



THORNTON O'CONNOR
TOWN PLANNING

Statement of Consistency

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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1.0 INTRODUCTION

1.1 Multi-Disciplinary Team

Thornton O'Connor Town Planning in association with TODD Architects, 3D Design Bureau, AECOM, The Big Space, Arborcare, JBA Consulting, DCON and AWN as detailed in the table below, have been retained by Exeter Ireland Property III Limited to prepare a planning application in respect of a proposed Student Accommodation development at the Cúirt Na Coiribe, Terryland, Headford Road, Galway.

COMPANY NAME	DOCUMENTS PREPARED
Thornton O'Connor Town Planning	<ul style="list-style-type: none"> → Planning Report → Statement of Consistency → Environmental Report → Student Demand and Concentration Report → Response to An Bord Pleanála Opinion
TODD Architects	<ul style="list-style-type: none"> → Architectural Drawings → Architectural Design Statement
3D Design Bureau	<ul style="list-style-type: none"> → Daylight and Sunlight Analysis → Photomontages and CGIs
AECOM	<ul style="list-style-type: none"> → Traffic & Transport Assessment → DMURS Statement of Compliance → Mobility Management Plan → Infrastructure Report → Stage 2 Flood Risk Assessment → Geotechnical Report → Energy Statement → Lighting Study
The Big Space	<ul style="list-style-type: none"> → Landscape & Visual Impact Assessment → Landscape Masterplan → Landscape Development Report
JBA Consulting	<ul style="list-style-type: none"> → Screening for Appropriate Assessment → Natura Impact Statement
Arborcare	<ul style="list-style-type: none"> → Tree Constraints → Arboricultural Impact Assessment
DCON Safety Consultants	<ul style="list-style-type: none"> → Draft Construction Management Plan → Draft Construction & Demolition Waste Management Plan
AWN	<ul style="list-style-type: none"> → Operational Waste Management Plan
O'Herlihy Access Consultancy	<ul style="list-style-type: none"> → Disability Access Statement
Exeter Property Ireland III Limited	<ul style="list-style-type: none"> → Student Management Plan

The subject lands have recently been purchased by our Client with the intention of developing a high-quality extension to an existing purpose-built student accommodation development. The proposed development comprises the provision of 520 No. new student bedspaces in addition to the existing 405 No. bedspaces, to provide a total of 920 No. bedspaces.

1.2 Purpose of this Statement

The *Planning & Development (Strategic Housing Development) Regulations 2017* specify that all SHD applications must be accompanied by a statement demonstrating that the proposal is consistent with the relevant National, Regional and Local policies. This Statement of Consistency Document demonstrates that the proposed scheme providing an additional 520 No. student bedspaces is fully consistent with national, regional and local planning policy.

The following documents are discussed throughout this Statement:

National

1. *Project Ireland 2040 – National Development Plan 2018-2027;*
2. *Project Ireland 2040 - The National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
4. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
5. *Guidelines on Residential Developments for 3rd Level Students (1999);*
6. *National Student Accommodation Strategy (2017);*
7. *Urban Design Manual – A Best Practice Guide (2009);*
8. *Design Manual for Urban Roads and Streets (2013);*
9. *The Planning System and Flood Risk Management (2011).*

Regional

10. *Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly 2020;*
11. *Metropolitan Area Strategic Plan for Galway City and Suburbs;*

Local

12. *Galway City Council Development Plan 2017-2023.*

It is through adherence to these documents and reference to their various tests, policies and criteria that this document aims to demonstrate how the proposed development is consistent with National, Regional and Local Planning guidance.

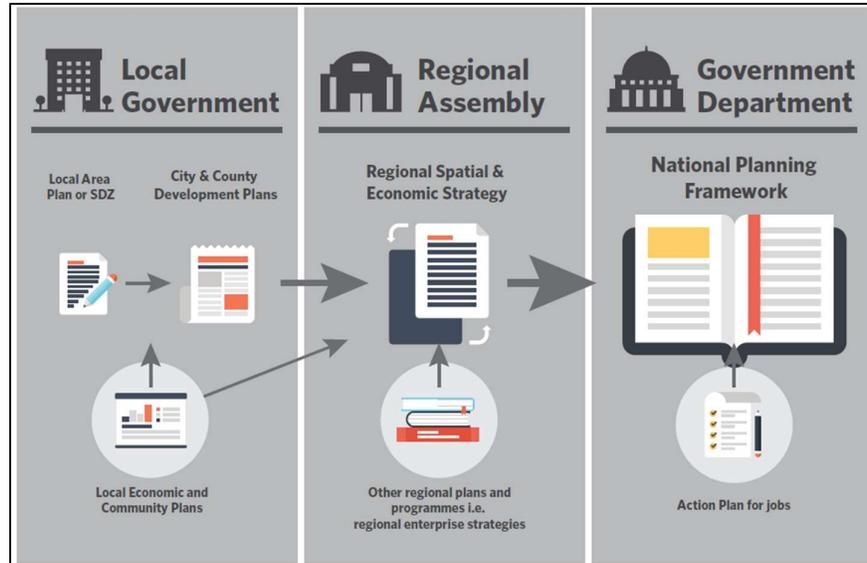


Figure 1.1: National Planning Hierarchy

(Source: National Planning Framework)

1.3 Layout of this Report

The following is the overall heading under which the above mentioned documentation will be discussed:

- Section 2.0 Description of Development;
- Section 3.0 National Policy;
- Section 4.0 Regional Policy;
- Section 5.0 Local Policy; and
- Section 6.0 Conclusion.

2.0 DESCRIPTION OF THE DEVELOPMENT

The proposed development will consist of: the demolition of the two storey building (582 sq m) at the entrance to the scheme towards the eastern boundary of the site and the removal of the fifth storey (attic) level (1,123 sq m) of the main building; and the provision of horizontal and vertical additions to and extensions of the main existing building providing 920 No. bedspaces (an additional 515 No. student accommodation bedspaces) in 868 No. bedrooms; ancillary student accommodation spaces at basement and ground floor level measuring 1,688 sq m and including gym/fitness studio, games room, library/study spaces, multi-functional spaces, café/restaurant, and student lounge spaces; all provided in a single building in 9 No. linked blocks ranging in height from 2 No. to 6 No. storeys (gross floor space of 24,693 sq m plus basement car-parking (2,443 sq m)).

The scheme also proposes 59 No. car-parking spaces (43 No. basement and 16 No. surface spaces); 656 No. cycle parking spaces; 5 No. motorcycle parking spaces; external student amenity spaces; hard and soft landscaping; attenuation pond/wetland area; boundary treatments; plant; diversion of services and all associated works above and below ground.

3.0 NATIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of National Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against the following guidelines and standards:

- *Project Ireland 2040: The National Development Plan 2018-2027;*
- *Project Ireland 2040: National Planning Framework;*
- *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
- *Urban Design Manual -A Best Practice Guide (2009);*
- *Design Manual for Urban Roads and Streets (2013);*
- *National Student Accommodation Strategy (2017);*
- *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018); and*
- *The Planning System and Flood Risk Management (2009).*

3.1 **Project Ireland 2040: The National Development Plan 2018-2027**

The *National Development Plan 2018 -2027* document underpins the overarching goals of the *National Planning Framework*. The plan sets out how Strategic Investment Priorities are aligned with public capital investments over the next ten years to achieve each of the National Strategic Objectives as set out in the *National Planning Framework*. The context of the National Development Plan is illustrated in Figure 3.1 below.

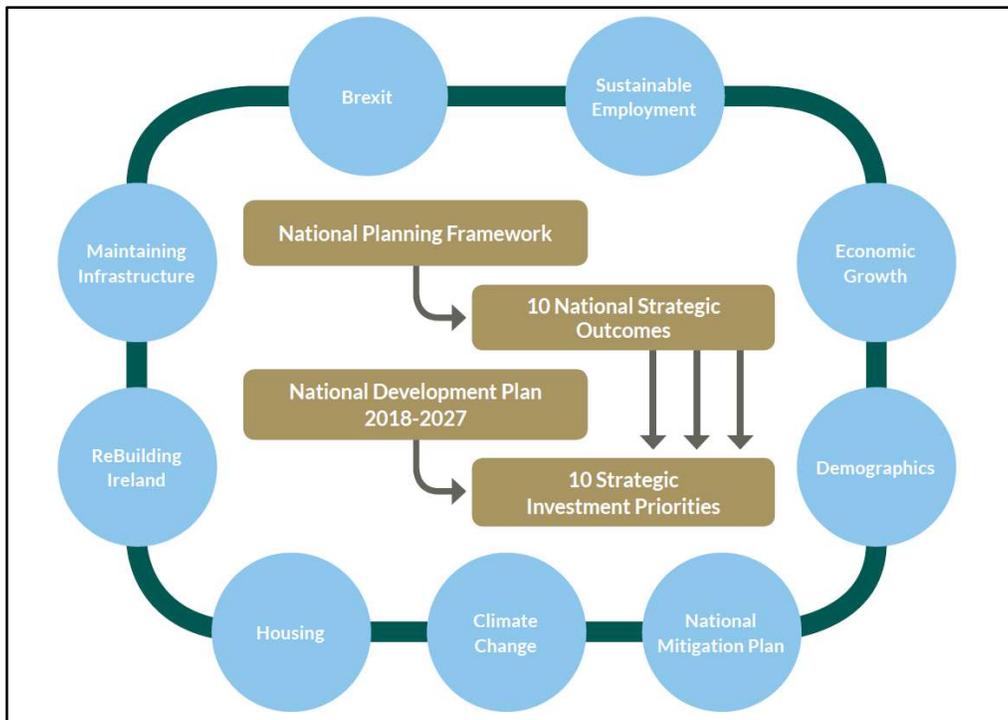


Figure 3.1: Context of the National Development Plan.

(Source: Project Ireland 2040 National Development Plan 2018 -2027)

The National Planning Framework published alongside the National Development Plan has 10 No. National Strategic Outcomes. The relevant strategic outcomes and objectives are discussed below at Section 3.2 of this report.

3.1.1 National Strategic Outcome No.4: Sustainable Mobility - *Galway BusConnects*

The *National Development Plan 2018-2027* dedicated funding for the implementation of the *Galway Transport Strategy* (2016) by aligning it with similar projects occurring in Dublin City and Cork City, known as '*Bus Connects*'. This is a statutory funding commitment to the design and implementation of bus network redesign for Galway City to meet its future transport needs.

'Galway BusConnects will deliver a rationalised network of five high-performing cross-city routes. All routes will serve major city centre attractions as well as linking all major destinations across the city. Galway BusConnects will comprise next generation bus lanes, enhanced services, cashless fares and account-based ticketing. As part of this programme delivery, a network of park and ride sites, serviced by more efficient bus network, will be put in place. Galway BusConnects will also encompass a variety of city centre public realm enhancements, will enhance the overall transport experience and improve the attractiveness of the city centre.'

This commitment for transport investment will see improvements to city access near to the subject site, with at least 1 No. bus route utilising the Headford Road to enter the city from the northern suburbs.

3.1.2 National Strategic Outcome No. 6: A Strong Economy supported by Enterprise, Innovation and Skills.

In supporting the objective of NSO No. 6, the following projects and programmes are proposed by the *NDP* which will support Higher Education Institutes in the Galway City Region.

*'The NPF sets the ambition of ensuring that jobs growth in the Eastern and Midland Regional Assembly area is at least matched by that of the **Northern and Western** and Southern Regional Assembly areas combined, a total of 660,000 No. new jobs. This ambition for Ireland's regions will be achieved **by investing**, through the National Development Plan, **in making places attractive for enterprise investment**, deeply rooted sectoral clustering driven by effective collaborations and **built around investments in Higher Education and Further Education Training (FET)**. The way in which skills and talent are nurtured, developed, deployed and retained is central to both national and regional ambitions.'*

The investment in Higher Education by the state is primarily focused on connections with enterprise and employment clusters in specific skill sectors, Research and Development centres and the investment in new Technical Universities and improvements to Institutes of Technology.

Specific Research Centres which include Galway based Higher Education Institutes are as follows:

- **INSIGHT:** research across data analytics, machine learning, artificial intelligence and related ICT challenges, hosted across University College Dublin (UCD), DCU, **National University of Ireland Galway (NUIG)**, UCC, NUIM, TCD and Royal Irish Academy.
- **CONFIRM:** research centre for advanced, smart manufacturing; application of sensor technology to manufacturing and industry 4.0 – hosted by UL in partnership with Tyndall National Institute, UCC, CIT, **NUIG**, Athlone IT, NUIM and Limerick IT.
- **CURAM:** research into next generation medical devices, biomaterials, drug delivery, device design- hosted by **NUIG** with UCD, UCC, TCD, UL and RCSI.

The partnership between Higher Education Institutes for these research programs shows a commitment to co-operation and investment in undergraduate and post-graduate Research and Development across multiple sectors and disciplines. The highlighted programmes will contribute to the clustering of employers within the Galway City region who are attracted by the quality and quantity of well-educated graduates produced in the region.

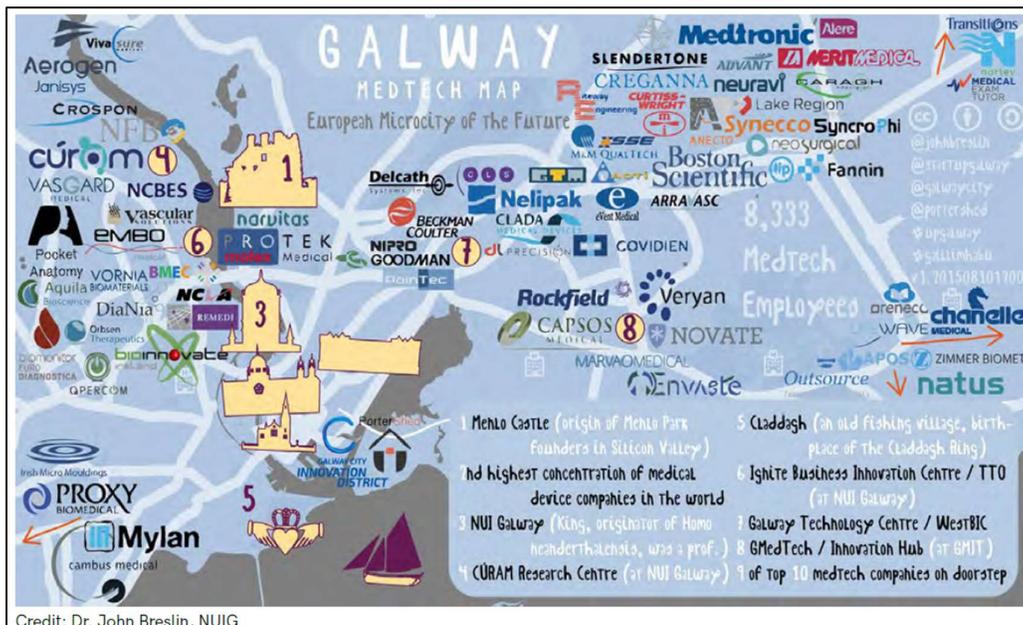


Figure 3.2: Medical-Technology Clusters in the Galway City Region

(Source: **Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Authority (2018)**)¹

There will also be a programme of investment in Institutes of Technology around the country to further their growth and expansion over the course of the National Development Plan:

'Eleven major infrastructure projects will be delivered around the country as part of a PPP programme for the higher education sector at Athlone IT (AIT), IT Blanchardstown,

¹ Note: As of March 2020, the finalised version of the Adopted RSES does not contain up to date graphics/maps and figures representing all adopted changes.

