



RESPONSE TO OPINION LRD5532

CALTRAGH LRD,
NEWTOWNHOLMES ROAD,
CALTRAGH & CORNAGEEHA,
SLIGO.

APRIL 2024

22110-XXXX-XXX-RP-RHA-AR-02605

TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	RESPONSE TO PLANNING AUTHORITY	3
3.0	RESPONSE TO TRAFFIC AND TRANSPORT	4
4.0	RESPONSE TO WATER SERVICES	7
5.0	RESPONSE TO HOUSING	8
6.0	RESPONSE TO ENVIRONMENT SECTION	8
7.0	RESPONSE TO SLIGO FIRE SERVICE	9
8.0	RESPONSE TO HERITAGE	9

1.0 INTRODUCTION

Introduction

This report addresses the specific information requirements and issues raised by Sligo County Council (SCC) in their pre-planning Large Scale Residential Development (LRD) Opinion issued on 12th December 2023 in relation to the proposed LRD at Newtownholmes Road, Caltragh & Cornageeha, Sligo, Co. Sligo comprising the construction of 118 no. residential units, 1 no. creche and all associated ancillary development works.

The opinion issued by the Council was subsequent to 1 no. Section 247 meeting which took place on 19th May, 2023 and a Section 32B meeting which took place on 19th October, 2023. Following the pre-planning meetings, the Council issued an Opinion in accordance with Section 32D of the Planning and Development (Housing) and Residential Tenancies Act (as amended) and advised that a number of items needed to be addressed in accordance with the requirements of Article 4(7) of the Planning and Development Regulations 2017. The specific information requested by CCC and our response to same, is outlined in Section 2 of this report.

2.0 RESPONSE TO PLANNING AUTHORITY

2.1 Taking in Charge

Details regarding the future taking-in-charge of the scheme to be submitted.

2.1.1 Response

A proposed site layout, indicating the areas to be taken in charge, and a property management strategy report have been submitted as part of the application.

2.2 Phasing Scheme

A detailed phasing plan will be required which identifies the delivery of essential infrastructure on site. The applicant was advised that the creche facility should not be in the final phase but should be close to the 75 unit number phase.

2.2.1 Response

A detailed phasing plan has been submitted as part of the application, with the creche facility to be delivered in the third phase during the construction of the first 77 units.

3.0 RESPONSE TO TRAFFIC AND TRANSPORT

3.1 External Road Network

- a) *Refer to Active Travel comments – coordination with proposed alignment and upgrade of Newtownholmes Road to be carried out.*
- b) *Applicant to construct the section of footpaths and cycleways (as designed by AT team) along the front boundary of the site as part of the scheme.*
- c) *Applicant to construct the footway and cycleway along the front boundary of the adjacent (Burke's) property so that there is adequate linkage northwards to tie in to the footway and cycleway due to be delivered as part of the Caltragh Homes development (construction ongoing).*
- d) *Continuous footpaths to be incorporated at site entrances as per Active Travel design.*
- e) *Sightlines at entrances to be achieved as per DMURS and Site Layouts to show visibility plays. These sightlines shall be achieved at an early stage in the development.*
- f) *The applicant shall agree the exact alignment of the external boundaries, entrances etc with SCCRD prior to the construction stage at the entrances.*

3.1.1 Response

- a) Consultation has taken place with the Sligo County Council Active Travel Team, and the updated proposal allows for coordination with proposed alignment and upgrade of Newtownholmes Road.
- b) The updated proposal indicates the section of footpaths and cycleways (as designed by AT team) along the front boundary of the site as part of the scheme.
- c) The updated proposal is to construct the footway and cycleway along the front boundary of the adjacent (Burke's) property.
- d) Continuous footpaths have been incorporated at site entrances as per Active Travel design and The Cycle Design Manual 2023.
- e) Sightlines at entrances are as per DMURS and the Proposed Road Layout drawing, 6736-JOD-XX-ZZ-DR-C-200-008, shows the visibility plays. These sightlines will be achieved at an early stage in the development.
- f) The applicant will agree the exact alignment of the external boundaries, entrances etc with SCCRD prior to the construction stage at the entrances.

