



An
Coimisiún
Pleanála

Inspector's Supplementary Report

ABP-318220-23

ABP-318217-23

Development	N6 Galway City Ring Road
Planning Authority	Galway County Council Galway City Council
Applicant	Galway County Council on behalf of itself and Galway City Council
Type of Application	Section 51 of the Roads Act 1993, as amended Section 49 of the Roads Act 1993, as amended
Prescribed Bodies	An Taisce -The National Trust for Ireland Department of Housing, Local Government and Heritage Offaly County Council Transport Infrastructure Ireland
Observers	Brendan Mulligan Cormac Michael Rabbitte

Enda McGovern
Friends of the Irish Environment
Galway City Harriers
Galway Green Party
IDA Ireland
James O'Connell
Shane Foran
Údarás na Gaeltachta

Aidan Donnelly (PRS 176)
Cairn Homes Properties Ltd. (PRS 261)
Frank and Pauline Joyce (PRS 133)
JFC Property Development Ltd and Jon Concannon
(PRS 238)
Linda Rabbitte (PRS 584)
Marian Rabbitte (PRS 576)
McHugh Property Holdings Ltd (PRS 583)
Michael and Annette Kerin (PRS 521)
Padraig Mac Donnacha
Paul and Anne Mulhern
Peter and Michelle Connolly (PRS 116)
Ruth and Ronan Burke (PRS 232)
Shane Kelly (PRS 216)

Objectors

Date of Site Inspections 29th – 30th October 2025, 8th – 9th January 2026

Inspector T Bradley

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Appendix A *Supplementary* Hydrogeology Report of January 2026

Appendix B *Supplementary* Appropriate Assessment Report of January 2026

Appendix C *Supplementary* Ecological Impact Assessment Report of January 2026

Appendix D Inspector's Report of June 2021 (which includes Ecological Impact Assessment Report of February 2020, Appropriate Assessment Report of February 2021 and Hydrogeology Report of May 2021)

1.0 Introduction

An Coimisiún Pleanála (the Commission) previously made a decision on this application by order dated December 2021. The application was initially submitted in October 2018, under reference number ABP-302848-18 and ABP-302885-18.

I refer to a memorandum on file dated 26th October 2023 which confirms that this decision was quashed by Order of the High Court, and the case was remitted by that Court to the Commission for a fresh determination. The file was assigned the new reference numbers ABP-318220-23 and ABP-318217-23.

Galway County Council on behalf of itself and Galway City Council are the applicant and are making the application to An Coimisiún Pleanála (the Commission) under Section 51 of the Roads Act 1993, as amended and Section 49 of the Roads Act 1993, as amended for the N6 Galway City Ring Road (the proposed development or N6GCRR).

Following a request for further information and an oral hearing, the proposed development was approved in December 2021. In 2022, a judicial review was taken of the Commission's decision to approve. In January 2022, this decision was quashed and the application remitted to the Commission.

The order of the High Court stated that the remitted application shall take effect from the point in time immediately after the submission of the initial Inspector's Report prepared by Ms Kellett (Senior Planning Inspector) and dated 22nd June 2021. This report now before the Commission is a 'supplementary report'. This report supplements the initial Inspector's Report prepared by Ms Kellett and dated 22nd of June 2021 and referred to hereafter as the Inspector's Report of 2021. Both reports should be read in conjunction with each other and indeed the various appendices that support it.

For clarity and in summary, the following dates are noted:

Table 1: Timeline of Application	
Date	Detail
Oct 2023	File remitted to the Commission
Dec 2023	Further Information sought by the Commission
Sep 2024	Initial Deadline for Response to Further Information
Jan 2025	Second Deadline for Response to Further Information as requested by applicant

Apr 2025	Third Deadline for Response to Further Information as requested by applicant
May 2025	Further Information deemed significant by the Commission
Jun 2025	Further Information published, statutory submission period open.
Aug 2025	Submissions due on Further Information
Sep 2025	Applicant requested to respond to submissions (30 no. submissions in total)
Oct 2025	Response to Submission by the Applicant

The Commission should refer to Section 2.0 of the Request for Further Information Response Report for additional details on the sequence of events since 2018 which is set out.

1.1 High Court Order

The Commission will note a memorandum on file dated 26th of October 2023 in which it advises the decision in respect of the previous files has been quashed by the Courts and remitted to the Commission for a fresh determination.

The order states:

"An Order remitting the said application for approval for a proposed road development under section 51 of the Roads Act 1993 as amended and the said applications for approval under section 49 of the Roads Act 1993 as amended for a motorway scheme and protected road scheme entitled "N6 Galway City Ring Road Motorway Scheme 2018 and Protected Road Scheme 2018 " to the First Named Respondent to be considered in accordance with law such remittal to take effect from the point in time immediately after the submission of the Inspector's Report (bearing the reference ABP-302885-18 & ABP-302848-18 and dated 22nd June 2021) to the Board".

The full order is available on the file for the Commission's review.

1.2 Additional Information

Having regard to the High Court Order in this case, the quashing of the previous Commission decision and the passage of time, the Commission considered that it was appropriate in the interests of justice to request relevant parties under Section 131 of the Planning and Development Act 2000, as amended, to make any further general submissions/observations in relation to the planning application.

This remitted application was considered at a Commission meeting held on the 10th of November 2023. The Commission noted the terms of the High Court Order perfected on the 9th of February 2023. The Commission decided that the following steps be taken in relation to the remitted application:

1. The Applicant shall be invited under section 217B(4) of the Act to update their application, given the passage of time since the application was lodged and the decision made. Given the overlap of this case with ABP-302848-18, a single request for further information shall issue in respect of both cases. Copies of the High Court Orders to be attached to this letter.
2. All other participants shall be notified of the High Court order remitting this case to the Commission for a fresh determination and advised that they will be given an opportunity to respond on any further information submitted by the Applicant. Copies of the High Court Order to be enclosed.
3. Upon completion of the above process, file to be referred back to the Commission with any responses to the said notice, for further consideration of the case, including circulation of any additional information, and allocation to Inspector to carry out a supplementary report on the remitted application.

These steps have been completed.

The applicant has provided updated information and said information was subject to a statutory consultation period in which members of the public could make a submission. Those parties who participated in the case originally were notified directly of this statutory consultation period.

Based on the response to the statutory consultation period, the application was invited to respond to these submissions. The applicant did this, and a response was received in October 2025.

The Commission should note that in certain submissions received from third parties it was not clear which application was being commented on, and they were misassigned. This clerical error has now been corrected, and you should note the submissions of Linda Rabbitte, Marian Rabbitte and JFC Property Developments are related to the land acquisition application (ABP-318217-23) and Galway City Harriers and Galway Green Party related to the road application (ABP-318220-23).

1.3 Oral Hearing

It was decided that no Oral Hearing be held as directed by the Commission on 13th January 2026.

In finalising this report the matter of an oral hearing was reconsidered and again I remain satisfied that it is not required. This is on the basis of the extensive hearing in 2020, and the submissions and issues raised therein by observers and objectors.

I am satisfied that the Commission's direction remains appropriate and written evidence has allowed for a proper and full assessment of the case without recourse to an oral hearing. It is considered that there is no issue arising that lacks clarity or detail or are so complex as to require a hearing. The holding of an oral hearing is, of course, entirely at the discretion of the Commission.

1.4 Further Information and Circulation

On the basis of all the information received following this order from the applicant and observers, it was considered there is no issue arising that lacks clarity or detail or are so complex as to require any additional information be requested from the applicant or indeed the observers and the applications can be satisfactorily assessed based on the information provided.

2.0 Proposed Development

In order to carry out the necessary assessments, the Commission should note modifications in respect of the proposed development that have occurred since its initial submission in 2018. These have arisen through a further information request and an oral hearing. The following should be read in conjunction with Section 4.0 of the Inspector's Report of June 2021 to be found at Appendix A.

2.1.1 Supporting Documentation

The Commission will note the following additional information submitted in support of the planning application

- Part I - 2025 Request for Further Information Response Report
- Part II - Updated Motorway Scheme 2018 Schedules/Deposit Maps
- Part III - Updated Protected Road Scheme 2018 Schedules/Deposit Maps
- Part IV - Obligations under Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended and submissions in relation to the Climate Action Plan 2024 (CAP24)
- Part V - Implications of new Galway City Development Plan Report
- Part VI - Updated Environmental Impact Assessment Report (EIAR)
- Part VII - Updated AA Screening Report & Updated Natura Impact Statement (NIS)

2.1.2 Description of Changes

In short, the proposed development comprises the construction of approximately 5.6 km of a single carriageway from the western side of Bearna as far as the Ballymoneen Road and approximately 11.9 km of dual carriageway from Ballymoneen Road to the eastern tie in with the existing N6 at Coolagh, Briarhill, associated link roads, side roads, junctions, structures and localised works to the existing electricity transmission and distribution networks (specifically comprising of the diversion of the 110 kV and 38 kV services).

The Commission will note some twelve changes identified by the applicant in Section 3.0 of the Request for Further Information Response Report. These are relatively minor changes relating to points of detail for local access and connections, land

acquisition and additional cycle and foot paths which were justified and agreed in the course of the previous planning application. They include:

1. Changes to the mitigation proposed for University of Galway (formerly NUIG) Sporting Campus
2. Alternative alignment for the southern portion of the Parkmore Link Road through Boston Scientific campus.
3. Additional access to severed lands for Property 106 proposed from Access Road AR 0/02.
4. Access Road AR 1/01 was amended to facilitate access to properties 131 and 7891 as agreed with these property owners.
5. Access Road AR 7/04 was extended further west to provide access to lands severed by a stream
6. Connection between Access Road 13/06 and the N83 Tuam Road for pedestrians
7. Changes to land ownership boundary details and / or property extents which are reflected in proposed modifications to the Motorway Scheme (Part II) and Protected Road Scheme (Part III)
8. Some permanent land acquisition was changed to temporary acquisition which is reflected in proposed modifications to Motorway Scheme (Part II) and Protected Road Scheme (Part III)
9. Some land proposed to be acquired was removed which is reflected in proposed modifications to the Motorway Scheme (Part II) and Protected Road Scheme (Part III)
10. Additional cycle paths and footpaths were added at Gort na Bro as set out in Drawing GARR-SK-OH-054 in the Schedule of Commitments on 4 November 2020.
11. Access Road AR 13/02 amended to minimise impacts on landowner whilst providing access to adjoining landowner
12. Access Road AR 06/04 amended to add a bus bay to reflect the design of the Knocknacarra District Centre Large-scale Residential Development (LRD) which obtained approval from ABP reference ABP-318687-23.

It is noted that housing schemes have also been progressed in proximity to the proposed development which required minor changes.

It should be noted that since the Inspector's Report of 2021, planning permission has been received for permanent and temporary stables for Galway Racecourse (Galway City Council Reference: 24/60279). This occurred outside of the current application. A condition of this planning permission is that no development shall commence until the proposed development has been approved by the Commission. Given the clear link between the two developments, the EIA and AA consider both developments.

In respect of land acquisition, the total area remains unchanged since the previous planning application save for lands related to Galway Racecourse. The primary changes relate acquisition being temporary rather than permanent including

1. Plot number 651a.202 shall be reduced in area so as to include only those lands required for the construction of the northern portion of Access Road 13/02 along the alignment of the existing bóithrin.
2. Plot number 713a.203 shall be subject to temporary acquisition.
3. Plot number 713a.204, Plot number 713a.101 and Plot number 713b.101 shall be subject to temporary acquisition to a depth of 1.5 metres below ground level and subject to permanent acquisition to a depth beyond 1.5 metres below ground level.
4. Plot 195a.202 shall be subject to permanent acquisition
5. Plot 246a.203 shall be subject to permanent acquisition, save for a portion

As expected, land ownership and occupancy have changes since 2018. The applicant has identified this and notified new parties as required.

In summary, the proposed development includes:

- a) Approximately 5.6 km of single carriageway (Protected Road)
- b) Approximately 11.9 km of dual carriageway (Motorway)
- c) A bridge over the River Corrib
- d) Two viaducts – one traversing University of Galway Sporting Campus and the other across non-designated priority Annex I habitat at Menlough
- e) Two tunnels one beneath the Lough Corrib SAC near Lackagh Quarry, and the other under part of the Galway Racecourse as well as tunnel maintenance buildings
- f) Four main Link Roads at N59 Link Road North, N59 Link Road South, Parkmore Link Road and City North Business Park Link

- g) Side Roads, junctions, roundabouts, pedestrian and cyclist facilities, lighting, fencing and noise barriers
- h) 10 underbridges and 7 overbridges
- i) Culverts and underpasses
- j) Gantry Signs
- k) Drainage works
- l) Attenuation ponds
- m) Diversions of utilities
- n) Demolition of 44 residential properties and acquisition of 10
- o) Demolition of 2 industrial properties (1 comprising 4 buildings)
- p) Demolition of 2 commercial properties
- q) Acquisition of 17 farm buildings and modifications/revoking planning permissions
- r) Demolition of one protected structure
- s) Environmental measures including lands north of Menlo Castle to provide an enhancement of the core foraging habitat for the Lesser Horseshoe bat known to roost at Menlo Castle, and all other associated works
- t) Temporary site compounds
- u) Landscaping works
- v) Material Deposition Areas
- w) Utilities and services diversion works, and
- x) Associated works on lands.

3.0 Policy Context

The Commission should note changes in the policy context for the proposed development since 2018. It should be acknowledged that the majority of policy remains unchanged in that period and parts of Section 5.0 of the Inspector's Report of 2021 remain valid.

The proposed development remains part of the TEN-T network. It fulfils a strategic function providing a strategic link to Galway City and other related roads including the N83, N84, N59 and the R336.

3.1 National Policy

3.1.1 Climate Action Plan 2025 (DECC, 2025)

The CAP25, builds on CAP24 and sets out a roadmap to halve emissions by 2030 and reach net zero by 2050. CAP25 continues to seek the implementation of carbon budgets and sectoral emissions ceilings that were introduced under the *Climate Action and Low Carbon Development (Amendment) Act, 2021*. Sector emission ceilings were approved by Government in July 2022 for the electricity, transport, built environment – residential, built environment – commercial, industry, agricultural and other (F-gases, waste & petroleum refining) sectors. Finalisation of the emissions ceiling for the Land Use, Land Use Change and Forestry (LULUCF) sector has been deferred from July 2022.

Citizen engagement and a strengthened social contract between the Government and the Irish people will be required around climate action. Some sectors and communities will be impacted more than others. A just transition is embedded in CAP25 to equip people with the skills to benefit from change and to acknowledge that costs need to be shared. Large investment will be necessary through public and private sectors to meet CAP24 targets and objectives.

The electricity sector will help to decarbonise the transport, heating and industry sectors and will face a huge challenge to meet requirements under its own sectoral emissions ceiling. CAP25 reframes the previous pathway outlined in CAP24, CAP23 and CAP21 under the Avoid-Shift-Improve Framework to achieve a net zero decarbonisation pathway for transport. This is a hierarchical framework which prioritises actions to reduce or avoid the need to travel; shift to more environmentally

friendly modes; and improve the energy efficiency of vehicle technology. A National Demand Management Strategy was commenced in 2023 with the aim of reducing travel demand and improving sustainable mobility alternatives.

Transport is targeted in CAP as a sector required to reduce emissions by 50 percent by 2030.

3.1.2 National Development Plan 2021-2030 (DPE, 2021 and review in 2025)

The NDP Review contains a range of investments and measures which will be implemented over the coming years to facilitate the transition to sustainable mobility. These measures include significant expansions to public transport options, including capacity enhancements on current assets and the creation of new public transport links.

The transport sector is responsible for 20 per cent of Ireland's GHG emissions and emissions from the sector were growing consistently pre-pandemic, despite the mitigation efforts undertaken. Major progress in decarbonising the sector is, therefore, a prerequisite for achieving Ireland's 2030 climate targets.

The NDP recognises the N6GCRR in its consideration of new national road infrastructure. This was reconfirmed in the National Development Plan Review in 2025.

The Commission should note Chapter 7 Climate Assessment in the in the National Development Plan Review in 2025 in which it is stated that *'in developing proposals for funding over the period 2026-2030, all Government Departments and Offices were required to assess their spending proposals against a range of climate and environmental outcomes. This ensures policy-proposing Departments have a focus on their obligations and targets from the outset, and anticipate and outline both the projected benefits, and any negative environmental impacts, of the capital projects they intend to progress over the period'*.

The National Development Plan Review 2025 includes for Sectoral Investment Plan for Transport which outlines the pathway for future investment in Ireland's transport system from 2026 to 2030. The proposed development is identified therein as a major National Roads Projects (>€200 m) scheduled to commence construction / procurement by 2030.

3.1.3 National Planning Framework Project Ireland 2040 (DHPLG, 2018 and as revised in 2025)

The National Planning Framework (NPF) establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050.

Managing the challenges of future growth is critical to regional development. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.

National Strategic Outcome 5 (NSO 5) (formally NSO 4) of the NPF, is related to sustainable mobility and recognises that major urban areas are too heavily dependent on road and private, mainly car based, transport with the result that the roads are becoming more and more congested. The NDP makes provision for investment in public transport and sustainable mobility solutions to progressively put in place a more sustainable alternative. 'Environmentally Sustainable Public Transport' is identified as a strategic investment priority in the NPF.

In line with Ireland's Climate Change mitigation plan, the state need to progressively electrify the mobility systems moving away from polluting and carbon intensive propulsion systems to new technologies such as electric vehicles and introduction of electric and hybrid traction systems for public transport fleets, such that by 2040 the cities and towns will enjoy a cleaner, quieter environment free of combustion engine driven transport systems.

Expand attractive public transport alternatives to car transport to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer term population and employment growth in a sustainable manner through measures including delivery of the key public transport objectives.

NSO 1 in relation to compact growth is also relevant and seek seeks to manage the sustainable growth of cities, towns, and villages to create compact and attractive places in which people can live and work. Also of note, is NSO 8 in relation to the

national objective of achieving transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.

The delivery of the Galway City Ring Road is considered a key future growth enablers for Galway in the NPF and would contribute to the National Strategic Outcome 2 for Enhance Regional Accessibility.

3.1.4 Transport Sectoral Adaption Plan (T-SAP-II) 2025-2030 (DoT, 2025)

Following recommendations made under the National Adaptation Framework, the Department of Transport updated the Transport Sectoral Adaptation Plan (T-SAP II) to reflect most recent climate projections, new policy developments, and progress made on climate adaptation since the first Plan was issued in 2019. T-SAP II was also designed to complement the analysis from the recent National Climate Change Risk Assessment, which identified some of the key risks to transport infrastructure, including potential disruption, damage and loss of transport infrastructure caused by sea level rise, coastal erosion, all types of flooding, wind, and extreme heat and cold, extreme precipitation and wildfires.

In addition to the ongoing projects, as part of this Plan, a total of 40 actions has been developed to address priority climate risks and support delivery of adaptation goal and objectives. T-SAP II and associated actions are expected to help build long-term resilience of the transport sector to climate change, so that it remains operational in the face of increasingly common and extreme weather events, while continuing to serve its social, environmental and economic objectives.

3.1.5 National Adaptation Framework 2024 (DoT, 2024)

The National Adaptation Framework 2024 (NAF) is a statutory framework outlining the Government's approach to climate change adaptation in Ireland. The NAF seeks to reduce Ireland's vulnerability to climate change impacts and it requires Government departments to produce sectoral adaptation plans. It states that a climate resilient Ireland will have a reduced reliance on fossil fuel and will have widely accessible electrified public transport.

The Sectoral Adaptation Plan for Transport sets policy on climate change adaptation strategies for the transport sector.

The overarching goal of transport adaptation planning is stated to be to ensure that the sector can fulfil its continuing economic, social and environmental objectives by ensuring that transport infrastructure is safeguarded from the impacts of climate change. The Plan sets out the following implementation objectives:

1. Improve understanding of the impacts of climate change on transport infrastructure, including cross-sectoral cascading impacts, and close knowledge gaps.
2. Assist transport stakeholders in identifying and prioritising climate risks to existing and planned infrastructural assets and enabling them to implement adaptation measures accordingly.
3. Ensure that resilience to weather extremes and longer-term adaptation needs are considered in investment programmes for planned future transport infrastructure.

Action 17 is to “strengthen sectoral adaptation responses by ensuring that climate resilience is considered in appraisal guidance, including in the update to the Common Appraisal Framework, for all future transport infrastructure projects over appropriate timescales.”

The Commission should note that the second Transport Climate Change Sectoral Adaptation Plan (T-SAP II) in Section 3.1.2 above is linked to this plan.

3.1.6 Ireland’s Long-term Strategy on Greenhouse Gas Emissions Reduction 2024

Preparation of a Long-Term Climate Strategy is a requirement of national, EU and international law. The 2024 strategy is stated to be the first prepared under the national Climate Act and it sets out Ireland’s 2050 climate action targets and describes sector-specific pathways to reaching those targets.

Section 8.4 of the Strategy relates to ‘Transport’. It notes that the population of Ireland is expected to reach 5.7 million by 2040 from a current estimate of 5.1 million in 2022. In parallel, over the next two decades there are projections of both employment and economic growth that may stimulate greater transport activity and demand. The Strategy states that without systemic and transformative changes in travel patterns, modal share, and technology, a growth in current transport activity and demand will further diminish our national competitiveness, quality of life, and decarbonisation goals.

Among the identified challenges facing decarbonisation are:

- “In the absence of suitable alternatives to the car at a national level, a cultural mindset has been embedded over decades whereby only car ownership is associated with perceptions of freedom and convenience – this is partly a result of our settlement patterns and previous policy-making;
- How to decouple travel demand from economic growth;
- How to address transport poverty while achieving decarbonisation of the sector;
- Addressing the significant lead-in times associated with the delivery of major transport infrastructure and rollout of additional public transport services as attractive and compelling alternatives to private car use;”

Under the heading of ‘Pathway to 2030’, the Strategy states that:

“As well as continuing the technology improvements previously committed to, demand reduction with modal shift will play an important role in the development of a more sustainable transport system over the next decade. Government investment in public transport, cycling and walking infrastructure, along-side the provision of increased public transport services and shared mobility options, will help to reduce reliance on private cars and address congestion in our cities. This investment is essential if we are to meet the level of system and behavioural change required to deliver on our climate ambition (including targets of a 50% increase in daily active travel journeys and a 130% increase in daily public transport journeys by 2030).”

Modal shift is identified as playing a key role in decarbonisation by 2050. The Strategy states that:

“Our cities will be leaders in transport innovation due to the predominance of short-distance journeys, existing availability of public transport alternatives, air quality considerations and due to the requirement to provide for greater urban density in residential development, to ensure improved proximity to services and more viable public transport, and consequently a reduced demand for private car ownership. This will lead to large improvements in the quality of urban living in the coming decades.”