IT Carlow, CIT, Dún Laoghaire Institute of Art, Design and Technology, GMIT, Limerick IT, Letterkenny IT, IT Tallaght, IT Tralee and WIT. [Our Emphasis]

As the second largest HEI in Galway, the Galway Mayo Institute of Technology is located to the east of the city, (3.6 Km walk/ cycle from Cúirt Na Coiribe) and has close ties to industry and regional employers. There is also an preliminary exploration of GMIT combining with IT Sligo and Letterkenny IT for a '*Connacht Ulster Alliance*' similar to the Technical University of Dublin.

The National Development Plan also includes support for private investment in HEIs through Exchequer Grants and other funding models. This includes the following projects currently in the pipeline or awaiting approval:

NUI Galway:

'New student residences, completion of the Human Biology building and other campus upgrades.'

As demonstrated by the above programmes and funding projects, the *NDP* seeks to support the Higher Education Institutes of the Galway City Region. Such investment will further strengthen the success of these institutions and see undergraduates and post-graduates attracted to the region. This means that for the additional investment the HEIs receive, there is an increased likelihood for Irish, European, UK and International students to seek student accommodation whilst studying in Galway.

(We note that under the recent SHD application Reg. Ref. PL61.303846, NUIG were granted permission for a further 674 No. student accommodation bedspaces on 4th June 2019).

3.2 Project Ireland 2040: National Planning Framework (NPF)

3.2.1 Introduction to NPF

Project Ireland 2040: National Planning Framework (NPF) is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country. The NPF is a long-term Framework that sets out how Ireland can move away from the current 'business as usual' pattern of development.

A core principle of the NPF is to:

'Allow for choice in housing location, type, tenure and accommodation in responding to need', in addition to tailoring 'the scale and nature of future housing provision to the size and type of settlement where it is planned to be located'.

Therefore, we submit that the provision of an additional quantum of student accommodation at the subject site will contribute in achieving the objectives of the NPF as the scheme will provide additional accommodation space for students seeking accommodation in Galway City, through the expansion of Purpose Built Student Accommodation, sustainably intensifying an existing facility.

The proposed development is a direct response to the housing crisis that is readily reported and identified in recent planning policy. This is also in conjunction with projected

growth in Higher Education demand in the coming decade, which will require an expansion of the purpose built student accommodation sector. (Please refer to the accompanying '*Student Demand and Concentration Report*' submitted as part of this application.)

The proposed application is consistent with the policy objectives as set out throughout this section, as it provides an improved level of amenity and communal space, promotes sustainable transport patterns, and contributes to the wider mix of student accommodation supply in the city.

Further, it will free-up private rented accommodation in the City contributing some relief for the current rental crises.

3.2.2 National Strategic Outcomes and Objectives

The NPF identifies a list of 10 No. National Strategic Outcomes which set out the ambition of the NPF (to create a single vision and a shared set of goals for every community across the country) as follows:

- 1) Compact Growth;
- 2) Enhanced Regional Accessibility;
- 3) Strengthened Rural Economies and Communities;
- 4) Sustainable Mobility;
- 5) A strong Economy supported by Enterprise, Innovation and Skills;
- 6) High Quality International Connectivity;
- 7) Enhanced Amenity and Heritage;
- 8) Transition to a Low Carbon and Climate Resilient Society;
- 9) Sustainable Management of Water, Waste and other Environmental Resources;
and
- 10) Access to Quality Childcare, Education and Health Services.

A number of key national policy objectives have been identified throughout the NPF in order to successfully deliver the 10 No. Strategic Outcomes.

We have carried out an assessment of the NPF with regard to the student accommodation proposed at the application. It is considered that the following National Policy Objectives are applicable to the proposed development at Cúirt Na Coiribe.

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design;
- Justification and Housing Need;
- Waste and Environmental Issues; and
- Implementing the National Planning Framework.

3.2.3 Population Growth and Employment

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the five main cities. The following objectives are considered to be most applicable to the residential development subject of this report:

- **National Policy Objective No. 1b** projects an additional 160,000 – 180,000 No. people in the Northern and Western Region.
- **National Policy Objective No. 1c** projects an additional 115,000 or 450,000 in total in the Northern and Western Region.
- **National Policy Objective No. 2a** sets a target of 50% of future population and employment growth to be focused in the existing five cities and their suburbs.
- **National Policy Objective No. 3a and National Policy Objective 3b** aim to deliver at least 40% of all new homes nationally, within the build-up of existing settlements and to deliver at least 50% of all new homes that are targeted in the five Cities within their existing built-up footprints.
- **National Policy Objective No. 4** aims to provide diverse and integrated communities ensuring the creation of attractive, livable, well designed, high quality urban places.
- **National Planning Policy No. 5** aims to develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The NPF states that proposals should:

*'prioritise the location of new housing provision in **existing settlements** as a means to maximizing a better quality of life for people through accessing services; **ensuring a more efficient use of land** and allowing for greater integration of existing infrastructure' . [Our Emphasis]*

The NPF outlines that the:

*'preferred approach would be compact development that focuses on reusing **previously developed, 'brownfield' land, building up infill sites**, which may not have been built on before and **either reusing or redeveloping existing sites and buildings**. [Our Emphasis]*

The proposed development is located within a residential area of Terryland on the Headford Road. The subject development and the neighbouring Gort Na Coiribe were initially built to include student and tourist accommodation. However, Cúirt Na Coiribe is now principally focused on student accommodation during term time, offering 405 No. bedspaces.

The addition of 515 No. student accommodation bedspaces to the existing building constitutes a significant investment in infill/ consolidated development within the existing

built up area of Galway City. Rather than continuing the sprawl of city development, the subject scheme adds capacity within walking and cycling range of NUIG and Eyre Square in a manner that has been designed to ensure an appropriate densification of a brownfield site, in accordance with the preferred approach of the NPF.

3.2.4 Current Trends in Tenure and Household Formation in Ireland

The development of Purpose Built Student Accommodation has expanded in recent years and has helped to alleviate some demand on the rental sector nationally. It has also been a successful landing pad for migrating students within the county as well as International students entering a competitive rental market. The NPF acknowledges that Ireland needs to invest in human capital in order to achieve a “*strong economy supported by Enterprise, Innovation and Skills.*”

In Section 6.5 of the NPF, the following is stated under the heading ‘*Education*’ in relation to investment in Higher Education Institutions (HEIs):

‘In the Higher Education sector, the development of Technological Universities has the potential to deliver greater opportunity to students in the regions served, to staff working in the institutions, and to the broader local economy and society. By creating institutions of scale and strength, multi-campus technological universities will bring greater social and economic benefits to their regions through a strengthened role in research and innovation and the delivery of a broad range of high quality education and training in each of their campuses.’

Further growth and expansion has been identified, for instance the RSES for the Northern and Western Regional Assembly has identified the future expansion of GMIT as a Technological University, stating the following:

‘The National University of Ireland, Galway (NUIG) and Galway Mayo Institute of Technology (GMIT) are huge assets for the city, with the latter having the potential to develop as a Technological University as part of the Connaught/ Ulster Alliance. They add significant value to Galway City in terms of being a significant employer, playing a major role in education provision and through the development of a knowledge economy.’

As the State and HEIs understand that investment must be made to expand their campus facilities to meet future changes in the economy and increased demand for student accommodation, similarly the private sector is expected to provide for the additional capacity in existing and new student accommodation. The locating of off-campus PBSAs therefore benefits from strong site selection and proximity to Higher Education, employment and strong urban settlements with the infrastructure, amenities and social infrastructure to support additional population.

National Policy Objective No. 31

‘Prioritise the alignment of targeted and planned population and employment growth with investment in:’

- *A childcare/ ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;*
- *The provision of early childhood care and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations.*
- ***The expansion and consolidation of third level facilities at locations where this will contribute to regional development.***
- *Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified. [Our Emphasis]*

The growth of Higher Education results in greater capacity for students, which subsequently results in more students enrolling in 3rd level education. This increases the need for managed student accommodation both on and off campus. The NPF recognises the emerging population and demand pressures and supports the locating of PBSAs within sustainable range of supporting infrastructure as follows:

'Demand for student accommodation exacerbates the demand pressures on the available supply of rental accommodation in urban areas in particular. In the years ahead, student accommodation pressures are anticipated to increase. The location of purpose built student accommodation needs to be as proximate as possible to the centre of education, as well as being connected to accessible infrastructure such as walking, cycling and public transport. The National Student Accommodation Strategy supports these objectives.' (Pg. 95)

In providing for this need, student accommodation will become a more prevalent typology where there is the demand and infrastructure to support it. In turn this can aide in consolidating population density and catering to the specific lifecycle needs of students within supportive environments and established communities. Therefore, the expansion of existing established student accommodation in proximity to education locations such as NUIG and GMIT, accessible by walking, cycling and public transport, is in line with the objectives of the NPF.

National Policy Objective No. 35

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

Although 'digs' type accommodation has declined in recent years, there is a recognised freedom and developmental threshold for students to branch out on their own and live in accommodation during their studies. Due to economic hardship, increased housing costs and a decrease in available supply, the overall 'college experience' has been diminished and the longer commuting patterns of students which has developed as a result has had a damaging effect on their quality of life.

Purpose Built Student Accommodation, such as Cúirt Na Coiribe is well placed to provide additional capacity, sustainable and accessible facilities proximate to Higher Education and to increase its provision of amenity, due to its location and in close proximity to NUIG, the Headford Road and Galway City Centre.

The following objectives respond to the changing nature of household formations and trends in tenure seen in current planning discourse.

- **National Policy Objective No. 6** acknowledges the changing role and function of settlements of all scales in terms of their residential population, employment, levels of amenity and design quality and their impact on the need to regenerate and rejuvenate the surrounding area.
- **National Policy Objective No. 11** states that there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages.
- **National Policy Objective No. 32** has a target of delivering 550,000 No. additional households to 2040.

The Galway City region as one of the 5 No. centres of growth within the NPF is also a location for significant investment in higher education and highly skilled parts of the economy which co-locate with Universities and Colleges. The further expansion of Higher Education Institutes (HEIs) within Galway will require a quantum of off-campus student accommodation which can provide additional supply to compliment this growth. Campus investment in NUIG, new research programmes and a possible Technical University involving GMIT are likely to see significant growth within the coming years under the National Development Plan. Therefore, the proposed additional 515 No. bedspaces is in line with National Strategic Planning Objectives of the NPF which recognises the changing role and function of settlements.

3.2.5 Sustainable Modes of Transport

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be most applicable to the student accommodation development subject of this report:

- **National Policy Objective No. 26** outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with planning policy.
- **National Policy Objective No. 27** aims to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.

As detailed in the Planning Report under *Section 2.4 Site Accessibility*, the following is of note:

Cúirt Na Coiribe is 1 Km walking distance from the nearest entrance to NUIG off of the Quincentennial Bridge on the N6 inner bypass road. This provides stairs to the Distillery Road beside the sports hall.

The subject development is also within 1.3 Km walking distance from Eyre Square at the heart of the city centre, an average walking journey of 18 No. minutes.

There will be 656 No. bicycle parking spaces provided within the development

It is anticipated that the majority of residents will walk or cycle to their destinations, which in the context of the metropolitan area are sustainable options that align with National and Local policy in promoting active travel and sustainable transport practices.

Cúirt na Coiribe is proximate to several key services and facilities as set out in the Planning Report. These locations include NUIG Campus, the retail areas of the Headford Road and the City Centre. The strategic location of the subject site provides for an accessible and well connected location which helps to support sustainable transport patterns.

3.2.6 Scale, Massing and Design

The National Planning Framework sets out a number of planning policy objectives that specifically relate to the Scale, Massing and Design of developments. The following objectives are considered to be most applicable to the subject development:

- **National Policy Objective No. 13** outlines that to achieve well designed high quality outcomes an array of standards will be put in place such as building height and car parking.
- **National Policy Objective No. 33** states residential development at appropriate scales within sustainable locations will be prioritised.
- **National Policy Objective No. 35** stipulates the requirement for an *'increase in residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site based regeneration and increased building heights.'* [Our Emphasis]

The proposed scheme represents the sustainable adaption of utilisation of an existing building, seeking to provide an increased density in an appropriate location adjacent to a range of services and facilities including NUIG.

The existing Cúirt Na Coiribe development is permitted to provide short term accommodation throughout the year, especially during the off-term months during the summer. This provides 398 No. rooms (after 7 No. are demolished as part of this application) with flexible tenure as per the original planning permission Reg. Ref. 00/249.

The additional new rooms are seeking permission for student accommodation with off-season short term accommodation as per the standard student accommodation definition.

The scheme will result in an improved design, which has been informed by the surrounding existing context, with the scheme designed to ensure there is no material impact on adjoining properties from a daylight and sunlight perspective. The height of the new development will range from 2 No. storeys to 6 No. storeys, which is not challenging in this central location.

3.2.7 Waste and Environmental Issues

The National Planning Framework sets out a number of planning policy objectives that specifically relate to Waste and Environmental Issues. The following objectives are considered to be most applicable to the residential development subject of this report:

- **National Policy Objective No. 52** sets out that the planning system must respond to the environmental challenges and have regard for to relevant environmental legislation.
- **National Policy Objective No. 53** is concerned about supporting the circular and bio economy and reducing the rate of urban sprawl.
- **National Policy Objective No. 54** aims to reduce the nations carbon footprint by integrating climate action into the planning system.
- **National Policy Objective No. 56** sets out the intentions for sustainably managing waste.
- **National Objective No. 57** identifies specific objectives to enhance water quality and resource management.
- **National Policy Objective No. 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective No. 60** outlines the importance to appropriately conserve and enhance the natural and cultural heritage of Ireland.
- **National Policy Objective No. 63** is in regard to the management and conservation of water resources and water services infrastructures.
- **National Policy Objective No. 64** sets out to *'Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems*

with zero local emissions, green infrastructure planning and innovative design solutions.'

- **National Policy Objective 75** stipulates that *'all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.'*

As set out in Section 3.2.5, the redevelopment of the subject site would encourage the use of public transport, walking and cycling in accordance with National Policy Objective No. 64, which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. As noted at Section 2.4 of the Planning Report, the development is located in close proximity to public transport and coca-cola zero bikes.

The existing provision for 135 No. underground car parking spaces (plus surface car parking) will be reduced in the proposed scheme, which provides 59 No. car parking spaces. Short term surface car parking beside and behind the ancillary services building will be removed. The proposed scheme will therefore result in a lower carbon footprint and would be consistent with National Policy Objective No. 54, which aims to reduce the carbon footprint of individuals and the nation by integrating climate action into the planning system. This also accords with the *Climate Action Plan July 2019* which sets out the programmes, projects and review mechanisms for climate action under the National Development Plan.

The proposed development is supported by an AA Screening and Natura Impact Statement (NIS) prepared by JBA Consulting and an Environmental Report prepared by Thornton O'Connor Town Planning which outlines in detail the measures which have been taken in order to meet the above policy objectives.