3.2 Internal Road Network

- a) *Continuous footpaths should be provided throughout the development thus providing priority for pedestrians over vehicular traffic e.g. at the entrance to the creche parking area, junction with cul de sac entrances etc The Applicant shall agree an updated layout with SCC Roads Dept. (SCCRD) prior to commencement.*
- b) *The Proposed Road Layout Plan shall be updated to reflect the material selection of each surface type throughout the development i.e. Homezones etc*
- c) *Concerns raised regarding straight stretches of internal roadways. Applicant to consider additional traffic calming measures.*
- d) *Footpaths in vicinity of the playground to be provided.*
- e) *Concerns raised in relation to the steep gradient of the site in some locations. Applicant to consider how this will be dealt with i.e. dwell areas for pedestrians. A maximum of 1:20 gradients are desirable.*
- f) *Road Safety Audit to be updated and drawings as required regarding the proposed road layout at the creche. Should a cul de sac be incorporated? How will drop-off be managed? Refer to comments from Road Design.*

3.2.1 Response

- a) The updated proposal allows for continuous footpaths throughout the development. The Applicant will agree the layout with SCC Roads Dept. (SCCRD) prior to commencement.
- b) The update Proposed Site Layout Plan drawing, 22110-XXXX-XXX-DR-RHA-AR-02002, reflects the material selection of each surface type throughout the development.
- c) Additional traffic calming measures have been incorporated into the updated proposal, including

extended home zones, raised tables and street features.

- d) Footpaths have been provided in the vicinity of the playground in the updated proposal.
- e) The existing site provides a difficult topography, a bowl shape with the lowest point to the centre of the scheme, adjoining the N4, rising away in all directions on slopes reaching 1:7 or 15% gradients. This bowl slope presents challenges in providing sufficient density while providing public and private amenity and tying in with the existing roads to the east and west. Given the topography of the site, gradients of 8.3% are allowable and still by accessible by wheelchair users as set out Section 4.4.6 of DMURS. A number of sections of the site are required to approach this gradient with a maximum slope of 7.5%. 2 No. Accessible Parking spaces are provided in the vicinity of the apartment blocks, these are carefully located to ensure routes to buildings and communal areas are maximized at a 5% or below gradient. Rest areas are created where possible and additional stepped routes are also provided for the end users following desire lines.
- f) The Road Safety Audit submitted with the application has been updated. To address the issues raised regarding the two access points the entrances have been relocated so that the distance from kerb to kerb is approx. 37.5m and lane to lane is approx. 40m. The drop off area for the creche has been revised to be a one way system and reorientated to ensure that the angle to the southern road is sufficiently tight to restrict vehicles from entering in the wrong direction or using the drop off as a through road from north to south. Signage has been proposed to indicate the one-way system.

3.3 Construction Details

- a) *Road construction details, paving, footpaths and surface water infrastructure shall comply with TII Specifications for Roadworks.*
- b) *Footpath construction shall comply with Series 1100 of the TII Specifications*
- c) *Roadway construction shall comply with Series 900 of the TII Specifications*
- d) *Footpaths shall be minimum 2m wide and shall be 150mm depth throughout the development.*
- e) *Public lighting shall be all LED type and comply with public lighting requirements for housing developments as specified under IS EN13201-Class S4.*
- f) *Provision of dropped kerbing and tactile paving shall be made at all pedestrian crossing points.*

3.3.1 Response

All relevant construction details are contained within the engineers documents and drawings submitted with the planning application.

- a) All Road construction details, paving, footpaths and surface water infrastructure in the submitted proposals comply with TII Specifications for Roadworks as shown on drawings 6736-JOD-XX-ZZ-DR-C-200-008 and 6736-JOD-XX-ZZ-DR-C-200-009
- b) The proposed footpath construction complies with Series 1100 of the TII Specifications as shown in "Typical Footpath Plan Concrete", "Typical Concrete Footpath Cross Section" and "Typical Concrete Footpath Cross Section at Driveway Entrances" of drawing 6736-JOD-XX-ZZ-DR-C-200-009
- c) The proposed roadway construction shall comply with Series 900 of the TII Specifications as shown in "Typical Road Cross Section: Section A-A" of drawing 6736-JOD-XX-ZZ-DR-C-200-009.
- d) All proposed footpaths are a minimum 2m wide and are 150mm deep throughout the development as shown in "Typical Footpath Plan Concrete" and "Typical Concrete Footpath Cross Section" of drawing 6736-JOD-XX-ZZ-DR-C-200-009.
- e) A proposed public lighting layout and report has been submitted with the planning application, public lighting shall be all LED type and comply with public lighting requirements for housing developments as specified under IS EN13201-Class S4.
- f) The submitted Proposed Road Layout drawing, 6736-JOD-XX-ZZ-DR-C-200-008, and Civils Design Report, 6736-JOD-XX-RP-C-0001, indicate the provision of dropped kerbing and tactile paving at all pedestrian crossing points and has been approved by means of a Stage 1/2 Road Safety Audit.