3.1.7 Water Action Plan 2024: A River Basin Management Plan for Ireland

The Water Action Plan 2024 (WAP) is Ireland’s third River Basin Management Plan and it outlines the measures the Government and other sectors are taking to improve

water quality in Ireland’s groundwater, rivers, lakes, estuarine and coastal waters, and provide sustainable management of Ireland’s water resources. The WAP is based on a single national River Basin District for the country, broken down into 46 catchment management units, which are further broken down into 583 subcatchments.

3.1.8 National Biodiversity Action Plan 2023-2030

The purpose of the National Biodiversity Action Plan (NBAP) is described as follows:

“This 4th National Biodiversity Action Plan strives for a “Whole-of-Government, Whole-of-Society” approach to the governance and conservation of biodiversity. The aim is to ensure that every citizen, community, business, local authority, semi-state and state agency has an awareness of biodiversity and its importance, and of the implications of its loss, whilst also understanding how they can act to address the biodiversity emergency as part of a renewed national effort to act for nature.

To do this, the NBAP takes account of the wide range of policies, strategies, conventions, laws and targets at the global, EU and national level that influence our shared environment in order to scale up biodiversity action.”

The NBAP sets out the following 5 No. objectives which have numerous supporting targets and actions: :

- Objective 1: Adopt a Whole-of-Government, Whole-of-Society Approach to Biodiversity.
- Objective 2: Meet Urgent Conservation and Restoration Needs
- Objective 3: Secure Nature’s Contribution to People.
- Objective 4: Enhance the Evidence Base for Action on Biodiversity.
- Objective 5: Strengthen Ireland’s Contribution to International Biodiversity Initiatives.

The Wildlife (Amendment) Act 2023 introduced a new public sector duty on biodiversity. Section 59B states that every public body shall, in the performance of its functions, have regard to the objectives and targets in a National Biodiversity Action Plan. An Coimisiún Pleanála is included in the list of ‘public bodies’ under Section 59H for the purposes of that Part of the Act.

The impact of development on biodiversity, including species and habitats, can be assessed at a European, National and Local level and is taken into account in the Commission's decision-making having regard to the Habitats and Birds Directives, Environmental Impact Assessment Directive, Water Framework Directive and other relevant legislation, strategy and policy where applicable.

3.1.9 National Sustainable Mobility Policy (DoT, 2022)

The purpose of this document is to set out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.

Goal 2 aims to reduce emissions by transitioning the bus, rail and small public service vehicle (SPSV) fleet across the country to low/zero emission vehicles in line with available technology. The actions under this goal are aligned with the actions in the CAP.

Goal 3 aims to expand the capacity and availability of sustainable mobility in the five cities (Cork, Dublin, Galway, Limerick and Waterford). This will be done through improved walking, cycling, bus and rail infrastructure, improved transport interchange and expanded public transport services.

Key actions in Action Plan seek to deliver metropolitan area transport strategies in the cities such as Galway Transport Strategy (GTS) (Action 78) and commence the delivery of BusConnects in Galway (Action 22).

3.1.10 National Road 2040 (TII, 2023)

NR2040 is TII's long-term investment framework for the maintenance, development, and management of Ireland's National Roads network. It acknowledges climate targets and long term strategic issues for the national road network.

3.1.11 National Investment Framework for Transport in Ireland (DoT, 2021)

One of the key challenges identified within this document relates to transport and the ability to maintain existing transport infrastructure whilst ensuring resilience of the most strategically important parts of the network. Population projections are expected to increase into the future and a consistent issue identified within the five cities of Ireland is congestion. Given space constraints, urban congestion will primarily have to be addressed by encouraging modal shift to sustainable modes.

The framework states that investment beyond the cities can help address pressures on urban infrastructure if traffic is diverted from entering the city centre, creating more space for sustainable mobility solutions. The framework uses the example of the Galway City Ring Road and its modelling which results in east-west traffic being diverted from the city centre. It concludes that where possible, infrastructure investment should take trips out of cities and towns which do not inherently need to be there.

3.1.12 TII Guidance

It is noted that the applicant has cited several TII standards and guidelines in respect of design quality and environmental compliance. Several of these were updated and others were newly introduced in December 2025. Specifically, these include standards for road structures in the design phase, biodiversity metric tools, air quality, population and human health and water impact assessment.

3.2 Regional Policy

There has been no material change of policy at the regional level. The key strategy remains the Northern and Western Regional Spatial and Economic Strategy 2020-2032 (RSES). RPO 3.6.7 of the RSES supports the delivery of the Galway City Ring Road.

3.3 Local Policy

The Commission should note changes to both county and city development plans.

3.3.1 Galway City Development Plan 2023-2029

Galway City Development Plan 2023-2029 replaces Galway City Development Plan 2017-2023. The plan continues supports the implementation of the wider Galway Transport Strategy (GTS) which comprises the Galway Ring Road. Specifically, under Policy 4.6 (1), it is the policy of the council to *'support the N6 Galway City Ring Road project in conjunction with Galway County Council and Transport Infrastructure Ireland (TII) in order to develop a transportation solution to address the existing congestion on the national and regional road network'*.

The proposed development has been prioritised within the plan and the Commission should note Sustainable Mobility and Transportation 4.8 Specific Objectives (24):

Give priority to the reservation the N6 GCRR designed strategic road corridor and any associated land requirements over other land uses and objectives in the City Development Plan and prohibit developments within the designed strategic road corridor which could potentially prejudice the development of this strategic road and river crossing.

3.3.1.1 Variations to the Galway City Development Plan 2023-2029

I note that a public consultation period has recently been undertaken in respect of Proposed Variation 1 and 2 of the Galway City Development Plan 2023-2029.

Variation 1 is respect of Residential Zoned Land Tax (RZLT) and included changes in zoning of lands in Roscam (south of, not adjacent to the proposed development) subject to existing economic activity.

Variation 2 includes a review of lands unzoned following Ministerial Direction and included amendments to the zoning status of the lands previously unzoned. This has

result in all lands (and specifically ten sites) in the city being subject to a land use zoning objective. The intention is to give clarity and a level of certainty to landowners and third parties in considering the current use and possible future development of the subject lands. It has resulted in some sites in proximity to the proposed development being zoned Agriculture (A) or Agriculture High Amenity (G). The zoning is typically analogous to lands adjacent. Sites in bold below interact with N6GCRR:

- Site 1 Cappagh Road is north of and not adjacent to the site.
- Site 2 Ballindooley north of and not adjacent to the site.
- **Site 3 Coolough Road is adjacent to the site and in proximity to the Access Road (AR11/01) to Lackagh Quarry. No works are proposed at this location, however, lands adjacent to Site 3 Coolough Road have been considered in the assessment. It is proposed to zone it Agriculture High Amenity. This is contiguous with the surrounding zoning that is considered in the assessment below.**
- Site 4 Quarry Road, Site 5 Two Sites Monument Road, is north of and not adjacent to the site.
- **Site 6 Off School Road is adjacent to the site and in proximity to Access Road (AR 13/02) and the mainline road corridor. No works are proposed at this location. It proposed to zone it agricultural. This is contiguous with the surrounding zoning that is considered in the assessment below.**
- **Site 7 School Road Castlegar is located within the site of the proposed development. It is proposed to zone it agricultural. This is contiguous with the surrounding zoning that is considered in the assessment below.**
- Site 8 Coast Road, South 9 & 10 Roscam are south of and not adjacent to the site.

These variations had not been adopted at the conclusion of this report.

3.3.1.2 Galway City Council Local Authority Climate Action Plan 2024-2029

The Galway City Local Authority Climate Action Plan (LACAP) 2024-2029 sets out a strategy to mitigate and adapt to climate change within the Local Authority. It considers factors such as reducing emissions, creating a circular economy, adapting to more frequent severe weather, and creating more sustainable land use patterns.

Action 27 of the LACAP commits GCC to working in partnership with key stakeholders across the city to support climate action initiatives, including active travel.

3.3.1.3 Galway City Biodiversity Action Plan 2025–2030

Galway City Biodiversity Action Plan has been updated for the period 2025-2030 and was published in December 2025 and therefore was not considered by the Applicant. The updated Plan provides a framework for the conservation of biodiversity and natural heritage for the Galway City area, updating the polies and objectives of the previous plan. The 2025-2030 plan considers the current state of Galway City's biodiversity, threat and provides biodiversity actions under a number of themes including themes and objectives relevant to planning and development.

3.3.1.4 Galway City Heritage Plan 2025–2030

The Galway City Heritage Plan 2025-2030 builds on the foundations laid by previous heritage plans, reinforcing commitment to preserving the City's cultural and historical assets while enhancing how we engage with and experience Galway's rich heritage. This plan will guide us towards a future where heritage is celebrated, protected, and remains a source of pride and connection for everyone.

3.3.2 Galway County Development Plan 2022-2028

Galway County Development Plan 2022-2028 replaces Galway County Development Plan 2015-2021. The plan continues to support the implementation of the wider GTS which comprises the Galway Ring Road. Specifically, under Policy Objective NR1 Key Road Infrastructure Developments, the council support the delivery of the N6GCRR.

Volume 2 of the plan comprises the Metropolitan Area Strategic Plan for Galway which anticipates population growth forecast under Project Ireland 2040. In order to deliver this population, increase the plan supports the GTS and the proposed development as part of that.

Appendix 3 of the Galway County Development Plan comprises the Galway County Transport and Planning Study. It identifies the proposed development to be of significant importance to ensure the success of the Galway MASP and the wider region

The objectives of the Gaeltacht Local Area Plan, 2008-2018 has been incorporated into Chapter 13 of the 2022-2028 plan.

3.3.2.1 Galway County Council Local Authority Climate Action Plan 2024-2029

The ambition of this Plan is aligned to the Government's National Climate Objective which seeks to achieve the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The Climate Action and Low Carbon Development (Amendment) Act 2021 frames Ireland's legally binding climate ambition to deliver a reduction in greenhouse gas emissions by 51% by 2030. To secure this sustainable future for the citizens of Galway, the Council has prepared this LACAP for the period 2024 to 2029 to create a low carbon and climate resilient County, by delivering and promoting best practice in climate action.

3.3.2.2 Ardaun Local Area Plan 2018-2024

This plan has expired since the previous planning application. It is Policy 1.4 (12) to review the Ardaun Plan, however, it remains a key strategic area for development with various strategic policies for the area throughout the plan.

3.3.2.3 Galway County Heritage and Biodiversity Plan 2024~ 2030

This plan serves as a framework for furthering the awareness, protection, conservation, promotion, and management of Galway's heritage and biodiversity over six years.

3.3.3 Galway Transport Strategy 2016-2036 (GTS)

In Table 2.1 of the updated EIAR, the applicant has provided an update on the status of the projects that make up the wider GTS. Notable updates include:

- Approval of BusConnects Galway (Cross City Link) in 2024
- Approval of BusConnects Galway (Dublin Road) in 2025
- Construction of Salmon Weir Bridge
- Other junction upgrades and active travel schemes

The GTS remains the transport strategy for Galway. There are plans to prepare a Galway Metropolitan Area Transport Strategy (GMATS) however this is unpublished.

4.0 Submissions

Following a Commission Direction and receipt of updated information from the applicant, prescribed bodies, observers and objectors were invited to make any further submissions/observations. There was also an additional statutory consultation period inviting other submissions.

4.1 Prescribed Bodies

4.1.1 An Taisce – The National Trust for Ireland

- The response from the applicant is based on the CAP24, rather than the CAP25 (which has since been published). The applicant should update its response on this basis.
- An Taisce makes this submission under four headings, as follows:
 - Compatibility of the N6 Galway City Ring Road with the CAP25.
 - Compatibility of the GTS and the Galway City and County
 - Councils' LACAPs with the CAP25.
 - The N6GCRR will not be an effective solution to congestion in the Galway Metropolitan Area.
 - The absence of a Galway Metropolitan Area Transport Strategy.
- The submission provides context of Ireland's emissions reductions obligations and the current progress in complying with same. It is the view that all developments must take place within constraints of these reductions and in order to comply it must result in cutting back on current projected emitting activities.
- The conclusion of the EIA is not compatible with national climate objectives set out in the CAP25 and other requirements of the LACAPs.
- As Carbon Budgets are fixed, if the building of the GCRR would account for total emissions over the construction period of 126,332 tonnes CO₂eq (Carbon Dioxide Equivalent), it would be necessary to balance this by an equivalent reduction somewhere else. That could mean having to forego the building of homes to address the housing crisis.
- It is submitted that the applicant should explain the remarkably low increase in the predicted CO₂eq emissions included in the Updated EIAR compared to the predictions included in previous submissions by the applicant.

- An Taisce suggests that, given scale of the proposed development, that the applicant be asked by way of a Further information Request details in response of sourcing of what volumes of GGBS can currently be sourced annually within Ireland, versus what volumes would be needed in the construction phase and other baseline details.

4.1.2 Department of Housing, Local Government and Heritage

- Section 9 of the Construction Environmental Management Plan (CEMP) states that advance treatment of invasive species may be required, such as Japanese Knotweed, and will be decided on a site-by-site basis. For example, in summary Table 9.2, areas of confirmed Japanese Knotweed within the development footprint states that "isolating the species may not be possible, likely that treatment may be required". The Department recommends all third Schedule non-native species subject to restrictions under Regulations 49 and 50 Part 1: Plants listed in S.I. No. 477/2011 European Communities (Birds and Natural Habitats) Regulations 2011 identified in the development zone should be treated prior to the commencement of construction works.
- In relation to Water Quality Monitoring, the Natura Impact Statement (NIS) Section 10.5 states "regular monitoring of downstream receptor water quality ... will be carried out and Section 8.5 in CEMP states the "Local Authority will make recommendations on the water quality parameters to be assessed, sampling intervals and locations". Monitoring is essential to assess the effectiveness of any mitigation measures outlined in the NIS and Environmental Impact Assessment Report (EIAR). The Department recommends the details should be agreed before any consent is approved.
- Regarding stockpiling of surplus materials, the Department notes the commitment for no stockpiling on lands within a European site (NIS 2.4.8 and CEMP 8.4.3), and stockpiling of materials will be 50 m away from Annex 1 habitat within a designated site. Annex I habitats outside designated sites have not been explicitly considered here, and the Department recommends no stockpiling on Annex I habitats outside designated sites.
- Lough Corrib SAC - The Statutory Instrument for this site was published in 2022. 'EUROPEAN UNION HABITATS (LOUGH CORRIB SPECIAL AREA OF CONSERVATION 000297) REGULATIONS 2022' - S.I. no 384 of 2022.

Therefore, Lough Corrib is no longer a candidate SAC (cSAC). Lough Corrib however is referred to as a cSAC in some updated reports, for example the 'River Corrib Bridge Constructability Report - updated March 2025'.

- The Department notes the aquatic vegetation in the River Corrib has been reclassified, on a precautionary basis, as corresponding to the Annex 1 habitat 'Vegetation of Flowing Waters 3260'. The NIS states 'At the site of the proposed River Corrib bridge where the elevated structure passes over habitats within the SAC, including Annex I habitat, Vegetation of Flowing Waters 3260 ...'. However, some maps have not been updated to reflect this change. For example, plate 2 at the start of the NIS technical summary, and plate 8.1 in EIAR. The Department recommends An Coimisiún Pleanála take this into account.
- The requirement for an Ecological Clerk of Works (ECoW) is stated in the NIS and EIAR. However, the CEMP makes reference to an Environmental Manager (EM) and there is no ECoW role outlined. The Department recommends An Coimisiún Pleanála takes this into account.

4.1.3 Offaly County Council

The submission makes no material comment.

4.1.4 Transport Infrastructure Ireland

Under the Government's Infrastructure Guidelines, Transport Infrastructure Ireland is the Approving Authority for National Road Projects and works in partnership with local authorities to deliver the investment priorities identified in the National Development Plan, which includes the Galway City Ring Road. TII confirms that the scheme is included in TII's current capital programme. TII fully supports the development and publication of this scheme by Galway County Council.

4.2 Observations (Roads Scheme)

4.2.1 Brendan Mulligan

- The submission of Mr Mulligan largely reiterates the points made by An Taisce – The National Trust for Ireland in Section 4.1.1.

4.2.2 Cormac Michael Rabbitt

- The modified GCRR, which is an alternative route alignment identified by the observer, represents a viable, lawful, and more socially responsive transport

solution for Galway - one that achieves its national connectivity and urban relief goals while respecting community integrity and environmental law.

- The submission assesses how the modified GCRR better complies with the intent, methodologies, and statutory framework set out in each chapter of the EIAR.

4.2.3 Enda McGovern

- The submission firstly raised the unit of measurement for the concentration of carbon dioxide in the atmosphere, described as parts per million (ppm). Carbon dioxide (CO₂) is an important heat-trapping gas, also known as a greenhouse gas, which comes from the extraction and burning of fossil fuels (such as coal, oil, and natural gas), from wildfires, and natural processes like volcanic eruptions.
- Many scientific and government experts agree that 350 ppm is a 'safe' level of carbon dioxide to be in place for the world to exist in harmony with climate, and nature. The concentration of atmospheric carbon is at a level that is very concerning as it significantly exceeds pre-industrial levels and is a prime contributor to global warming and climate change.
- The submission also provides evidence on induced demand, adopting a precautionary approach to climate change and the impact to nature as a result motorway construction.

4.2.4 Friends of the Irish Environment

- It is submitted that, notwithstanding the Revised Further Information submission this application does not have the information and mitigation measures required to allow the Commission to meet its obligations under Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended;
- The proposed development is inconsistent with the national CAP24 and CAP25, the Carbon Budgets, the Galway County Council and Galway City Council LACAPs, and the EU and international law commitments to which these give effect;
- The EIAR does not contain the necessary assessment of alternatives required to comply with the Environmental Impact Assessment Directive. The proposed

development does not address and provide for the reduction of traffic congestion in and around Galway City.

4.2.5 Galway City Harriers Athletic Club

- The submission acknowledges that the main reason for the reactivation of this planning decision is on climate grounds there is significant overlap between the climate impact of the road and the adverse impact of the road.
- It also maintains that the objections raised by the club at the 2020 Oral Hearing remain valid, and they are reproduced in updated form to correspond to the updated documentation from Galway County Council submitted in April 2025.
- Clearly the N6GCRR is a major project, but this submission focuses on the University of Galway Sports grounds at Dangan and immediately surrounding area as that is where the majority of Galway City Harriers (GCH) athletics activities takes place.
- The submission makes the case that the road, during construction and after, will have a detrimental impact on their club's activities and to the use of University of Galway Sports grounds for other sports and outdoor activities.
- Air pollution levels in an area used by a wide variety of sports people will be heavily impacted bringing N02 pollution levels well above WHO guidelines. Higher levels of air pollution and noise, and the Loss of one of Galway's protected views, will make it a far less appealing and less healthy place to exercise.
- Biodiversity loss in this area will have an impact on the nature value and therefore the climate resilience of the area.
- The submission provides information on the use of sports facilities and participation in the club. The GCRR will have a major impact on the sports amenity of the area. Sports are not just about physical exercise. Many use the trails to be closer to nature and further from the noise and traffic of the city.
- Access restrictions during construction will mean that sports clubs will have to relocate training and events. In some cases, alternative venues may be impossible to find Leading to higher dropout rates of athletes.
- The issues raised at the Oral Hearing in 2020 have not been addressed in the updated submission from Galway County Council

- Conflicting statements in the plans about access during construction means that their club and others do not know how much access will be possible during construction.
- N02 pollution predictions showed a dramatic increase in N02 levels near Dangan in the 2018 submission. The increase is now described as negligible in the 2025 submission. There is no justification given for the new projections and the new numbers lack credibility.

4.2.6 Galway Green Party

- This observation makes the case that the 2025 response from Galway County Council does not provide sufficient information on the climate impact. It also contends that the figures for other pollutants, such as N02, do not reflect the actual increase in pollution that will occur, and which was documented in earlier submissions.
- It can be only assumed that if the climate and pollution impacts were properly communicated, the impact of this project would not be acceptable to the general public. It is also contended that even if the pollution and climate concerns had been mitigated, the GCRR would still fail at its primary objective which is to reduce traffic congestion in Galway city centre. The modal shift figures provided by Galway County Council show that the road will make no positive contribution to the city centre traffic.
- For these reasons, the submission urges ACP to reject the proposed GCRR and allow Galway City and County to focus on the many transport projects, including active travel and public bus and rail transport projects, which will bring far greater benefit to the citizens of Galway and the surrounding areas for the remainder of the 21st Century.

4.2.7 IDA Ireland

- IDA Ireland is the State Agency that is responsible for winning Foreign Direct Investment (FDI) for Ireland. These Investments cover a full spectrum of activities including manufacturing, research development & innovation and business services, and they result in significant capital investment and employment creation in Ireland.

- To support the continued growth of employment in FDI companies in Galway city, the implementation of the GTS is required in order to enable the efficient movement of employees and freight in Galway city and county.
- The Galway City Ring Road is a fundamental aspect of the GTS and is required to support the future growth of the city, county and wider region.
- In this context, IDA Ireland is very supportive of the development of the Galway City Ring Road.

4.2.8 James O'Connell

- The GTS 2016 is the strategic framework within which the impacts of the proposed development are being assessed. Based on the additional information submitted, it is evident that many of the proposed development's benefits, as well as mitigation measures for its negative impacts, are dependent upon the implementation of the full GTS. The policy and legal context in which the GTS was developed has changed significantly with several national level policy documents and legislation listed, as well as evidenced studies and research.
- The NTA has delayed progress on the GMATS based on this planning application. However, this creates a circular dependency and the proposed development is being justified on an outdated strategy. This is irrational under undermines any strategy-led approach to transport planning in Galway. If the application cannot be justified on the GMATS, it should be considered premature.

4.2.9 Shane Foran

- The observation considers that much of the current traffic problems in Galway city are an artificial and avoidable result of the manner in which planning and roads management have been conducted.
- The amount of through traffic arriving at Galway is trivial and does not require a ring road. Before any new roads proposals are approved the city council should be required to implement a program of works to support other forms of transport such as walking, cycling and public transport. This should include provisions for multi-modal transport combining different modes.
- The GTS which is claimed to support the ring road proposals is not a credible document. The GTS has the appearance of an attempt to evade and avoid

standard elements of sustainable transport planning such as combining cycling with public transport.

- The GTS fails to mention or implement various measures for promoting cycling access that were established in state policy and reports at the time that it was written. Given their fundamental reliance on the flawed GTS, the N6GCRR proposals should be rejected.

4.2.10 Údarás na Gaeltachta

- The clients of Údarás na Gaeltachta are operating at a disadvantage due to deficient road infrastructure in the area and related traffic delays and disruption. This results in increased journey times. This undermines the sustainable development of the Gaeltacht generally.
- The submission highlights the benefits of the proposed development for the Gaeltacht generally including improved access, connections and supply chains which will accelerate growth for clients and the region. It will also assist in developing the marine and tourism economies
- The submission is also of the view that the proposed development will bring about environmental benefits through an expanded public transport service, reduced carbon emissions as a result of reduced congestion.