In addition to the above, a number of technical reports have been prepared and are enclosed will be submitted with this application including:

Flood Risk Assessment prepared by AECOM;
Infrastructure Report prepared by AECOM;
Traffic Transport Assessment prepared by AECOM;
Energy Statement prepared by AECOM;
Lighting Report prepared by AECOM;
Daylight and Sunlight Analysis prepared by 3D Design Bureau;
Tree Survey and Arboricultural Impact Assessment prepared by Arborcare;
Draft Construction and Demolition Waste Management Plan by DCON;
Draft Construction Management Plan by DCON; and
Operational Waste Management Plan prepared by AWN.

3.2.8 Implementing the National Planning Framework

Having regard for the implementation of the National Planning Framework, the following objective is considered applicable to aligning the proposed scheme subject of this report with all National Strategic Outcomes of the NPF:

The **National Policy Objective No. 74** states that proposals should 'secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.'

The table below has set out how the proposed development is consistent with the relevant objectives of *Project 2040: National Planning Framework* which will contribute towards achieving the 10 No. National Strategic Outcomes also identified in the NPF as follows:

Consistency with National Strategic Outcomes			
No.	Objective:	How it is Addressed by this Development:	Does it meet the criteria:
1:	Compact Growth;	Sustainable and efficient expansion to an existing student accommodation scheme which increases density and provides added amenity space for students.	Yes
2:	Enhanced Regional Accessibility;	Located within comfortable walking and cycling distance of public transport, Higher Education Institutions, Employment, as well as access to the services and social infrastructure of Galway City.	Yes
3:	Strengthened Rural Economies and Communities;	N/A – Urban Area	N/A
4:	Sustainable Mobility;	Reduced Car Parking and increased provision of Bicycle Parking. The development will be built to current accessibility standards.	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	The proposed development will support the development of a highly-skilled workforce that will ultimately contribute to a strong economy.	Yes
6:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A

7:	Enhanced Amenity and Heritage;	New amenity spaces are being provided, with the existing scheme providing no amenity for the students. This includes amenities such as a gym, cinema, function rooms, café spaces and study spaces.	Yes
8:	Transition to a Low Carbon and Climate Resilient Society;	<p>The proposed development will improve the energy performance of the building and provide new internal services. This will include improvements to fire safety, telecommunications/ internet access, laundry facilities, water infrastructure and CCTV as set out in the accompanying documents.</p> <p>Lower car parking provision and an increased quantity of bicycle parking can contribute to sustainable modes of transport.</p>	Yes
9:	Sustainable Management of Water, Waste and other Environmental Resources;	<ul style="list-style-type: none"> • Please see <i>Operational Waste Management Plan</i> prepared by AWN. • Improvements to the sustainable use of energy, waste rain water run-off in the form of a Sustainable Drainage System and wetland/attenuation tank, and other on site improvements. • Sustainable modes of transport encouraged by reduction in car parking (150 No. to 59 No.) and increased cycle parking provision (656 No proposed). • Solar Panels provided at roof level. 	Yes
10:	Access to Quality Childcare, Education, and Health Services;	<ul style="list-style-type: none"> • Close proximity to NUI Galway, GMIT and several local services, including Galway University Hospital 1.25 Km away. 	Yes

Section 3.2 of this document has set out how in our professional opinion the proposed development is consistent with the relevant objectives of *Project 2040: National Planning Framework*.

3.3 *Action Plan for Housing and Homelessness, Rebuilding Ireland*

The Action Plan for Housing and Homelessness – Rebuilding Ireland is the government’s publication which addresses the significant increase in new homes that is needed and the scale and speed to which they are required. The Action Plan outlines a five pillar approach;

Pillar No. 1 – *Address Homelessness;*

Pillar No. 2 – *Accelerate Social Housing;*

Pillar No. 3 – *Build More Homes;*

Pillar No. 4 – *Improve the Rental Sector;* and

Pillar No. 5 – *Utilise Existing Housing.*

It is considered that the proposed development directly addresses the objectives set out within Pillar No. 3 and Pillar No. 4. It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars.

Pillar No. 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.

Pillar No. 4: Improve the Rental Sector – Address the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents. Support greater provision of student accommodation.

The Action Plan notes that the student population is projected to grow by around 20,000 students (or 15%) to approximately 193,000 No. students by 2024. The Action Plan also notes that the *‘Report on Student Accommodation: Demand and Supply’* (2015) by the Higher Education Authority estimates that approximately 25,000 No. student bedspaces will be required nationally to meet the increase in demand resulting from the growth of the student population. The Action Plan commits to:

‘The development of a national student accommodation strategy in 2017 by the Department of Education and Skills (DES) in conjunction with the DHPCLG and other stakeholders, including DPER and the Department of Finance. This will set out a broad framework for delivery of an enhanced level of accommodation which will inform local authority housing strategies and the land management process in general, in order to provide suitably located and affordable sites.’

Additionally, as discussed in the *‘Student Demand and Concentration Report’* provided as part of this application, there has been additional research by the Department of Education and Skills which forecasts continued growth in third level students up to the years 2029-31. The report entitled *‘Projections of demand for full-time third level education 2018-2040’* states the following:

‘Under scenario S1 (baseline) total enrolments will rise each year up to 2030 and peak at 222,514, an increase of over 38,870 on 2017 levels, driven primarily by demographic trends. After 2030 numbers will fall steadily to reach 203,000 by 2040. Scenario S2, which holds the transfer rate steady but increases international enrollments by an additional 25 per cent over S1, will add an additional 3,658 students by 2030, and over 7,300 by 2040. Under S3 where both the transfer rate and international students rise

strongly, enrollments in 2030 are projected to be 58,556 higher than 2017.’ [Our Emphasis]

	S1 (baseline)	S2	S3	S0
2017		183,642		
2018	186,890	186,890	187,689	186,091
2019	191,324	191,324	193,141	189,506
2020	196,609	196,609	199,626	193,591
2023	204,339	205,437	212,691	197,085
2026	213,624	215,819	228,202	201,241
2029	222,264	225,556	241,167	206,653
2030	222,514	226,172	242,198	206,488
2031	222,109	226,133	242,392	205,850
2032	221,379	225,769	242,145	205,003
2035	215,091	220,578	236,607	199,063
2038	207,269	213,854	229,203	191,921
2040	202,925	210,241	225,193	187,972

Figure 3.3: Projected Third Level Education Enrollment. Including Undergraduate, Postgraduate, and International Students.

(Source: Department of Education, *Projections of demand for full time third level education, 2018-2040*)

Under scenario 'S0' the transfer rate to third level is modelled as falling by 10% to 2027, however even with such a drop-off, the significant population influx will still see a peak in demand for third level education spaces by 2029. This is based on a significant demographic shift of people who would have been born between 2008-2014. This will continue to place additional pressures on education provision at secondary and tertiary levels up over the life of the NPF and beyond the current *Rebuilding Ireland* policy.

To address the accommodation needs of the growing student population, there are a number of key actions listed in the Action Plan, particularly under Pillar No. 4 which are relevant to the development of student accommodation.

Key Action No. 4.7

Key Action No. 4.7 states that the Action Plan will:

'Prepare and publish a national student accommodation strategy, which will set out a broad framework for delivery of an enhanced level of accommodation and which will inform local authority housing strategies and the land management process in general, in order to provide suitably located and affordable sites.'

The stated objective for the key action No. 4.7 is:

'To develop a national policy on specific needs and mechanisms for the development of appropriate on-campus and off-campus student accommodation.'

This document was completed in 2017 and has been included and discussed as part of the accompanying *'Student Demand and Concentration Report'*. It is our opinion that the proposed development is consistent with this strategy and the accompanying Report responds to the request of the Board.

Key Action No. 4.8

Key Action No. 4.8 states that the Action Plan:

'Will work with stakeholders to prioritise and progress viable projects to provide additional student accommodation in key urban areas.'

The stated objective for key action No. 4.8 is:

'To bring on stream proposals capable of delivering an additional 7,000 student accommodation places by end 2019, on or off-campus, in addition to projects already committed to.'

A significant surge in PBSA permissions and completions has occurred nationally since the adoption of the Action Plan and the *National Student Accommodation Strategy (2017)*, with a particular focus on the Dublin Metropolitan Area.

In the Galway City context, planning permissions of note since the Action Plan are as follows:

Private Developments:

- GCC Reg. Ref. 16/156 (as amended) – Fairgreen Road for 147 No. bedspaces;
- GCC Reg. Ref. 17/121 – Queen Street for 345 No. bedspaces; and
- ABP Ref. 301693 -SHD – Former Westwood Hotel for 395 No. bedspaces.

On-Campus Developments:

- ABP Ref. 303846 – SHD – North Campus (NUIG) for 674 No. bedspaces.

The *National Student Accommodation Strategy* estimated that in excess of 3,422 No. additional PBSA bedspaces would be required by the year 2024 (Pg 26). A further

exploration of Planning Permissions to date and existing PBSAs is provided in Section 4.0 of the *'Student Demand and Concentration Report'*.

Key Action No. 4.10

Key Action No. 4.10 states that the Action Plan will:

'Help to fund a Student Housing Officer to work with the Union of Students in Ireland, local authorities, AHBs and housing providers, to identify and expand short-term capacity enhancing measures in the student accommodation sector'.

The stated objective for key action No. 4.10 is:

'To assist students in finding appropriate accommodation'.

Key Action No. 4.13

Key Action No. 4.13 outlines the intention to:

'Enable student accommodation projects for 100 No. units or more to go straight to An Bord Pleanála, as well as maximise the opportunities for joint venture projects on local authority sites to proceed through the Part 8 process and prepare guidance on planning policies around student accommodation developments'.

The stated objective for Key Action No. 4.13 is:

'To enhance certainty and reduce delivery timescales and costs associated with bringing student accommodation proposals forward'.

All of these proposed Key Actions and a commitment to the production of *'National Student Accommodation Strategy (2017)'* have contributed to the growth and continuing delivery of PBSAs to the economy, with the majority taking place in the Greater Dublin Area.

The proposed student accommodation scheme would provide for affordable student accommodation in an urban area of high demand. The 515 No. new bedspaces will help to directly address the evident housing need, responding proportionately to the pillars as set out above. With less students requiring accommodation in the private market, this will result in additional available properties that are available for other renters.

It has been demonstrated that the proposal at the subject of this statement is consistent with the policy guidance of the *Action Plan for Housing and Homelessness, Rebuilding Ireland*.

3.4 *Urban Design Manual – A Best Practice Guide (2009)*

1) **Housing Location in Urban Areas**

The Urban Design Manual sets out 12 No. key indicators for developments in urban areas;

Context – How does the development respond to its surroundings?

The proposed development maintains the courtyard format of the existing building and expands facilities vertically, horizontally and through adaptation of the underground car park. Where new build elements are added they are to adjust internal layouts, and to add new extension blocks which are massed towards the front of the existing building, as well as some gable ends, such as to the north west.

The overall expansion will make use of the existing building frame and provide a contemporary use of the existing palettes of materials found in the wider landscape, whilst also providing for a sustainable expansion of an existing structure.

2) **Connections – How well connected is the new neighborhood?**

The proposed development maintains the existing access via frontage onto the Dun Na Coiribe Road. This provides the same level of access to the surrounding neighbourhood that currently exists as well as easy access to NUIG in particular.

3) **Inclusivity – How easily can people use and access the development?**

The proposed development has been designed with due regard to maintaining the existing access to the facility and providing new stair and lift cores to the extension blocks, as well as accessible rooms in some areas.

The reduced underground car park will also provide sheltered bicycle storage racks for 576 No. bicycle spaces. At surface level 80 No. short-stay bicycle parking spaces will be provided for visitor parking. Additionally, there will be 5 No. motorcycle spaces provided within the basement.

A total of 59 No. car spaces will be available to students and short stay residents during the summer months. Of the total number of car parking spaces provided, some 6 No. will be accessible. The basement car parking will also provide 4 No. electric car changing spaces. The reduction in total car parking also anticipates the sustainable transport pattern of students going forward.

4) **Variety – How does the development promote a good mix of activities?**

The expansion of this existing student accommodation scheme will provide for an additional influx of students and short term letting during the summer months. This provides for an increase in population who can contribute to the local economy and rely upon services, facilities and amenities within the city.

The proposed development introduces a significant quantum of amenity spaces for the student population that have not previously been available.

The retention of the Scotty's Restaurant (172.15 sq m) also provides a mixed-use in the site which will not be affected by the proposed development.

5) Efficiency – How does the development make appropriate use of resources, including land?

The proposed scheme is an expansion of an existing student accommodation scheme which makes use of the surrounding land within the existing curtilage, including the demolition of the existing 2 No. storey external services building. Additional amenity space is achieved through the refurbishment of car park areas and a new landscape masterplan. As such the proposal represents the intensification of a brownfield site as opposed to the utilisation of a greenfield site, which fully accords with the principles of proper planning and sustainable development.

6) Distinctiveness – How do the proposals create a sense of place?

The development is proposed in an urban location surrounded by a mixed environment of uses including but not limited to residential, health, civic, retail and commercial. The proposed residential development and associated works will contribute to increasing the vibrancy and vitality of the local area.

'The site rests within a transitional zone between Galway City and the natural beauty of rural Galway ('The Wild Atlantic Way'). The Architectural context around the site bares little relation to either rural Ireland or the townscape character of Galway City. In response to these contextual considerations the architectural design concept has been developed to respond to the wider landscape and transition from mountain, rural land, city to sea. The colours of the vertical cladding have been developed in dialogue with the natural colours found on the transitional journey described.' -Architectural Design Statement by TODD Architects

The full range of material treatments will provide a clear delineation of internal rooms from external views, whilst also providing new larger windows. The overall approach improves energy efficiency, light infiltration and provides a modern best practice approach to adaptive and sustainable redesign.

7) Layout – How does the proposal create people friendly streets and spaces?

An active frontage will be provided fronting onto the Dun Na Coiribe access road, which will provide significant passive and active surveillance of this approach to all surrounding developments. The proposal also introduces active uses at ground floor level along the street front significantly improving animation and activity in this area.

8) Public Realm – How safe, secure and enjoyable are the public areas?

The proposed development includes a comprehensive Landscape Masterplan prepared by The Big Space, included with this application. The open space surrounding the development, including the internal courtyards are included in this Landscape Masterplan. This provides a greater level of amenity than the current existing development.

9) Adaptability – How will the buildings cope with change?

The proposed development is a significant adaptation of an existing student accommodation scheme. The expansion of 515 No. rooms includes internal changes to the existing structure and a vertical extension of 2 No. storeys in some locations.

There will also be an adaptation of underutilised space in the existing car park which will see a reduction in car spaces (150 No. – 43 No.), and the creation of new communal amenity facilities for residents along with further spaces at ground floor level. The new floor spaces will be similarly able to be adapted.

10) Privacy and Amenity – How does the scheme provide a decent standard of amenity?

The majority of new bed clusters/ apartments feature individualised bedrooms (with en suite bathrooms) and share kitchen/living areas. The adaptations to existing apartments mostly consist of expanded living/kitchen dining areas and additional bathrooms/ en suites where applicable. There will also be the creation of new amenity areas as detailed in the *Planning Report and Response to Opinion*, which have not been available to residents in the past.

11) Parking – How will the parking be secure and attractive?

Given the nature of student accommodation, the provision of reduced car parking spaces is considered appropriate.

The majority of movement requirements for students in a walkable city such as Galway is when students are leaving the city at the weekend, breaks in the semester or the end of term. Currently the 135 No. car spaces provided in the underground car park rarely fill to half capacity, and in such a case many students vehicles are not used on a daily basis and remain stationary for significant periods of time.

