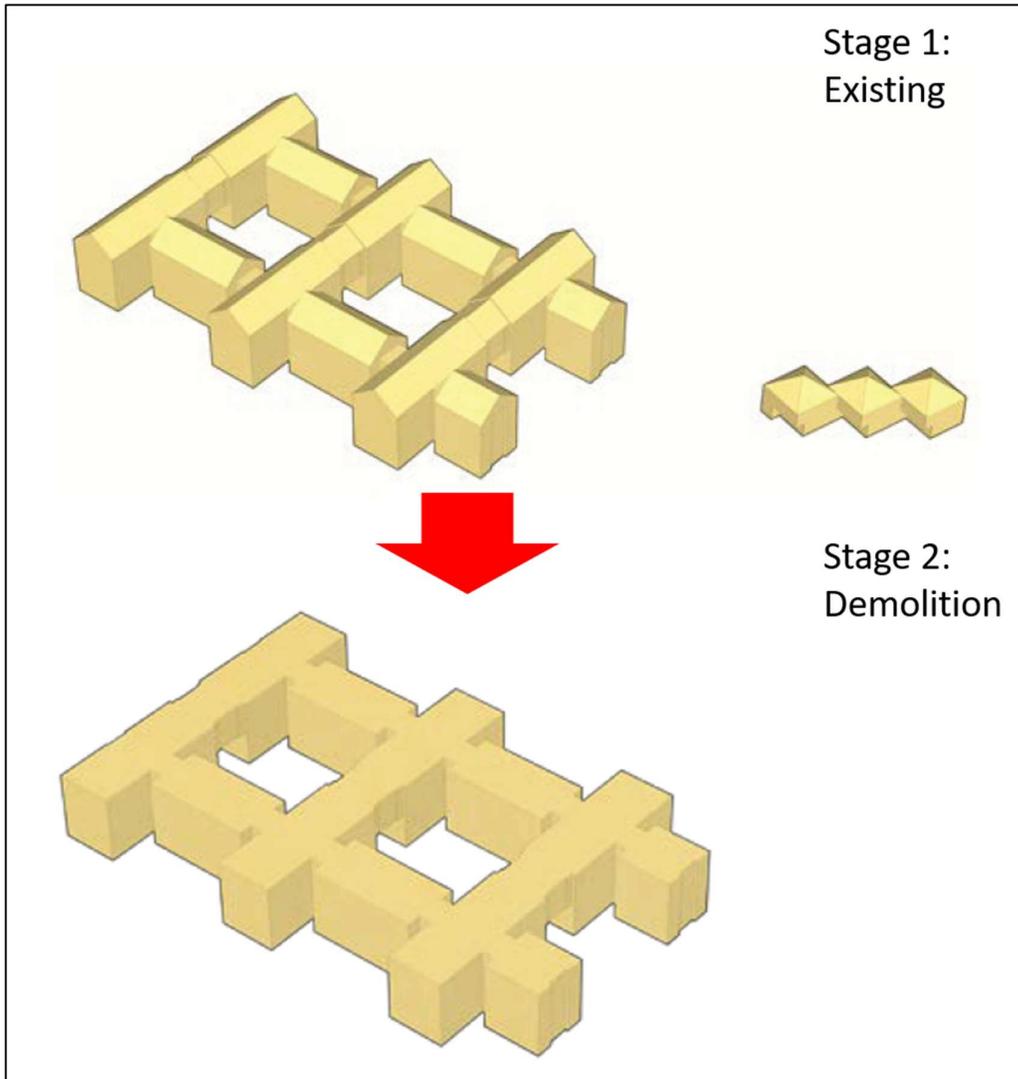


Figure 3.8: Stage Nos. 1 and 2 of the Design Process.

(Source: TODD Architects, March 2020)

As can be seen in Figure 3.8, the first stage of the design process is the demolition of the external services building followed by the removal of the attic level/ pitched roof. This allows for the existing Cúirt Na Coiribe to provide the base for a number of extensions both outward and vertically.

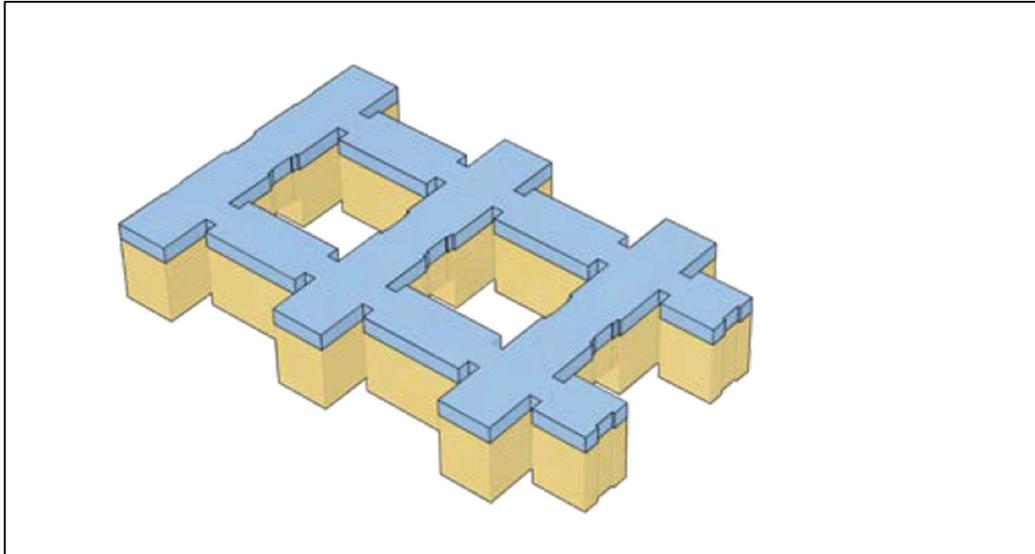


Figure 3.9: Stage No. 3 of the Proposed Design. Introduction of a new 4th Floor

(Source: TODD Architects, March 2020)

At stage No. 3, a new 4th floor is added to extend the Cúirt Na Coiribe complex vertically above the existing building.