4.3 Objections (Compulsory Acquisition)

4.3.1 Aidan Donnelly (PRS 176)

- While it is agreed there is a need for the proposed development, the objector opposes the proposed development based on the application being incomplete and the significant economic, environmental and social impacts it raised.
- There has also been a lack of engagement and consultation with the affected landowners particularly over the seven years since the application was first made. The objector cites several directives and charters in which consultation is advocated for.
- The proposed development will split the landholding into three parts and undermines the agricultural viability, access and future development potential. No measure is proposed to mitigate this injurious effect. Other issues include surface water runoff.

- The objector considers that the environmental effects have not been adequately mitigation in respect of noise, climate and air quality. The construction disruption will be significant and will have a social and community impact.
- An alternative alignment is proposed further 100 m to 150 m further north on its approach to Barna which would improve road safety, minimise displacement and land fragmentation and better integrate future transport infrastructure and residential lands.

4.3.2 Cairn Homes Properties Ltd. (PRS 261)

- Concerns that blasting impacts and buffer zones imposed in a recent LRD Application (ABP-321970-25) on lands beyond the CPO boundary are not explicitly detailed in the updated Environmental Impact Assessment. The consequence of this could potentially create a negative precedent which would influence all other residential proposals on Residential 'R' and 'R2' zoned lands within proximity of proposed and potential blasting sites required for the delivery of the proposed N6 GCRR.
- It is request that the Commission require the N6GCRR applicant to explicitly define any proposed blasting exclusion zones (e.g. 100 m buffers); clarify how such buffers will be implemented, enforced and mitigated; assess whether any such exclusion zone functionally extends the CPC) boundary, and whether further lands should have been included; ensure that the application of informal buffer zones does not undermine housing delivery, contrary to the adopted Development Plan; Protect the rights of landowners and developers impacted by uncertain or unpublished constraints.
- The access arrangements impacting multiple landholdings under Cairn Homes Properties Limited's ownership. A significant concern relates to the adequacy of access arrangements, especially in light of evolving national policy and technical standards, and the emergence of active development proposals on these lands including DMURS. The applicant needs to that road layouts, junctions, and pedestrian/cyclist infrastructure facilitate safe, convenient, permeable and direct access to and from their client's lands, supporting the strategic objectives of sustainable urban growth in Galway.

- It is respectfully submitted that An Coimisiún Pleanála adopt a pragmatic, evidence-based approach to these issues, consistent with its own decisions under ABP-321970-25 and ABP-318465-23.

4.3.3 Frank and Pauline Joyce (PRS 133)

- The objectors wish to express, in the strongest possible terms, the unbearable toll that the proposed Ring Road development has taken on them and their family over the past ten years. A full decade has passed since their home was earmarked for demolition, and yet they remain trapped in a limbo of uncertainty, restriction, and emotional torment-with no definitive timeline, no meaningful updates, and no respect shown to them as homeowners and citizens.
- It appears that every habitat and species-from bog cotton to bats is afforded more legal protection, planning sensitivity, and consideration than the families whose lives and futures are directly impacted. While the objectors do not diminish the value of environmental concerns, it is infuriating to watch endless debates and delays about these matters, while those who are being asked to sacrifice their homes are left to suffer in silence.
- For the past ten years, they have endured the constant and empty refrain that this project will be "shovel ready in XX years" anytime any official speaks. Meanwhile, their lives have stood still. They are expected to carry on in a house with no certainty about its future. They cannot commit to basic home improvements as a result or build other developments on the site for their family.
- This situation is disgraceful. It is an affront to any notion of fair treatment or due process. There should be a clear "use it or lose it" policy in planning: if no meaningful progress occurs within a fixed timeframe-ten years, in this case -- the designation to demolish a home should automatically lapse. People cannot be held to ransom indefinitely.
- The objectors are homeowners, citizens, and families who deserve certainty, respect, and a future. It is demanded that An Coimisiún Pleanála take their suffering seriously and fast track the review to provide immediate closure on this matter. Ten years is long enough.

4.3.4 JFC Property Development Ltd and Jon Concannon (PRS 238)

- The submission relates to lands in Mincloon on the Clybaun Road in Galway which are zoned Residential R and where residential development is ongoing or planned to occur. The observer plans to imminently submitted a planning application for same. The submission seeks to ensure the objective to deliver residential development on these lands is not undermined.
- The submission seeks assurances in relation to noise mitigation through extended noise barriers, surface water management, blasting. The submission seeks that the site is mitigated as if housing is existing.

4.3.5 Kevin Gill, Eavan Flanagan, Aoibheann & Fionn Flanagan-Gill (PRS 220)

- The objector and home owner cannot believe they have been living under the CPO for the proposed development of some 11 years, their home for 14 years. They maintain their objection to the proposed development.
- Issues raised include impact to human health, continuing traffic congestion and urban sprawl. The conclusion of the EIAR is based on the pre-determined need for the road. The route selection process prioritises natural heritage impacts over humans.
- The proposed development will have a devastating impact on urban and rural residential communities across Galway City and County resulting in the demolition of homes, destruction of farms, community division, amenity damage and associated impacts of light pollution, noise, dust, vibration and health deterioration.
- The submission includes a quotation from President Michael D. Higgins in relation to climate change, details of the family history and personal statements from the members of the family living in the home.
- The submission raises issue with the consultation undertaken by the applicant and that it was largely a box ticking exercise rather than 'sincere consultation'.
- The objector raises the potential for light rail with examples from Europe being provided to demonstrate where it has been viable with populations similar to Galway.

4.3.6 Linda Rabbitte (PRS 584)

- The construction and operation of the proposed development will have a significant adverse impact on European Sites within the zone of influence of the proposed development. The submission disagrees with the conclusion of the Scott Cawley report.
- There are no guarantees that the measures proposed will be sufficient to mitigate impacts to cultural heritage, in particular Menlo Castle whose setting will be materially changed.
- The interaction of the proposed development with Galway Racecourse will have a major tourist and economic impact and, even with mitigation, will result in adverse effects.
- The city plan has policy measures to protect cultural heritage and areas of high scenic amenity including Menlo Village and specifically Menlo Castle which is a rare site in the city. Other alternative options should be considered.
- The submission disagrees generally with the categorisation of certain impacts as 'imperceptible'; most notably landscape and visual and the psychological health impact as a result of landscape change.
- The submission is concerned with works at Lackagh Quarry including impacts from air quality, materials deposition impacts, traffic and access due to the proximity of the observer's home.
- There is continuous, ongoing, construction/clearing being carried out in the former Lackagh Quarry site located in Coolough, Galway. It is considered that the quarry structure may be compromised. The elements of the proposed development interacting with the quarry must be reevaluated prior to any further consideration being given to its future use. The observer's property has suffered damage from these seismic tremors.

4.3.7 Marian Rabbitte (PRS 576)

- The documents submitted fail to mention alleged unauthorised continuous, currently ongoing, construction/clearing being carried out in the former Lackagh Quarry site located in Coolough, Galway. It is considered that the quarry structure may be compromised. The elements of the proposed development interacting

with the quarry must be reevaluated prior to any further consideration being given to its future use.

- There are no guarantees that the measures proposed will be sufficient to mitigate impacts to cultural heritage, in particular Menlo Castle whose setting will be materially changed.
- Other alternatives including light rail and buses would help ease the traffic congestion and negate the need for the proposed development. Car travel may not be the viable in future.

4.3.8 McHugh Property Holdings Ltd (PRS 583)

- The submission urges An Coimisiún Pleanála to carefully consider the above matters in assessing the justification for permanent land take at Lackagh Quarry. The objector has consistently engaged in good faith and is open to working with the applicant to arrive at a proportionate, legally sound and environmentally responsible outcome. However, should these issues remain unresolved, MPH reserves its right to pursue all avenues available, including legal recourse.
- While the temporary use of the quarry as a construction compound is not opposed in principle, the permanent acquisition of substantial additional lands for compensatory habitat creation is unjustified. MPH strongly contends that publicly owned lands should be prioritised for compensatory habitat purposes ahead of private land acquisition. Notably, Galway City Council owns approximately 4.89 hectares of land immediately east of Lackagh Quarry, which is potentially suitable for this use. These lands, or other publicly owned parcels within the county, should be fully assessed before attempting to acquire privately held development land. In parallel, their client's alternative lands at Moy, Kinvara—professionally assessed by MKO Ecology—remain a viable and appropriate option.
- In relation to access matters, they strongly recommend that a comprehensive review of access arrangements across all impacted MPH landholdings be undertaken, with specific reference to the updated July 2023 DMURS standards; the planning status and zoning of the lands in question; current and planned development activity; and the need to prevent long-term land sterilisation through inadequate or outdated access design.
- Failure to address these issues may compromise the viability of key development sites and conflict with both national planning policy and constitutional protections

for property rights. The objector remains available to meet with the design team and relevant authorities to identify practical and policy-compliant solutions.

4.3.9 Michael and Annette Kerin (PRS 521)

- It is requested that all matters raised by the observer originally are again assessed 'de novo' in the context of the further information.
- The submission maintains its objection to the proposed development for the reasons outlined previously.

4.3.10 Padraig Mac Donnacha

- The observation raises deficiencies and unresolved issues in traffic management, hydrology, archaeology, geology, and Planning Enforcement protection measures, including air and water pollution, and it further establishes how a section of the proposed route for the N6GCRR is currently a series of unauthorised developments.
- The objection reviews the issue of Galway City Councillors deletion of a public right-of-way from the CDP 2023-2029 and the then directives/restrictions placed on said unauthorised alterations and unauthorised developments and the failure of the Planning Authority, Galway City Council to enforce and/or curtail and prevent systematic abuses of the planning regulations.
- This observation asks that the Commission include clarifications and conduct a review of local planning enforcement issues pertaining to/regarding specific aspects of this observation, as a matter of urgency.

4.3.11 Paul and Anne Mulhern

- This project represents a deeply flawed response to Galway's transport and environmental challenges. It undermines national climate objectives, ignores more effective transport alternatives, and risks causing lasting damage to communities and ecosystems.
- Plate 6.21 of the GCRR submission clearly shows that adding the ring road results in less than a 1% change in any mode of transport. These are significant gains that can be achieved without building the road. In fact, the claim that the road will reduce congestion is directly contradicted by the very data intended to support it.

- The GCRR submission repeatedly presents combined impacts of the road and other planned measures, making it impossible to assess the road's true individual effect. This tactic appears designed to make the road seem less harmful or even beneficial when it is not. It is requested An Coimisiún Pleanála seek greater clarity on this issue, as it obscures meaningful evaluation and misleads both decision-makers and the public.
- The notion that traffic can be reduced while increasing car use is fundamentally flawed. While the road may divert some traffic, it also encourages more driving and car-dependent planning. No one is driving just to the ring road; they are using it to get elsewhere. Even if the GCRR is combined with the full suite of planned public transport measures, we still risk creating a more car-dependent urban form.
- If traffic is pushed outward without strong public transport and urban mobility solutions within the city, Galway risks falling into the 'doughnut model'- hollowing out the city centre while development sprawls along the outer ring. This would severely impact local businesses, hospitality, and cultural life, undermining the very vibrancy that Galway is known for.
- The transformative potential of non-road measures- already outlined in the GTS - has not been properly explored or prioritised. These alternatives, if fully implemented, offer far greater potential to tackle congestion, emissions, and public health impacts without the devastating environmental and social cost of a major new road.
- The proposed route will have a severe and personal impact on residents, including myself. A portion of the objectors land is slated for compulsory acquisition, and the road would run dangerously close to my property. They have serious concerns about air pollution, noise, privacy, and the long-term liveability of their home and neighbourhood. These impacts are deeply disruptive, especially when the proposed development's benefits remain unproven.
- This project has already faced multiple legal challenges and procedural setbacks, including those related to compliance with EU climate and environmental law. It would be both reckless and premature to proceed with such a controversial and contested project when more sustainable, lower-risk alternatives exist.

- Recent public commentary has claimed that the GCRR is not a standalone solution, but rather an “enabler” of the GTS. This argument is unconvincing and contradicted by the data in the proposed development’s own submission. If the ring road were truly essential, they would expect to see a substantial shift in transport modes with its inclusion - but the data shows otherwise. Even with all supporting measures in place, the road makes less than a 1% difference in transport mode share.

4.3.12 Peter and Michelle Connolly (PRS 116)

- The “Dedicated Badger Survey” describes an active sett and a secondary sett on the objector’s property (listed as “S23 and S24” in Figure 8.4.1) as ‘possibly inactive’. The objector states that S23 is very much active and requests that Figure 8.4.1 could be amended to include this sett. The objector does not agree with the methodology for replacement setts which includes construction with plastic pipes and plywood as set out in Appendix A.8.26.
- The objector requests that the stone boundary walls are rebuilt, albeit this was deemed unnecessary and out of character previously. The objector refers to the county development plan which includes provisions to protect and retain such features in Chapter 10, Section 8.13: Trees, woodlands, natural boundaries and stone walls.
- The uptake in electric vehicles is optimistic as the market is still very much in development stage with issues regarding battery safety and disposal options. Also, second-hand market for EV’s is uncertain with very expensive replacement costs for parts, batteries etc.
- With quite a small percentage of traffic being diverted to the new road the objector queries why other aspects of the overall traffic plan for Galway are not being pushed through in tandem with the road element. Most car journeys from the west are still heading into Galway city centre and are not destined to bypass it. As stated in previous submissions traffic congestion from the West is not an issue during school holidays as school drop offs journeys are not taking up road space. The objector queries why there is no emphasis placed on moving Schools outside the city or on a more efficient free school travel scheme. The completion of the long planned and incomplete Barna inner relief road would go a long way to relieve traffic issues in Barna village.

- As affected property owners the objectors have for the last 25 years had this by pass / ring road traversing the land. The objectors' children are now of an age where they could possibly get planning permission for homes on their family land but they are unfairly restricted in their options until this project is decided on and if it is approved, they may have to wait until it is completed.

4.3.13 Ruth and Ronan Burke (PRS 232)

- There is no justification as to why the CPO lines are so close to both dwellings in particular, Hillcrest House. It is understood the road has to be widened but the CPO lines drawn appear to be too close to the front door of Hillcrest House. It is respectfully asked for the CPO lines to be revisited and only what is actually required for road widening to be subject to CPO and separate driveways are maintained.
- There is no bus on Ballymoneen Road Upper- Kearaun. Given planning has just been granted to Cairn Homes for another large scale residential estate the bus upgrade should be given priority so all the residents can access public transport.
- There is an overreliance on cars as the roads around Kearaun are not fit for purpose and have no cycle lanes or footpath

4.3.14 Shane Kelly (PRS 216)

- The objector disputes points made by the applicants at the oral hearing and considered them erroneous in relation to AR 4/05.
- The objector claims there is misuse of the CPO process and the in aiming to provide agricultural access and like-for-like replacement to the Boleybeg Bóthrin the land take should be reduced from 6 m to 2 m in width. A two lane, 6 m wide access road with grass verging either side is disproportionate to
- The applicant should address the source of the Recurring Flood. Otherwise, the Ring Road, will be beset with flood water issues indefinitely. The Recurring Flood is an existing problem and now is the time to address it as part of the construction process of the Ring Road.
- An integrated drainage strategy to include proper drainage along the Access Route AR 4/05, inserting culverts at the location of the 3 drains on the Property should form part of the Schedule of Commitments made by the Applicant in

constructing the Ring Road. Otherwise, there will be flood water pooling into the Property affecting ongoing agricultural and equine activities and there will be flood water flowing on to the Cappagh Road North and down the gradient of the Cappagh Road North mixing with the Recurring Flood waters and pooling in the location of the Ring Road as it intersects the Cappagh Road.

- The objector seeks replacement stone walls with stone facing on the exterior and interior (both sides of the wall.). That replaces like-for-like within the spirit of the body of CPO law in Ireland. This was agreed to by the Applicant at an oral hearing on 29 October 2020.
- To address anti-social behaviour, the applicant should include a gate with a lock across the Access Route AR 4/05 at the location just beyond the dwelling in order to prevent trespassers, squatters. It will also have the effect of keeping livestock off of the Cappagh Road North and walking on to the Ring Road posing health and safety issues for road users travelling at speed. The construction by the Applicant of this gate across the Access Route AR 4/05 should be included in the Schedule of Commitments. The Applicant has conceded on 29 October 2020 at an oral hearing that the gate would be included across Access Route AR 4/05 There is a similar gate with a lock being placed across AR07/07. They are asking for the same treatment in that regard.
- The objector is of the view that a number of serious issues have been raised in this Submission. It would be unconscionable for An Commission Pleanála not to hold a further module to the oral hearings so to allow landowners to raise further questions associated with the documents submitted. Failure to hold an oral hearing exposes the Ring Road application to a further judicial review challenge(s).

5.0 Planning History

A review of the relevant local authority planning portal and the Commission's case files was carried out in January 2026 to collate any relevant, recent planning history for the site. A detailed planning history is provided by the applicant. This is noted.

There are a significant number of planning applications along the route which include large residential, domestic residential such as alterations to existing houses, commercial and community development and telecommunication infrastructure etc. This is to be expected in such urban and rural locations. These are all noted and considered in the context of the assessment below – in particular the cumulative and in-combination assessments.

For a detailed planning history and catalogue of plans and projects which may interact with the proposed development, the Commission should refer to Appendix A26.1 and A26.2 of the EIAR which relates to the Cumulative Effects Assessment (CEA). Similarly, Appendix 1.8 of the NIS lists projects assessed in combination with the proposed development.

A number of observers to the file made reference in their submissions to planning histories for particular sites, which are noted and acknowledged. In addition, planning authorities, in their submission, cited several other planning histories. This is also noted.

6.0 Planning Assessment

I have read the entire contents of the file including the updated EIAR, updated NIS and all supporting documentation submitted with the application. I have visited the subject site and its surroundings. I have read in full the observations submitted in respect of the application including the third-party observations, the observations from the planning authority and the observations from prescribed bodies.

In order to prepare this supplemental report, I have also reviewed and relied on the report and in particular the assessment provided in the Inspector's Report of June 2021 and its various appendices which included specialist ecological and hydrogeological input.

It is my view that this report is valid and assessment remains robust, albeit supplementation is required in the context of the order of the High Court and other changes given the passage of time. On this basis, these reports are appended to this report and the Commission should rely on them and read them in conjunction.

There are a variety of issues raised within the submissions received, I have considered them on a themed basis within the relevant sections of the report hereunder. I consider the critical issues in determining the current application before the Commission are as follows:

- Principle of the Development
- Compliance with the Sustainability Mobility Policy
- Absence of Galway Metropolitan Area Transport Strategy
- Compliance with the CAP25 and related strategies, plans and objectives
- Consideration of Submission

The Commission should also have regard to other sections of this report including:

- Planning Assessment (this Section)
- EIA (Section 7.0)
- WFD (Section 8.0)
- AA (Section 9.0)
- CPO (Section 10.0)

Each assessment has had regard to all submissions made by parties to the planning application. There is an inevitable overlap between the assessments with certain

matters falling into the planning assessment, EIA, AA, WFD and CPO. In the interest of brevity, matters are not repeated but the Commission should have regard to all sections when deliberating and reaching its conclusions in respect of the planning application and each discrete assessment under EIA, WFD, AA and CPO.

6.1 Principle of the Development

I remain of the view that the proposed development has been justified on the basis of traffic congestion, delays and poor journey characteristics in the Galway City area. This is extensively discussed in Section 10.3 and 10.4 of the Inspector's Report of 2021. The population of the Galway Metropolitan Area is due to grow under the NPF and regardless of other intervention the traffic congestion will worsen. The proposed development will not resolve all of Galway City's traffic woes, it is not intended to. Rather, it will facilitate the diversion of traffic from city streets and roads and enable them to be used for more sustainable modes of transportation.

The Commission should note that there has been some change in development plan policy in the intervening period. Both the city and county development have been replaced, the current plans for consideration include:

- Galway City Development Plan 2023-2029
- Galway County Development Plan 2022-2028

These replacements have been reflected in the updated EIAR and in particular Chapter 2 which addresses Planning and Policy Context. The N6GCRR is a strategic project that is identified in the NPF, NDP, RSES and MASP.

The authors of the development plans are the promoters and applicant for the proposed development before you and, as expected, there is clear alignment and both development plans carry extensive support for the development of the road in particular and directly in the city plan under Policy 4.1 General (Transport), Policy 4.5 Transport Demand Management Measures, Policy 4.6 Road and Street Network and Accessibility, Policy 6.1 (15) General Policy (Economy) which supports the N6GCRR project to address the existing congestion on the national and regional road network. The N6GCRR has been identified as a specific objective on the land use zoning map for the city plan. Galway County have set out its support for the proposed development in Table 6.1 and NR 2 Key Roads Infrastructure Developments of the county plan. It is noted that the city plan maintains the objective to give priority to the

reservation the N6 GCRR designed strategic road corridor and any associated land requirements over other land uses and objectives in the City.

I am conscious there are other provisions in the plans, most notably across Chapter 5 Natural Heritage, Recreation and Amenity, Chapter 8 built Heritage and Chapter 9 Environment and Infrastructure of the city plan and Chapter 4 Rural Living and Development, Chapter 7: Infrastructure, Utilities and Environmental Protection, Chapter 8: Tourism and Landscape, Chapter 10: Natural Heritage, Biodiversity and Green/Blue Infrastructure, Chapter 12: Architectural, Archaeological and Cultural Heritage in the county plan. These largely seek to protect built and natural heritage features in the environment. I am satisfied, however, that the likely consequences for the proper planning and sustainable development in the area arising from the proposed development on such policies and objectives in the Galway City Development Plan 2023-2029 and Galway County Development Plan 2022-2028 have been fully considered in the results of the Strategic Environmental Assessment and Appropriate Assessment of these plans undertaken in accordance with the SEA Directive (2001/42/EC).

Regardless the applicant has undertaken an extensive EIAR, which is detailed further below, and the Commission can acknowledge the significant impacts and mitigation measures to such built and natural heritage features which arise in relation to the proposed development such as areas of ecological importance, recreational areas, woodland parks, boreens and trees, views of special amenity value and interest such as Menlo Castle and the River Corrib, etc. Again, I defer specifically to *Sustainable Mobility and Transportation 4.8 Specific Objectives (24)* of the Galway City Plan which gives:

priority to the reservation the N6 GCRR designed strategic road corridor and any associated land requirements over other land uses and objectives in the City Development Plan.