However, in the reduction of available car parking from 135 No. spaces (plus surface car parking) to a total of 59 No. spaces, there will be the addition of a significant quantum of communal amenity space, plant rooms and circulation. This is a gain for the overall development as amenity spaces did not exist previously (with further high quality amenity spaces provided at basement and ground floor level). This enhances the residents experience and limits the number of trips necessary by car into the city.

The remaining 43 No. car parking spaces at basement level are arranged as follows:

35 No. Standard Car Parking Spaces
 4 No. Accessible Car Parking Spaces
 4 No. Electric Car Parking Spaces and Charging Points

Additionally, there will be parking space for 5 No. Motorcycles.

Externally the set down area and surface car parking to the rear of the services building will be removed. The remaining 16 No. surface car parking will be to the west of the building near to Scotty's Restaurant, with short stay car parking in front of the reception. A total of 2 No. accessible car spaces will be available at surface level.

Sustainable modes of transport such as cycling and walking are promoted within the scheme, with the provision of a Mobility Plan being prepared for the application stage.

1.2) Detailed Design: How well thought through is the building and landscape design?

A detailed *Architectural Design Statement* prepared by TODD Architects is submitted as part of this application (please refer to Section 4.0 *Current Proposal* and Section 5.0 *Design in Detail*)

There is a detailed Landscape Masterplan by The Big Space included. Within these drawings is designs and particulars of how the external amenity spaces will be updated for residents use, they are described as follows:

'The landscape design provides for the following uses:

- *Space for informal gathering*
- *Seating*
- *Walking*
- *Space for passive recreation*
- *Playscape elements*

This network of linked public spaces will provide for passive recreation within an attractive environment. New tree planting will be provided including smaller specimen tree/multi-stem shrubs around the perimeter of the subject lands.'

The proposed Student Accommodation scheme is consistent with the suggested standards of the *National Student Accommodation Strategy (2017)* and Section 50 of the Finance Act (1999) -Guidelines on Residential Developments for 3rd Level Students.

3.5 *Design Manual for Urban Roads and Streets (2013)*

The *Design Manual for Urban Roads and Streets* (DMURS) sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposed subject development.

A separate compliance document relating to consistency with the guidance of DMURS has been prepared by AECOM for this application.

3.5.1 Policy Background

DMURS gives weight to the *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009 -2020*. The key goals as set out within the *Smarter Travel* document include:

- *To reduce overall travel demand;*
- *To maximise the efficiency of the transport network;*
- *To reduce reliance on fossil fuels;*
- *To reduce transport emissions; and*
- *To improve accessibility to public transport.*

Given the urban location of the application site and the proximity to education, services and facilities, and also given the nature of student accommodation it is anticipated that there would be limited vehicular traffic demand. It is projected that tenants of the scheme would rely on walking, cycling or utilising existing public transport routes to reach their desired destination. There will be reduced car parking available on site, currently the 135 No. underground car parking spaces are underutilised. The underground car park will reduce to 43 No. car spaces in order to provide 576 No. secure bicycle spaces and 5 No. motorcycle spaces. At surface level there will remain 16 No. car parking spaces. Parking to the west of the site will remain in situ. There will also be 80 No. bicycle parking spaces provided by Sheffield stands at surface level spread throughout the Landscape Masterplan.

The scheme is considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009 – 2020*.

3.5.2 Site Layout and Legibility

The proposed development scheme provides an active frontage on Dun Na Coiribe Road created through the communal space at ground level in Block Nos. 7, 8 and 9, and the reception area. The Landscape Masterplan prepared by The Big Space Landscape Architects has addressed the legibility of the site, noting the following in their assessment of the site:

'The primary aim of the landscape strategy is to identify the important elements within the subject lands to expose the aspects of the approach to its space, character and consequent proposal.

The primary landscape components include:

- *Enhanced courtyards providing attractive outdoor spaces;*
- *New entrance plaza;*
- *Perimeter walkway and planting;*
- *Increased cycling parking; and*
- *Tree and shrub planting.*

Perimeter boundaries (northern and eastern boundaries)

The lands are currently laid out as student accommodation with associated car parking and facilities and is partially enclosed by a perimeter fence and planting along the northern, western and southern boundaries.

Proposed Landscape

The proposed layout successfully utilizes the existing landscape elements including the topography. The primary design consideration within the landscape was to consider the requirements of the existing and future residents, through the provision of high quality public spaces with a strong landscape character. The proposed landscape strategy forms part of the overall greenspace network within the overall development.'

The following summary of proposed works and their impacts is an extract from the *Landscape and Visual Impact Assessment* prepared by The Big Space Landscape Architecture:

- *New entrance plaza;*
- *Enhanced courtyards to provide attractive outdoor spaces, recreation and amenity, including seating and lighting elements;*
- *Access to outdoor seating from the existing restaurant, with new canopy;*
- *Perimeter pathways to provide recreational opportunities, as well as linking the various external areas and courtyards;*
- *Increased cycle parking spaces;*
- *Tree and hedge shrub planting within, at the entrance and at certain locations around the perimeter of the subject site; and Playscape elements.*

The existing vehicular access will be retained though the site to the existing vehicular ramp to the underground car park and to the surface parking area along the south-west boundary.

The public areas surrounding the development will be subject to passive surveillance as result of overlooking units from within the scheme and communal courtyards being semi-private.

3.5.3 Sustainable Transport

The subject site is eminently within walking and cycling distance of Eyre Square and the NUI Galway Campus, as discussed in detail in Section 3.0.

The Headford Road is served by the No. 407 bus which runs at a frequency of every 30 minutes towards Eyre Square.

The DMURS guidelines have a '*vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips.*'

The proposed scheme provides for 576 No. bicycle parking spaces located at basement and 80 No. bicycle spaces at surface, ensuring sustainable modes of transport are encouraged. A Traffic Transport Assessment has also been prepared by AECOM.

As established in the above commentary, it has been demonstrated that the proposed Shared Living scheme is consistent with the guidance as per the *Design Manual for Urban Roads and Streets (2013)*.

3.6 Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)

The Guidelines set out that a key objective of the NPF is to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.

The Minister's foreword to the Urban Development and Building Heights Guidelines, December 2018 acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas. This is regarded in the guidelines and literature as an unsustainable model in need of proactive and inventive solutions.

The Building Height Guidelines state that there is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The Building Height Guidelines note that:

'A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.' [Our Emphasis].

These Guidelines are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The Guidelines note that increasing prevailing building heights has a critical

role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and our planning process must actively address how this objective will be secured.

3.6.1 Special Planning Policy Requirement No. 3 of the *Height Guidelines*

SPPR₃ of the Building Height Guidelines sets out that:

'It is a specific planning policy requirement that where;

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria [below]; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.'

The Guidelines also note the following:

*'In relation to the assessment of individual planning applications and appeals, it is Government policy that **building heights must be generally increased in appropriate urban locations**. There is therefore a presumption in favour of buildings of **increased height in our town/city cores and in other urban locations with good public transport accessibility**.'* [Our Emphasis].

As increased heights are proposed at the subject site, we have demonstrated how the proposed development satisfies the specified criteria set out in Section 3.0 of the Height Guidelines as follows:

Development Management Criteria	
At the Scale of the Relevant City/ Town	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i> 	<ul style="list-style-type: none"> The subject site has excellent public transport accessibility, as detailed in section 2.4 of the Planning Report. A <i>Mobility Management Plan</i> prepared by AECOM has also been submitted as part of this application. The subject site is considered eminently suitable for student accommodation given the availability of sustainable modes of transport, proximity to NUIG and the existing uses on site.

<ul style="list-style-type: none"> • <i>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake landscape and visual assessment (LVIA), by a suitably qualified practitioner such as a chartered landscape architect.</i> 	<ul style="list-style-type: none"> • A complete LVIA by The Big Space Landscape Architects has been completed in conjunction with Verified View Montages prepared by 3D Design Bureau.
<ul style="list-style-type: none"> • <i>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</i> 	<ul style="list-style-type: none"> • The proposed development utilises the frame of an existing building to gain an additional 2 No. storeys in part and develop new blocks extending from existing gable ends, as well as new blocks extending to the front of the site. • By maintaining the dominant building form within this site area, the subject scheme seeks to limit urban sprawl by making best use of an existing brownfield site and the core structure of an existing building.

Development Management Criteria	
At the scale of District/ Neighbourhood / Street	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i> 	<ul style="list-style-type: none"> • The contemporary additions to the existing development provides additional passive surveillance to the entrance and a cohesive blending of the new additions to the existing structure. • New internal landscaping and the addition of an attenuation pond/wetland area to the landscaped area adjacent to the Terryland River provide for an improved semi-public area for residents and provides sustainable drainage features.
<ul style="list-style-type: none"> • <i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with</i> 	<ul style="list-style-type: none"> • The proposed development extends outward from the existing gable ends of the double-courtyard building and extends the kitchen and living areas

<p><i>materials / building fabric well considered.</i></p>	<p>along several wings providing new window opes in keeping with the extension blocks.</p> <ul style="list-style-type: none"> • The <i>Architectural Design Statement</i> prepared by TODD Architects enclosed with this application submission further details the use of materials, design, and stepped heights of the proposed development. • The proposed development has responded to the Board’s opinion and provides a stepped approach to height from 2 No. storeys to 6 No. storeys which minimises overlooking and overbearing.
<ul style="list-style-type: none"> • <i>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)”.</i> 	<ul style="list-style-type: none"> • The proposed development is on a slight rise above the Terryland River and is predominantly within Flood Zone C and a small portion is also within Flood Zone B, as detailed in the <i>Stage 2 Flood Risk Assessment</i> carried out by AECOM as part of this Application. • The Finished Floor Level of new Blocks and the basement entrance have also been altered to reflect changes to massing, drainage and proximity to Flood Zone B. This has been raised to 6.01 m OD Malin. • New attenuation storage will be included as part of the development to limit increased run-off into the surrounding drainage and the nearby Terryland River to current base levels.
<ul style="list-style-type: none"> • <i>The proposal makes a positive contribution to the improvements of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i> 	<ul style="list-style-type: none"> • The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area. There will be active frontages resulting from new ground floor amenity spaces which contribute towards enhancing the legibility of the scheme within its context. • Additionally, a public lighting plan produced by AECOM provides for an appropriate external lighting of the

	structure given its location in the urban landscape.
<ul style="list-style-type: none"> <i>The proposal positively contributes to the mix of uses and/ or building / dwelling typologies available in the neighbourhood.</i> 	<ul style="list-style-type: none"> As discussed within this report and the <i>Student Demand and Concentration Report</i>, the subject development is designed to accommodate additional students at a location of an existing student accommodation development. This helps to limit urban sprawl and provide proximity to Higher Education Institutes and surrounding services such as the Headford Road retail area.

Development Management Criteria	
At the Scale of the Site/ Building	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i> 	<ul style="list-style-type: none"> A Daylight and Sunlight Analysis has been prepared by 3D Design Bureau as part of this application. <i>'The ADF has been calculated for 31 rooms, all of which have met the recommended level of ADF and should receive sufficient daylight. The majority of assessed LKDs have an ADF of more than 5%, and should be considered very well daylit spaces.'</i>
<ul style="list-style-type: none"> <i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and an effective urban design and streetscape solution.</i> 	<ul style="list-style-type: none"> As noted above there is a Daylight and Sunlight Analysis prepared by 3D Design Bureau, which found the following: <i>'Should the proposed expansion to the student accommodation at Cúirt na Coiribe be constructed as per the current proposal, it will not result in a perceptible level of impact to the daylight or sunlight received by the neighbouring properties.</i> <i>Future residents of the proposed development will enjoy excellent levels of daylight within the proposed units.'</i>

Development Management Criteria	
Site Specific Assessments	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measurements to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</i> 	<ul style="list-style-type: none"> • There are no anticipated impacts on micro-climatic factors when the tallest component of the development is 19.55 metres.
<ul style="list-style-type: none"> • <i>In development locations in proximity to sensitive bird and/ or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/ or collision.</i> 	<ul style="list-style-type: none"> • The Natura Impact Statement and Appropriate Assessment Report found no potential impacts for bird or bat habitats. The NIS stated the following: <i>'There are no recordings of protected floral or faunal species within the proposed site from the National Biodiversity Datacentre (NBDC, 2019).'</i>
<ul style="list-style-type: none"> • <i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i> 	N/A
<ul style="list-style-type: none"> • <i>An assessment that the proposal maintains safe air navigation.</i> 	N/A
<ul style="list-style-type: none"> • <i>An urban design statement including, as appropriate, impact on the historic built environment.</i> 	<ul style="list-style-type: none"> • An <i>Architectural Design Statement</i> has been prepared by TODD Architects as part of this application. The scheme has been sensitively designed to integrate into the surrounding context and protect the residential amenity of the adjacent developments. • A <i>Landscape Visual Impact Assessment</i> and <i>Verified View Montages</i> have also been prepared to accompany this application in order to provide a complete overview of the subject design.
<ul style="list-style-type: none"> • <i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i> 	<ul style="list-style-type: none"> • An <i>Appropriate Assessment Statement</i> has been prepared as part of this application. A <i>Natura Impact Statement</i> has also been completed.

It is considered that the proposed development providing heights ranging from part 2 No. to part 6 No. storeys and comprising of 920 No. bedspaces of student accommodation at the subject site represents the proper planning and sustainable development of the area. The parapet height of the proposed development is increased above the height of the existing pitched roof of Cúirt Na Coiribe by circa 4 No. metres. The subject site is a suitable location for consolidated development and infill in accordance with National Objectives and in the interests of protecting the surrounding amenity.

We submit that the development proposed is in accordance with the direction of recent National Planning Policy, National Guidelines and the direction of the Minister in relation to assessment and design of taller buildings, consolidated development, and increased density in appropriate locations. It is therefore our contention that the subject development can be successfully assimilated into its receiving environment and context.

3.7 The Planning System and Flood Risk Management (2009)

The following section details the findings and considerations of the Flood Risk Assessment carried out by AECOM as part of this application. The subject site has been assessed based on the most up to date modeling of historic flooding, and projected impacts of existing risk and the potential increases related to climate change.