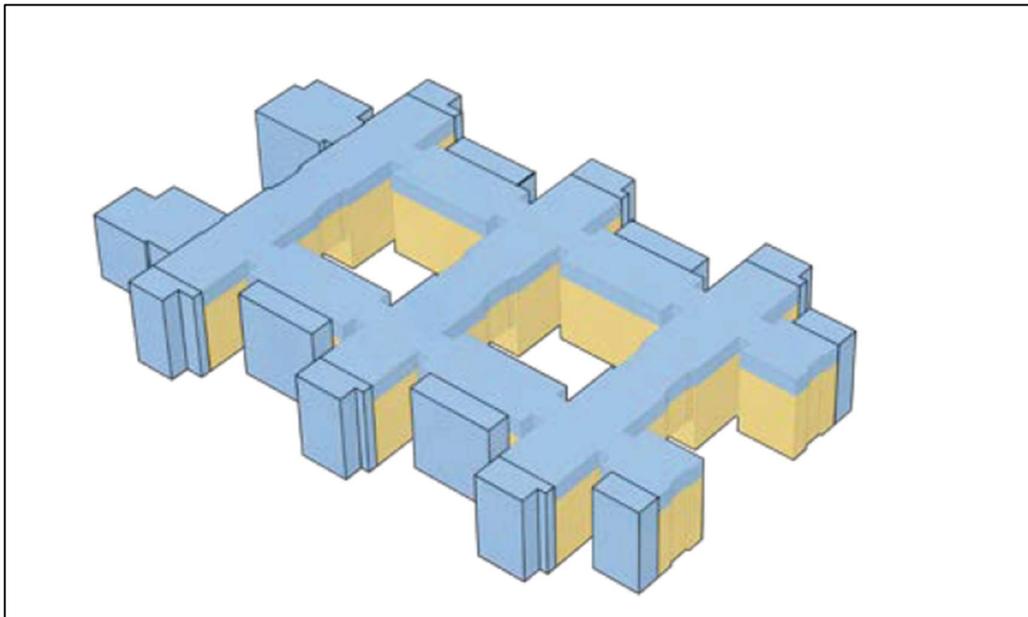


Figure 3.10: Stage No. 4 of the Proposed Design. New Extensions to all Blocks

(Source: TODD Architects, March 2020)

Following the addition of height to the existing building there will be additional wings to Block Nos. 3 and 4 along the north-western boundary. There will also be additional extensions to all other blocks which expand the living/ kitchen/ dining areas and also provide for the rearrangement or addition of bedrooms to each connected bedroom cluster/ apartment.

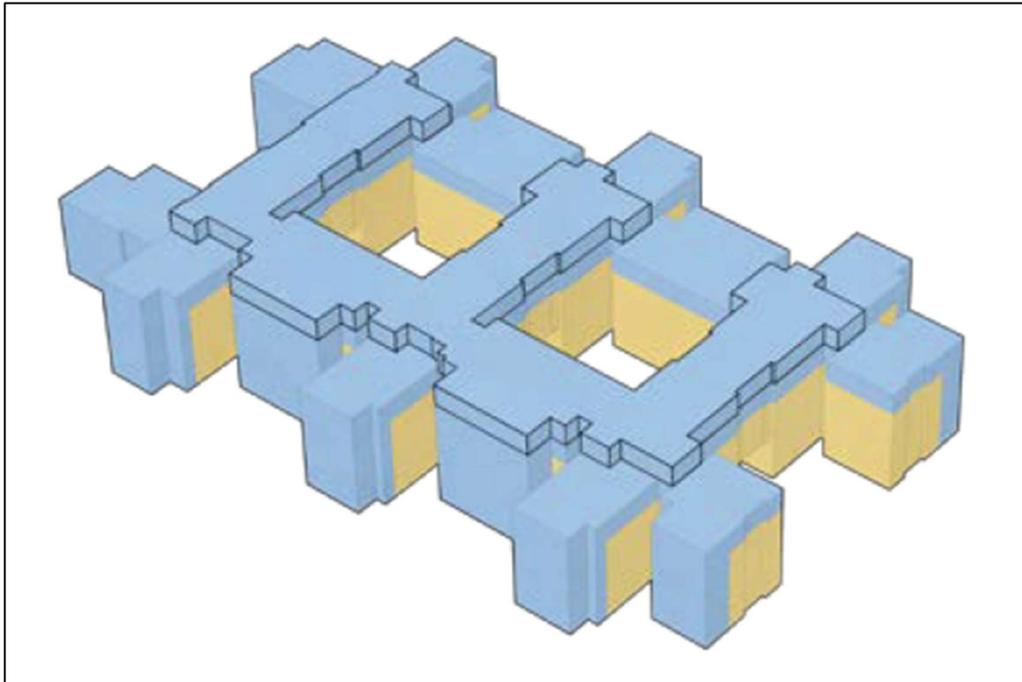


Figure 3.11: Stage No. 5-Additional set-back 5th Floor added and the creation of new roof levels.

(Source: TODD Architects, March 2020)

Additional height is subsequently added to the central areas of the complex providing for setbacks from the extensions and wings of each block. This is to reduce the impact of such massing and height on the surrounding developments.