Overall, the Commissioners are reminded of the population growth projections for Galway included in the NPF. The NPF promotes sustainable development founded upon a compact city model with increased residential density accompanied by enhanced public transportation and proper provision for cycling and walking. The proposed development will enable capacity for trips to be made without the need to

go into the centre of the city meaning less congestion in the city centre. This will enable road space to be reallocated to more sustainable modes of transport as set out in the GTS. Compact growth and enhanced regional accessibility are Strategic Outcomes in the NPF.

In conclusion, the planning policy while changing and being updated, has not changed in any material context and the proposed development aligns with all relevant national, regional and local policies and objectives in such a way that the principle of development is acceptable.

6.2 Compliance with the Sustainability Mobility Policy

The purpose of this document is to set out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade. A key issue raised by Friends of the Irish Environment is whether the proposed development prioritises interventions in line with the Sustainability Mobility Policy.

The applicant has demonstrated in subsequent Section 6.4 of this report, that the proposed development will avoid stimulating or facilitating increased GHG emissions from transport over the next 20 years. A key figure that will be highlighted to the Commission in the section, is a 43% reduction in vehicles emissions and a 16% reduction in kilometres travelled while catering for a 30% increase in population. Emissions reduction will occur but need to be set in the context of a growing city. The Commission in considering this should also bear in mind that infrastructure is at capacity in Galway presently.

The proposed development, a key measure of the GTS, will enable a shift to active travel and transport in the city. The applicant has demonstrated that it is possible to restrict traffic on three of the four bridges in the city which facilitate east-west movement. These are wider aims within the GTS. I am satisfied that the proposed development is adaptable and resilient to the impacts of climate change in future.

More specifically, delivery of metropolitan area transport strategies in the cities such as GTS (Action 78) are key actions of the Sustainability Mobility Policy. I am satisfied that the Sustainability Mobility Policy has considered the proposed development in the context of the GTS and that the proposed development is consistent with its policies.

There may remain concern regarding the possibility that providing a new road will result in an increase in the number of cars attracted onto the road network (i.e. induced demand). However, I am comfortable with the role of the road within the strategic picture that has been set out in the GTS. The GTS is an integrated and holistic solution of which the proposed development is one facet. The applicant has been careful to state that the road on its own would not solve the problems of traffic in Galway City. However, it is considered an enabler to the GTS and provides the opportunity to balance road space in the city area and facilitate the use of other modes of transport such as public transport, cycling and walking. The road will divert considerable traffic volumes away from the city, thereby reducing congestion and making the city a more attractive and safer place to walk or cycle. I am of the opinion, on balance and examining the proposed development in a strategic context, that the proposed development would support the removal of through traffic from the city, reduce journey times for public transport and enable a reduction in congestion which are all key aims of the Sustainability Mobility Policy.

In this report I have noted the changing policy and legal context which Friends of the Irish Environment and Mr O'Connell refer, including the introduction of the national Sustainable Mobility Plan (the proposed development will facilitate reallocation of road space for sustainable modes), the CAP25 (43% reduction in vehicle emissions compared to 2018, and a 16% reduction in vehicle kilometres travelled). and other studies related to the cost of congestion (which does not account for the demand management measures contained within CAP25), Five Cities Demand Management (measures therein incorporated into the proposed development) and Galway Light Rail (a complementary scheme to the proposed development). The changes are acknowledged and the applicant I am satisfied in my review of these documents that the proposed development is in alignment. I note other recommendations in the Five Cities Study which includes Galway for demand management measures including congestion charging, parking levies and low traffic neighbourhood. These are noted and the applicant is alert to these and have factored them in its modelling given they are largely linked to the demand management measures in the CAP25.

The issue of induced demand has been raised in a number of submissions and considered extensively by the applicant in its reporting and previously in the Inspector's Report of 2021. The applicant has modelled a 2% increase in car mode

share, i.e. induced traffic/demand, when considered the proposed development in isolation which equates to 1% increase in CO₂eq emissions when compared with the Do-Minimum scenario. However, when demand management measures are introduced, there is no material change in car mode share. Therefore, the proposed development has to be viewed in the context of a wider strategy including the GTS and CAP25 measures. I am satisfied the Commission can take into account these measures in the context of its obligations under CAP25.

6.3 Absence of Galway Metropolitan Area Transport Strategy

Several observers, including An Taisce and James O'Connor, raise the issue of the Galway Metropolitan Area Transport Strategy and whether the proposed development can be progressed in its absence. I remind the Commission that, while this has been identified as an action in the current CAP25 it remains unpublished and the GTS remains the de facto transport strategy for Galway. While it was published in 2016 and is now some ten years in existence, I am satisfied the applicant has provided sufficient and qualified information in respect of its compliance with CAP25.

I am satisfied the GTS can align with the CAP25. The applicant has proven that the delivery of the proposed development (as an integral part of the GTS) alongside other measures in the GTS and demand management measures in the CAP25 can contribute meaningfully to the targets of CAP25. I would also dismiss the requirements for a future Galway Metropolitan Area Transport Strategy to be a prerequisite to the conclusion on consistency with the CAP25 or that it undermines the current GTS.

6.4 Climate Action Plan 2025 and related strategies, plans and objectives

6.4.1 Introduction

A central argument in respect of not proceeding with the proposed development is in respect of the compliance, or lack thereof, with climate legislation, namely the obligations placed on public authorities by Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended and the CAP25 (which to my

knowledge is the most recent plan available). This argument is articulated by Friends of the Irish Environment, among others.

At this juncture, I must remind the Commission of their obligations under this climate legislation. Section 15 (1) (a) states:

A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—

(a) the most recent approved climate action plan,

(b) the most recent approved national long term climate action strategy,

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

(d) the furtherance of the national climate objective, and

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

The legislation is explicit in that the Commission must perform its function in a manner that is consistent with CAP25 and any other plans that Section 15 of the Climate Act refers. The Commission should note it and ensure it will extensively deliberate upon it in its consideration in respect of climate.

The primary documents which the Commission are assessing the proposed development on are as follows:

- CAP25 (the most recent approved CAP)
- Long-term Strategy on Greenhouse Gas Emissions Reductions 2024
- National Adaptation Framework 2024
- Transport Sectoral Adaption Plan (T-SAP II) 2025-2030
- National Climate Objective as set out in Section 3 (1) of the Climate Act

I remind the Commission, prior to making any decision in respect of this proposed development, to verify whether any new CAP or framework has been published since the discharge of this report before you.

6.4.2 Supporting Information

The consideration of climate and Section 15 obligations is supported by information contained in the EIA and I refer the Commission to the assessment below and the

information contained in Chapter 17 of the EIAR submitted by the applicant. This considers the proposed development in isolation and without wider measures in the GTS or CAP25 and any other plans that Section 15 of the Climate Act refers. In isolation, the proposed development is predicted to result in a permanent moderate adverse effect on climate.

The Commission should make the distinction between the EIA Assessment which is a methodical approach of the proposed development in isolation and the Climate assessment as presented here in this section of this report which factors in implementation of measures in the CAP25 and GTS. While observers dispute this approach, I am satisfied with the approach the applicant has set out and it is correct to consider wider initiatives that would have a bearing on achieving targets in CAP25.

For an understanding of this approach, I also refer to Part IV of the 2025 RFI Response in which the applicant has considered *Obligations under Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended* and submissions in relation to the CAP24.

The Commission should be aware the applicant has provided updated information in October 2025 to reflect that fact that the CAP25 was published in the intervening period. This issue was raised by Brendan Mulligan, An Taisce and Friends of the Irish Environment and I am satisfied the applicant has addressed the update of plans appropriately. The Commission will acknowledge that there is a constantly changing policy framework occurring outside of this planning application. The applicant and this assessment have been assessed in the context of the most recent CAP25.

6.4.3 Assessment

I have considered the difference between CAP24 and CAP25 and the plans largely remain the same given the change of plans was raised by numerous observers. There is no change to key performance indicators related to transport between both years. In fact, CAP25 states that it is to be read in conjunction with CAP24 to facilitate a focus on the delivery of outstanding actions from CAP24 and high-impact legacy actions from CAP23. The applicant has also advised that the changes to CAPs does not result in any consequential change to the EIAR topic of Climate which is addressed in subsequent sections. I do not see any reason why the

Obligations Report was required to be updated and any reasonably informed person can read it in the context of both CAP25 and CAP24. On this basis I also do not see any requirement to seek further comment from prescribed bodies and third parties on the October 2025 response by the applicant.

The proposed development is related to the transport sector and the key targets in the CAP25 in respect of same include:

“reduce emissions include a 20% reduction in total vehicle kilometres travelled relative to business-as-usual, a 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share. Fleet electrification and the use of biofuels will continue to provide the greatest share of emissions abatement in the medium term.”

Based on the traffic modelling prepared by the applicant in respect of the proposed development, the following outcomes are expected:

- 16% Reduction in total Vehicles travelled by 2030 when compared to the Business as Usual Scenario
- 43% reduction in carbon emissions from transport within the area of influence when compared to 2018 levels

On the basis of the climate assessment in the EIAR, I am satisfied that the applicant has demonstrated compliance with sectoral emissions ceilings and that the proposed development is one of a suite of priority interventions which is required to unlock the aims of the Sustainable Mobility Policy and GTS. Transport strategies require an integrated approach, and it would be imprudent to not address issues of congestion, delays and poor journey characteristics in the Galway City area in the context of the GTS which seeks to deploy wider sustainable mobility projects. The applicant in my view has demonstrated this extensively. This is notable in the comparison of the do-something scenario and the do-nothing scenario which shows a 43% reduction in emissions and a 16% reduction in kilometres travelled.

On the basis of these figures and consideration of wider demand management factor, the Commission can be satisfied that the proposed development does not in any way cut across, jeopardise or render more difficult the furtherance of the national climate objectives, which are stated in CAP25 as a 20% reduction in vehicles travelled and 50% cut in fossil fuel use in the transport sector.

While I am of the view no inconsistencies arise with regard to *Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended* and the Commission can view the proposed development as consistent with the CAP25 and other related strategies and frameworks, it could equally be satisfied that it has been *practicable* in performing its functions under said Act in the context of the GTS, which is an integrated and strategic transport strategy for the city. The case for the proposed development, which is one of several projects of the GTS, is set in the context of forecast population growth in the NPF and is considered practicable with demand management measures and other sustainable mobility projects in the GTS. The scheme, in the context of the GTS, will support long-term goals to reduce traffic congestion and emissions in Galway City.

It is acknowledged, as An Taisce and Brendan Mullgan point out, that the proposed development when considered in isolation is expected to have a permanent moderate adverse residual effect on climate following the implementation of construction phase mitigation. The Commission should be clear that the EIAR cannot account for other commitments such as those related to sustainable modes of transport, in the GTS or indeed CAP25 which has commitments also. The Commission should consider holistically the climate assessment of the EIA in conjunction with commitments in the GTS and CAP25. It is recommended that the Commission reason its conclusion, as set out in the EIA in this report, and accept the adverse climate impacts of the proposed development in isolation. Paul and Anne Mulhern share this concern about the combined impacts of the road and other planned measures, making it impossible to assess the road's true individual effect. However, I am satisfied that the GTS is the overarching strategy and can be considered in the context of CAP25. The EIAR has presented the impacts in respect of climate and the moderate adverse residual impact.

This has to be viewed in the context of a growing city whose infrastructure is at capacity and whose population is expected to increase some 30% between 2016 and 2030 in the metropolitan area; the NPF suggests it would increase by 50% population growth in the Galway Metropolitan Area by 2040 over 2016 levels. This population growth has to be a material factor in any decision given demand for all modes of transport will increase in 2040 including public, private and freight by 20%. I note in particular Plate 4.2 Delay Time 2018 versus 2030 Do nothing and a growing

over-capacity issue leading to queues and delays equating to approximately 37% increase in delays across Galway. In addition, Plat 4.3 illustrates a 20% total increase in travel time across Galway between a base year of 2018 and a 2030 Do Nothing Scenario. The suite of other interventions that could occur within a less congested city area can also support a shift to active travel and public transport, including by the reallocation of road space.

I am satisfied that in order to attain the government's objectives of compact growth and attainment of CAP25 targets, road congestion needs to be addressed in Galway and the proposed development is one of a number of solutions to enable this as a part of a wider sustainable transport network as set out in the GTS.

Friends of the Irish Environment is also of the view that the GTS is incompatible with the CAP25 more generally. While this strategy does predate the concept of CAPs, having reviewed the GTS in the context of the proposed development, I am satisfied that it aligns with the CAP25 and that its suite of measures would contribute toward the achievement of the national level targets.

The applicant has presented information on the various modelling tools used to forecast emissions including the Irish Car Fleet Model, Carbon Footprinting Tool and the NTA's Regional Modelling System (RMS) and the Western Regional Model (WRM). The baseline environment is taken from 2018 and the applicant has examined scenarios including a 2030 Do Nothing Scenario and 2030 Do Something Scenario. These scenarios assume several key transport projects are undertaken including the proposed development and other major schemes like BusConnects and the cycle network outlined in the GTS. The do something scenario includes additional demand management measures including overall reduced car ownership levels in Galway (10% reduction compared to 2016), car free urban centre, congestion charge areas and other car parking measures. The model also assumes that there would be no sale of combustion engines from the end of 2029.

The result of the modelling includes the previously mentioned 43% emission reduction in comparison to the 2018 baseline. While this is largely linked to the urban area of Galway, its area of influence is much larger than Galway City itself and includes large areas of County Galway including Oughterard, Headford, Tuam, Loughrea and Gort. Another key result of the modelling is the overall reduction in

kilometres travelled by vehicles of 16%. The Commission should note that this includes all vehicles types and if considering private vehicles alone the figure is 18% reduction and for goods vehicles it is a 1% reduction.

In respect of improving the modal share, of note is the consideration of the business as usual scenario with and without CAP25 measures. Without the proposed development the mode share is 52.6% and with the proposed development the mode share is 54.6%. In the do something scenario, when CAP24 demand management measures are included the mode share is 29.6% without the proposed development and 29.7% with the proposed development. What these figures suggest is that the proposed development will not induce demand in a scenario with demand management measures. It also suggests that the proposed development which is intended for the movement of 'strategic traffic' only which the applicant considers movements which would not typically be undertaken by walking, cycling or public transport and that this creates space for sustainable modes of transport elsewhere in the city. This supports the assumption of the applicant that the proposed development supports a shift from private car modal share when demand management measures are in place. This is demonstrated in the percentage reductions in Annual Average Daily Traffic crossing the River Corrib between the BAU and CAP DS Scenarios. The applicant has also examined the performance of the network in the AM peak Hour. The levels of the delay between 2023 and 2030 reduced by approximately 20% without the proposed development and 50% with the proposed development. In short, the proposed development will improve journey times overall and support the reallocation of space for other modes of transport.

In respect of the LACAPs, both city and county have goals of achieving 51% reduction in greenhouse gasses by 2030 relative to 2018 which is consistent with CAP25. The 51% figure is not sector specific and, on this basis, I would refer the Commission to more specific targets in the CAP25. Consistency with CAP25 will ensure consistency with the LACAPs. Of note within the Galway City LACAP is the goal to deliver a decarbonised zone in the city. The proposed development would be a key enabler to this goal.

The Commission should also consider air quality in the context of the CAP25. Chapter 16 of the EIAR has considered air quality. The associated reduction in traffic and removal of strategic movements and reallocation of space to sustainable modes

of transport will improve air quality as a result of decreases in overall AADT. During the operational phase, compliance with all air quality standards will be achieved, save for one receptor moderate adverse impact is expected. No significant residual air quality impacts are predicted for human and all air quality standards will be achieved.

The Commission should also consider the CAP25 in the context of the construction phase and in particular the embodied carbon associated with construction materials. The applicant has set out a range of measures in Section 17.6.2 of the EIAR to minimise as far as practicable the embodied carbon and use low carbon construction methods and low carbon cement material. The applicant will utilise green procurement, use of appropriate materials and material reuse (where appropriate). The construction phase residual impacts considered moderate in the EIAR as a result of embodied carbon.

I note that the submissions of An Taisce and Brendan Mulligan raise the issue of wider carbon budgets and sectoral emissions ceilings. I am satisfied that these are government and Ministerial obligations and that on the basis the Commission finds that the proposed development is consistent with CAP25 and other related strategies and frameworks, it follows that it is consistent with the relevant carbon budgets and sector emissions ceilings. In particular Section 4 (2) (a) of the Climate Act provides that the climate action plans should ensure that it its consistent with the carbon budget programme. The applicant also draws attention to Section 4 (8) (g) of the Climate Act which addresses the considerations in a climate action plan and national long term climate action strategy and that they should have particular regard to in so far as practicable, the need to maximise employment, the attractiveness of the State for investment and the long term competitiveness of the economy. The applicant has made the case in this regard that the project will have a significant positive impact on the Galway economy by reducing traffic congestion which currently constrains economic growth and competitiveness. Similarly, the CAP25 will have considered Section 4 (8) (m) of the Climate Act and the status of the National Planning Framework which specifically cites the delivery of the Galway City Ring Road as a key future growth enabler for Galway. On this basis, the Commission should accept that the Minister in preparing the CAP25 and related strategies and framework brought it forward in the context of this proposed development before you and is

satisfied that there is scope in the carbon budgets and emissions ceilings and Climate Action Plans to deliver this project.

I am satisfied that the proposed development aligns and supports the relevant roadmap actions set out in the CAP25 which are purposefully set out in order to meet sectoral emission ceilings and budgets. There are numerous strategic factors which may influence attainment of the national level carbon budgets and ceilings outside of the proposed development which include successful roll out of demand management measures and electric vehicles.

In considering Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction 2024, it is noted that modal shift is identified as playing a key role in decarbonisation by 2050. Many observations raise the issue of induced demand and the proposed development in making car travel more accessible would undermine modal shifts. I am satisfied that the applicant has provided sufficient evidence to say this would not be the case and the proposed development (as an integral part of the GTS) results in the enablement of demand management measures as a result of additional road space within the city and a better performing transport network for all modes of transport reducing delays by 50% when compared with 2023 levels.

In respect of the National Adaptation Framework 2024 and Transport Sectoral Adaption Plan (T-SAP II) 2025-2030, I am satisfied that the applicant has considered the implications that the climate change itself may have on the proposed development and have considered its climate resilience. Extreme weather events from precipitation and related flooding issues have been considered in the planning application and I am satisfied with the applicant's conclusion in Appendix A.11.1 - Flood Risk Assessment Study. The Commission should also note the applicant has considered appraisal guidance, including in the update to the Common Appraisal Framework in which climate is a key criteria.

I note the submission of An Taisce and Brendan Mulligan who contest assumptions made in respect of electric vehicles, I am satisfied that they are appropriate and the reliance on the CAP25 target of 30% by 2030 is appropriate. This is the plan that the Commission have available to it and should rely on assumptions therein. The plan was informed by wider state assumptions including NTA's ENEVAL tool. I am satisfied that the applicant has explained the predicted CO₂eq emissions included in

the Updated EIAR compared to the predictions included in previous submissions by the applicant and in particular is use of ENEVAL modelling. Despite criticism of the model from Friends of the Irish Environment, I am satisfied that ENEVAL is the most reliable, up to date and scientific model available based on reliable projections for various factors and provides a practicable forecast of climate impacts on which the Commission can base its assessment.

I am satisfied the GTS can align with the CAP25. The applicant has proven that the delivery of the proposed development (as an integral part of the GTS) alongside other measures in the GTS and demand management measures in the CAP25 can contribute meaningfully to the targets of CAP25. I would also dismiss the requirements for a future Galway metropolitan Area Transport Strategy to be a prerequisite to the conclusion on consistency with the CAP25 or that it undermines the currently GTS.

I am conscious of the Galway City Development Plan 2023-2029 provisions in respect of climate change also and note Policy 2.2 Climate Action which sets out broad support for a range of measures related to climate action. I am satisfied the proposed development is in compliance with same as demonstrated in planning particulars submitted including the EIAR, AA, the Climate Obligations Report and additional information submitted in October 2025. The Commission should note that the GTS, of which the proposed development is a factor in progressing public transport and sustainable mobility projects, is considered a key policies measure in climate adaptation and mitigation measures by Galway City Council as set out in Table 2.1 of the plan.

6.4.4 Conclusion

Therefore, in performing its functions in relation, the Commission will have regard to Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended by Section 17 of the Climate Action and Low Carbon Development (Amendment) Act 2021, and the requirement to, in so far as practicable, perform its functions in a manner (consistent with CAP24 and CAP25 and the national long term climate action strategy, national adaptation framework and approved sectoral adaptation plans set out in those Plans and in furtherance of the objective of

mitigating greenhouse gas emissions and adapting to the effects of climate change in the State).

Having considered:

- The report on Obligations under Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended and submissions in relation to the CAP24 submitted by the applicant.
- The updated EIAR and in particular topics in relation to climate submitted by the applicant and related topics such as biodiversity, air quality and human health.
- The submissions of various observers, in particular An Taisce, Bredan Mulligan and Friends of the Irish Environment, Enda McGovern, Galway Green Party, among others.
- The response to the submissions of observers, submitted by the applicant in October 2025.
- The provisions of the National Sustainable Mobility Policy in which it is the goal to expand the capacity and availability of sustainable mobility and complementary provisions of the GTS which share similar goals and in which the proposed development is an integral part to delivery specified sustainable mobility projects.
- the relevant development plans which support the proposed development extensively and in particular Galway City which gives priority to the proposed development over other objectives
- the Galway County Council Local Authority Climate Action Plan 2024-2029 and Galway City Council Local Authority Climate Action Plan 2024-2029 which are consistent with CAP25 and the city plan in particular which supports the implementation the GTS

and on the basis that:

- the consideration of 'consistency' in the context of the Climate Act Plan, the proposed development can factor in measures outside of the proposed development itself, such as wider projects in the GTS and demand management measures in the CAP25
- the proposed development (as an integral part of the GTS) directly results in a 43% reduction in carbon emissions from transport when compared to 2018 levels

and a 16% Reduction in total Vehicles travelled by 2030 when compared to the Business as Usual Scenario.

- the proposed development (as an integral part of the GTS) results in the enablement of demand management measures as a result of additional road space within the city and a better performing transport network for all modes of transport reducing delays by 50% when compared with 2023 levels.
- the proposed development, incorporating wider demand management measures, limits emissions despite an expected population increase of up to 50% by 2050 in line with the NPF.
- the mitigation measures in respect of green procurement, embodied carbon and use of low carbon construction methodologies will be implemented.
- the proposed development has been extensively considered in the context of other reasonable alternatives (Chapter 4 of the EIAR) including light rail, BusConnects and demand management measures including a car free urban area in the core city centre, a congestion charge in the core city area, increases in parking charges across in the city, reduction in public transport fares, removal of free workplace car parking in the city congesting, etc.
- there would no significant adverse impacts from the proposed development in respect of climate change vulnerability as set out in Chapter 17 Climate of the EIAR submitted by the applicant.
- there would be permanent moderate adverse residual impacts on climate from the proposed development (in isolation and in the absence of the implementation of the wider GTS and demand management measures in CAP25), over its lifecycle following the implementation of construction phase mitigation measures,
- there are no significant adverse impacts in respect of other climate related topics such as, air quality, human health.