The subject site is located on the edge of Flood Risk Zones B and C above the Terryland River, as detailed in Figure 3.5 below:

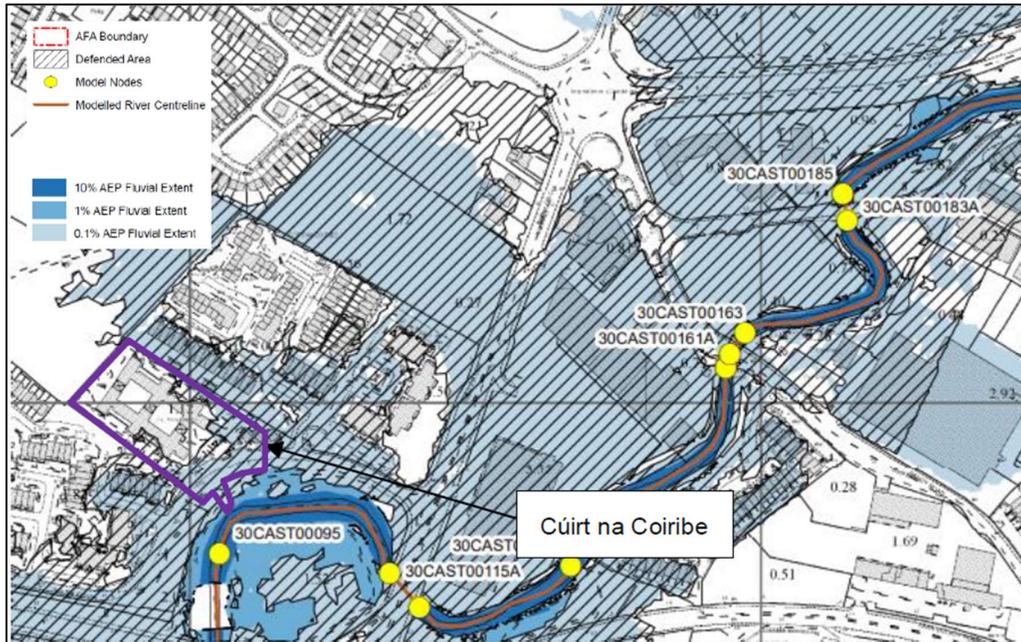


Figure 3.5: Flood Risk Mapping of the Terryland River. Site outlined in Purple (Indicative Only)

(Source: Floodmaps.ie, Annotated by Thornton O'Connor Town Planning, 2020)

The subject site is elevated above the Terryland River which is 50 metres away. There is a buffer of green space and a pedestrian path between Cúirt Na Coiribe and the river course. Along the riverbank is a series of connected habitats as identified by the *Natura Impact Assessment* including the following:

- Reed and Large Sedge Swamps (FS1);
- Reed and Large Sedge Swamps / Amenity Grassland (improved) (FS1/ GA2);
- Amenity Grassland (improved) (GA2);
- Amenity Grassland (improved)/ Scrub (GA2 / WS1);
- Depositing/ lowland rivers (FW2);
- Dry calcareous and neutral grassland (GS1);
- Wet Grassland (GS4);
- Hedgerows (WL1);
- Riparian woodland/ Immature woodland (WN5 / WS2); and
- Scrub (WS1).

Following topographical survey's the following levels were established for the existing and proposed development:

- *'The existing site levels range from approximately 5.5 m to 6.8 m OD Malin,*
- *The existing Finished Ground Floor Level of the main accommodation building is between 6.79 m OD Malin and 6.83 m OD Malin.*
- *The existing Finished Ground Floor Level of the reception/ services building is between 6.02 m OD Malin and 6.13 OD Malin.*
- *The existing basement floor level is 3.25 m OD Malin.'*

The following is the established flood risk for Fluvial flooding for Flood Zone A and Flood Zone B in the vicinity:

Type of Flood Risk	Flood Zone	Return Period	Water Level
Fluvial Flood Risk	Flood Zone A	1 in 100 year	4.04 m OD Malin
	Flood Zone B	1 in 1,000 year	6.01 m OD Malin

Due to portions of the subject site being subject to a potential flood risk in Flood Zone B, the following solution is proposed for the protection of the basement car park in the even of a 1 in 1,000 year flood event:

'The road elevation at ground floor level at the entrance to the basement level is currently 3.25 m OD Malin. It is proposed to increase the elevation at the entrance to the basement (at ground floor level) to 6.1 m OD Malin. Therefore, in the event of a 1 in 1,000-year return period fluvial flood event occurring, the basement entrance will not provide a direct flow path for flood waters to enter the basement.'

The *Stage 2 Flood Risk Assessment* also assessed the potential risk of an increase flow rate in the Terryland River as a result of the proposed attenuation storage (see *also Infrastructure Report* prepared by AECOM):

'The existing development does not include attenuation storage for surface water run-off generated within the site. The proposed development will result in an increase in building footprint within the development site. However, the majority of the existing site is currently hardstanding in the form of paved roads and paths, therefore the resulting increase in areas generating run-off is negligible.

The redevelopment works include for the provision of an attenuation area sized to cater for the entire site for a 1 in 30 year return period rainfall event with HydroBrake to restrict the run-off to predevelopment rates. Therefore, there will be a net overall reduction in the rate of run-off discharged to the Terryland Stream when compared with the existing development.'

'As there will be no hydrological impacts, mitigation is not proposed.'

The proposed attenuation storage is therefore not considered part of any additional mitigation measures in regard to potential for flood risk to the subject site.

In the event of a flood event the following recommendation is provided by the *Stage 2 Flood Risk Assessment*:

'While conditions required to generate a flood risk to the proposed development will not occur frequently, there is still a risk to the development site. The Finished Floor Level of the existing and proposed buildings is above the 0.1% AEP water level. It is proposed to increase the existing ground elevation at the entrance to the basement to 6.1 m OD Malin.

It is recommended that an emergency plan is prepared for the accommodation complex and that residents/ tenants are aware of the procedures. While the details of this plan will be the responsibility of the proprietor, it is recommended that access to basements is prevented and guidance is given on what actions residents are required to take prior to the onset of flood event and during a flood event.'

The Stage 2 Flood Risk Assessment provides the following conclusion:

'The potential flood risk at the site of the proposed development has been assessed. There are no historic reports of flooding of the development site. Based on the predictive flood risk mapping available, it is concluded that there is a fluvial flood risk to the eastern end of the development site and the access road from the Headford Road. However, the Finished Floor Levels of the existing and proposed accommodation buildings (6.83 m OD Malin) place the buildings within Flood Zone C. In addition, when the presence of the existing OPW flood defences are considered, the risk of fluvial flooding is reduced to a residual risk. While there is a potential risk to the development associated with fluvial flooding, should such an event occur it is considered associated with fluvial flooding, should such an event occur it is considered that the impact on the proposed development would be minimal as the building floor levels are above the predicted 1% and 0.1% AEP event water levels. Therefore, it is considered that there will be a negligible impact on flood risk and the floodplain as result of the proposed development.'

It is therefore considered that given the appropriate design and engineering response of the proposed development the flood risk arising from fluvial flooding can be managed on site in accordance with best practice assessments.

4.0 REGIONAL POLICY

This section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against the *Regional Spatial and Economic Strategy (RSES)* for the Northern and Western Regional Assembly, as well as the urban area specific *Galway Metropolitan Area Strategic Plan (MASP)*.

Such longer-term planning has been introduced incrementally as part of Project Ireland 2040 and is made a statutory requirement by the NPF. The longer nature of regional plans, and the creation of a reformed planning hierarchy means that sustainable development must have regard to these documents.

The *Regional Spatial and Economic Strategy* for the Northern and Western Regional Assembly has been adopted as of January 2020. (Note: As of March 2020, the finalised version of the Adopted RSES does not contain up to date graphics/maps and figures representing all adopted changes.)

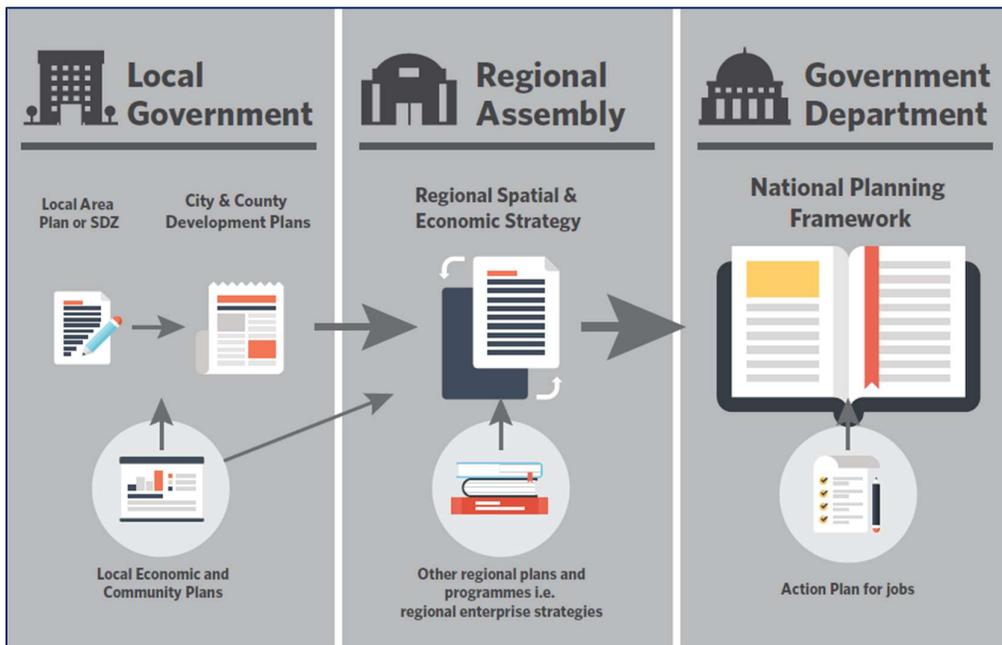


Figure 4.1: The Revised Planning Hierarchy following the Adoption of the NPF

(Source: Ireland 2040: National Planning Framework)

4.1 **Regional Spatial and Economic Strategy for the Northern & Western Regional Assembly (2020)**

The adoption of the National Planning Framework further replaced the previous planning hierarchy by establishing the requirement for the Regional Assemblies to adopt their own Regional Plans which will help to inform Metropolitan and Urban Plans, as well as the formation of Local Development Plans into the future.

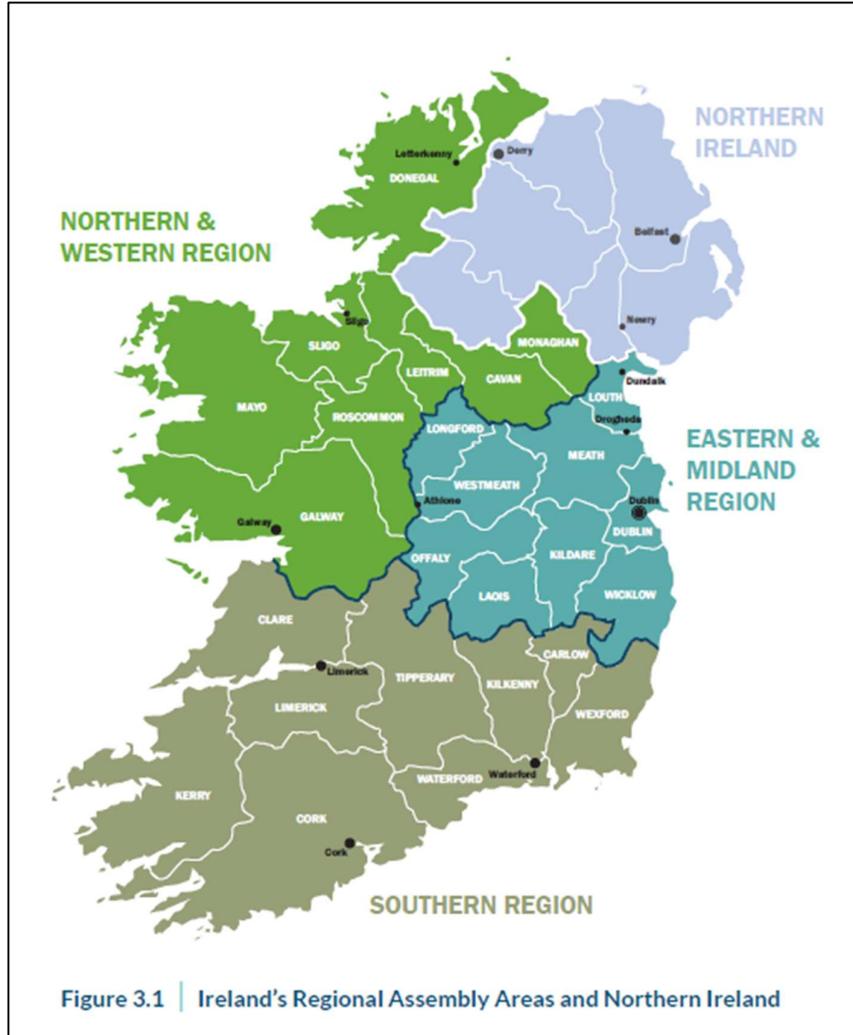


Figure 4.4: Regional Assembly Areas of Ireland.

(Source: *Ireland 2040: National Planning Framework*)

Galway City is located within the Northern and Western Regional Assembly (NwRA). The *Regional Spatial and Economic Strategy (RSES)* was adopted on the 24th January 2020.

Such longer-term planning has been introduced incrementally as part of Rebuilding Ireland/ Project Ireland 2040 and has become a statutory requirement resulting from the NPF. The longer nature of regional plans and the creation of a reformed planning hierarchy means that sustainable development must have regard to these documents. The adopted RSES (January 2020) states:

'Successful places around the world all exhibit key ingredients – innovation, diversity, creativity and tolerance. Our region has these traits in abundance, but it also has the capability to be a leader in sustainability and consolidate its reputation as one of the best places in Ireland to live and work.'

'Our RSES is built on the strategic assumption that sustainability will be the future differential; a new ingredient in 'Place' success.' -Director's View

As household size continues its trend towards lower average household occupancy in urban areas there will be a greater demand on the rental market for space. In particular, the delivery of student accommodation is an important stepping stone to providing independent living but in a managed setting which will also relieve the rental sector.

It is also important to consider the quality of life on offer to students. Galway City and the wider region is renowned for its amenity, attractions and culture. The City's Higher Education Institutions have a competitive edge when it comes to the quality of life and proximity to influential Foreign Direct Investment. The adopted RSES provides the following description of FDI's contribution to the region:

'Our regional economy has long-standing strengths in agri-food, life-sciences, RTDI, engineering, retail, manufacturing, service sector, energy, creative sector, tourism, marine and many more. These give us durable foundations upon which to build our future. The region boasts over 140 FDI multinationals supported by the IDA employing over 26,000 people. Enterprise Ireland support SME's employing over 20,000 people in the region, and Údrás Na Gaeltachta support enterprises that employ almost 6,000 people in Counties Mayo, Galway and Donegal.' – Adopted Regional Spatial and Economic Strategy Section 4.1: Economy and Employment (Pg 109)

Galway City is well located to benefit from further investment in its Higher Education Institutes, as demonstrated in Section 3.1 and the accompanying Planning Report and Student Demand and Concentration Report. It is also acknowledged that the clustering of Foreign Direct Investment in several highly skilled employment sectors has contributed to demand on the growth and success of these Higher Education Institutions. The RSES supports the continued planning policy and economic strategies which will foster this relationship further.

4.1.1 Growth Ambitions of the Adopted RSES

The RSES contains 5 No. 'Growth Ambitions' to assist in aligning National and Regional policies with a qualitative, economically focused, and adaptive set of principles which will underpin the ongoing review process of the policies, initiatives and infrastructure projects contained within the plan.

Informing these *Growth Ambitions* is an understanding that due to rural decline and depopulation, there has been a recurring skills and qualifications drain from the region. Recent decades have brought Foreign Direct Investment, but continued growth requires a connected approach to skills, further education, quality of life and a sense of place.

The 5 No. *Growth Ambitions* are as follows:

RSES Growth Ambitions		
Key Principle	Growth Ambition	Development Response
People and Place	<i>'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.'</i>	<ul style="list-style-type: none"> • The subject application is located within the existing built-up area of Galway City. • By providing a consolidated quantum of student accommodation in close proximity to NUIG and the City Centre, the subject proposal seeks to promote active travel, sustainable communities and an enhanced living experience.
Vibrant Ambition	<i>'The NWRA believes that strong economic growth, which creates permanent, sustainable jobs, is best achieved by building a competitive and productive economy. Focusing policies on scale, investing in connectivity and our people whilst aggressively pursuing a low carbon approach to enhance our differentiation.'</i>	<ul style="list-style-type: none"> • The subject proposal seeks to expand the existing Student Accommodation development and create jobs and a management structure that is a vibrant and vital part of student life, within the development. • By providing stable accommodation for the City's burgeoning student population it creates opportunities for networking, socialising, collaboration and the growth of skills for career development. • The proximity to education and local services also encourages a low carbon approach and sustainable modes of transport are encouraged. • The proposed development seeks to avoid demolition of the existing main building and instead proposes an expansion and adaptation of existing infrastructure to provide 920 No. bedspaces.