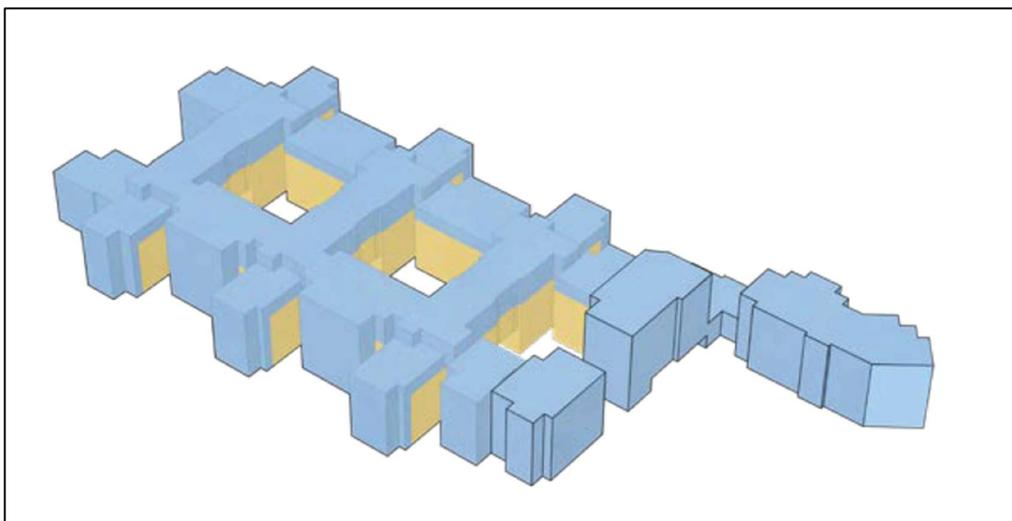


Figure 3.12: Final Stage, the Creation of Block Nos. 7, 8 and 9

(Source: TODD Architects, March 2020)

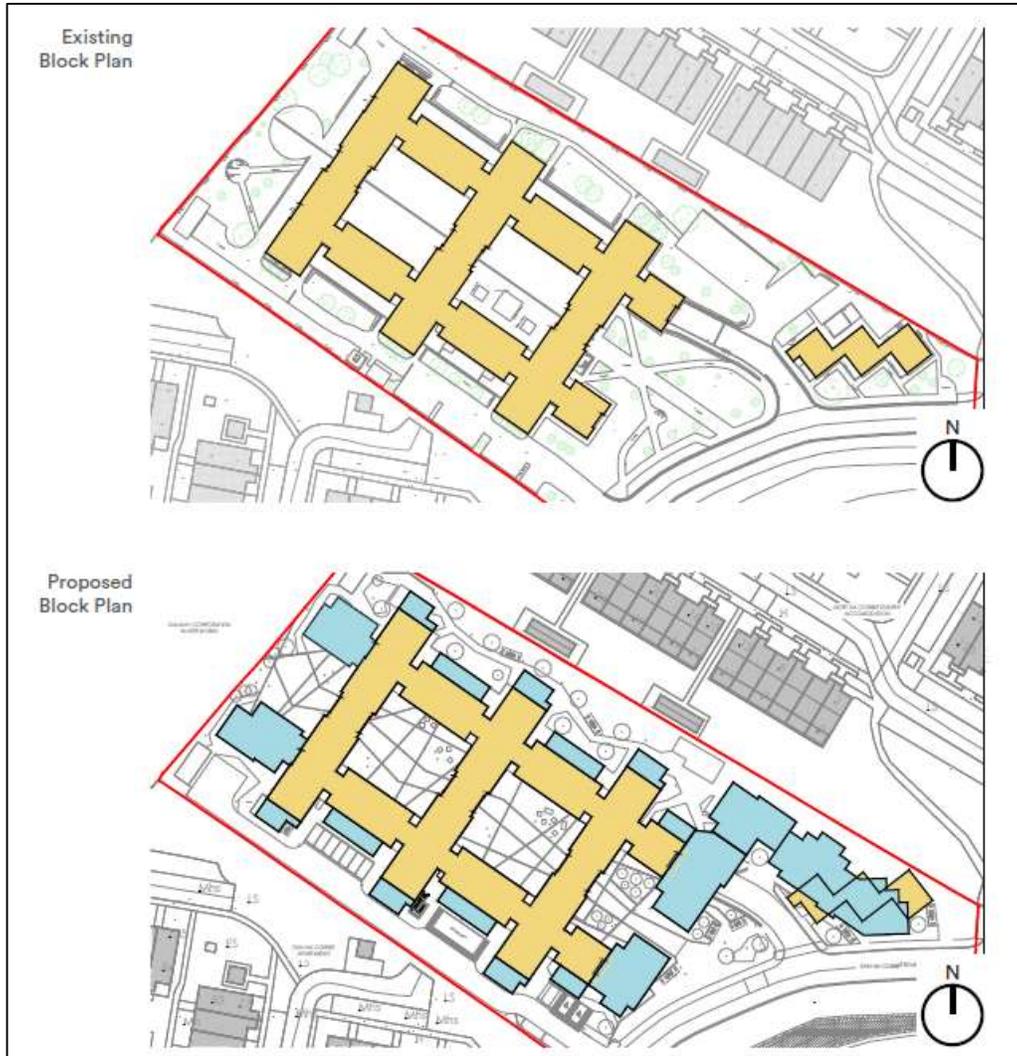


Figure 3.13: Existing and Proposed Block Arrangement Compared

(Source: TODD Architects, March 2020)

As demonstrated by Figure 3.13, the proposed new footprint elements (shaded light blue) are carefully positioned in relation to the available connections to the existing structure and distances to boundaries.