3.4 Road Safety Audits

- a) *A Stage 1/2 Road Safety Audit shall be submitted with the application.*
- b) *A Stage 3 Road Safety Audit shall be carried out on completion of the project and be submitted to SCC Roads Department for review.*

3.4.1 Response

- a) *An updated Road Safety Audit has been submitted with the application.*
- b) *A Stage 3 Road Safety Audit will be carried out on completion of the project and be submitted to SCC Roads Department for review.*

3.5 Road Design Office

Applicant to consider reducing the number of entrances onto Newtownholmes Road from two to one single entrance as the two entrances is likely to cause vehicles exiting and entering the proposed development due to their proximity. The developer to investigate the alternative arrangement of a set down and turn around area in front of the creche. The Traffic and Transport Assessment compiled for the development suggests that one entrance has the capacity to cater for traffic movements at peak flow times.

3.5.1 Response

The scheme's two access points provide for a circular drop off to the creche building and ensure the drop off area does not form part of a desire line for other vehicular traffic, maximising the safety for the creche users. As part of the updated proposal which has been submitted the two access points the entrances have been relocated so that the distance from kerb to kerb is approx. 37.5m and lane to lane is approx. 40m. The drop off area for the creche has been revised to be a one way system and reorientated to ensure that the angle to the southern road is sufficiently tight to restrict vehicles from entering in the wrong direction or using the drop off as a through road from north to south. Signage has been proposed to indicate the one-way system.

3.6 Active Travel

- a) *At the northwest corner of the development, the proposed footpath ends at the site boundary –this footpath must connect into the adjoining proposed housing development providing meaningful pedestrian linkage.*
- b) *Applicant to confirm front boundary alignment as per Active Travel proposed alignment. This must include the southeast corner as the cycle lane and footpath end prematurely.*
- c) *Pedestrian facilities within the development – road crossing points are poor and the applicant is advised to reexamine each junction.*
- d) *Outdoor Bike parking facilities to be provided.*
- e) *There are concerns regarding the shared street along the Southern section of the development as it appears to be excessively long with no traffic calming*
- f) *Pedestrian and cycling facilities along shared streets – application to address material selection.*

3.6.1 Response

- a) *The updated proposal indicated the footpath, at the northwest corner of the development, connecting to the adjoining housing development's public open space at the play and seating area providing meaningful pedestrian linkage between the developments.*
- b) *The submitted proposal indicated the front boundary alignment as per Active Travel proposed alignment including the in the southeast corner where the cycle lane and footpath have been extended.*
- c) *Continuous footpaths have been incorporated at site entrances as per Active Travel design and The Cycle Design Manual 2023. Additional and improved crossing points have been proposed and dropped kerbing and tactile paving has been proposed at all pedestrian crossing points.*
- d) *Bike Parking is provided for apartments in line with Section 4.17 - Quantity of the "Design Standards for Apartments" 2023 which requires one bike space per bedroom and visitor storage at a rate of 1 per 2 units. Resident bike spaces are provided for at ground floor units within their private terrace area while communal*

stores provide for storage for the first floor units. Visitor spaces via outdoor sheffield stands are provided for in 3 easily accessible locations. See Section 3.2 and 3.3 of the Architectural Design Statement, document reference 22110-XXXX-XXX-RP-RHA-AR-02601. The creche is also provided with bike parking, set out that it could allow for "bike and trolley" accessibility and all dwellings have rear garden access for bicycle parking.

- e) In the updated proposal submitted traffic calming is achieved by extending the homezone areas across the Sothern Section of the development thus providing a change of surface finish material.
- f) Material selection for homezones is a buff coloured asphalt as indicated on the Proposed Site Layout Plan, drawing 22110-XXXX-XXX-DR-RHA-AR-02002.

4.0 RESPONSE TO WATER SERVICES

4.1 Storm Water

Storm discharge to the existing storm water pipe is not currently feasible as this storm water system is not complete. If the developer wishes to use this infrastructure, they will be required to complete the outstanding infrastructure. This is likely to require an additional 800m of storm drain, approx. diameter 750-1050, appropriate outfall and all required environment reports etc.

Storm drains to be laid to adequate fall to prevent settlement of silt etc.

The existing small watercourse (carrying storm water from adjacent roads) on the site will be culverted over its entire length to facilitate the construction of the proposed footpath and active travel works. As identified in the Appropriate assessment – All culverting of existing water courses shall be in accordance with OPW section 50 guidelines.