Natural Ambition	<p><i>'It has been identified that more strategic actions are required to prepare the region for what is to come and highlights the need to create a combined long term vision for the future of both energy supply and our ability to generate renewable energy. To address our energy requirements our RSES emphasises the need for co-ordination, new thinking, investment and skills to implement change. All considerations need to be cognisant of our natural resources, landscape and heritage (natural, social & cultural).'</i></p>	<ul style="list-style-type: none"> • Supporting and catering for the student population of Galway is important to the fostering of regional innovation, investment and growth of the economy and social & cultural assets. • The new additions to Cúirt Na Coiribe consist of modern materials and are designed to achieve an improved energy rating. This will also be developed in conjunction with improvements to the buildings systems with the provision for adaptation and upgrading into the future.
Connected Ambition	<p><i>'Accessibility and mobility within the region has a direct effect on the region's economic competitiveness. It also has an effect on the attractiveness of the region as a favourable living and visiting environment. The RSES will support further investment in sustainable transport measures. In addition, to achieve our Vision for the region we need to strengthen our digital network and enable new technologies to work by ensuring that policies and systems are in place that can help people transition to a world much more digitally connected.'</i></p>	<ul style="list-style-type: none"> • There will be a strong emphasis made on sustainable transport and enhanced mobility for residents of the student accommodation complex. This will include the enhancement of bicycle parking spaces to 656 No. spaces. There will also be a reduction of car parking to 59 No. spaces from 135 No. spaces. • There will be resources for active travel and regional amenity access/ tourism available from the reception area. • The development is within 1 Km walking distance from NUIG, 1.3 Km from Eyre Square and up to 3 Km from GMIT, a 10 minute bicycle journey.
Inclusive Ambition	<p><i>'One of the strongest foundations and emerging propositions this region has to build on is its 'liveability'. The Region aspires to being one of the most liveable places in Europe with a commitment to</i></p>	<ul style="list-style-type: none"> • The subject scheme proposes to enhance the amenity and communal space on offer to residents by providing 1,688 sq m of internal amenity spaces. This will improve the

	<i>sustainable and inclusive growth.'</i>	general amenity and quality of life for residents throughout the academic year.
Infrastructure Ambition	<i>'Provision and maintenance of economic infrastructure, such as energy, water, and wastewater, are key to delivering compact growth and a connected, vibrant, inclusive, resilient and smart region.'</i>	<ul style="list-style-type: none"> It is considered that this ambition applies to the relevant Local Authority, and the compact development of the subject site is consistent with these aims.

The proposed expansion of an existing student accommodation development aligns with the Growth Ambitions of the RSES by promoting the consolidated development of a brownfield site that is well located for infrastructure, services and the promotion of sustainable transport patterns. The strategic location of this development makes it ideal for a creative approach to sustainable development that prevents urban sprawl and provides for increased population density which is supported by surrounding services and land uses, such as proximity to Higher Education Institutions, local services and the historic city centre.

4.1.2 Key Business Elements and Placemaking

In order to connect a enterprise and quality of life goals with effective development management/ planning, the RSES frame effective 'place-based' assessments on the following 'Key Businesses Elements'. This is with a view to placemaking and enhancing the overall attractiveness of Galway City and the wider region as a place to live, work, study and enjoy a healthy quality of life.

The following *Key Business Elements* as set out by the RSES are relevant to the subject application and we have set out how the proposed development responds to these objectives:

Regional Policy Objectives	
Objective:	Design Response:
1. <i>Development of compact urban centres with critical mass in population; encouraging the revitalization of urban areas and reinhabitation of urban cores;</i>	<ul style="list-style-type: none"> The provision of 920 No. Bedspaces (an additional 515 No. bedspaces over the 405 No. existing bedspaces) will provide a significant uplift in the available student accommodation supply in Galway City. This also encourages compact growth.
2. <i>Provision of connectivity and access (including national and international), enabled by physical and technology infrastructures with capacity resilience and quality especially post-BREXIT;</i>	<ul style="list-style-type: none"> The proposed development will include construction of new state of the art facilities built to modern building standards. This will improve access to telecommunications and services for

	<p>residents with the provision of amenity and library spaces.</p>
<p>3. <i>Establishment of competitive, smart and integrated public transport networks within and between cities and urban areas;</i></p>	<ul style="list-style-type: none"> • Located just above the Terryland River, the subject site is within easy walking distance of NUIG (1 Km) and the wider Historic City Centre (1.3 Km). • There is also provision for a bus corridor through the Gort Na Coiribe development within the Galway Transport Strategy which is referenced by the Galway City Council Development Plan, and the MASP for Galway (as discussed in Section 4.3)
<p>4. <i>Nurturing of world class infrastructure and competitive services with capacity, resilience and quality;</i></p>	<ul style="list-style-type: none"> • The proposed facility is designed to a high standard, with internal amenity spaces, energy efficiency, adaptability and resilience.
<p>5. <i>Growing our third level infrastructures, access to skills and to research, development and innovation;</i></p>	<ul style="list-style-type: none"> • By providing off-campus Purpose Built Student Accommodation that is within easy walking/ cycling distance of key Higher Level Institutions, the subject application will aid the continued support of the tertiary education sector in the city. • By providing additional PBSA bedspaces within Galway City's existing built-up footprint, the proposed development will assist in freeing up space in the private rental sector, and assist in nurturing an educated, skilled and vibrant workforce.
<p>6. <i>Availability of property solutions – including "ready-to-go" commercial properties, "landing spaces", co-working spaces and flexible property solutions and affordable housing;</i></p>	<ul style="list-style-type: none"> • Accessible Student Accommodation in close proximity to education is a valuable "landing space" for the yearly influx of students to Galway City. Cúirt Na Coiribe aims to continue to be a market leader in welcoming students with an integrated management plan (as submitted with this application), transport and travel information, and knowledge and support for local/ regional businesses, services and tourism. • Outside of term time the facility will also cater for short-stay accommodation.
<p>7. <i>Co-location or dynamic clustering, enabling connectivity and linkages within and between suppliers and</i></p>	<ul style="list-style-type: none"> • Through the development of the subject application there will also be on site improvements in amenity provision for the existing development and new

<p><i>purchasers, between enterprises and Higher Education Institutes (HEIs).</i></p>	<p>residents. These facilities include "Scotty's" restaurant and a self-catering coffee dock.</p> <ul style="list-style-type: none"> • Each "House-unit" of bedspaces will feature integrated living/ kitchen/ dining areas which will allow for self-catering and social integration between residents.
<p>8. <i>Development of quality of life factors and sense of place, including harnessing the social, and cultural dimensions of the living experience of communities, including the unique social, linguistic and cultural dimensions of our Gaeltacht communities.</i></p>	<ul style="list-style-type: none"> • The development of additional communal facilities within the existing Cúirt Na Coiribe and the new parts of the development will provide an improved level of amenity and supportive environment which will contribute to the overall resident experience and quality of life.

The development of additional beds at the site of an existing student accommodation development provides for consolidated development within the existing footprint of Galway City. Through a sustainable increase in density and height within the same site area, the subject scheme also provides for improved internal community amenities and encourages sustainable transport patterns. This is in accordance with the above Key Business Elements in support of Placemaking as set out in the RSES.

4.1.3 Relevant Regional Policy Objectives of the RSES

The following Regional Policy Objectives are of relevance to the subject site:

RPO 3.1:

'Develop urban places of regional-scale through:

- a) *Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth;*
- b) *Delivering significant compact growth in Key Towns; and*
- c) *Developing derelict and underutilised sites, with an initial focus on town cores.*

RPO 3.2:

- a) *Deliver at least 50% of all new city homes targeted in the Galway MASP, within the existing built-up footprint of Galway City and suburbs;*
- b) *Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint; and*
- c) *Deliver at least 30% of all new homes that are targeted in settlements of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints.*

RPO 3.8:

'Support the design of new/ replacement/ refurbished dwellings to high energy efficiency standards that fully avail of renewable technologies, maximise solar gain, utilising modern materials and design practices.

RPO 7.20:

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

The subject development is consistent with the goals and policies of the NPF and the RSES in seeking compact growth and consolidated development within the built footprint of Galway City. As an existing structure and brownfield site, the expansion of the subject student accommodation development is appropriate for the subject site and in line with national and regional policy.

4.2 Galway Metropolitan Area Strategic Plan 2020-2032

The Metropolitan Area Strategic Plan (or MASP) for Galway City is located within the RSES for the Northern and Western Regional Authority. The MASP sets out the strategic response for Local Authorities to implement the NPF within the regional context of the RSES. It sets out the key drivers of aims, objectives and policies to assist Galway City & Suburbs to continue to be a place to live and work that is sustainable and adaptable to change.

Galway Vision

'The MASP 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 vision for Galway is that it will be a leading European city renowned for its quality of life, its history, its culture and its people. It is and will be a place that embraces modern technologies, high standards of education, competitive and sustainable enterprises.'

The extent of the Galway Metropolitan Area Strategic Plan shows that there is a substantial scope for growth to 2040 and beyond. To best adhere to the goals and objectives of the NPF and the RSES, development should consolidate from the inner-city to district centres, before additional areas of expansion are explored. This means that central and/or accessible locations such as the subject site are vital for the sustainable growth of the City and Suburbs.

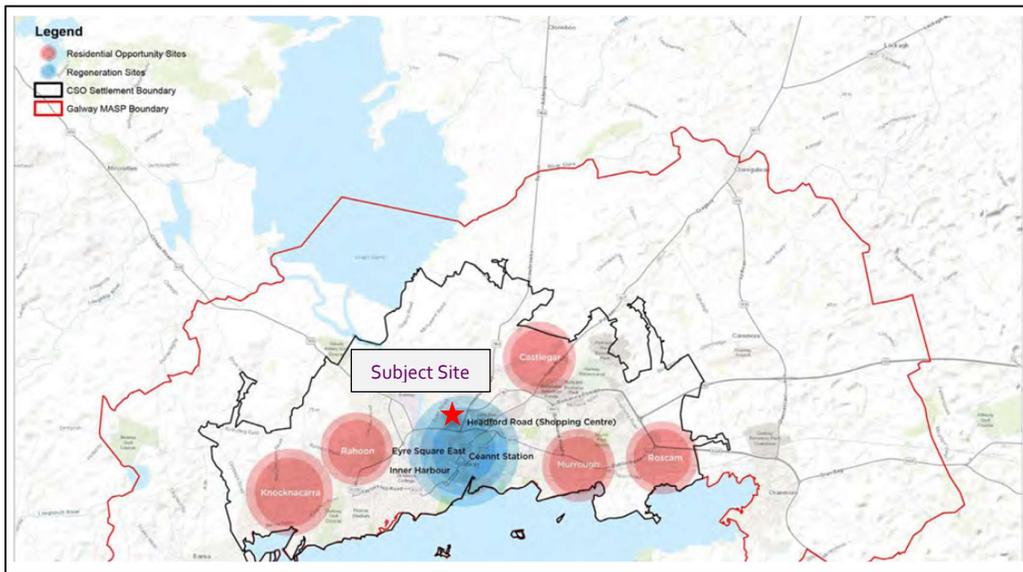


Figure 4.2: Galway Metropolitan Area as represented in the MASP. Note the Blue Highlighting of City Centre Regeneration Lands.

(Source: *Draft RSES for NWRA², Draft Galway MASP, 2018*)

In recognition of the strategic context of the Galway Metropolitan Area as the only city within the Northern and Western Regional Assembly, the following Regional Planning Policy demonstrates the importance of collaboration between Regional Authorities to offer a combined alternative to the dominance of Dublin:

RPO 3.6.1

'It is an objective to establish a collaborative approach between the Regional Assemblies (NWRA, SRA), the Local Authorities and other stakeholders to enable all their metropolitan areas to collaborate to harness their combined potential as an alternative to Dublin.'

Galway City is well placed to offer an alternative in terms of education and co-location with a range of employers (especially med-tech and pharmaceuticals). The significant student population of Galway City represents an important component of the current and future economy of the region, and the housing needs of this cohort must be catered to by on and off-campus purpose built student accommodation.

4.2.1 Population Targets and Housing

The following are the population targets of the *National Planning Framework* as applicable to the RSES, and the targets of the RSES in the context of the growth of the Galway Metropolitan Area.

² As of March 2020, the finalised version of the Adopted RSES does not contain up to date graphics/maps and figures representing all adopted changes.

NATIONAL POLICY OBJECTIVE	NORTHERN AND WESTERN
➤ Growing Our Regions	➤ +160,000 – 180,000 people (1 M total) ➤ +115,000 – in Employment (450,000 total)
➤ Building Stronger Regions: Accessible Centres of Scale	➤ Galway City and Suburbs: +40,000 – 45,000 (at least 120,000 total)
➤ Compact, Smart, Sustainable Growth	➤ 50% of new city housing within existing Galway City and suburbs footprint

Settlement	Population 2016 Census	% Increase To 2040 (Min)	Uplift to 2040	Proposed 2026 Uplift (Min)	Proposed 2031 Uplift (Min)	Transitional Target Population
Galway City	79,900	50 - 55	42,200	23,000	12,000	115,000

The following policies of the Galway City MASP relate to the approach to compact growth to be taken by the RSES and Galway City and County Councils.

'Galway Metropolitan Area has a considerable land capacity that can significantly contribute to meeting the housing demands based on population targets set out in the NPF and the RSES. The Targets are that:

- 1. The population of Galway MASP to grow by 27,500 to 2026 and by a further 14,500 to 2031 with the population of the city and suburbs accommodating 23,000 to 2026 and a further 12,000 to 2031.*
- 2. Deliver at least half (50%) of all new homes that are targeted within the MASP to be within the built-up footprint.'*

RPO 3.6.2

'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.'

Galway City has a significant population of students related to the numerous Higher Institutes of Education located within the city (particularly NUIG and GMIT). This is further detailed within Section 4.2.2 of this *Statement of Consistency* and the accompanying *Student Demand and Concentration Report*.

The population of students attending Higher Education in the Galway Metropolitan area is in excess of 24,000 No. students per year. This provides for a constant seasonal variation in population which is supported by purpose built student accommodation on and off-campus as well as the rental sector of Galway City. Through the intensification of the subject site, it is believed that a greater population can be supported by the additional bedspaces and the proposed improvements in on-site amenities. The subject proposal also provides for short-stay tourist accommodation during the summer months/outside of term time. This proposal is consistent with the population targets of the NPF, RSES and Galway MASP.