The proposed design approach seeks to make better use of a brownfield development whilst also protecting the surrounding residential amenity. This has been achieved through the careful design, modelling and the consideration of the inputs by specialist expertise throughout the design process.

4.0 SPECIFIC INFORMATION REQUIRED

4.1 Additional Reports, Documents and Drawings Requested by the Board

Further to the above request there were additional requests for supporting documentation, drawings and reports to support the design and justification for the proposed development.

An Bord Pleanála stated the following:

'Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the perspective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission.'

The following sections detail the extent of each report and output requested by the Board in support of the proposed development.

4.2.1 Item No. 1

'A student demand and Concentration Report having regard to established student accommodation developments and extant permissions for student accommodation developments.'

Applicant's Response

A 'Student Demand and Concentration Report' has been prepared by Thornton O'Connor Town Planning and included as part of this application.

As the *Student Demand and Concentration Report* demonstrates, there are several factors influencing current demand for Purpose Built Student Accommodation (PBSA) in the state and in the Galway Metropolitan Area. Driven by the success of local higher level institutions such as NUI Galway and the Galway and Mayor Institute of Technology, there is in excess of 23,000 No. students studying in Galway throughout the year.

These students are drawn from a wide geographic range from throughout the country and therefore require accommodation within the city to help to reduce long and unsustainable commuting patterns. As demonstrated by analysis of the Higher Education Authorities (HEA) *'Higher Education and Spatial Socio-Economic Profile (October 2019)*, there is an increasing number of students of both NUIG and GMIT who were resident outside of Galway County upon enrollment with their higher education institute.

Analysis of the existing and permitted student accommodation within Galway has also highlighted that there is a shortfall in available PBSA bedspaces within the city in the short to medium term. When faced with the growth in demand for higher education due to natural increases in demographics and an increasing internationalisation of Irish Higher Education Institutes, the overall student population of Ireland is set to grow substantially up to the year 2030.

It is with an outlook to these varying factors and an impetus to improve existing facilities that

the subject application seeks to grow Cúirt Na Coiribe from 405 No. bedspaces to 920 No. bed spaces.

4.2.2 Item No. 2

'A landscape master plan drawing at an appropriate scale that details specifically pedestrian/cycle permeability from the site and the connectivity of the site to the wider area including designated green networks. An open space drawing that shall include space for more active recreation for families. The public open space shall be usable space, accessible and overlooked to provide a degree of natural supervision. The open space provision shall clearly delineate public, semi-private and private open spaces.'

Applicant's Response

A revised 'Landscape Master plan' has been prepared by The Big Space Landscape Architects, including the provision of playscape elements, seating and lighting.

The proposed landscape plan will include areas of natural and passive play which will provide for the children of families visiting during the summer months to play, explore and engage with the surrounding landscaped areas.

The main campus and satellite campuses of NUIG are easily accessible from Cúirt Na Coiribe by walking and cycling. The most direct route to campus is via the Quincentennial Bridge to the south-west of the subject site, as demonstrated by the *Student Management Plan* prepared by Exeter Ireland Property III Limited:

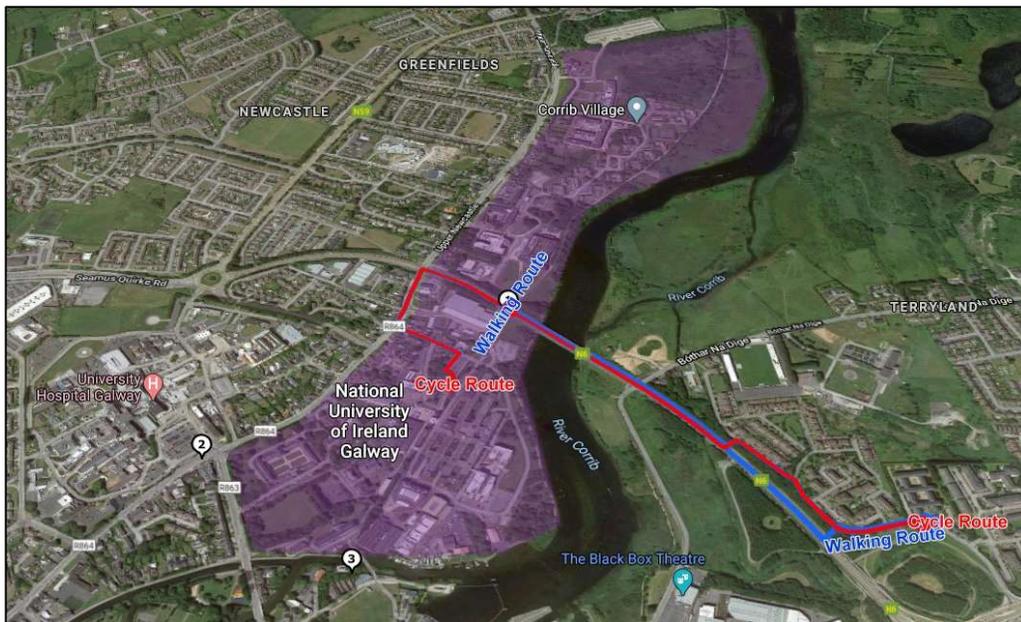


Figure 4.1: Walking and Cycling Routes to NUIG Galway

(Source: *Student Management Plan* prepared by Exeter Ireland Property III Limited, April 2020)

Pedestrian and cycle access to the site has been explored in detail by the *Planning Report*, the *Traffic & Transport Assessment* and *Mobility Management Plan* prepared by AECOM and within the *Architectural Design Statement* prepared by TODD Architects, as detailed by the extracted figures below:

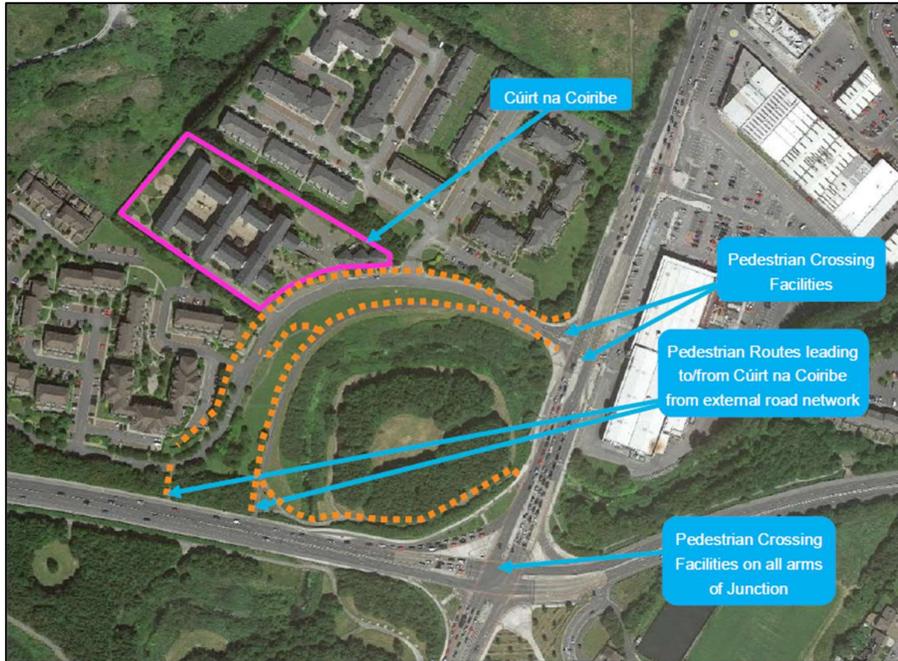


Figure 4.2: Pedestrian Connections/ Facilities Adjacent to the Subject Development

(Source: Traffic & Transport Assessment prepared by AECOM, March 2020)

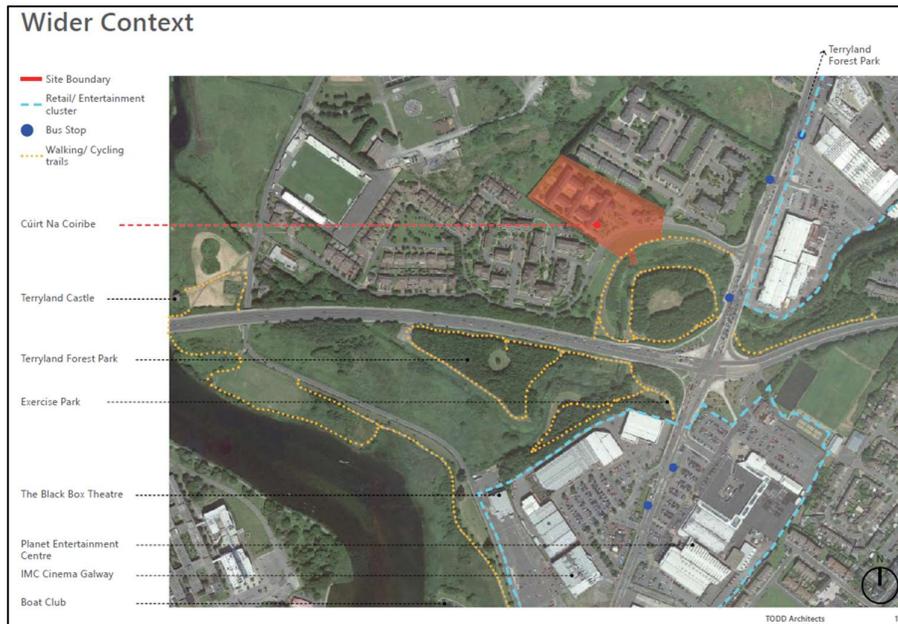


Figure 4.3: Wider Context Surrounding the Subject Site

(Source: Architectural Design Statement by TODD Architects, March 2020)

4.2.3 Item No. 3

'A report that specifically addresses the proposed building materials and finishes and the requirement to provide high quality and sustainable finishes and details.'

Applicant's Response

A report titled *'Architectural Design Statement'* has been prepared by TODD Architects and is provided as part of this planning application.