In considering the proposed development I would also remind the Commission that targets set out in CAP25 are national level targets, to be achieved by Ireland as a whole, and may not be achieved by individual projects.

I am satisfied that the proposed development is, in so far as practicable, consistent with:

- the most recent approved Climate Action Plan, CAP25 and

- Galway County Council Local Authority Climate Action Plan 2024-2029
- Galway City Council Local Authority Climate Action Plan 2024-2029
- Long-term Strategy on Greenhouse Gas Emissions Reductions 2024
- National Adaptation Framework 2024
- Transport Sectoral Adaptation Plan (T-SAP II) 2025-2030
- National Climate Objective as set out in Section 3 (1) of the Climate Act

The Commission can be satisfied that an approval for the proposed development would not in any way cut across, jeopardise or render more difficult the furtherance of the national climate objective and the achievement of the objective of mitigation greenhouse gas emissions and adapting to climate change.

6.5 Consideration of Submissions

6.5.1 An Taisce – The National Trust for Ireland / Brendan Mulligan

I am satisfied, as set out in Section 6.4 above, that the applicant has addressed the differences between the CAP24 and the CAP25 which has been published in the intervening period. The applicant has updated its response on this basis.

As set out in Section 6.4 I am equally satisfied that the applicant has demonstrated the compatibility of the N6GCRR with the CAP25 and interrelated issues with the GTS and the Galway City and County Councils' LACAPs. The transport strategy and LACAPs are consistent with the CAP25. Consistency with the CAP25 and the relevant actions therein ensures the proposed development meets governmental sectoral emission ceilings and budgets and the total amount of greenhouse gases emissions that the transport sector can produce to achieve a 51% GHG reduction goal by 2030 and net-zero by 2050.

The applicant acknowledges that the N6GCRR is not the sole solution to congestion in the Galway Metropolitan Area and other measures are being brought forward under the GTS, which is the current transport strategy for the area. The applicant has also set out the different requirements of the EIA, in which permanent moderate adverse impacts are expected in terms of climate and the assessment which should take place for under the Climate Act. The EIA has not taken into account the wider demand management measures (which are outside the control of the applicant and not project level mitigation measures) included in CAP25. In short, the conclusion of

the EIA presenting adverse impacts in terms of climate is not a reflection of how it complies with national climate objectives set out in the CAP25 and other requirements of the LACAPs.

It is noted that over the construction period total emissions of 126,332 tonnes CO₂eq are predicted. I do not accept the assertion by the prescribed body that that would mean having to forego the building of homes as climate budgets are balanced between transport and residential sectors. The prescribed body has not put forward any material evidence to support this claim. In any case, the total CO₂eq predicted to be generated by the proposed development through all phases of construction, is expected to be 0.7% of Ireland's transport budget for 2030 (6MtCO₂eq). Similarly, the CAP25 will have considered Section 4 (8) (g) of the Climate Act and the status of the National Planning Framework which specifically cites the delivery of the Galway City Ring Road as a key future growth enabler for Galway. On this basis, the Commission should accept that the Minister in preparing the CAP25 and related strategies and framework brought it forward in the context of this proposed development before you and is satisfied that there is scope in the carbon budgets and emissions ceilings to deliver this project.

In respect of the use of granulated blast furnace slag (GGBS), I am satisfied that the applicant has demonstrated it benefits both in terms of construction and its ability to reduce embodied carbon. This is a mitigation measure to reduce embodied carbon and I am satisfied it also aligns with the objectives of the CAP25. The applicant references in particular the Department of Enterprise, Trade and Employment (2022) document in respect of reducing embodied carbon in cement and concrete through public procurement. This report makes specific reference to unused GGBS in the supply chain.

6.5.2 Cormac Michael Rabbitt

This submission, which compares the proposed development to an alternative alignment, is noted. For context, the Commission should note that Mr Rabbitt represented the N6 Action Group at the 2020 Oral Hearing. There is no submission from the N6 Action Group on this current file.

I note the Inspector's Report of June 2021 and specifically paragraph 10.6.33 which concluded "that while this option would address some of the traffic problems facing

Galway, it would not address all of the issues that are required to be addressed as detailed in the EIAR and addressed throughout this report". I recommend the Commission continue to rely on this assessment. The recommendation to maintain this position is also furthered by the applicant's consideration of this alternative route in the Chapter 4 Alternatives of the EIAR which the biodiversity and cultural heritage impact as unreasonable. The applicant has provided a detailed response in Section 3.0 of the Response to Submissions in October 2025 which outlined the issues with the alternative route and why the route as it currently is presented was chosen above others. I do not intend to repeat this in the interest of brevity, but I am of the view that the applicant has been methodical in its approach to the consideration of alternatives and have supported this with extensive evidence. I would also point to the observer's submission in comparing the EIAR as lacking such a methodological approach and supporting evidence.

6.5.3 Enda McGovern

The submission firstly raised the unit of measurement for the concentration of carbon dioxide and that many scientific and government experts agree that 350 ppm is a 'safe' level of carbon dioxide to be in place for the world to exist in harmony with climate, and nature. The concentration of atmospheric carbon is at a level that is very concerning as it significantly exceeds pre-industrial levels and is a prime contributor to global warming and climate change. The concern of the observer is noted and the states response to this concern is set out in the Climate Act and associated CAP25.

This submission queries induced demand as a result of the proposed development. The applicant has set out information in respect of induced demand in Section 6.8.1 of the updated EIAR. Therein they examined a Do-Minimum and Do Something scenario. In the Do Something scenario, which includes the proposed development, the mode share increases by approximately 2%. However, when the applicant considers wider measures in the GTS, the CAP25 there is minimal resultant change car mode share. These demand management measures should be factored in as they provide a more holistic approach to management of travel in this city. Plate 5.1 in the Response to Submissions of October 2025 show Mode Share Results in a business as usual scenario versus a CAP do something scenario with and without the proposed development. Overall, I am satisfied in a business as usual scenario

the demand induced for car travel will be minimal although 2% is still an increase. Implementing the CAP25 measures however does result in a significant reduction. Therefore, while induced demand may be a factor and will likely occur, there is a wider strategy in place, the GTS and CAP25 Demand Management Measures, to mitigate it and that the issue of demand management needs to be looked at holistically in the context of the wider transport strategy for Galway and governmental climate actions. The Commission will note that demand management and behavioural change measures need to be considered along with infrastructure improvements like the proposed development in order to address induced demand. I note that the matter of flooding is extensively addressed both the applicant and in Inspector's Report of 2021 and the proposed development is designed to TII specification factoring in best practise drainage design and considers flood risks and climate change. The proposed development is consistent with the Planning System and Flood Risk Management Guidelines for Planning Authorities November 2009. Mr McGovern has also raised issue with habitat destruction, fragmentation of ecosystem, water, noise and air pollution, the climate impact and localised flooding. All these make up topics across the EIA and AA and have been assessed therein.

6.5.4 Friends of the Irish Environment

The key tenant of the Friends of the Irish Environment submission is in respect of climate change and obligations under Section 15 of the Climate Action Act & Low Carbon Development Act 2015, as amended. As discussed in Section 6.4 above, I am satisfied that the applicant has provided sufficient information to meet its obligations and perform its functions in respect of the Climate Act. The assessment above is of the view that the proposed development is consistent with the national CAP24 and CAP25, the Carbon Budgets, the Galway County Council and Galway City Council LACAPs.

I am also satisfied with the observer's other concern that the EIAR does not contain the necessary assessment of alternatives required to comply with the Environmental Impact Assessment Directive has been adequately addressed by the applicant. The assessment of alternatives is considered in Section 7.2 and has been methodical in its approach to the consideration of alternatives and have supported this with extensive evidence.

The applicant has clearly explained that the proposed development, in isolation, will not provide for the reduction of traffic congestion in and around Galway City. It forms an element of a wider strategy, the GTS, which includes a wider catalogue of projects to reduce traffic congestion through measures in respect of public transport, walking and cycling.

6.5.5 Galway City Harriers Athletic Club

I am satisfied that the applicant has fully assessment the impacts that will arise to the University of Galway and related facilities including those which are used by Galway City Harriers and other recreational/sporting users.

I note that there will be no direct impact on the tartan running track albeit construction works are likely to occur in proximity to it. The continued access is demonstrated in Drawing no. GCOB-3000-D-104. The Sports Pavillion which provides numerous ancillary facilities including changing rooms and toilet will have some temporary disruption due to changes to a plant room, one changing room one storage area and one weights area. However, the majority of changing rooms will remain operational during construction.

The construction of the Corrib Bridge will be sequenced and will result in the controlled access to the river walkway in proximity to the works. It is the applicant's intention through mitigation measures to ensure existing trails will be available for public use during construction. This will be highly controlled, but I am satisfied that given the temporary nature of it, it strikes a balance between the need for the proposed development and wider amenity and recreational needs of the University of Galway community including those who use riverside paths and other green areas for running. There is minimal impact to parking facilities at University of Galway and construction related parking will not materially impact the existing spaces.

I am satisfied, during and post construction, that the applicant has provided sufficient mitigation to avoid detrimental impacts on club's activities and to the use of University of Galway Sports grounds for other sports and outdoor activities. It is acknowledged that there will be a visual impact, however, again the impacts of the proposed development in respect of visual amenity are justified and have been well demonstrated in Appendix A.12.2 of the updated EIAR with multiple photomontages of the Corrib Crossing. It is accepted that the proposed development will be a novel

intervention in the landscape at this location and there is potential for landscape or visual impact impacts. However, it is considered the bridge and road will not become a prominent feature on the skyline, will be visually contained and is within the urban area of Galway and in proximity to the existing Quincentenary Bridge. It is not possible to mitigate the immediate impacts at the riverwalk, however.

The noise and air quality impacts are fully acknowledged by the applicant but it remains that the proposed development achieves the TII design standards in this respect. The noise levels likely to be experienced at University of Galway amenity areas will be similar to amenity areas elsewhere in the city. The Commission is reminded that the University of Galway campus is located in a suburban/urban area and is not considered a quiet area in any case. It is noted that no significant residual air quality impacts are envisaged for human receptors. Air quality modelling results based on TII REM tool is provided in Appendix A.16.2 of the Updated EIAR.

In respect of biodiversity in this area, I am satisfied the applicant has provided detailed mitigation in respect of the impacts that may rise and no likely significant residual effects are predicted. Matters in respect of swan mussels, leeches, kingfisher and bats have been adequately addressed in information submitted by the applicant and while I note the observers concerns, I am relying on the applicant's evidence in this instance which is methodical and evidenced based in its ecological assessment.

Overall, I am satisfied the applicant has fully addressed the alternatives as set out in Section 7.2 of this report.

6.5.6 Galway Green Party

I am satisfied that the applicant has provided an analysis of the climate impact from the proposed development both in isolation and when factoring in measures in the GTS and other demand management measures in CAP25. The applicant is careful in the EIAR that the proposed development is expected to have a permanent moderate adverse residual effect on climate. This is a result of an increase in carbon emissions of on average 42,111 tonnes per year during construction, 4,584 tonnes per year by 2031, and 662 tonnes per year by 2046. I reinforce to the Commission the applicant has been correct in its approach to the EIAR and presenting the

proposed development in isolation. It is not so confined when consider its consistency or otherwise with CAP25.

The applicant has highlighted its TII Road Emissions Model (REM) which is a new software to calculate transport emissions, Calculator for Road Emissions of Ammonia (CREAM) which has facilitated the consideration of ammonia concentrations and the Air Pollution Information System (APIS) tool which considers air quality and ecological receptors and the NTA ENEVAL model. All these systems have been developed since the previous EIAR and are used to enhance the air quality study in the updated EIAR. As with any reliable model, these systems are continually updated with relevant data when available. The applicant does not consider these to have a bearing on the 2018 assessment. However, they do provide more robust accurate assessments. On this basis I am satisfied the applicants approach to developments in electric vehicles figures for other pollutants, such as N02, is appropriate.

The climate and pollution impacts have been properly communicated in the EIAR, which is methodical and evidenced based. The applicant has clearly explained that the proposed development, in isolation, will not provide for the reduction of traffic congestion in and around Galway City. It forms an element of a wider strategy, the GTS, which includes a wider catalogue of projects to reduce traffic congestion through measures in respect of public transport, walking and cycling.

6.5.7 James O'Connell

Mr O'Connell is of the view that the proposed development's proposed benefits, as well as mitigation measures for its negative impacts, are dependent upon the implementation of the full GTS. It is his view that the policy and legal context in which the GTS was developed has changed significantly with several national level policy documents and legislation listed, as well as evidenced studies and research.

In this report I have noted the changing policy and legal context which Mr O'Connell refers, including changes to the NPF (need for the proposed development is compounded by continued population growth in Galway) the introduction of the national Sustainable Mobility Plans (the proposed development will facilitate reallocation of road space for sustainable modes), the CAP25 (43% reduction in vehicle emissions compared to 2018, and a 16% reduction in vehicle kilometres

travelled). and other studies related to the cost of congestion (which does not account for the demand management measures contained within CAP25), Five Cities Demand Management (measures therein incorporated into the project scenarios) and Galway Light Rail (a complementary scheme to the proposed development). The changes are acknowledged and the applicant I am satisfied in my review of these documents that the proposed development is in alignment.

The applicant has provided a long list of projects to show progress in respect of the GTS which includes bus infrastructure, pedestrian and cycle links, safer school access and park and rides developments. I am satisfied certain measures are being progressed under the plan. It is the current plan for transport in Galway. The reasons as to why GMATS has not been progressed or published is not a matter the Commission can examine - it needs to consider the live plan before it. I do note the concern of the observer in respect of a circular dependency on the strategy that the much emphasis on delivery of the proposed development before the Commission before delivering more other sustainable mobility projects. However, it is clear from the applicants list that it is doing projects it can in a congested environment. It is accepted that the proposed development will improve the bus network delay considerably (between 30% - 45%) in peak hours and a 33% reduction in traffic on the Quincentenary Bridge and a 25% reduction in HGV kilometres within the N6/R338 cordon.

6.5.8 Shane Foran

I am satisfied that the proposed development meets the strategic need of the TEN-T Comprehensive Road Network and meets other objectives of TEN-T, CAP25 and the Sustainable Mobility Strategy to remove certain trips from Galway City and enable a reallocation of road space in a currently congested environment. I am satisfied the applicant is progressing other projects where appropriate in relation to walking and cycling.

The submission questions whether additional car parking on the west side of the river would remove the need for trips across the river. However, the applicant has clearly demonstrated in its response that providing more parking in proximity to the city centre and making travel to the city more accessible would worsen impacts in term of travel times particular in terms of public transport.

In respect of the distribution of schools in Galway and associated journeys, I am satisfied it is considered the planning application and the location of school is not a matter of fact and not in the control of the applicant. While additional schools to the east of the river may be developed in future, it is expected that lower levels of traffic will occur in proximity to the existing schools on the western side of the river as a result of safer access and public transport and sustainable mobility measures. It is noted that any future plan for the Ardaun local area may provide for schools to east of the city in future.

The proposed development does not provide any new connection to the proposed Galway Harbour development. It should be noted that the harbour is already serviced via R338 Regional Road and Lough Atalia Road. The traffic assessment in respect of the harbour is satisfied that it is well served by road access (with the lowering of the vertical profile of Lough Atalia Road at the railway bridge in 2015) and need for a link road does not arise.

6.5.9 IDA Ireland / Údarás na Gaeltachta

The submission of IDA Ireland and Údarás na Gaeltachta who have several clients operating in Galway and Gaeltacht Conemara is noted and the applicant has made the case in respect of deficient road infrastructure and related traffic delays and disruption. The wider economic benefits of the proposed development have been set out in the EIAR.

6.6 Conclusion

Having regard to the foregoing I consider that the imperative for the proposed development is clearly identified in national, regional and local transport and planning policies. It will seek to advance the improvement in connectivity, support compact growth and is a key measure in the GTS, which as an integrated transport solution for Galway City, seeks to reduce the reliance on private vehicle trips, with the consequent reductions in vehicle emissions.

The construction phase involved to realise such a large infrastructural project within both established and emerging residential communities presents significant challenges, and I note the mitigation measures proposed by the applicant and recommended in my assessment that will be required to limit, as far as practicable, the impacts of the construction phase.

I accept that due to the nature of the works proposed, the proximity of the established residential areas to same, permanent material changes to the immediate environment of residential properties, including demolition and acquisition in certain instances, will arise due to the introduction of the road. This is unavoidable given the geography of the area and settlement pattern. The applicant has provided extensive evidence in its consideration of reasonable alternatives which are complete and robust.

I am satisfied that the public have been adequately consulted and that the applicant has complied with statutory and non-statutory requirements.

I submit that these impacts must be balanced against the need for the proposed development which is long established in policy which are aligned with national, regional and local transport policies and must reasonably be accepted in principle. The proposed development would be in accordance with proper planning and sustainable development of the area.

7.0 Environmental Impact Assessment

The applicant has submitted to the Commission an updated EIAR prepared in accordance with Section 50 of the Roads Act 1993 (as amended) and Directive 2011/92/EU of the European Parliament and Council, 2011 on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014.

This updated EIAR (submitted in 2025) should be read in conjunction with the parent EIAR (submitted in 2018) and any subsequent documents that were submitted prior to the remittal including further information and at the oral hearing.

This section of the report comprises an EIA of the proposed development. Some of the matters considered have already been addressed in the Planning Assessment above. This section of the report should be read, where necessary, in conjunction with relevant sections of the Planning Assessment and the Appropriate Assessment section below.

7.1 Updated Environmental Impact Assessment Report

An updated EIAR prepared on behalf of the applicant has been submitted with the application. The updated EIAR largely follows the parent EIAR submitted in 2018. The updated EIAR consists of several parts:

1. Volume 1 - Non-Technical Summary (NTS) which summarises the updated EIAR in plainer language.
2. Volume 2 - Main Report which considers a range of specific environmental topics in compliance with Article 5 of the EIA Directive and Schedule 6 of the PDR.
3. Volume 3 - Figures which contain images in relation to various topics.
4. Volume 4 - Appendices which contain supplemental information to the main body.

As this is an updated EIAR, the Commission should note in particular, changes in the main report in the following chapters:

- Chapter 1 - Introduction which has been updated to take into account changes in legislation. This is noted but does not materially change the framework for EIA.

Chapter 2 - Planning and Policy Context which has been updated to reflect all the policy changes that have occurred since 2018. Materially, the Commission should note the relevant development plan for Galway City which has changed since 2018.

Chapter 3 – Need for the Project while having been reviewed, largely remains the same and the applicant is of the view that the same need exists now as in 2018.

- Chapter 4 - Alternatives Considered for the Project remains largely unchanged but additional information has been included on the 2006 Galway City Bypass options, light rail alternative (i.e. trams). Much of this information did form part of previous considerations and was presented at the oral hearing. A description of the main alternatives studied by the applicant is provided in Chapter 4 along with the reasons for the preferred choices, these are outlined in greater detail under Section 7.2 below.
- Chapter 5 – Project Description and Chapter 7 – Construction Activities describes the proposed development, including information on the site and the proposed development size and design. The Commission will note changes identified by the applicant in Section 3.0 of the Request for Further Information Response Report. These are relatively minor changes relating to points of detail for local access and connections, land acquisition and additional cycle and foot paths which were justified and agreed in the course of the previous planning application. It is not intended to repeat them here. It is also noted that housing schemes have also been progressed in proximity to the proposed development which required minor changes also. Chapter 5 of the EIAR provides sufficient detail in respect of the proposed development and supplemented in Chapter 7 by details of Construction Activities.

The likely significant direct and indirect effects of the development are considered under the following specific headings, which collectively address the factors set out in Article 3 of the EIA Directive 2014/52/EU:

- Chapter 6 - Traffic Assessment and Route Cross-Section
- Chapter 7 - Construction Activities
- Chapter 8 - Biodiversity
- Chapter 9 - Soils and Geology
- Chapter 10 - Hydrogeology
- Chapter 11 - Hydrology

- Chapter 12 - Landscape and Visual
- Chapter 13 - Cultural Heritage
- Chapter 14 - Material Assets - Agriculture
- Chapter 15 - Material Assets - Non Agriculture
- Chapter 16 - Air Quality
- Chapter 17 - Climate
- Chapter 18 - Noise and Vibration
- Chapter 19 - Population and Human Health
- Chapter 20 - Resource & Management
- Chapter 21 - Major Accidents, Inter-Relationships, Interactions and Cumulative Impacts
- Chapter 22 - Summary of Mitigation Measures and Residual Effects
- Chapter 23 - Schedule of Environmental Commitments Chapter

This specific headings largely mirror that in the parent EIAR; however, the Commission should note:

- Chapter 16 Air Quality and Chapter 17 Climate were originally a single chapter in the parent EIAR, however, due to focus on climate in the remitted application it has been separated for clarity. This is an acceptable approach.

Chapter 20 Resource & Management which address waste management. This has been extracted from Section 7.0 in the parent EIAR and updated accordingly to reflect changes in terms of guidance and legislation for waste management. This is an acceptable approach.

The impact of the proposed development was assessed under all the relevant topics as set above. Mitigation measures are set out in each chapter. Where further detailed surveys or assessments were required under each topic these have been compiled and are contained in the appendices.

The documentation prepared by ARUP with the support on specific topics for different specialist consultants and dated March 2025 is in line with current best practice guidance and allows for a complete examination and identification of any potential significant effects of the development, alone, or in cumulation with other plans and projects. This is supplemented with additional information responding to

observations in October 2025. I am satisfied that the information provided in the EIAR is up to date.

I am satisfied that authors of each chapter of the EIAR, as provided in Table 1.3 of the EIAR, have suitable professional competencies, qualifications and experience to prepare an EIAR in their respective field. The EIAR and supplementary information provided by the applicant complies with Article 94 of the PDR – see full assessment below.

I have carried out an examination of the information presented by the applicant, including the EIAR and the response to the observations/submissions received. A summary of the submissions made by the local authorities, prescribed bodies and observers have been set out in Section 4 above. The relevant issues arising are addressed below under the relevant headings, and, as appropriate, in the reasoned conclusions and recommendation.

The Commission should also have regard to other sections of this report including:

- Planning Assessment (Section 6.0)
- EIA (this Section)
- WFD (Section 8.0)
- AA (Section 9.0)
- CPO (Section 10.0)

Each assessment has had regard to all submissions made by parties to the planning application. There is an inevitable overlap between the assessments with certain matters falling into the planning assessment, EIA, AA, WFD and CPO. In the interest of brevity, matters are not repeated but the Commission should have regard to all sections when deliberating and reaching its conclusions in respect of the planning application and each discrete assessment under EIA, WFD, AA and CPO.