As seen in Figure 4.2 above, the subject site is within range of the regeneration sites identified around the city centre, including the *Headford Road (Shopping Centre)*. The following are the regeneration areas of importance within the MASP environs:

- i. *Consolidation of the existing neighbourhoods of Knocknacarra, Ragoon, Castlegar and Roscam;*
- ii. *Development of Regeneration Lands at Ceannt Station Quarter, Inner Harbour and Headford Road;*
- iii. *Ardaun*
- iv. *Murrough*
- v. *Baile Chláir, Bearna, Oranmore, Briarhill*

There is also reference within the MASP to a comprehensive study of building heights for the Galway Metropolitan Area which will inform the further drafting of Development Plans and the Development Management and delivery of regeneration and compact growth objectives for the above strategic locations and the wider Metropolitan Area.

RPO 3.6.3:

- (a) *The Assembly supports the preparation of a Building Heights Study, a strategy to guide future sustainable development which takes into account the historic, cultural and infrastructure features of the city. In developing this strategy, areas of high density will target residential density of 50 No. units/Ha. The default rate for other areas will generally be 35 units/Ha.*
- (b) *The preparation of a Building Heights Study shall take into account all material considerations including but not limited to, the historic cultural and infrastructure features of the city, urban design, architectural quality, placemaking, regeneration and public transport provisions. It shall also take account of the economic, social and environmental issues that need to be addressed so that quality living is delivered. The study should be cognisant of the need to deliver compact growth and density of residential development may be one metric but the quantum of commercial, social and cultural floor space should also be a consideration.*

As stated in Section 3.6 relating to the *Height Guidelines*, the subject development has been assessed in accordance with current national guidelines on height, density and supporting specialised inputs such as *Daylight and Sunlight Analysis Report, Verified View Montages and Landscape and Visual Impact Assessment*. It is our submission that the proposed development is consistent with the *Height Guidelines* and the *Galway City Council Development Plan 2017-2023* in regard to height and urban design.

4.2.2 Student Accommodation and the Galway MASP

As demonstrated throughout this Report and supporting submissions, such as the *Student Demand and Concentration Report* there is a significant population of students within the Galway Metropolitan Area. This population presents a unique challenge for the city as it is incumbent on the Higher Education Institutions, the *Purpose Built Student Accommodation* sector and the wider Galway rental market to support this fluctuating population of younger

adults attending Third Level Education. Therefore, the MASP has acknowledged this challenge and provided the following commentary:

Student Accommodation

*'It is important to specifically refer to the student population of the city as it comprises a significant quantum of the city population (over 24,000 students attend third-level colleges in the city) and there is a particular demand for student niche accommodation in the city to meet their needs. The objective of the MASP is to support the provision of purpose-built student accommodation both on and **off-campus at appropriate locations**. Delivery of this type of accommodation can be met on a variety of mixed zoned sites and is beneficial in freeing up existing private housing stock within existing housing developments. **This type of accommodation also has the potential to meet tourism accommodation demands outside of term time.**' [Our Emphasis]*

It is our submission that the proposed development is well located proximate to NUIG and the city centre for an intensification in the provision of student accommodation. This will be accompanied by an increase in the quality and quantum of amenities and facilities for students to cater for a diverse range of needs and interests.

5.0 LOCAL POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy and is consistent with the objectives and guidance as set out within the *Galway City Council Development Plan 2017-2023*.

5.1 *Galway City Council Development Plan 2017-2023*

5.1.1 Zoning of the Subject Site

The subject site is zoned "Residential" or "R" in the *Galway City Council Development Plan 2017-2023* where the stated 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.'

There is a smaller part of the subject site which is also zoned 'RA' or 'Recreational Amenity', this has the following objective:

'To provide for and protect recreational uses, open space, amenity uses and natural heritage.'

This portion of the site will be the location of a 'wetland' attenuation pond as part of the Sustainable Drainage System (SuDS).

The current student accommodation at Cúirt Na Coiribe has been in existence since the early 2000s (Parent Permission Reg. Ref. 00/249). In that time it has become an integral part of the surrounding community and integrated as part of its surrounding residential context.

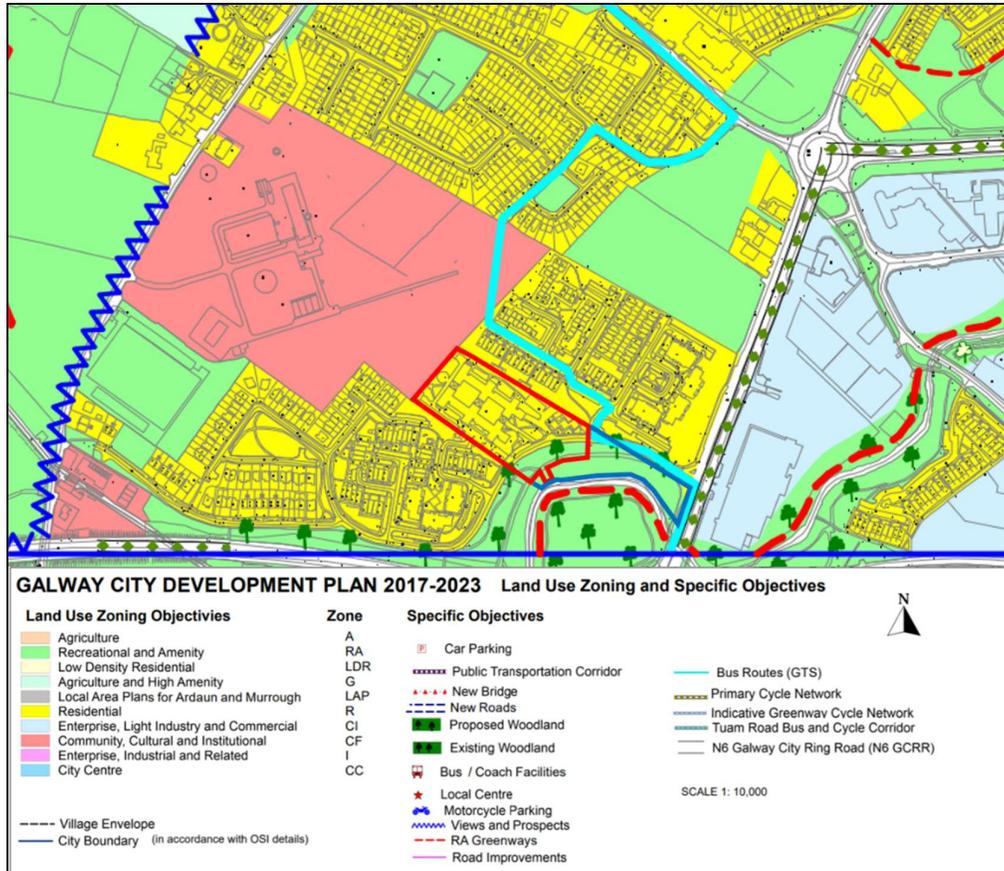


Figure 5.1: Zoning of Subject Site. As Outlined in Red (Indicative Only)

(Source: *Galway City Council Development Plan 2017-2023, Annotated by Thornton O'Connor Town Planning, 2020*)

To the south of the subject site the Terryland river curves through the landscape. This water course also features a series of walking trails, which are marked in the Development Plan for improvement to greenway use and will connect with other trails in the Lough Corrib region and towards Tuam, County Galway. The subject site also has strong permeability across the green space to the N6 and the Headford Road. A specific policy marked on the Map (light blue line) also indicates an improvement to road layout which will see the introduction of a bus route adjacent to the site to Galway’s northern suburbs.

Immediately adjacent to the south of the subject site is an area earmarked to form the Headford Road Local Area Plan. This LAP is currently undergoing the drafting process, however there is a strong policy intent to improve accessibility, strengthen the urban form, overall amenity and to provide a vibrant and sustainable area for work/ life balance.

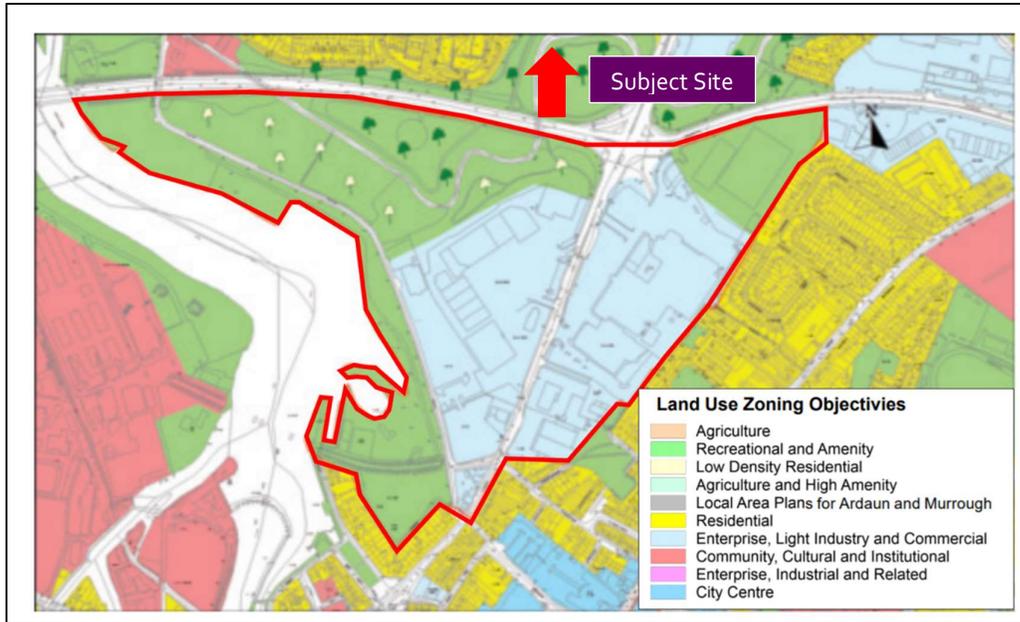


Figure 5.2: Headford Road LAP Area, to the south of the subject site. (Red arrow indicating the location of subject site outside the map area)

(Source: Galway County Council Development Plan 2017-2023, annotated by Thornton O'Connor Town Planning, 2020)

The subject site is well placed to support this LAP. The subject site is capable of providing increased density to support the character of the Headford Road and develop a sense of place. The proposed development will provide a significant architectural uplift to the area, providing contemporary buildings to juxtapose with the existing surrounding buildings.

5.1.2 Compliance with the Zoning Objectives of the Galway City Council Development Plan 2017-2023

There are a number of general policies within the Galway City Council Development Plan 2017-2023 which are applicable to the subject site, these will be outlined and referred to in this section.

Policy 8.7 Urban Design

- Encourage high quality urban design in all developments.
- Improve the qualitative design standards through the application of design guidelines and standards of the Development Plan, in particular the Galway Shop Front and Signage Design Guidelines (2012) and Design Guidelines: Canopies (2011).
- Ensure that high quality urban design contributes to successful urban regeneration in the city.
- Encourage innovation in architecture and promote energy efficiency and green design.
- Prepare Local Area Plans for Ardaun, Murrough and the Headford Road Area (south of the Bodkin junction) which provide an urban design framework to

contribute to the development of sustainable and vibrant living and working environments.

- *Encourage the use of design statements and masterplans/framework plans for large-scale development where appropriate.*
- *Proposals for buildings which are taller than the prevailing benchmark heights will only be considered where they do not have an adverse impact on the context of historic buildings, Architectural Conservation Areas, residential amenity or impinge upon strategic views.*

Submitted as part of this application is a Design Statement by TODD Architects detailing the principles which have informed the design of the proposed development.

The Design Statement addresses the above policy by stating the following:

1. The scale of the existing “facilities” building being two storey above basement and consisting of interlocking rectangular blocks to give a “zig zag” footprint is considered to be sub-optimal in design terms. It is considered that a series of new blocks can be accommodated at the entrance to the site which will be more in keeping with the scale of the remainder of the development and which forms a coherent entrance space to the development as a whole.
2. In relation to the main blocks of accommodation, it is proposed to extend towards the south and north boundaries the existing “blank” gable elements: The removal of the existing attic floor level is proposed and the building extended in height ranging from four to six storeys.
3. 2 No. new blocks are proposed to the rear of the site (Blocks 3 & 5), linked to the existing blocks and viewing west towards the Treatment Works.

The varying heights of the proposed new development represents a contextual response whereby privacy and amenity value, both within the proposed development as well as adjoining developments, is carefully considered.

Policy 9.3 Flood Risk Assessment

- *Require site-specific Flood Risk Assessment (FRA) for planning applications in identified areas at risk of flooding, where appropriate, in accordance with the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Council Development Plan 2017-2023.*
- *Ensure the use of SUDS, sustainable urban drainage systems, wherever practical, in the design of development to reduce the rate and quantity of surface water run-off.*
- *Ensure new development, where appropriate, is designed and constructed to meet the flood design standards outlined under Section 11.27 Flood Risk Management and the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Council Development Plan 2017-2023.*

As stated previously there is a Flood Risk Assessment included with this application conducted by AECOM. This assessment has been carried out in accordance with best practice and adheres to the policies set out in the *Galway City Council Development Plan 2017-2023*.

There is also an *Infrastructure Report* prepared by AECOM which details the drainage plans, wetland/ attenuation pond and SuDS proposed for the subject site.

Policy 9.5 – Sustainable Building Design and Construction

- *Increase the energy performance of future buildings in the city by encouraging energy efficiency and energy conservation in the design and construction of development.*
- *Encourage new development to limit greenhouse gas emissions and make use of opportunities for renewable and low carbon energy including through design, layout, orientation and use of materials.*
- *Encourage consideration of orientation in the siting, layout, massing, landform and aspect in the design of future housing developments, in order to avail of passive solar gain and natural ventilation.*

The proposed development will see the upgrading and expansion of an existing student accommodation facility, this development approach is a sustainable practice and promotes the storage of embodied carbon contained within building materials.

By upgrading internal layouts, external frontages and providing new building blocks, the subject scheme seeks to achieve a higher energy rating and provide the latest sustainability and construction standards throughout the development.

The following is an extract from the *Energy Statement* by AECOM:

'The first step to implementing a low energy design on the Cuirt na Coiribe development will be to reduce the energy required to heat the development using passive means. The main passive energy reduction measure on new build elements and extensions will be the specification of a high performance building fabric including high specification u values for building elements such as walls, glazing, roof and floors. Infiltration losses account for a significant proportion of the total heat loss of buildings and the air tightness details of the development will be carefully developed to minimised infiltration losses. Thermal bridges also contribute a significant proportion of building heat loss and thermal bridges at junctions will be carefully detailed to reduce these losses.

Careful design of glazing (particularly on south facing facades) has the potential to reduce the heating consumption of the development by maximising solar heat gain. The glazing specification shall maximise solar gain while minimizing heat loss. While maximising solar can reduce heating consumption it can cause overheating issues. In recognition of this overheating assessments will be carried out during the design and mitigation measures (for example blinds) will be provided where required to prevent overheat.'

A Daylight and Sunlight Analysis by 3D Design Bureau has also been provided as part of this application. An assessment of the 'Average Daylight Factor' or 'ADF' entering a number of tested rooms within Cúirt Na Coiribe found the following:

'An assessment has been carried out to the Average Daylight Factor (ADF) of selected habitable rooms across the ground floor of the proposed development. The assessed spaces have been chosen with the aim to represent all room types. Where room types are repeated, although the actual ADF will differ due to differences in context, a similar ADF should be assumed. No assessment has been carried out on subsequent floors as the levels of daylight naturally increase as the floor level increases and the lowest floor is deemed to be the worst case scenario.

BS 8206-2 Code of practice for daylighting, recommends an ADF of 5% for a well day lit space and 2% for a partly daylight space. Below 2% the room will look dull and electric lighting is likely to be turned on. In terms of housing, BS 8206-2 also gives minimum values of ADF: 1.5% for living rooms and 1% for bedrooms.