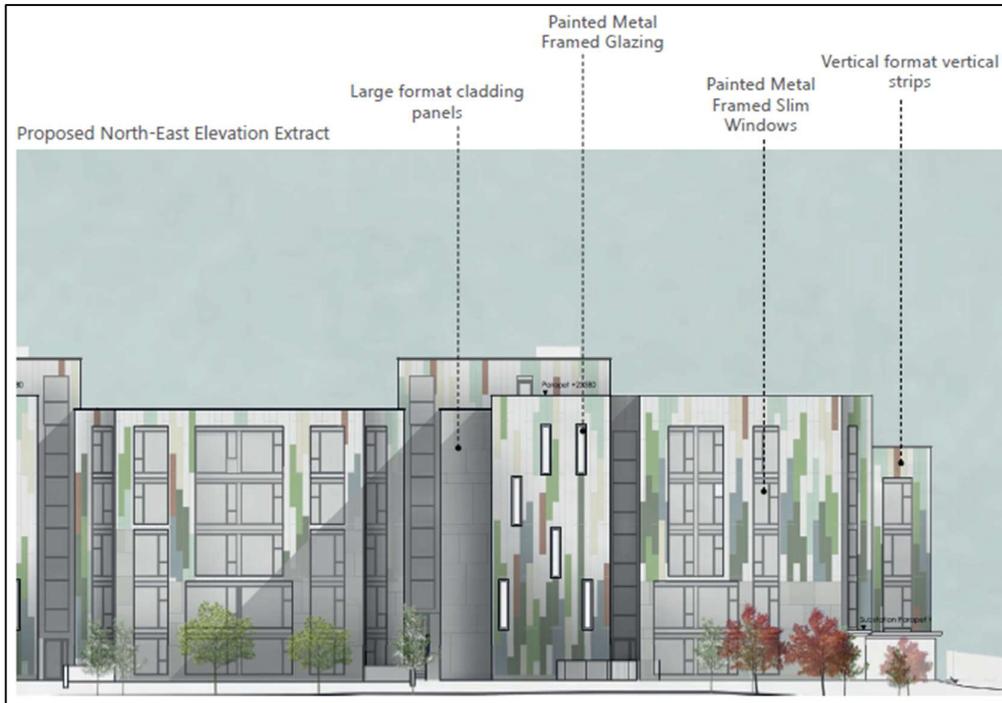


Figure 4.4: Proposed Materials of the Subject Design

(Source: TODD Architects, March 2020)

Within the *Architectural Design Statement* the following commentary is provided to explain the design choices involved in developing the proposed palette of materials for the external elevations:

'The current palette of materials principally consists of painted rendered external walls, with some feature limestone-clad elements, and pitched roofs, all of which seems appropriate for the scale of development. However, we are of the opinion that a more sophisticated palette of materials is merited in the proposed enlarged development.'

'The entire external appearance of the development will be significantly upgraded both in visual and thermal performance terms and there will be no difference between the existing buildings and the newly constructed elements.'

The following extract details the sustainability benefits of the proposed cladding:

'Rain screen cladding board is proposed for the whole development as a sustainable solution as it is made from recycled content and has a low embodied energy due to it being manufactured in Ireland. Rain screen also has a high insulation value as it allows for insulation to be placed on the exterior of a building – minimizing thermal bridging. It also can reduce heating and cooling costs of a building as the ventilation gap between the panel and insulation materials allows excessing heat & cold be dissipated. Rain screen cladding is also low maintenance with a long life expectancy.'



Figure 4.5: Design Evolution of External Elevations over the course of the project

(Source: TODD Architects, March 2020)

As can be seen in Figure 4.4 and 4.5 there has been a considered evolution in the chosen materials over the course of the development of this project. Further justification for the proposed cladding and other materials can be found within the *Architectural Design Statement*.

4.2.4 Item No. 4

'A report that addresses issues of residential amenity (both existing residents of adjoining development and future occupants), specifically how the development will limit the potential for overlooking, overshadowing and overbearing. The report shall include full and complete drawings including levels and contiguous site cross-sections and elevations showing the relationship between the proposed development and adjacent developments.'

Applicant's Response

A report titled *'Architectural Design Statement'* has been prepared by TODD Architects and is provided as part of this planning application, which provides a detailed response to this Item.

A report on *'Daylight/Sunlight and Shadows'* has been prepared by 3D Design Bureau and is also provided as part of this planning application.

Current Residential Amenity - Cúirt Na Coiribe

Figure 4.6 details the existing amenity available at Cúirt na Coiribe. As the permitted development was completed circa 2004 as self-catering student and tourism apartments, there was less of an established precedent for residential amenity for student accommodation on a national basis. Since the completion of Cúirt Na Coiribe, there has been a number of more contemporary developments of purpose built student accommodation within Ireland. These developments tend to provide a greater quantum of residential amenities that are not currently available within the existing development. This has been provided through a number of rooms, facilities and specific amenities which help to provide for the entertainment, comfort and support for resident within their curtilage.

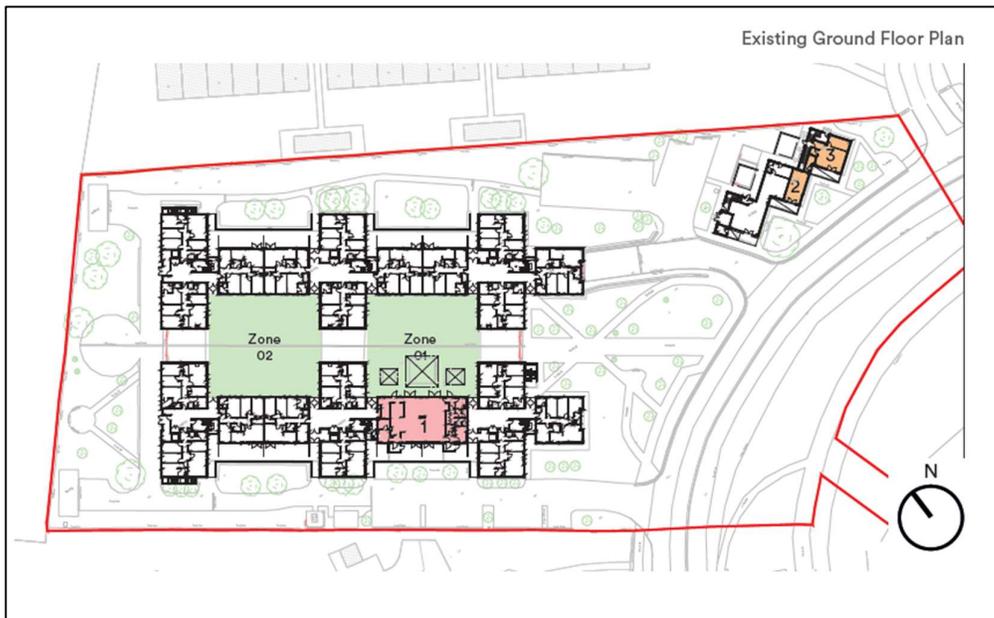


Figure 4.6: Existing Amenity Spaces in Cúirt Na Coiribe

(Source: TODD Architects, March 2020)

The existing amenity spaces are as follows:

1. Scotty's Restaurant 170.15 sq m
2. Laundrette 19.42 sq m
3. Reception 40.13 sq m

This is also supplemented by the landscaped areas surrounding the existing development of 1,007 sq m. In total the existing amenities equate to 1,238.7 sq m throughout the development.