4.1.1 Response

In the updated proposal submitted with the planning application it is proposed that all storm water generated by the site will discharge by gravity, passing through a Class 1 Klargestor NSBE040 Bypass Separator or equal and similar approved, to an appropriately sized StormTech attenuation / infiltration storage system, or equal and similar approved, located within the open space in the central area of the development as shown on Drawing No. 6736-JOD-XX-ZZ-DR-C-200-001. The storm water will then infiltrate from the attenuation / infiltration storage system into the surrounding soil, therefore discharge to the existing storm water pipe is no longer proposed.

All proposed storm drains to be laid to adequate fall to prevent settlement of silt etc. as per the design submitted.

The Screening for Appropriate Assessment Report does not state that a watercourse crosses the proposed site. Section 3.2 of the report identifies the nearby Knappagh stream and Garavogue river, and states that there are no other water features proximate to the Project.

4.2 Water & Foul Water

An Irish Water (Uisce Éireann) Pre-connection enquiry form was submitted to Irish Water (Uisce Éireann) in relation to the proposed development for the required wastewater and water connections. The Confirmation of Feasibility was received showing at that stage (December 2022) both water and wastewater connections are feasible without upgrades from Irish Water (Uisce Éireann).

The COF does not extend to the management or Disposal of Storm Water, nor does it extend to fire flow requirements. It would be expected that flow rates of the order of 15l/s are available at the development. If Flows above this amount are required, network upgrades or on site storage to the satisfaction of the fire service shall be required.

As there is an existing UE assets on the site the applicant will be required to contact the UÉ diversion team with respect to required diversion/build over details etc.

4.2.1 Response

The updated storm water proposals, as per section 4.1.1 above, do not propose discharge to the existing storm water system. As required under statutory regulations fire safety capability on site will be confirmed prior to the construction phase during the applications for fire certificates. Infrastructure and service requirement compliance have been allowed for within the engineering design documentation included as part of this planning application.

5.0 RESPONSE TO HOUSING

5.1 Part V

It is required that the Part V offer will be consistent with the policy of Sligo County Council and asset out in latest Part V Guidance note. The requirement of units on offer is as follows:

Total Units = 118 units. 20% = 23.6

units

Total = 23 units being offered

The process for dealing with the shortfall will depend on the existing use value, market value and plot areas. This will be agreed after grant of permission.

The provision of 1 bed units will be required to satisfy any Part V condition. SCC Housing section have reviewed the proposal and have the following specific comments:

SCC requirement as follows:

- *2 No. 4 bed units*
- *9 No. 3 Bed units*
- *8 No. 1 Bed apartments (SCC would accept these in 2 blocks – note redesign of the blocks required to facilitate this)*
- *No. 2 Bed Houses*

Total: 23 units

House units to be dispersed throughout the development and the provision of 1 bed units will be required to satisfy any Part V condition.

Information and costs for agreement is to be provided by the applicant as part of the planning application Part V proposal.

Estimated costs calculations including Construction Costs, development costs, profit on costs and land costs will be required – to be prepared by Chartered Quantity Surveyor.

Applicant to revert with response for further consideration by the Council to confirm the number of units proposed to offer for Part V, the house types and the house numbers (map to be provided showing the numbering scheme for the development with Part V offer clearly indicated)

6.2.1 Response

An updated site layout, drawing no. 22110-XXXX-XXX-DR-RHA-AR-02501, indicating the proposed Part V units, updated Part V schedules and an updated Part V Housing Quality Audit have been submitted as part of the planning application. An new apartment building, unit type A1BA, has been proposed to provide 8 no. 1 bed units as requested.

The units provided are as follows:

2 no. 4 bed units

9 no. 3 bed units

4 no. 2 bed units

8 no. 1 bed units

Discussions have taken place between the applicant and the Sligo CoCo regarding costings and it has been agreed that, should this application be successful, these can be provided after the grant of permission, prior to commencement.

6.0 RESPONSE TO ENVIRONMENT SECTION

6.1 Water catchment Section comments

The Environment Section has no objections to the proposed development subject to compliance with development policies.

It is noted that no wastewater pumping stations are proposed, surface water disposal proposals contain a provision for a Class 1 interceptor and the Construction and Environmental Management Plan prepared is detailed.

Subject to any submissions received on the file, it is likely that our standard conditions for such residential developments will be sufficient.

6.2.1 Response

The applicant will comply with all conditions should the application be approved.