The ADF has been calculated for 31 rooms, all of which have met the recommended level of ADF and should receive sufficient levels of daylight. The majority of the assessed LKDs have an ADF of more than 5% and should be considered very well daylit spaces.

The results of for the study on ADF can be seen on pages 14-17.'

It is therefore our contention that the proposed bedspaces provide a strong quality of passive solar gain and natural daylight infiltration throughout the development which meet the above standards set out in the *Galway City Council Development Plan 2017-2023*.

Policy 9.8 – Sustainable Urban Drainage Systems (SUDS)

- *Ensure the use of Sustainable Urban Drainage Systems (SUDS) and sustainable surface water drainage management, wherever practical in the design of development to enable surface water run-off to be managed as near to its source as possible and achieve wider benefits such as sustainable development, water quality, biodiversity and local amenity.*
- *Proposals for Sustainable Urban Drainage Systems (SUDS) should include provisions for the long term management, operation and maintenance of these systems.*

The subject site is located within Flood Zones B and C. The majority of the site is within Flood Zone C, including the habitable areas. The proposed development will include a new attenuation tank systems and SuDS drainage systems to limit outflow of storm water from the scheme into the surrounding water systems.

The following is an extract from the *Infrastructure Report* by AECOM:

'To store run-off in excess of this flow rate, it is proposed to provide a wetland in the green area to the east of the development site as set out within the CIRA C753 document. Wetlands are features with a permanent pool of water that provide both attenuation and treatment of surface water runoff. They can support emergent and

submerged aquatic vegetation which helps enhance treatment processes and has amenity and biodiversity benefits. The proposed wetland is to be enclosed with a fence to prevent any threat to locals or animals falling into the wetland. Mature hawthorn bushes are specified on either side of a post and rail fence. There will be a gated entry provided to allow for maintenance of the wetland. Water signage and a lifebuoy will also be required.

Attenuation storage is provided above the permanent pool and wetland areas. A hydro-brake installed at the outflow controls the rates of discharge from the pool which is limited to the greenfield runoff rate (QBar). The storage area has been sized based on the volume required (135.2 m³) to run-off from the development site during a 1 in 30-year return period rainfall event. A 20% increase in rainfall intensities as a result of impacts of climate changes has also been incorporated in this design.'

The subject scheme will provide for a sustainable expansion of an existing student accommodation development which will provide 920 No. bedspaces in an infill/brownfield location. This will comprise of significant consolidation of development which is in line with National, Regional and Local objectives for sustainable development.

5.1.3 Building Height within the *Galway City Council Development Plan 2017-2023*

The existing development at Cúirt Na Coiribe is a 4 No. storey building with a tall pitched roof, which contains a number of attic apartments. The proposed development would remove the pitched roof and in several locations articulate upwards to an overall height of 4-6 No. storeys. Similarly, the new additional blocks will not exceed 6 No. storeys.

'In the assessment of development proposals, the following principles will be considered when assessing capacity for height:

- *Protection of existing built and natural heritage and residential amenity.*
- *Creation of landmarks that enhance the city's legibility without eroding its innate character.*
- *Retention of existing benchmark heights so as to retain strategic views and to protect and enhance the general character of sensitive locations.*
- *Promotion of higher density at centres/nodes of activity, on large scale infill sites and along public transport corridors.'*

The subject development addresses these criteria through the following design considerations:

- The subject scheme is only c. 4 metres taller than the existing development at its highest point (going from 15.466 metres to 19.55 metres).
- According to the Daylight and Sunlight Analysis by 3D Design Bureau, the following was stated in the conclusion:

'Should the proposed expansion to the student accommodation at Cúirt na Coiribe be constructed as per the current proposal, it will not result in a

perceptible level of impact to the daylight or sunlight received by the neighbouring properties.

Future residents of the proposed development will enjoy excellent levels of daylight within the proposed units.'

- The proposed frontage onto the Terryland River and access road will create a landmark profile in the landscape signifying the surrounding residential cell above the Headford Road area.
- The new extension blocks to the front of the development bring a new materiality and design language to the scheme, presenting a new façade and arrangement of buildings stepping back to the existing structure.
- Along the side elevations of the existing building are new extensions to the gable ends and inset kitchen/ dining areas of several apartments. These extensions bring forward new opes and material treatment tying the new elements together whilst also increasing the floor area and communal areas of existing and proposed units.
- The Headford Road is a busy node of commercial and community activity adjacent to the N6/ inner bypass road. This prominent location is also close to the city centre and NUIG. The proposed development seeks to provide increased density and modern sustainable infill to an existing brownfield location.
- There is an objective of the *Galway City Council Development Plan 2017-2023* to provide a new bus service in the vicinity as per the *Galway Transport Study 2016*. The area is currently served by the No. 407 bus to Eyre Square.

Additionally, the *Galway City Council Development Plan 2017-2023* states the following:

'Any development proposals for buildings above the prevailing benchmark height will be required to be accompanied by a design statement outlining the rationale for the proposal and an assessment of its impact on the immediate and surrounding environment including buildings, open space, public realm and any views.'

The densification of the subject lands is appropriate having regard to the adopted *Height Guidelines* (discussed in Section 3.8), which note that building heights must be generally increased in appropriate urban locations.

The suitability of the proposed development for additional height is discussed throughout the Design Statement by TODD Architects, and contained within the assessments of SPPR 3 of the *Height Guidelines* (Section 3.8.1). It is also discussed in the accompanying LVIA prepared by The Big Space Landscape Architects.

5.1.4 Student Accommodation Objectives

The *Galway City Council Development Plan 2017-2023* sets out a number of objectives and statements in support of the sustainable management of student housing. Recognising the differing needs of their student population likened to comparable cities, there is an understanding that due to the scope and nature of housing availability in Galway, a more dedicated supply of student accommodation has been required in recent years. There is support in the policy for high quality PBSAs. Galway is a city of culture, tourism, and education and with this comes a need to provide accommodation for the increasing number of students attending third level education. Thus, the Development Plan supports student accommodation:

'Support the development of third level student accommodation both on campus and through private student accommodation schemes. Require such private student accommodation, in particular new build, to generally be of the type that would have otherwise qualified for tax relief under Section 50 of the Finance Act 1999.'

The Development Plan sets out that proposals for student accommodation should comply with the design standards promoted by the Department of Education and Skills, *'Guideline on Residential Development for 3rd Level Students (1999)* and the supplementary review document *'Matters arising in relation to the Guidelines on Residential Developments for 3rd Level Students (July 2005)* when considering planning applications for student accommodation. The enclosed schedule of accommodation demonstrates how the subject development complies with these standards, and similarly to national best practice highlighted within *National Student Accommodation Strategy (2017)*.

There is a desire to maintain higher levels of quality and control over the nature of student accommodation, in order to create attractive, safe and affordable dedicated accommodation that is not sub-standard or at the expense of the health, well-being, or amenity of students. The Development Plan states the following:

'Student accommodation should be designed to be attractive, accessible, safe, and minimise adverse impacts on the surrounding area while creating mixed, healthy and inclusive communities. The nature, layout and design of the development should be appropriate to its location and context and should not result in an unacceptable impact on local character, environmental quality or residential amenity.'

By providing additional capacity within an existing student accommodation facility, the proposed development is less likely to limit impact the existing amenity or accessibility enjoyed by the subject site.

As part of the upgrade and expansion works, the Cúirt Na Coiribe Student Accommodation will adapt and sustain its effective management to account for the increase in student bedspaces and changes to ancillary facilities.

'An appropriate management plan should be part of student accommodation applications to minimise potential negative impacts from occupants and the development on surrounding properties and neighbourhoods and to create a positive and safe living environment for students.'

A *Student Management Plan* prepared by the Exeter Ireland Property (III) Limited is included as part of this application. The following extracts detail the important measures management will take in regard to protecting residential amenity within Cúirt Na Coiribe and in regard to the neighbouring developments:

Antisocial Behaviour

'The Management Team have primary responsibility for handling potential antisocial behaviour. This involves managing any behaviour that intrudes on others' enjoyment, in most cases involving excessive noise. One-to-one discussion is the preferred option and in most cases it goes no further than that, although in the case of significant damage or offence, financial penalties can be invoked. In extreme cases the Management Team are mandated to involve the Gardai.'

Residents are made aware of their behavioural responsibilities from the time of their arrival. There is a clear statement of the rules governing acceptable behaviour on the website, including in the License to Reside. The Code of Conduct is a central feature of the Welcome Events.

The Management Team requires that noise levels at night, between 11 pm and 7 am, do not exceed 45dB, and social gatherings will be shut down immediately if they are in breach of this to the extent of causing annoyance to other residents or neighbours. A 24 hour telephone service is available to our neighbours to inform the Management Team of antisocial behaviour.

Antisocial behaviour interventions are logged in order to monitor repeated breaches.'

Operation

'A central pillar of our Good Neighbour Policy is respect for the right of the local community to a quiet life. To that end, residents will be required to sign a License to Reside agreement which sets out a code of behaviour for the duration of the license period. Particular consideration is given to the prevention of any activity that might cause nuisance to adjoining local residents. Short Stay residents, as part of this booking terms and conditions, are informed of their obligations to abide by the same rules.'

Lines of communication

'There is a 24-hour telephone service available for local residents to make the Cúirt na Coiribe Management Team aware of any antisocial activity that might be taking place. Full contact details will be circulated to local residents and businesses. At the beginning of each year representatives of local residents groups will be invited to meet the residents with the intention of building positive relationships in the context of sharing local advice. In the case of official student events held at Cúirt na Coiribe, advance notice will be given to local residents by the Management Team.'

The current accommodation as has evolved to cater to the needs of students in the Galway City area. This shift in focus has allowed Cúirt Na Coiribe to become an important supply of student accommodation by providing 405 No. bedspaces within the city. By consolidating and expanding within the same development, the potential of any impacts on surrounding residential amenity are mitigated.

A part of the redevelopment of the subject site, some 1,688 sq m of communal amenity will be incorporated within existing space and the new extensions, providing a far greater level of amenity for existing and proposed students.

When assessing planning applications for student accommodation the Planning Authority has set out that it will consider the following as per the *Galway City Council Development Plan 2017-2023*:

Galway City Council Student Housing Objectives	
Policy Objective:	Response:
<i>The location and accessibility to educational facilities and the proximity to existing or planned public transport corridors and cycle routes;</i>	<ul style="list-style-type: none"> • 1.3 Km from Eyre Square, 10 Minute Cycle to NUI Galway Campus, adjacent to planned Transport Corridor. • Cycle routes existing on N6 and Headford Road, with indicative Terryland Park Greenway nearby. The Galway Transport Strategy also calls for a City network of local routes and greenways. • Coca Cola Coke Zero Bikes stand located at Headford Road.
<i>The potential impact on local residential amenities;</i>	<ul style="list-style-type: none"> • Expansion of existing scheme provide the following results of the Daylight and Sunlight Analysis by 3D Design Bureau: <p style="margin-left: 40px;"><i>'Of the 182 windows assessed for impact to VSC, 178 have met the BRE guidelines on impact to VSC. The impact to these would be considered imperceptible. All 4 windows that did not meet the BRE guidelines on impact to VSC would encounter a slight level of impact.'</i></p> <p style="margin-left: 40px;"><i>'This study has 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.</i></p> <p style="margin-left: 40px;"><i>As the amenity areas to the rear of 1-36 Gort Na Coiribe, capable of receiving 2</i></p>

	<p><i>hours sunlight on March 21st are considerably above the recommended levels 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.'</i></p> <ul style="list-style-type: none"> • The scheme will be well managed in accordance with the <i>Student Management Plan</i>.
<p><i>Adequate amenity areas and open space;</i></p>	<ul style="list-style-type: none"> • Provision of 1,688 sq m new internal dedicated amenity space.
<p><i>The level and quality of on-site facilities, including storage facilities, waste management, bicycle facilities, leisure facilities, car parking and amenity;</i></p>	<ul style="list-style-type: none"> • New waste management plan prepared by Awn, new launderette, altered parking arrangements and new bike stands, new and improved interior and exterior amenity spaces.
<p><i>The architectural quality of the design and also the external layout, with respect to materials, scale, height and relationship to adjacent structures. Internal layouts should take cognisance of the need for flexibility for future possible changes of uses;</i></p>	<ul style="list-style-type: none"> • A modern and contemporary design which features several new blocks and extensions which links the design across the development. • This new development provides a sustainable upgrade / expansion of existing facilities within the same development footprint. • 656 No. Bicycle Parking Spaces, 80 No. short stay Sheffield stands at surface level, 576 No. two tiered enclosed cycle storage at basement level. • 43 No. car parking spaces at basement level, 16 No. car parking spaces at surface level. • Additionally, 5 No. motorcycle spaces at basement level.
<p><i>The number of existing similar facilities in the area. In assessing a proposal for student accommodation the Council will take cognisance of the amount of student accommodation which exists in the locality and will resist the over-concentration of such schemes in any</i></p>	<ul style="list-style-type: none"> • As set out in <i>Student Demand and Concentration Report</i>, a scoping exercise was carried out to screen for existing PBSAs in Galway City with <i>National Student Accommodation Strategy (2017)</i> recognising demand for significant increase in bedspaces. This Map and accompanying Table detail all known PBSAs within Galway

<p><i>one area, in the interests of sustainable development and residential amenity;</i></p>	<p>City. Ranges of 250 Metres and 1 Km indicated to accord with the Dublin City Council policy provided as an example within the <i>National Student Accommodation Strategy (2017)</i>.</p>
<p><i>Details of the full nature and extent of use of the proposed use of the facilities outside of term time.</i></p>	<ul style="list-style-type: none"> • The proposed scheme will be managed as short term holiday lettings by the operators of this facility outside term time, as are the existing bedspaces and as permitted under legislation.

5.1.5 Plot Ratio

The following policies of the *Galway City Council Development Plan 2017-2023* set out the plot ratio requirements.

Section 11.4.2 Plot Ratio

- *The plot ratio density standard is designed so as to help prevent the adverse effects of over-development on the amenities of the area.*
- ***In general for new development, the maximum plot ratio permitted will be 2:1.***
- *In the case of infill development in an existing terrace or street, it may be necessary to have a higher plot ratio in order to maintain uniform fenestration and parapet alignment or to obtain greater height for important urban design reasons. In such circumstances, an increased plot ratio may be permitted.*
- *Where a site has an established plot ratio in excess of the general maximum for its zone, re-development may, in exceptional circumstances, be permitted in line with its existing plot ratio if this conforms to the proper planning and sustainable development of the area.*
- *Minor extensions, which infringe plot ratio, may be permitted where they are necessary to the satisfactory operation of the building.*

[Our Emphasis]

These policies were prescribed by the *Galway City Council Development Plan 2017-2023* prior to the adoption of *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)*.

6.0 CONCLUSION

This document has comprehensively overviewed all relevant national, regional and local planning policy documents which are considered to be of relevance to the proposed development at the subject site.

We submit that the proposed development is consistent with all relevant policy documents discussed throughout this report. National policy expressly seeks the densification of sites in existing settlements such as the subject site through increased building heights.

The proposed development provides the expansion of an existing student accommodation facility in close proximity to Universities, Institutes of Technology, services and amenities. It therefore represents a significant investment for a strategically located site in Galway City.