Figure 4.7: Proposed Amenity Spaces

(Source: TODD Architects, March 2020)

The proposed development makes use of the underutilised underground car park to expand upon available space for additional amenities. In turn the new basements of Block Nos. 7, 8 and 9 provide for further resource areas and amenities.

Basement

1. Cinema	34.8 sq m
2. Party/ Function Room	298 sq m
3. Gymnasium/ Fitness Room	381.5 sq m
4. Games Room	64.53 sq m
5. Launderette	25.4 sq m
6. Multifunctional Space	118 sq m
7. Multifunctional Space	46.34 sq m
8. Library/ Study Space	124.44 sq m
9. Study Space	156 sq m
10. Study Space	146 sq m

Ground Floor

11. Existing Scotty's Restaurant	172.2 sq m
12. Café / Restaurant	123 sq m
13. Students Reception	40.36 sq m
14. Student Lounge/ Coffee Dock	129.76 sq m

There is 1,688 sq m of new proposed indoor amenity space (excluding the existing Scotty's Restaurant).

There will also be new landscaping provided to the remaining external amenity areas which will bring more of this space into usable functions for residents. This external amenity equates to 1,393 sq m. The total amenity space for the subject scheme will be 3,253 sq m.

Impacts on Daylight and Sunlight on Surrounding Developments

In conjunction with the redesign of the proposed scheme there has been a re-assessment of impacts on neighbouring properties in regard to daylight / sunlight.

This has seen an improvement in the Vertical Sky Component (VSC) achieved by the assessed windows of properties within Gort Na Coiribe compared to the pre-application design. This has been accomplished through the reduction of heights in some locations, such as Block No. 8, and changes in the massing of the proposed Block No. 9.

At pre-application the summary of results was as follows:

'Of the 182 windows assessed for impact to VSC, 165 have met the BRE guidelines to impact to VSC. The impact to these windows would be considered imperceptible. All of the windows that did not meet the BRE guidelines on impact to VSC would encounter a slight level of impact.'

The findings of the updated assessment of neighbouring properties states the following:

'Of the 182 windows assessed for impact to VSC, 178 have met the BRE guidelines on impact to VSC. The impact to these windows would be considered imperceptible. All 4 windows that did not meet the BRE guidelines on impacts to VSC would encounter a slight level of impact.'

This demonstrates that through a reduction in heights and a modulation of the proposed design there has been a reduction in impacts on the VSC reaching neighbouring developments. A total of 13 No. windows have seen a reduction in impact as a result of changes to the proposed design.