The Commission should refer to the consideration of submissions in Section 6.5 and 10.2 in particular in completing its EIA.

Details of the consultations entered into by the applicant as part of the preparation of the application and updated EIAR are set out in Section 1.4 of the updated EIAR. I consider that the applicant has taken all reasonable steps to engage with the local community. As required the application is accompanied by copies of the relevant

notices, with the website on which the documentation can be assessed provided. I consider that the engagement has been effective in terms of advising the public of the proposed development and that third parties were not disenfranchised.

The limitations of the updated EIAR set out in respect of each topic of the EIAR are noted, however, none are considered material to the assessment or result in a defective assessment which occurs below.

Table 2: Article 94 (a) Information to be contained in an EIAR
Schedule 6, paragraph 1
A description of the proposed development comprising information on the site, design, size and other relevant features of the proposed development (including the additional information referred to under section 94(b)).
A description of the proposed development is provided in Chapter 5 and 7 of the updated EIAR. It includes details on the proposed development site, the design and size of the proposed development, temporary and permanent land take, requirement for materials, details of the construction programme and operation phases. Further details on the development site are provided in the technical chapters of the EIAR. There is no material aspects of the development require further clarification. I am satisfied therefore that sufficient information has been presented to enable an assessment of likely significant environmental effects to be carried out.
A description of the likely significant effects on the environment of the proposed development (including the additional information referred to under section 94(b)).
An assessment of the likely significant direct, indirect, and cumulative effects of the development is carried out for each of the technical chapters of the EIAR as well as Chapter 21 Inter-Relationships, Interactions and Cumulative Impacts. These are considered in the technical assessment of this EIA below. I am satisfied that the likely significant effects of the development on the environment have been described.
A description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment of the development (including the additional information referred to under section 94(b)).
Measures to mitigate predicted environmental effects are set out in each technical chapter of the updated EIAR (where relevant), in summary in Chapter 22 and 23 and in the updated CEMP. Having regard to my examination of the EIAR and the submissions made, and my assessment of the likely significant effects of the development on the environment, I am satisfied that the EIAR provides a description of the features and measures to avoid, prevent or reduce significant adverse effects.
A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its

specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment (including the additional information referred to under section 94(b)).

Alternatives are considered in Chapter 4 of the updated EIAR and include a 'do nothing' scenario and 'do something' scenario, alternative locations, alternative transport solutions, alternative design and layouts. Having regard to the details presented I am satisfied that the applicant has provided a description of the reasonable alternatives, relevant to the road scheme, and an indication of the main reasons for the resultant proposed development, with reference to effects on the environment (see further comments below on alternatives). I have considered the other alternatives submitted through observations and objections to the file by third parties in Section 7.2 for clarity. I am satisfied to proceed on the basis of information presented by the applicant

Schedule 6, Paragraph 2

A description of the baseline environment and likely evolution in the absence of the development.

A description of the baseline environment is typically included in each technical chapter of the updated EIAR and an assessment of the likely evolution of it, in the absence of the development (do nothing scenario). Where it has not been addressed in the EIAR, the baseline environment and its likely evolution can be readily assessed from the information on the file/inspection of the development site. The Commission should note that relevant surveys and studies in relation to the baseline environment have either been sustained or updated since the application was originally submitted in 2018.

A description of the forecasting methods or evidence used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information, and the main uncertainties involved

A description of the forecasting methods or evidence used to identify and assess the significance of effects is included in each technical chapter of the EIAR. Any difficulties encountered, or areas of uncertainty, are also identified in the technical chapters. Having regard to my review of the EIAR and to the environmental impact assessment carried out below, I am satisfied that there are no significant impediments to the assessment of environmental effects, by virtue of difficulties encountered or areas of uncertainty.

A description of the expected significant adverse effects on the environment of the proposed development deriving from its vulnerability to risks of major accidents and/or disasters which are relevant to it.

Vulnerability of the proposed development to environmental effects arising from the risks of major accidents and/or disasters is appropriately considered in Chapter 21 of the updated EIAR.

Article 94 (c) A summary of the information in non-technical language.

Volume 1 of the updated EIAR comprises a Non-Technical Summary (NTS) of the proposed development. I have read the report, and it summarises, in non-technical language, the information contained in the EIAR and likely environmental effects of the development.

Article 94 (d) Sources used for the description and the assessments used in the report

The sources used to inform the description, and the assessment of the environmental effects of the development are set out in each chapter, typically at the beginning of the technical assessment under methodology and in more detail at the end of the chapter under References. I consider the sources relied upon are generally appropriate and sufficient.

Article 94 (e) A list of the experts who contributed to the preparation of the report

A list of the various experts who contributed to the EIAR is set out in Table 1.3 of the EIAR. Where relevant, this information is repeated in the introductory sector of each chapter. Details include the name and qualification of the expert, their area of expertise and years of relevant experience. I have reviewed each of the technical sections of the report, and I am satisfied that it has been prepared by experts with competency in the technical subject areas.

The Commission should also note for the purposes of this updated EIA, that the EPA published updated guidance in May 2022. This was an update of the 2002 document *Guidelines on the Information to be contained in Environmental Impact Assessment Reports*. This updated guidelines do not materially change the overall approach to or methods in the EIA topics.

I am satisfied that the information provided is reasonable and sufficient to allow the Commission to reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account current knowledge and methods of assessment. I am also satisfied that the information contained in the EIAR complies with the provisions of Articles 3, 5 and Annex (IV) of EU Directive 2014/52/EU amending Directive 2011/92/EU.

7.2 Consideration of Alternatives

The matter of alternatives and the requirements of Article 5(1)(d) of the 2014 EIA Directive and Section 50(2)(b) of the Roads Act 1993 is addressed extensively in Chapter 4 of the EIAR and in Section 11.3.1 of the EIA of the Inspector's Report of 2021. The Commission should familiarise themselves with the following:

- do-nothing scenario, which the applicant considers will only result in increased congestion over time.
- do-minimum scenario, which included planned and likely transportation schemes including smart mobility measures would not sufficiently reduce congestion either
- do something (traffic management and road based infrastructure), which sought to maximum the existing infrastructure or other road based alternatives would not sufficiently address congestion either

It is fair to say that this project has long been in gestation, and the alternatives have been well considered. They have also been well scrutinised by prescribed bodies, third parties and indeed this competent authority in the Inspector's Report of 2021 (and indeed the Commission's consideration of a proposal for a bypass in 2006 which was ultimately refused). The history of alternatives is long and well documented.

The applicant has adequately and exhausted consideration of the reasonable alternatives and has made a reasonable case for the proposed development. The key matter of whether other modes of transport should be prioritised before the necessity for a new road is considered extensively. It is important to state that many of the alternatives proposed, do-minimum and do-something, could still (and in my opinion should still) be implemented in future with the road development. I do not believe it to be an either or scenario.

I would remind the Commission of the fact that the road is included in the City and County Development Plans which were themselves subject to a Strategic Environmental Assessment (SEA) as was the relevant variation to the County Plan. The GTS which is part of the Statutory Plans was also subject to SEA. It could be argued that as a decision to include a road has been fully assessed and adopted as part of the statutory plans, there is no need to revisit this decision.

I note Friends of the Irish Environment and the submission of others which question the consideration of alternatives again. The applicant has suitably addressed the Five Cities Demand Management (measures therein incorporated into scenarios) and Galway Light Rail (a complementary scheme to the proposed development). Notwithstanding these measures, the applicant has identified traffic, which is not conducive to walking, cycling or public transport (including Light Rail) and is

considered strategic traffic difficult to serve by public transport. In the modelling it is noted that two thirds of the traffic using the N6GCRR would cross the River Corrib, in the morning peak hour, to access destinations outside of the city boundary.

Therefore, there is a wider need to be met for the proposed development which would complement any future light rail and demand management measures. I note other recommendations in the Five Cities Study which includes Galway for demand management measures including congestion charging, parking levies and low traffic neighbourhood. These are noted and the applicant is alert to these and has factored them in its modelling given they are largely linked to the demand management measures in CAP25.

Friends of the Irish Environment state that the consideration of alternatives for not meeting legal requirements and that analysis should have been done on light rail scenarios. However, the applicant has in my view successfully argued that light Rail alone will not resolve the significant transport issues currently experienced in Galway City and its environs and detail in Chapter 3 of the updated EIAR. Given it did not meet the Project Objectives, the applicant quite rightly discounted it as an alternative. I am satisfied that further analysis was not required and I refer the Commission, and the observer to EPA (2022) guidelines on the 'Information to be Contained in Environmental Impact Assessment Reports' which states that every alternative does not require a detailed assessment or 'mini-EIA'. I am satisfied the applicant has provided sufficient information to the Commission to qualify its chosen alternative in the context of others and the Commission has enough information before it to make a qualified decision in respect alternatives and in particular its impact on climate, emissions, traffic impact.

While in most cases, providing additional road infrastructure in response to congestion is unlikely to solve the issue. The applicant has clearly justified the proposed development in the context of the limited space to provide significant extra capacity for sustainable modes of transport in Galway City. The N6GCRR is a key enabler through the removal of strategic trips from Galway City to accommodate the future sustainable growth in Galway under the NPF. In turn. It can provide for travel demand in as far as possible is catered for sustainably through increased public transport usage, walking and cycling as envisioned under the National Sustainability Mobility Policy and GTS. The applicant has assessed the likelihood that the

additional road capacity will induce additional car-based travel, as cautioned in the Five Cities studies. But clearly determined using its traffic model that it would not ultimately result in any significant increase in emissions.

In considering alternatives, the Commission should also consider the Department of Transport (2025) study titled the Economic Cost of Congestion in the Regional Cities 2022-2040. The document views congestion on the context of continued economic growth and increased population and consequently states that increased transport demand will eventually result in the N6GCRR becoming congested without further intervention. This document in setting out the costs of congestion in cities including Galway is intended to inform demand management measures. It does not assess future scenarios with demand management measures in place and the Commission should note that it does not incorporate demand management measures set out in CAP25. Again, the Commission need to be clear that the applicant acknowledges that the proposed development cannot resolve all of Galway's congestion issue in and of itself. It needs to be viewed in the context of the wider plans in the GTS and furthermore CAP25 demand management measures which collectively seek to address behavioural change in modal use. This study in my view reaffirms the requirement to implement a national demand management strategy which is beyond the applicant's control. It in no way undermines the need for the N6GCRR.

Before concluding on alternatives, it would be remiss of the Commission not to reconsider the required land acquisition included as part of the preferred scenario which includes the demolition of 54 properties, many of which are homes. The exercise of considering reasonable alternatives is the key approach to avoiding significant environmental effects. There is a balance to be struck between several criteria, however, be it biodiversity or human impacts. In this case the Commission will need to accept that that significant environmental effects relating to acquisitions and in particular demolition of homes cannot be avoided. I am satisfied the consideration of alternatives has justified such significant environment effects.

I agree that the final route alignment chosen, of which there are many alternative is the one which best meets the objectives set out for the proposed development. I also accept that the consideration of options within the selected route corridor and the strategy for key junctions was a rigorous process which had regard to environmental considerations and to the Project Objectives.

I submit that the consideration of alternatives followed a comprehensive process. It indicates how the proposed development evolved and how it was adjusted to take into consideration environmental effects and matters arising during the consultation process. On balance, therefore, I consider that the requirements in terms of reasonable alternatives have been satisfactorily discharged and the requirements of the EIA Directive in this regard have been met. The proposed development as set out in the planning application is the preferred approach when all factors are taken into account.

7.3 Assessment of Topics

Each topic in the EIAR has been for the most part considered in the following format:

- Introduction
- Methodology
- Receiving Environment
- Potential Effects
- Mitigation Measures
- Residual Impacts
- Cumulative Impacts
- Compensatory Measures (if required)
- Conclusion
- References

Unless otherwise stated below, the methodology and the approach to each topic is considered appropriate. This assessment can rely on the updated EIAR submitted and addresses key issues, impacts and mitigations of the proposed development.

As this is an updated EIAR, and the Commission can largely rely on the EIA completed in the Inspector's Report of 2021 and associated appendices. It is proposed to complete the EIA in the context of the following questions, while relying on and updating the previous EIA where required:

5. Are there any changes to the guidance and standards for the methodology for the impact assessment? If so, what are they?
 1. Has the baseline changed? If so, how and where?

2. Do these changes to the baseline alter the conclusions of the impact assessment taking cognisance of updated impact assessment guidance? If so, how?
3. Do any changes to the conclusions of the impact assessment alter the mitigation strategy? If so, how?
4. Do any changes to the mitigation strategy alter the residual impact assessment? If so, how?
5. Are there any changes to the cumulative impact assessment? If so, how?

This is a pragmatic approach in order to present a coherent assessment and avoid undue repetition particularly where there have been no material changes. The third parties participating in this application have not put forward any other method or approach in how to do this.

7.3.1 Traffic Assessment and Route Cross Section

Chapter 7 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on traffic and transportation during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment including Air Quality, Climate, and Noise and Vibration.

I am satisfied that the applicant has, through extensive evidenced surveys, adequately demonstrated the existing traffic congestion issues in the city and the need for improvements to the structure of the road network to improve regional accessibility and to address the challenges that face Galway in growing in a compact manner as required by the NPF.

The Commission should note that since the Inspector's Report of 2021, updated traffic modelling has occurred to reflect the publication of Census 2022. Additionally, the applicant has sustained its survey campaign and provided traffic data from 2023 which is further validated using 2024 data. The modelling is acceptable and reflective of the travel movements in Galway City. I remain in agreement with the Inspector's Report of 2021 that the modelling approach utilised and the WRM, including details of its development, methodology and calibration is a robust, well-considered and suitably conservative model.

The Commission should also note changes to the modelling years. The applicant originally anticipated an opening year of 2024 and a design year of 2039 (15 years

after opening). These have now been revised to 2031 and 2046. To reflect the modelling years, the applicant has also taken into account revised land use forecasts, infrastructure provision assumed to be in place and current traffic conditions.

I note the primary and relevant guidance is that published by TII which includes: TII Project Appraisal Guidelines for National Roads (TII, 2016), Spatial Planning and National Roads Guidelines for Planning Authorities (Department of Environment, Community and Local Government, 2012), Traffic and Transport Assessment Guidelines (National Roads Authority, 2007) and the EPA guidance document relating to EIA. Aside from the EPA guidance, no major change in methodology is noted.

These changes in modelling are noted, however, do not have any material bearing on the parent assessment and in particular the three key performance indicators which the applicant has set out. These include journey times on key routes; ratio of flow (of traffic) to capacity ratio at key junctions; and network statistics. The applicant concluded that the proposed development continues to have a significant positive impact when assessed against the KPIs and will result in reduced traffic and congestion.

The analysis provided by the applicant is clear. Galway is expected to grow, both in terms of population and employment, under the NPF and the do-nothing and do-minimum scenarios will not improve the ratio of flow (of traffic) to capacity ratio at key junctions. More generally the do-nothing and do-minimum scenarios will not improve journey times on key routes, even when other measures in the GTS are considered. This rationale establishes a need for the proposed development that results in improved junction capacity and journey times. I am satisfied in the context of the existing city and the ambition same in the NPF that the proposed development is needed and should be seen in the context of an underdeveloped road network.

I note continued concern about induced demand from observers to the application. In the context of the settlement strategy in Galway which has resulted in large peri-urban or indeed peri-rural residential areas, it is a real concern. However, induced demand is a global concern and that the proposed development is one element of the GTS and the other measures to improve public transport and active travel

infrastructure are required to address induced demand. I am in agreement with the original Inspector's Report and do not see it as a reasonable reason for refusal of the proposed development. I am satisfied that the proposed development has been considered in this context and in the context of *Redesigning Ireland's Transport for Net Zero* and the *Five Cities Study* which examines the factors leading to car-dependent systems referenced by Friends of the Irish Environment including issues related to induced car demand, urban sprawl, and the sustainable modes low-attractiveness. The applicant has acknowledged that the proposed development in of itself will not resolve traffic congestion entirely and it a complementary scheme to other measures contained in the GTS and indeed wider national demand management measures which may be implemented by government including congestion charging, parking levies and low traffic neighbourhoods. I am satisfied the EIAR has considered all relevant and reasonable alternatives in this context.

In conclusion, I am satisfied that the proposed development will remove a significant amount of traffic from city centre streets and thereby alleviate congestion, freeing up road space for reallocation and the implementation of the public transport and active travel measures set out in the GTS.

It will provide a missing element of strategic infrastructure in an underdeveloped road network, providing an additional river crossing and linking the various radial routes feeding into the city. It will support the significant growth and population increase that is forecast for the city and will fulfil a strategic function as a TEN-T route.

However, the Commission should be clear, the proposed development will not resolve or eliminate congestion in Galway in isolation. In certain locations no material improvements in traffic will be seen. The proposed development is one component of a wider GTS which is expected to result in increased public transport and walking and cycling measures.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

7.3.2 Biodiversity

Chapter 8 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on biodiversity during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment including Air Quality, Noise and Vibration. Matters related to Appropriate Assessment are considered in Section 9.0 of this report.

This section has been supported by a Specialist Report: Supplementary Ecological Impact Assessment prepared by Dr Maeve Flynn BSc. PhD. MCIEEM. It is found in Appendix E of this report. I accept this report and its conclusions are reflected and discussed in this section. It should be noted that this is a supplementary report to previous assessment prepared by Mr. Arnold and undertaken to inform the Inspector's Report of 2021. The report in respect of the original application and this updated report is included as appendices of this report and, while the assessment below references and is informed by Dr Flynn's and Mr Arnold's assessment, these appended reports should also be read in conjunction with this section.

The primary updates in relation to biodiversity are on foot of additional survey work undertaken over 2022 and 2024. The surveys and their timings have been summarised in Table 8.2 of the updated EIAR. The survey effort is noted and provides the Commission with sufficient understanding of the baseline environment and how it may of changes over the years. I also note surveys which were not repeated since the initial planning application, where particular species like slender naiad and varnished hook moss and fresh water pearl mussel and molluscs were not recorded in the Zone of Influence (Zoi). This is accepted.

In considering changes to relevant guidance and standards the applicant has cited the following as having a bearing on its methodology.

- Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition) (Collins (ed.), 2023)
- Bat Mitigation Guidelines for Ireland V2 (NPWS, 2022)
- UK Bat Mitigation Guidelines (Reason and Wray, 2023)
- Survey and Mitigation Standards for Barn Owls to inform the Planning, Construction and Operation of National Road Projects (TII, 2021)

- Guidelines on the Information to be Contained in Environmental Impact Assessment Reports
- Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2 (CIEEM, 2018)

I note that TII published a new technical document in December 2025 titled Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: User Guide Document. This was published in the course of the planning process and while it may have been beneficial to the applicant in preparing their updated EIAR, I am satisfied that the applicant has embedded biodiversity considerations into all decisions made in respect of the proposed development. The applicant has adequately quantified and evidenced the impacts on biodiversity in its reporting to enable the Commission to reach a decision.

I am generally satisfied that where new guidance has been published, that the existing surveys and methodology applied to respective species are comparable and consistent and the applicant has sought to review and update its approach in so far as practicable. In assessing the proposed development, the Commission can be satisfied that it has had regard to these guidelines and standards.

The new EPA (2022) guidelines are reflected in the updated chapter as are CIEEM 2018 guidance. I am satisfied that these changes have little bearing on the parent EIAR and does not result in any changes in methodology.

The applicant has also noted a long list of plans and policies related to biodiversity which I am satisfied the proposed development complies with, including:

- Ireland's 4th National Biodiversity Action Plan 2023-2030
- Galway City Development Plan 2023-2029
- Galway City Biodiversity Action Plan 2025-2030 (note this has now been updated to 2025-2030 and changes therein reflected in the Specialist Report: Supplementary Ecological Impact Assessment)
- Ardaun Local Area Plan 2018-2024
- Galway County Development Plan 2022-2028
- Galway County Heritage and Biodiversity Plan 2017-2022
- TII Biodiversity Plan 2023
- TII Landscape Plan 2023

I note in particular relevant local biodiversity areas identified in the Galway City Development Plan 2023-2029 and the Galway City Biodiversity Action Plan 2015-2030. I refer the Commission's attention to Table 1 of the Specialist Report: Supplementary Ecological Impact Assessment which addresses the impacts and notes in particular loss of certain habitats and species in certain local biodiversity areas. There will be significant impacts on 12 of the 16 CBA sites.

The applicant is satisfied that the distribution and extent of habitats and the distribution and abundance of flora, and fauna has not changed materially since 2018. Any changes are minor and have arisen due to land use change as a result of agricultural practices, vegetation clearance, development and natural succession.

I note that all the figures and appendices have been updated to reflect the findings of said surveys and data collected. In particular Figures 8.23.1 to 8.23.15 illustrate the changes in the habitat baseline. These baseline changes are textually described in Section 8.3.1 of the updated EIAR.

In 2023, three additional invasive species were recorded outside the assessment boundary, no additional rare or protected species were recorded. The applicant has also included Key Ecological Receptors (KERs) identified by the Inspector's Report of 2021 and assessed same. There has been no change in otter activity since 2018. Bat species and their distribution are consistent since 2018. Badger activity is consistent, however additional setts have been identified outside the assessment boundary. Marsh Fritillary distribution and habitat is reducing since 2018. The baseline for fish species white-clawed crayfish, the freshwater pearl mussel, red grouse, woodcock, common frog, smooth newt and the common lizard is consistent with that presented in the 2018 EIAR; with the exception of zebra mussel which is an invasive species in the River Corrib and Coolagh Lakes and European eel in Ballindooley Lough.

The applicant is aware of its legal obligation to obtain a derogation license under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021 in respect of certain activities related, in this instance in particular, to bat and otter species. It currently holds a licence for 2025 and this can be updated for 2026. I note commentary in the Specialist Report: Supplementary Ecological Impact Assessment in respect of the status of the derogation and the

Commission should rely on its conclusion that it can have confidence that the bat mitigation is appropriate and proportional in respect of impacts on bats and their roosts

In respect of Birds, six additional wintering birds have been identified, these are of the highest conservation concern and include gadwall, little egret, red grouse, red wing, ringed plover and whooper swan, four additional breeding birds have been identified including common gull, little egret, snipe and tree sparrow. There were no additional barn owl breeding sites but two non-breeding sites have been confirmed. One of this is in proximity to the east side of the proposed development.