6.2 Waste Enforcement Section

No comments. Any scheme will require Tier 2 Construction and Demolition Resource Waste Management Plan (RWMP).

6.2.1 Response

A Construction and Operational Waste Management Plan has been developed and submitted as part of the planning application.

7.0 RESPONSE TO SLIGO FIRE SERVICE

7.1 SFS comments

- a) *Fire safety certificates are required for the apartment buildings in accordance with Article 11(1)(a) of the Building Control Regulations 1997-2018.*
- b) *It appears that there is no suitable turning area on the short road south of creche.*
- c) *Hydrants should be provided as per Irish Water guidelines.*

7.1.1 Response

- a) As required under statutory regulations fire safety certificates will be applied for with respect to the relevant buildings in due course.
- b) In the submitted application turning areas have been provided and a full swept path analysis has been carried out, see drawings 6736-JOD-XX-ZZ-DR-C-200-011 and 6736-JOD-XX-ZZ-DR-C-200-012.
- c) Fire hydrants have been provided as per Irish Water guidelines, see drawing 6736-JOD-XX-ZZ-DR-C-200-007.

8.0 RESPONSE TO HERITAGE

8.1 Heritage Officer Comments

The submitted Archaeological report proposes that the site is tested owing to its large area (3.7Ha) and proximity to other significant monuments (causewayed enclosure at Caltragh). Consideration should be given to geophysical survey in advance of testing. Subject to NMS advice.

No Ecological Impact Assessment Report (ECIAR) has been provided for the site. There are always opportunities for biodiversity gain on the site that should be fully considered and integrated into the proposed development and should inform the landscape plan. The followings should be considered:

- *retaining and supplementing by planting native hedgerow on all site boundaries, this will provide wildlife corridors and links to the north park and pocket parks.*
- *Planting schedule for pocket parks to include native tree and shrub species and pollinator*

- friendly planting.*
- *Maintain existing water courses/drains/wetland areas in a natural state (no culverting). Look at opportunities to use water attenuation to create ponds for wildlife in the public park areas.*
- *Provide integrated swift boxes throughout the development, where building height and aspect are suitable.*

Any proposed building demolition/tree removal will require a bat survey and mitigation. Appropriate bat survey periods apply (May to Oct). This cannot be conditioned/done retrospectively and must be carried out to inform the planning assessment.

Consideration of a placename proposal for the development that is in keeping with the area, in Irish and English.

8.1.1 Response

An archaeological Geophysical Survey of the site has been carried out under license and has been submitted with the planning application, see document 22110-AMS-XX-RP-CA-0002. The geophysical survey encountered 17 anomalies. Overall, the majority of the anomalies could be linked to drainage and historic boundaries. Pit-like features and isolated points of burning were also identified which are likely small areas of burning. Should the application be successful the report will provide the basis for accurate test trenching prior to commencement of work.

In the landscaping proposals submitted as part of the planning application significant measures have been taken to mitigate the loss of trees and achieve net gain with regard to biodiversity. This has entailed the establishment of new sections of native hedgerow and tree planting to create a continuous green corridor on the southern, northern and western boundaries of the site. Only native trees/shrubs will be planted, and these will only be sourced from Irish nurseries to prevent fungal pathogens arriving from European nurseries. Where possible semi-mature trees will be planted to support biodiversity and provide early establishment onsite. Wildflower seed will only be sourced from Ireland so that native flowering plants will support biodiversity.

An ecological assessment has been carried out and submitted with the planning application and confirms a biodiversity net gain of 135.53%, see document 22110-AEMP-RP-310.

Swift nest boxes are to be built into gables with an open aspect, close to roof level, a minimum 5 metres above ground level. Exact locations to be agreed prior to commencement.

A Preliminary Roost Assessment (PRA) for Bats was undertaken on-site of any buildings, trees, and other structures. No buildings were identified on-site. Stone walls were identified on-site, along the eastern and southern site boundary. These were assessed as having negligible bat roosting potential due to their low height of 1m. 3-no. trees were assessed as having bat roosting potential on-site. All trees assessed as having Bat roost potential will be retained in accordance with current site plans. Should any of these trees be required to be removed as part of site works they will require 2 emergence/re-entry surveys between May and September in accordance with BCT guidance or will require an endoscope survey of potential roosting features as set out in documents 230320-PD-11-A and 22110-AEMP-RP-310.

Should the application be successful a suitable placename proposal for the development that is in keeping with the area, in Irish and English, will be agreed with the council as part of the pre commencement conditions.