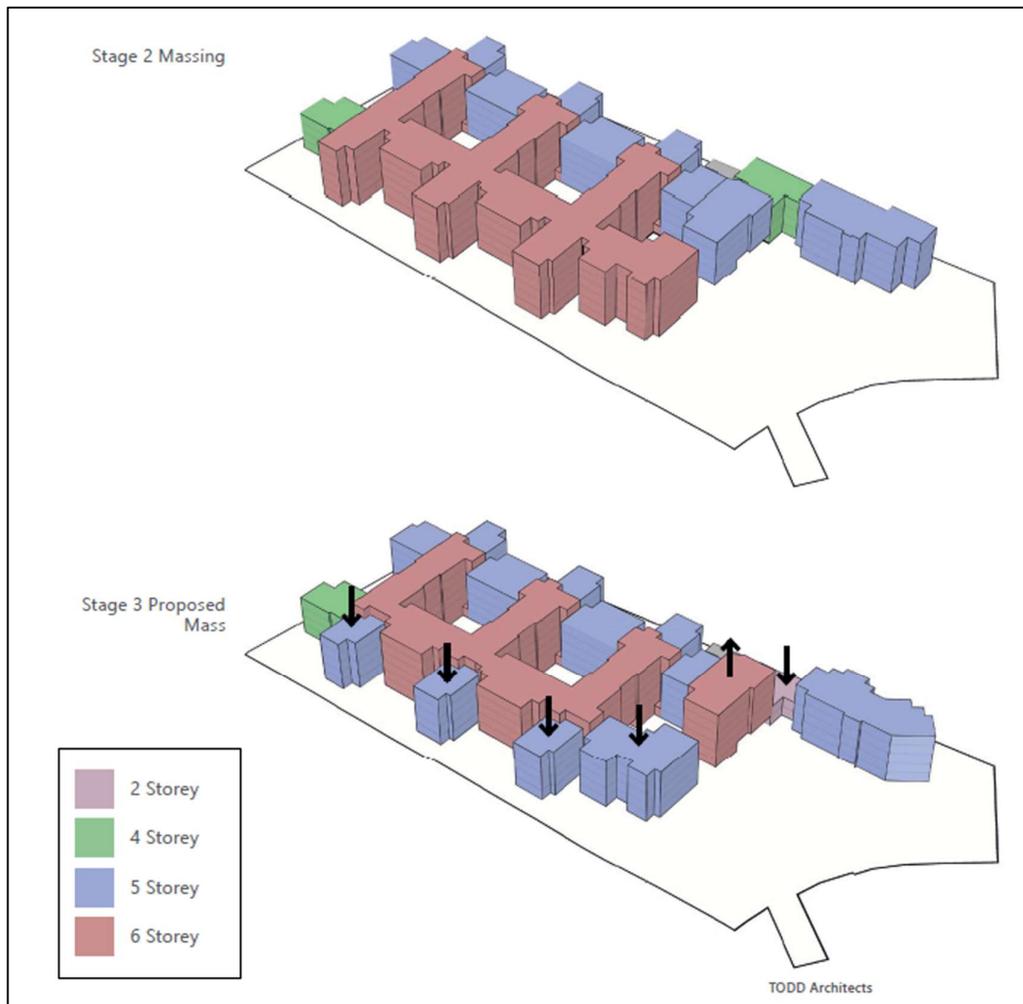


Figure 4.8: Changes to the Proposed Design. Note Block No. 8 along the north-eastern boundary which has reduced to 2 No. Storeys.

(Source: TODD Architects, March 2020)

Neighbouring Residential Amenities and Daylight/ Sunlight

The neighbouring amenity spaces of Gort Na Coiribe were assessed for the potential impact of the proposed development. The following extract provides the summary results from the *Daylight and Sunlight Analysis*:

'This study assessed the impact the proposed development would have on the levels of sunlight received in the amenity areas behind 1-36 Gort Na Coiribe. To calculate this, the percentage of the green space which can receive two hours or more of direct sunlight

on March 21st has been calculated in both the baseline and proposed states. A comparison between these values will determine the level of impact.

As the amenity areas to the rear of 1-36 Gort na Coiribe, capable of receiving 2 hours sunlight on March 21st are considerably above the recommended level as per the BRE guidelines in the baseline state. The impact to this figure caused by the proposed development would be marginal and these areas would remain adequately sunlit throughout the year. The impact caused by the proposed development should be considered imperceptible.'



Figure 4.9: Amenity Areas Assessed as part of Daylight/ Sunlight Analysis

(Source: *Daylight and Sunlight Analysis* by 3D Design Bureau, March 2020)

These results demonstrate that the proposed design and its impact on neighbouring properties of Gort Na Coiribe are within BRE guidelines, and are unlikely to contribute to a reduction in residential amenity.

Overbearing

As demonstrated in Section 3.0 there has been several reductions in proposed height and massing throughout the scheme. This provides for reductions in the potential for overbearing at several locations, particularly the relationship of Block No. 8 and the north-eastern boundary.

This is also applicable to the setting back of heights along the south-western boundary where the new extension areas reach a height of 5 No. storeys with a setback level towards the middle of the overall massing. This helps to limit the appearance of bulk and height along this frontage onto Dun Na Coiribe.



Figure 4.10: Contextual Elevation of the North-Western Boundary.

(Source: TODD Architects, March 2020)

As can be seen in Figure 4.10 the reduction in massing to the south-western boundary with Dun Na Coiribe has provided for an overall less overbearing building form at this location.

As discussed in Section 3.1 there have been several changes to the orientation and type of window opens close to boundaries which reduces the potential for overlooking on neighbouring properties and their amenity spaces. This is most notable to the northern boundary close to Block Nos. 8 and 9 and to the north-western boundary adjacent to Block Nos. 3 and 4.

4.2.5 Item No. 5

'Additional documentation relating to appropriate flood risk assessment that demonstrates the development proposed will not increase flood risk elsewhere, and if practicable, will reduce overall flood risk. The flood risk report shall have regard to all site investigations and constraints for the site development. A flood risk assessment shall be prepared in accordance with the 'The Planning System and Flood Risk Management (including associated 'Technical Appendices').'

Applicant's Response

An updated '*Flood Risk Assessment*' has been prepared by AECOM and is included as part of this planning application in accordance with the appropriate standards and guidelines relating to '*The Planning System and Flood Risk Management (2009)*'.

4.2.6 Item No. 6

'A site-specific Student Management Plan which includes details on management outside of term-time.'

Applicant's Response

The applicant *Exeter Property Ireland III Ltd* has prepared a document entitled '*Student Management Plan*', which has been included as part of this planning application.

4.2.7 Item No. 7

'A site layout drawing indicating what areas, if any, are to be taken in charge by the Local Authority.'

Applicant's Response

It is not intended that any part of the development will be taken in charge. It will all be maintained in the ownership of the land owner, and maintained by the property management company operating the Cúirt Na Coiribe Student Accommodation.

4.2.8 Item No. 8

'Details of Public Lighting.'

Applicant's Response

The Table 3.1 below details the drawing prepared by AECOM detailing the design and layout of Public Lighting proposed as part of this planning application.

The following drawing has been produced as part of the '*Lighting Report*' as part of this application.

Lighting Layout Drawings			
Drawing Number	Title	Scale	Page Size
PR354607-ACM-00-XX-DR-EL-020002	External Public Lighting Layout	1:250	A1

The '*Lighting Report*' which has been prepared and included as part of this planning application, and concludes the following:

'The Cuirt Na Coiribe student accommodation lighting design meets all the relevant standards and requirements for the purposes of planning.'



5.0 CONCLUSION

It is our professional opinion that the aforementioned responses, along with the supporting technical reports and drawings enclosed with this Planning Application, addresses the items raised by An Bord Pleanála's Opinion dated 13th September 2019.

We submit that the proposed expansion of a student accommodation on the site of Cúirt Na Coiribe, Headford Road Galway represents the proper planning and sustainable development of this existing building and partial brownfield/ infill site.

Signed:

A handwritten signature in black ink that reads "Patricia Thornton".

Patricia Thornton
Director
Thornton O'Connor Town Planning