The Commission will note the long list of European Sites (SACs and SPAs), NHAs, and pNHAs which the applicant has also assessed. I am satisfied the sites screened in is complete. The following European sites are noted: Lough Corrib SAC, Lough Corrib SPA, Galway Bay Complex SAC and Inner Galway Bay SPA; Ardrahan Grassland SAC, Castletaylor Complex SAC, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Rahasane Turlough SPA, Rahasane Turlough SAC, Cregganna Marsh SPA, Maumturk Mountains SAC, The Twelve Bens/Garraun Complex SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA, Ross Lake and Woods SAC, East Burren Complex SAC, Moneen Mountain SAC, Black Head-Poulsallagh Complex SAC, Gortnandarragh Limestone Pavement SAC, Inishmore Island SAC and Kilkieran Bay and Island SAC. The following nationally designated sites are noted: Moycullen Bog NHA, Furbogh Wood PNHA, Kiltullagh Turlough PNHA, Ballycuirke Lough PNHA, Connemara Bog Complex PNHA, Drimcong Wood PNHA, Ross Lake and Woods PNHA, Black Head-Poulsallagh Complex PNHA, Lough Fingall Complex PNHA, Rahasane Turlough PNHA, Gortnandarragh Limestone Pavement PNHA, Moneen Mountain PNHA, East Burren Complex PNHA, Kiltiernan Turlough PNHA, Castletaylor Complex pNHA, Turloughcor PNHA, Inishmore Island PNHA, Maumturk Mountains PNHA, The Twelve Bens/Garraun Complex PNHA, Mason Island Machair PNHA, Mweenish Island Machair PNHA, Finish Island Machair PNHA, Duck Island PNHA, Inishmuskerry PNHA, Ardmore Point pNHA, Eagle Rock pNHA, Geabhrog Island PNHA, Oilean Na Ngeabhrog (Glencoh Rock) PNHA, Kinvarra Saltmarsh PNHA and Oilean Na Ngeabhrog (Illaungurraig) PNHA.

While the Commission will note the changes in guidance, standards and baseline environment, and the applicant has been careful to detail them all in the updated EIAR, overall, I agree with their conclusion that the changes to the baseline do not materially alter the conclusion of the impact assessment. The KERs and their likely significant effects are noted.

Both the applicant and specialist ecologist have reached similar conclusions on KERs, however, there is variation in respect of barn owl and peregrine falcon which the Commission should note. It is noted in the Specialist Report: Supplementary Ecological Impact Assessment that the potential magnitude of impacts are increased due to likely disturbance/ loss of breeding sites adjacent to the outer boundary of the proposed development for Barn Owl and Peregrine Falcon. This is largely in relation to the geographic scale of impacts. The previous specialist report prepared by Mr. Arnold considered the impact to this species to be at a national scale. The applicant is of the view that it is at a local scale. In considering the matter again, Dr. Flynn is of the view that given the conservation status of Barn Owl (Red list BoCCI) a more conservative estimate of County level of impact may be appropriate which is a magnitude lower than that detailed in Mr Arnold's report for this species. Regardless, I am satisfied with the consideration given to this issue in the Specialist Report: Supplementary Ecological Impact Assessment and whether it be a local, county and national level magnitude of impact, it does not have a bearing on the mitigation measures being brought forward and the residual impacts to these species would remain.

The proposed development has significant impacts and the applicant has acknowledged this. However, what is critical to this supplementary report is that no material changes have occurred to the mitigation strategy. The mitigation strategy, in my view, is extensive and cautious in any case, regardless of changing significance of impacts and no additional mitigation has been identified.

In saying this, I do note the Department of Housing Local Government submission in respect of biodiversity. The applicant has revised this submission and accepted enhanced mitigation measures to satisfy the Department. On this basis and in agreement with the expert ecologist these have been included as a condition of approval below should the Commission be so minded. These include that the applicant:

- treat all third Schedule non-native species subject to restrictions under Regulations 49 and 50 Part 1: Plants listed in S.I. No. 477/2011 European Communities (Birds and Natural Habitats) Regulations 2011 before construction starts.
- agree details of water quality monitoring with the NPWS to ensure the effectiveness of the mitigation measures outlined in the NIS and Environmental Impact Assessment Report (EIAR).
- ensure no stockpiling occurs within any Annex I habitat area

The Department has also stated that the Statutory Instrument for the Lough Corrib SAC was published in 2022 - *European Union Habitats (Lough Corrib Special Area Of Conservation 000297) Regulations 2022' - S.I. no 384 of 2022*. I note that textual errors in respect of the word 'candidate', however, I am satisfied the applicant and relevant assessment has considered the site as an SAC.

Similarly, the Department notes the aquatic vegetation in the River Corrib has been reclassified, on a precautionary basis, as corresponding to the Annex 1 habitat 'Vegetation of Flowing Waters 3260'. I note the errors in maps which have not been updated to reflect this change. The error is noted and considered in the assessments.

The Department also highlights the requirement for an Ecological Clerk of Works (ECoW) is stated in the NIS and EIAR. However, the CEMP makes reference to an Environmental Manager (EM) and there is no ECoW role outlined. The Department recommends An Coimisiún Pleanála takes this into account. This is noted, and while the Commission could expressly condition the requirement for an ECoW in the CEMP, it would be duplication of mitigation measure already committed to in the EIA and AA. On that basis I am satisfied no additional condition is required.

The residual impacts also go unchanged and the applicant has listed the Likely significant residual effect which I agree with and is reiterated below:

- international geographic scale, for the permanent loss of c.0.01ha of Active Blanket bog habitat
- international geographic scale, for the permanent loss of c.0.01ha of the mosaic containing Active Blanket bog, Wet heath and Dry heath habitats

- international geographic scale, for the permanent loss of c. 1.54ha of Limestone pavement habitat outside any European site
- international geographic scale, for the permanent loss of c.0.03ha of the habitat mosaic containing Limestone pavement and Calcareous grassland
- national geographic scale, for the permanent loss of c.3.9ha of Wet heath habitat outside any European site
- county geographic scale, for the permanent loss of four Petrifying spring features at Lackagh Quarry outside any European site
- Habitat Clusters 1-12 ranging from the local to international scale, dependent upon the potential impacts of the proposed development on each of the individual ecological receptors that make up the biodiversity resource within a given habitat cluster A likely significant residual effect for the loss of local populations of the red-listed bryophyte species Imbricate bog moss *Sphagnum affine* at the national geographic scale
- loss of local populations of the red-listed bryophyte species Woodsy thyme moss *Plagiomnium cuspidatum*, Lesser striated feathermoss *Plasteurhynchium striatulum* and Red bog-moss *Sphagnum capillifolium* subsp. *capillifolium* at the county geographic scale
- loss of local populations Eyebright *Euphrasia arctica* at a local geographic scale
- county geographic scale, for the potential permanent loss of a Barn Owl nest site at Menlough
- county geographic scale, for the potential permanent loss of a Peregrine falcon nest site at Lackagh Quarry
- at the local geographic scale, on all bat species (including lesser horseshoe bat) due to the presence of the proposed development within their foraging areas
- local geographic scale, for the permanent loss of 18 calcareous springs (FP1) (Non-Annex I habitat type) at Lackagh Quarry, c.5.24ha of Dry-humid acid grassland (GS3) (Non-Annex I habitat type) and c.1.30ha of Poor fen and flush habitat (PF2) (Non-Annex I habitat type)
- local biodiversity areas: Coast Road (R336) to the N59 Moycullen Road, the River Corrib and the Coolagh Lakes, Menlough to Coolagh Hill, Ballindooley Castlegar, Doughiska local biodiversity area, Cooper's Cave Terryland local

biodiversity area, Terryland Glenanail local biodiversity area, City Canal System local biodiversity area, and Waterbody local biodiversity area.

The losses of Limestone pavement habitat, Petrifying springs and Wet heath habitat cannot be directly compensated. However, peatland and limestone associated habitats locally will be.

I have considered cumulative impacts of various projects occurring in the vicinity the proposed development including plans expected to be undertaken. However, as stated the mitigation is extensive and no additional mitigation is considered necessary on foot of this.

Overall, this project is complex from a biodiversity perspective, however, the Commission should note that the implementation of the mitigation measures will be overseen by both the Ecological Clerk of Works (employed by the Contractor) and a Site Monitoring Team which will include the Project Ecologist (appointed by Galway County Council/Transport Infrastructure Ireland), who will be available for the duration of the construction phase for the proposed development.

The applicant has also sought to incorporate points of details that arose in course of the previous planning process including during the further information response, oral hearing and the Inspector's Report of 2021 which was supported by expert ecological advice. It is noted that the applicant has not adopted two recommended additional mitigation measures including planting at infiltration basins at Castlegar for marsh whorl snail and translocation of ant hills. The applicant has reasoned the exclusion of these which I accept including the need for infiltration basins to function for drainage and that ant species are not considered to be protected, rare or threatened. While I do not consider these necessary based on the applicant's submissions, should the Commission be considered that marsh whorl snail and ant hill remains an issue a condition supplementing the schedule of environmental commitments can be readily included.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on biodiversity. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.3 Soils & Geology

Chapter 9 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on soils and geology during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment including biodiversity, hydrogeology and hydrology.

The primary updates in respect of soils and geology are due to new EPA (2022) guidelines. The applicant has changed 'impacts' to 'effects' and updated the description of said effects, which are tabulated in Table 9.3. I agree that these changes have little bearing on the parent EIAR and does not result in any changes in methodology.

I note that the applicant has considered topsoil health as a new effect since 2018. This is accepted but in practice, I am satisfied normal construction practice and mitigation measures will ensure no significant impacts in respect of soil. I note the applicant will stockpile excavated topsoil using appropriate methods to minimize the effects of weathering. Other measures related to dust minimization, protection of groundwater and prevention of runoff. All standard and readily implementable measures in the scheme of this nature.

The applicant has continued visual surveys of the site and site-specific ground investigations were undertaken to inform the planning application for the permitted temporary stables at Galway Racecourse.

This has resulted in some changes to the baseline environment which include the identification of a deposit of lacustrine soil in proximity to Galway Racecourse, topsoil and peat are now considered a feature of importance of high, certain karst features could not be found and this resulted in updates to the Karst Survey and consequently in the EIAR.

The applicant has reviewed the Galway City Development Plan 2022-2028 and updates and amendments to Geological Heritage Area which have been changed as

a result of the Irish Geological Heritage Programme. A new Geological Heritage Site is identified at Doughiska N6 Road Cut (GC001).

These changes in the baseline have result in alterations to the conclusion of the impact assessment. As discussed, topsoil has been examined in more detail to consider impacts of compression of substrata and loss of agricultural land. This is to take account of the EU Directive on Soil Monitoring and Resilience. Topsoil and peat features have a significance of moderate or slight prior to the implementation of mitigation measures. The updated Karst Survey and removal of features eliminate certain impact to same which were identified previous in 2018. The Doughiska N6 Road Cut (GC001) has been assessed and the proposed development does result in the loss or damage of a proportion of this site. The applicant considers the significance will be significant/moderate. The impact to all other Geological Heritage Areas is considered negligible.

All other changes to the baseline are considered immaterial the overall assessment and would not be of a scale to change the impact assessment – this is accepted.

It is noted that while the impact assessment has changed, it has not resulted in any further mitigation measures that were present in the original EIAR. In reviewing the 2018 EIAR I do note the omission of information in relation to Doughiska N6 Road Cut (GC001). However, in review the information submitted during the oral hearing I see that commitments were made and the applicant has now simply formalised these into the updated EIAR. These include notification to Geological Survey Ireland and preservation or recording of the rock face in consultation with Geological Survey Ireland.

The new effects in relation to topsoil and peat and the mitigation measures committed to in the course of the planning application change the residential impact assessment. Following their application, the residential impacts are moderate/slight. For the Doughiska N6 Road Cut (GC001), residual impacts will be significant/moderate following mitigation. There also has a cumulative impact on the Doughiska N6 Road Cut (GC001).

I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on soil and geology. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.4 Hydrogeology

Chapter 10 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on hydrogeology during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment including biodiversity, soils and geology and hydrology.

The Commission will note that Mr James Dodds (formerly of Envireau Water) was appointed to assist with the assessment of this topic for the purposes of EIA (and related ecological issues). Mr. Dodds prepared a report in respect of the original application and this updated report is included as Appendix A of this report and, while the assessment below references and is informed by Mr Dodds assessment, this report should also be read in conjunction with this section. Mr Dodds' report also informed the Appropriate Assessment section of this report. I accept this report and its conclusions are reflected and discussed in this section.

In addition to Mr Dodds' report the Commission will also note that there are updates in respect of hydrogeology due to new EPA (2022) guidelines. These are not considered material to the overall methodology and assessment . It is also noted that there are minor updates in the receiving environment due to the ongoing survey efforts (including desktop studies of publicly available data, aerial photographs and surveys undertaken by Arup) and new developments occurring in the Galway area. Some figures and appendices have been updated to present new data.

Similar to other topics, the applicant has been keen to incorporate points made during the previous planning application process, as a result of submissions during

the oral hearing and having considered the Inspector's Report of 2021 and Mr Dodds specialist hydrogeological report. This has resulted in several issues raised therein being incorporated and assessed in the updated EIAR.

Mr Dodds' updated report has taken into account the two additional groundwater wells (W50-21 and W50-22) and one new karst feature (K328) that have been identified since the initial 2018 application. Their inclusion does not change the outcome. Similarly, Mr Dodds has reflected the planning status of the stables at Galway Racecourse as well as the ground investigations undertaken for same. It is noted that it has expanded the assessment boundary. Other habitats and ecological sites have also been identified.

The applicant has also factored in risk assessments that have been undertaken in respect of the Water Framework Directive and ground water flooring including the WFD Cycle 2 (20160-2021) and GSI Ground Water Flood Map Assessments (2022).

Mr Dodds remains satisfied, in his professional opinion, appropriate interpretation of the findings of the investigations have been undertaken, enabling the applicant to develop a robust conceptual model (that has not materially changed) which demonstrates a sufficient understanding of the hydrogeological environment. Having reviewed the information submitted by the applicant in the EIAR, I would concur with Mr Dodds that the applicant has demonstrated a clear and comprehensive understanding of the relatively complex and varied hydrogeological environment and I consider that this allows for the potential impacts of the proposed development to be properly understood and assessed.

The conclusion of the EIAR remains unchanged notwithstanding the changes in the baseline, however, it is noted that the location of the impacts has changed as a result of the survey output from 2023 and 2024 which included habitat mapping and ground investigations

Aside from the clarifications arising during the original application process and considered in the Inspector's Report of 2021, no additional mitigation has been recommended by the applicant. Mr Dodds is of the opinion that the potential impacts can be reduced to an appropriate level through the design of construction and operation of the scheme and its associated mitigation measures.

Taking account of the design of the scheme and the proposed mitigation, there are no residual risks that would be sufficient to undermine the conservation objectives of the River Corrib and associated lakes, or any other GWDTE in the SAC or surrounding area. It is noted that there remains potentially profound residual impact for five Annex I habitat and a slight moderate residual effect on four non-Annex I habitat due to lowering of groundwater levels below water dependant habitats.

On the basis of Mr Dodds' recommendations, I have included a condition, should the Commission be minded to give approval, in respect of groundwater monitoring. Prior to the commencement of development, the details of groundwater monitoring including water quality parameters, sampling intervals and locations and detailed response plan should be agreed with the NPWS. Parameters should be measured and recorded electronically on an hourly basis, with the monthly and quarterly monitoring being used to verify and calibrate ongoing electronic monitoring.

The implementation of the CEMP and associated SECP and Karst Protocol is an important mitigation, together with the continuous maintenance of the drainage systems, wetland treatment and soakaway areas, in perpetuity. Failure to do either of these could result in an unacceptable impact.

It is my considered view that with respect to hydrogeology and following the implementation of the mitigation measures prescribed in the design the proposed road development will not, by itself or in combination with other plans or projects, have any adverse effect on the integrity of any European sites in view of their conservation objectives and there is no reasonable scientific doubt as to that conclusion. On that basis and subject to other aspects informed by specialist advice, my recommendation would be to approve the planning application.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

7.3.5 Hydrology

Chapter 11 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on hydrology during its construction and operation phases. This topic has numerous interactions with other

chapters of the EIAR which are addressed in separate sections of this assessment including biodiversity, soils and geology and hydrogeology.

Since the original EIAR, little has changed in respect of guidelines and standards. The applicant again notes the EPA (2022) guidelines which has been factored into the updated EIAR.

I note the publication of Water Impact Assessment of Proposed National Roads - Standard (PE-ENV-01201) and Water Impact Assessment for National Roads, Light Rail, TII Publication Title: Metro and Rural Cycleways – Overarching Technical Document (PE-ENV-01202) in December 2025. While these are new documents introduced in the course of the process, I am satisfied that the applicant has met the key principles of the assessment process set out therein, through the use of other appropriate guidance set out in Section 11.2 of the updated EIAR. The documents relied on in the methodology of the updated EIAR are the basis on which the TII standard is based on. I am satisfied that the applicant has adequately assessed the proposed development in line with guidance, standards and technical requirements and the introduction of the standard and technical document, while centralising guidance in a single location, are not material to the overall assessment provided by the applicant in the updated EIAR.

Similarly, the baseline environment has not changed significantly. I note the WFD third cycle status are available and states the River Corrib and other smaller watercourses crossed have a good status. There has been continued sampling for water quality, and this indicates no significant change over the period since 2018. Flow in the River Corrib has changed slightly according to the applicant due to change and upstate to the OPW gauged flow data. Overall, these changes are considered immaterial to the impact assessment.

The applicant has advised that the changes above have not resulted in any changes to the impact assessment, mitigation measures, residential impact assessment and cumulative impact assessment. The Commission is reminded that the original EIAR should be read in conjunction with all relevant clarifications, amendments and updates made through the planning application. This is a reasonable and proportionate conclusion in respect of this topic. I have considered the submissions

and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

7.3.6 Landscape and Visual

Chapter 12 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on landscape and visual during its construction and operation phases.

The applicant has noted the publication of the TII (2020) *Overarching Technical Document* titled *Landscape Character Assessment (LCA) and Landscape and Visual Impact Assessment (LVIA) of Specified Infrastructure Projects* and *Design and Delivery of Soft Landscape Treatments in Urban Transport Environments* since the original EIAR. These have been factored into the updated EIAR in addition to the EPA (2022) updated guidelines.

In December 2025, TII published a new standard Aesthetics of Road Structures (DN-STR-03021) and Technical Acceptance of Road Structures on Motorways and Other National Roads (DN-STR-03001). While this standard has been introduced in the course of the planning process, I am satisfied that road structures have been sensitively designed and in keeping with the predominant environmental landscape through which the road passes. There is a consistency in the design of road structures proposed along the route also, giving the appearance of a 'family' of structures. I see no reason to reconsider the aesthetic design of the proposed development and its structures in the context of this planning process.

The baseline has changed, largely as a result of new infill residential development in proximity to the site. The applicant has also identified changes to Menlo Castle (ruin) which has had ivy removed.

The development plans for both city and county have changed and any changes therein have been reflected in the updated EIAR in respect of the description of landscape character, protected views and scenic viewpoints. It is noted that 'green wedges' identified in the lapsed Bearna Local Area Plan 2007-2017 have been

omitted when this plan was being incorporated into the Galway County Development Plan.

These changes have resulted had consequential updates to the impact assessment. While these are all noted, they do not result in any changes to the conclusion of the assessment. The mitigation measures are also the same and have simply consolidated commitments made in the course of the planning application into the updated EIAR.

The applicant has advised that the changes above have not resulted in any changes to the residual impact assessment. Given the new developments in the area, the cumulative impact assessment has changed to take account of these. This is a reasonable and proportionate conclusion in respect of this topic. I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on landscape and visual. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.7 Cultural Heritage

Chapter 13 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on cultural heritage, which includes archaeology and architectural heritage, during its construction and operation phases.

The applicant has noted the publication of the TII (2024) *Guidelines for Cultural Heritage Impact Assessment of TII National Road and Greenway Projects* since the original EIAR. These have been factored into the updated EIAR in addition to the EPA (2022) updated guidelines. Archaeological, Architectural and Cultural Heritage

now referred to as the Cultural Heritage chapter) has been updated fully in accordance with the 2024 in addition to the EPA (2022) updated guidelines.

The applicant has noted several new cultural heritage sites in proximity to the Galway Racecourse which is a structure. The applicant has said it is difficult to determine the function or date of the structure (AH 42) but it may have functioned as a shelter or animal pen. It is also noted that the practice of dry stone wall construction, which is extensive in Galway, was added to the UNESCO *'Representative List of the Intangible Cultural Heritage of Humanity'*.

This impact assessment has changed slightly due to the TII (2024) guidelines and updated baseline environment. They are largely immaterial in the context of the original assessment in my opinion. The identified impacts at AH 42, AH 2 and BH 12 remain significant.

Additional mitigation measures have been identified and included in the updated EIAR.

The applicant has advised that the changes above have not resulted in any changes to the residual impact assessment and cumulative impact assessment. This is a reasonable and proportionate conclusion in respect of this topic. I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on cultural heritage including archaeology and architectural heritage. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.8 Material Assets Agriculture

Chapter 14 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on agricultural assets during its construction and operation phases.

The applicant notes a new Census of Agriculture which was carried out in 2020. This census is carried out every ten years and has been incorporated into the updated EIAR to determine baseline farm types (e.g. average farm size and farm enterprise types). There have been slight changes in farm sizes and farm enterprise types since 2010, they are not significant in the context of the proposed development. The baseline data for grass and crops yields has also changed based on new data from Teagasc, University College Dublin and the Central Statistics Office but again are considered insignificant.

Physically, along the proposed development the applicant has drawn the Commission's attention to eight changes to land parcels. These have largely changed due to infill residential development, as would be expected in a growing urban centre. Three of these land parcels are now excluded from consideration in this topic but are included in the assessment of non-agricultural material assets. Five land parcels simply have reduced agricultural lands as a result of the residential development.

Following this the baseline is updated to consist of 192 agricultural land parcels compared to 195 land parcels in the original EIAR, a consequent reduction of 18 hectares. Severed land parcels have been reduced by one. This has resulted in textual changes to the chapter, in particular the summary tables. These are noted and changes acknowledged.

The applicant has advised that the changes above have not resulted in any changes to the impact assessment, mitigation measures, residual impact assessment and cumulative impact assessment. This is a reasonable and proportionate conclusion in respect of this topic. I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed

development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on agricultural assets. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.9 Material Assets Non-Agriculture

Chapter 15 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on non-agricultural assets during its construction and operation phases.

The Commission in examining this topic should factor in the changes in respect of agricultural lands above – these have changed the number of land parcels being considered and in a similar manner to Chapter 14 of the updated EIAR there is a consequential updating of relevant tables.

Again, the Commission should be aware of the continued infill residential development occurring in proximity to the proposed development. As would be expected in a growing urban centre, there is continued residential development and there is also activity occurring in terms of planning permission with new schemes being applied for and existing schemes seeing their permissions wither. The applicant draws the attention of the Commission to continued expansion of the Boston Scientific campus in Ballybane.

University of Galway is also an active location and in continual development. They have obtained planning permission for replacement pitches in 2021 which was previously an identified mitigation measure in the original EIAR.

At Galway Racecourse, the replacement temporary and permanent stables, and associated development (Planning Reference 24/60279) is noted. This was considered extensively in the original decision and resulted in a recommendation of Condition 5 to omit the permanent stables.

The baseline changes do alter the conclusions of the impact assessment and results in the overall reduction of one affected land parcel since 2018 EIAR. There are now

319 non-agricultural properties affected in this updated EIAR. This has resulted in textual changes to the chapter, in particular the summary tables. These are noted and changes acknowledged.

As a result of changes at University of Galway Sport Pitches and Galway Racecourse, mitigation for ancillary facilities like changing facilities and temporary and permanent stables which have been agreed with both University and Galway and Galway Race Committee Trust.

In this topic I would again draw the Commission attention to the extensive impact non-agricultural material assets. This material assets are largely people's homes which will be acquired and demolition in order to facilitate the proposed development. The residual impact is unavoidable, but the Commission should be satisfied they have sufficient information to justify 26 significant adverse impacts (compared to 28 in the 2018 Assessment) and 32 very significant adverse impacts (compared to 31 in the 2018 Assessment). I am satisfied that the justification is there to accept these impacts and the applicant has engaged extensively with the owner/occupiers at these land parcels.

The applicant has advised that the changes above have not resulted in any material changes to the cumulative impact assessment – there remains adverse negative impacts given the significant impacts already identified above.

I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on non-agricultural assets, most notably dwellings/homes. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.10 Air Quality

Chapter 16 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on air quality during its construction and operation phases. This chapter has numerous interactions with other topics in the EIA including traffic, biodiversity, and population and human health

Chapter 16 Air Quality and Chapter 17 Climate were originally a single chapter in the parent EIAR, however, due to focus on climate in the remitted application it has been separated for clarity. This is an acceptable approach.

TII (2022) published an additional standard titled Air Quality Assessment of Proposed National Roads since the submission of the original EIAR. This has resulted in a change from BRE (2003) control measures to IAQM (2024) guidance. This IAQM (2024) guidance provides a detailed list of mitigation measures that may be used at difference phases. I have considered these and while textually there are differences, I am satisfied the applicant generally had the relevant measures that would have been required.

The applicant also draws the attention of the Commission to a TII Road Emissions Model (REM) which is a new software to calculate transport emissions, Calculator for Road Emissions of Ammonia (CREAM) which has facilitated the consideration of ammonia concentrations and the Air Pollution Information System (APIS) tool which considers air quality and ecological receptors and the NTA ENEVAL model. All these systems have been developed since the previous EIAR and are used to enhance the air quality study in the updated EIAR. As with any reliable model, these systems are continually updated with relevant data when available. The applicant does not consider these to have a bearing on the 2018 assessment. However, they do provide more robust accurate assessments

I note that TII has published an updated Technical Document for Air Quality Assessment of Specified Infrastructure Projects in December 2025 (PE-ENV-01106) and updated Air Quality Assessment of Proposed National Roads Standard (PE-ENV-01107). The applicant has relied on PE-ENV-01107 published in 2022, however, both updated documents are complementary of one and other.

PE-ENV-01106 includes up to date considerations of matters related to legislation, ammonia monitoring and other background information on standards. It also provides information on the TII REM Model and dust. PE-ENV-01107 includes up to date considerations of legislation, requirements for air quality practitioners, background information on standards. It also provides information on the TII REM Model. While these documents were published in the course of the process, I am satisfied that the applicant has adequately assessed the proposed development in line with TII guidance, standards and technical requirements and the changes are not material to the overall assessment provided by the applicant in the updated EIAR.

The baseline environment has remained largely the same although minor variations are noted due to continued monitoring (i.e. the systems are becoming more robust and accurate). Regardless the conclusions of the impact assessment have remained the same.

The applicant has advised that the changes above have not resulted in any changes to the impact assessment, mitigation measures, residential impact assessment and cumulative impact assessment. This is a reasonable and proportionate conclusion in respect of this topic. I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not result in significant effects on air quality.

7.3.11 Climate

Chapter 17 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on climate during its construction and operation phases. This is a central topic in the consideration of observations and objections to the proposed development and the Commission

should consider arguments in respect of climate in carrying out its assessment. In observations and objections, the central argument is that the proposed development would in effect increase emissions, particularly as a result of induced demand as vehicular movements will become more attractive. As a result, these parties are of the view that it does not meet the state's climate obligations.

Chapter 16 Air Quality and Chapter 17 Climate were originally a single chapter in the parent EIAR, however, due to focus on climate in the remitted application it has been separated for clarity. This is an acceptable approach and represents the impetus placed on climate through the Climate Action and Low Carbon Development Act 2015, as amended.

The applicant has changed the methodology for the climate assessment as a result of the TII (2022) standard titled *Climate Assessment of Proposed National Roads*. The Commission should note that this standard was not included in the original EIAR in 2018 and was not introduced at any juncture in the process such as in further information or the oral hearing. It was published after the decision by the Commission in 2021. As a result, the Institute of Environment Management and Assessment (IEMA) guidance was superseded. It is the applicants view that the TII (2022) standard is more directly applicable to an Irish context in any case. The assessment is supported by the TII Carbon Tool, consideration of embodied carbon and ENEVAL (discussion on ENEVAL above in Section 7.3.10 of this report).

The traffic assessment considered above in Section 7.3.1 is interrelated to climate and the Commission is reminded to review this section and note the changes in the design years for the proposed development being opening (2031) and design (2046).

At the time of the Inspector's Report of 2021, no national sector specific targets were available, and the conclusion of that report was that the proposed development '*is likely to result in a significant negative impact on carbon emissions and climate that will not be fully mitigated*'. The applicant was also of the view that the proposed development "*is regarded as likely to have a significant adverse impact on carbon emissions and climate*", as noted in the Statement of Evidence of Sinéad Whyte, Arup at the oral hearing in February 2020.

In 2024 the EPA published national level transport projections of CO₂ emissions *Ireland's Greenhouse Gas Emissions Projections 2024-2055*. The applicant has factored in these projections into their assessment for the opening and design years.

The proposed development is expected to have a permanent, moderate, adverse effect on climate on the basis of the TII (2024) standard. This is a significant impact which the Commission should note. As per the standard, the next significance level, above moderate adverse, is major adverse. The following differences are noted which resulted in the proposed development not falling into the major adverse significance level –

- The proposed development greenhouse gas impacts can be partially mitigated
- The proposed development has partially complied with do-minimum standards set through regulation, and have not fully complied with local or national policies
- Falls short of full contribution to Ireland's trajectory towards net zero

The primary difference would be where there is no meaningful absolute contribution to Ireland's trajectory towards net zero.

Overall, I am satisfied that the documentation submitted has quantified the emission from the proposed development in an accurate manner. The scheme will have a predicated operational change of approximately 0.0764% in CO_{2eq} relative to the 2030 transport budget. This percentage is small in a national context, but it nonetheless represents an increase in emissions and a negative contribution to the achievement of net zero. However, the proposed development has incorporated mitigation and is part of a wider transport strategy for Galway which includes measures for all modes of transport.

The Commission should also note EU Technical Guidance on climate proofing infrastructure which advises that projects taken isolation is likely to result in an increase in CO_{2eq} emissions and that projects should be considered in the context of the plan from which they originated.

On this basis, an assessment of emissions without the proposed development, without GTS and without CAP25 is compared to emissions with the proposed development, with the GTS and with CAP25. An 8% decrease in CO_{2eq} emissions due the predicted traffic changes on the road network in 2030 is expected to arise in this case.

The applicant has 'augmented' its mitigation measures in respect of climate to provide for a Government (2024) publication which ensure the procurement phase of the proposed development promotes reductions in embodied carbon. The use of granulated blast furnace slag (GGBS) is noted in particular, and I am satisfied that the applicant has demonstrated the benefits both in terms of construction and its ability to reduce embodied carbon.

The applicant has advised that the changes above have not resulted in any changes to the residual impact assessment and cumulative impact assessment. This is a reasonable and proportionate conclusion in respect of this topic.

In the context of the EIA, there are no operational phase measures available mitigate impacts. Therefore, the proposed development results in an increase in greenhouse gas emissions and does not meet Ireland's target of net zero. The Commission is reminded that the residual effect is permanent, moderate and adverse and will need to accept this significant impact in its reasoned conclusion were it minded to approve the proposed development. I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either. The assessment in respect of the CAP25 is set out above in Section 6.4 of this report and can be read in conjunction. It is in this context that wider mitigation measures set out in CAP25 are considered which may lessen the impacts. But ultimately these are governmental measures outside of the control of the applicant. When these measures are considered in the context of CAP25, increases in greenhouse gas emissions will decrease over time (through demand management measures and uptake in electric vehicles for example).

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on climate. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.12 Noise and Vibration

Chapter 18 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on noise and vibration during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment including Traffic and Transportation, Population, Biodiversity and Human Health.

The guidance in respect of this topic has remain largely unchanged although the applicant has cited updates to certain documents in including the (UK Highway Agencies, 2020) Design Manual for Roads and Bridges (DMRB) LA 111 Sustainability & Environmental Appraisal LA 111 document. Rating therein have been applied in the updated EIAR.

At a local level, Galway City and Galway County councils have prepared revised Noise Action Plans for the period 2024-2028. These documents seek to reduce noise and have identified Priority Important Areas (PIAs) for same where harmful effects on the population are likely to be most concentrated and not where there is likely to be the most harmful effects caused. These are largely linked to traffic noise. The applicant is of the view that the proposed development does not add to noise levels in these locations. On foot of these changes, the applicant has reconsidered its approach for categorising the significance effects relating to operational noise and has updated same.

The overall noise environment has not changed since 2018, although traffic levels are increasing in line with population growth. The applicant has updated the unattended noise surveys in 2023 and 2024. There is little difference in ambient noise levels between the 2018 EIAR and the 2025 EIAR, save for Cappagh Road. Traffic flows on the Cappagh Road between 2016 and 2023 have increased by approximately 78%, therefore traffic noise levels could change by 6 to 7db. Other roads are below 50% which correlates to the expected change of 3dB.

As discussed, infill housing has occurred in the vicinity of the proposed development and the updated EIAR has incorporated these into the assessment as Noise Sensitive Locations.

Considering all this, the Commission should note that the construction noise impact does not change. At the operation stage, the Commission should reconsider the following factors which has had a bearing on the operational noise assessment – increased traffic flows and additional NSLs. While these have changed the assessment somewhat, traffic noise levels are still typically between 0 and +/-2 dB compared to the original assessment. While certain NSLs may notice this dB level, it remains that the initial mitigation measures are sufficient to reduce levels below TII standards (i.e. 60dB L_{den}). The applicant has identified one residential scheme at Ballymoneen Road where additional mitigation would be required. This is a residential estate to the south of the proposed development which was granted planning permission in 2019. The applicant has considered this project and notes that a condition was imposed by the Commission at that time to include for noise mitigation in the site and the applicant, as a result, is of the view the developer of said project is responsible for noise attenuation. While there may have been perceived uncertainty about the ring road at the time of the residential scheme being given planning permission, I am satisfied that this condition is sufficient to ensure residents of this estate in future do not experience adverse noise impacts. The residential scheme was progressed in full knowledge that there is an application and reserve for a major road adjacent to it.

It also noted that the applicant is proposed to extend the scope of mitigation measures related to noise barriers. This relates to the height and length of these noise barriers only largely as a result of additional NSLs. This is an acceptable and commonly deployed measure to attenuate noise from road schemes. The installation of additional barriers would be immaterial in the context of this extensive scheme and be beneficial in terms of human health and landscape and visual impacts also. Notable changes include a height increase of .5 of metre in Upper Danaghan (NB8/02) and a length increase of 120m at Coolagh Road (NB10/01). I consider these changes immaterial and would have no landscape and visual impact. The applicant is also considering other activities being carried out including the laying of Low Noise Road Surfaces on Ballymoneen Road and Letteragh Road/Circular Road. This is an acceptable approach.

The applicant has advised that the changes above have not resulted in any changes to the residual impact assessment and cumulative impact assessment. This is a

reasonable and proportionate conclusion in respect of this topic. I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not result in significant effects on noise and vibration.

7.3.13 Population & Human Health

Chapter 19 of the updated EIAR identifies, describes and assesses the potential direct and indirect impacts of the proposed development on population and human health during its construction and operation phases. This topic has numerous interactions with other chapters of the EIAR which are addressed in separate sections of this assessment including Air Quality, Climate, and Noise and Vibration.

Again, I am largely satisfied changes in respect of this topic are not material to parent assessment carried out in the Inspector's Report of 2021.

The applicant has taken into account a new standard published by TII (2024) titled Population and Human Health Assessment of Proposed National Roads Standards (PE-ENV-01108). The standard is largely framed around the requirements of the EIA legislative framework. I am satisfied that the applicant has considered and met the requirements of this document in the updated EIAR and the impacts to population and human health in a central consideration therein. They have provided a sufficient evidence base to support their consideration of alternatives in respect of this topic and decision to proceed with the option now before the Commission. The applicant has been careful in detailing the significant impacts that will occur due to the acquisition and demolition of homes along the route. While PE-ENV-01108 was only published in September 2024, it has since been updated in December 2025. The changes relate to reformatting and restructuring, clarifications in respect air quality and noise standards and ensuring consistency with other documents. While these documents were published in the course of the process, I am satisfied that the

applicant has adequately assessed the proposed development in line with TII guidance, standards and technical requirements and the changes are not material to the overall assessment provided by the applicant in the updated EIAR.

The Commission should also note other updates in the intervening years including

- IEMA (2022) Guide to Effective Scoping of Human Health in Environmental Impact Assessment
- IEMA (2022) Guide to Determining Significance for Human Health in Environmental Impact Assessment .

These documents do not change the methodology of the EIAR in any material way. However, they have further informed and strengthen the conclusions of the updated EIAR.

I note that there remains no standalone Health Impact Assessment (HIA). I am satisfied however that the chapter and relevant appendices have sufficient information and constitutes a de facto health impact assessment, albeit integrated into a wider topic.

I also note changes to the Census which most recently occurred in 2022. This links to the traffic assessment and need for the proposed development from a population perspective given the report increase of 7.3% in population in Galway City and suburbs since 2016. This has a correlation to traffic volumes. Of course, the Commission is reminded that the NPF identified Galway for future population increases. While population increases may emphasise the need for the proposed development it does not alter the assessment of population and human health in a material way.

In respect of the physical baseline, little has changed, however, and as noted in the Census the population has increased, and this has resulted in some infill development in proximity to the proposed development. Other developments in the area include new infrastructure like the N59 Moycullen Bypass which became operational in 2023. Other more road improvements like minor junction upgrades have occurred.

The applicant has advised that the changes above have not resulted in any changes to the impact assessment, mitigation measures, residual impact assessment and

cumulative impact assessment. This is a reasonable and proportionate conclusion in respect of this topic. I have considered the submissions and response to same and am of the view that no matter has been raised that would materially change the conclusion either.

In highlighting negative impacts, the Commission can also look at the positive impacts on the socio-economics of the area. The road is seen as being vital to support Galway city as an economic driver for the western region and to continue to attract inward investment and support balanced regional development. The Commission will note submissions from IDA Ireland and Údarás na Gaeltachta supporting the proposed development.

Several objectors are of the opinion that the EIAR is inadequate particularly in relation to the impact on Human Beings. Many objectors considered that biodiversity has taken precedence over Human Beings. I am satisfied that the EIAR has been prepared in accordance with the EIA Directive which clearly indicates that Population and Human Health as well as Biodiversity are addressed within the EIAR. It is clear from the extensive evidence before the Commission that the topics of Human Beings and Ecology were considered to be priority constraints throughout the process.

I would remind the Commission of the significant negative residual impacts that arise as a consequence of acquisition and demolition of homes. In certain locations, the level of acquisition and demolition is such that it has community level impact and those houses that are not being acquired and demolished may find themselves severed or isolated from their community. This is unfortunate but acceptable given the overriding need and wider community need for the proposed development. I also note impacts to Menlo Castle and indeed University of Galway Sporting Campus, however, I am satisfied that the impacts are acceptable.

The Commission is reminded to reconsider the information set out in the Inspector's Report of 2021 in respect of this topic, in addition to this report, given the significance of impacts for population and human health. The Commission should be satisfied that the need for the proposed development justifies the significant impacts to population and in particular the loss of homes. These are real lives, homes and communities being impacted. I have read back the evidence provided by many objectors in the oral hearing and indeed several submissions and personal

statements (including children) to the current file. They candidly express the toll this has and will take on their personal lives. I am conscious, for several objectors, that no amount of monetary compensation can replace a home which they have made a life of memories. However, the Commission need to objectively weigh up the congestion issues in the area, the supportive planning policy for the proposed development and a wider vision for Galway to grow under the NPF that justifies the need for these acquisitions.

It is considered that the corresponding section of the updated EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would result in significant effects on population and human health. However, it is recommended that Commission accept such impacts as reasoned in Section 7.4.

7.3.14 Resource and Management

Chapter 20 is a new standalone topic, although the Commission should note that information was contained within a number of chapters of the original EIAR in 2018 most notable Chapter 7 Construction Activities. Since then, there has been greater emphasis on waste as a topic in EPA (2022) guidelines and wider government initiatives related to waste planning and the circular economy.

Waste and surplus materials will be generated throughout the construction and operation phases. The estimated quantities of waste and construction materials for the proposed development are shown in a number of tables including Table 20.7 which relates to demolition waste specifically structural and non-reinforced concrete, masonry stone, metal sheeting, and temporary flooring materials, Table 20.8 excavated materials like made ground, topsoil and subsoil, Table 20.9 construction materials. The quantities outlined are in keeping with what one would expect in such a road project. The potential impact (pre-mitigation and monitoring) for site clearance and demolition waste, excavation waste, imported material will be negative and slight. Construction Waste and Municipal Waste will be Negative, not

significant/imperceptible and short-term. During operational phase, the proposed development does not generate any significant level of waste although it is accepted that municipal waste does arise and period maintenance does generate some waste also.

Regardless of the impact rating, the applicant has committed to mitigation measures which would be standard, good practice and readily implementable in a project of this nature. The contractor and roads operator would need to ensure compliance with the provisions of the Waste Management Act 1996, as amended in any case.

The primary mitigation measure is a Construction and Demolition Resource and Waste Management Plan (CDRWMP). An outline plan is provided in Section 7 of the Construction Environmental Management Plan which is found in Appendix A.7.5 of the updated EIAR. No measures are required for the operation phase and normal operating procedures would include waste management.

There will be no significant residual impacts or cumulative impacts from the proposed development.

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

7.3.15 Major Accidents and Disasters

Chapter 21 of the EIAR identifies, describes and assesses the potential risks to the proposed development from major accidents and natural disasters during its construction and operation phases. The requirements of Article 3(2) of the Directive include the expected effects deriving from the vulnerability of the proposed development to risks of major accidents and/or disasters that are relevant to the proposed development.

The applicant has identified two Seveso Sites in proximity to proposed development at Oranmore and Galway Harbour. However, these are over a kilometre from the proposed development and are scoped out from consideration.

There is no identified mitigation but the design has inherent design to reduce risks of major accidents and disaster particularly major road traffic accidents. There is also suite of plans and procedures to manage and minimise risks including the CEMP,

CDRWM, CTMP, Non-Native Invasive Species Management Plan, Sediment, Erosion, Pollution Control Plan, Environmental Incident Response Plan and Pest Control Plan.

Post mitigation, there is low risk assigned to events like ground collapses, utility disruption, major traffic accidents, bio-security events, industrial accidents. Following the implementation mitigation measures no significant residual impacts are accepted.

I consider that the applicant has adequately identified the likely risks of major accidents and disasters to and from the proposed development and that the screening exercise and the risk assessment undertaken is in line with good practice. I consider that appropriate mitigation measures have been proposed to manage and reduce the identified risks and note that it is proposed to maintain and update the risk assessment throughout the design and construction of the proposed development. In conclusion, I am satisfied that the applicant has addressed the requirements of the EIA Directive with respect to risk of major accidents.

It is considered that the corresponding section of the EIAR has adequately identified, described and assessed the direct and indirect risks of the proposed development in respect of this topic and in accordance with the requirements of the EIA Directive.

It is considered that the proposed development, on the basis of information submitted and submission received on the file, and subject to mitigation and monitoring measures, would not be likely to give rise to significant risk of major accidents and disasters.

7.3.16 Interactions

Chapter 21 of the EIAR addresses interactions of the potential environmental impacts arising with a matrix provided in Table 21.10. I would concur that the most dynamic interactions pertain to human beings with other interactions including between transport and air, noise and climate. Similarly, biodiversity has an interaction with hydrology and hydrology.

I have interrogated the methodology, assumptions and evaluation of the likely and significant effects and associated mitigation measures of each topic and consider the applicant's conclusion in the interactions of environment impacts as set out in the EIAR robust and complete. It is considered that the corresponding section of the

EIAR has adequately identified, described and assessed the direct and indirect effects of the proposed development in respect of interactions and in accordance with the requirements of the EIA Directive.

I have considered the interrelationships between factors and whether this may, as a whole, effect the environment, even though the effects may be acceptable when considered on an individual basis. In my assessment of each environmental topic, I have considered the likelihood of significant effects arising as a consequence of interrelationship between factors. Most interactions e.g. the impact of noise and vibration on the population and human health are addressed under individual topic headings.

Having regard to the impacts which are predicted to occur having regard to the nature of the proposed development, mitigation measures, or as a consequence of proposed conditions, I do not foresee any likelihood of any of these interrelationships giving rise to significant effects on the environment.

In conclusion, I am satisfied that there are no such effects and, therefore, nothing to prevent the approval for the development on the grounds of interaction between factors.

7.3.17 Cumulative Effects

Chapter 21 of the EIAR addresses the potential for cumulative impacts to arise. The potential is considered in the context of other permitted and planned development in the area as well as the existing/approved plans and programmes. The process by which the projects and plans included in the assessment are set out in Section 21.5 of the EIAR and the long list of projects considered are set out in Appendix A.21.1 Cumulative Impact Assessment of the EIAR.

Those brought forward for more detailed assessment have been identified on the basis of temporal scope, scale and nature and likelihood of significantly contributing to the effects of the proposed development . Other factors such as the conceptual or physical effect-receptor pathway or the capacity of the receiving environment to absorb any changes as a result of potential cumulative effect were also considered.

It is accepted that the EIAR was written at a point in time and proposals come and go in the planning system while any proposed development is being assessed by the Commission. I have reviewed the relevant planning registers in December 2025 to

ensure no other projects arose. These are all noted and considered in the assessment.

The assessment of a range of plans and programmes is included in Section 21.5.2 and considers a suite of national, regional and local policy documents. I consider that the documents considered is comprehensive. I note that a number of the plans have been updated since the preparation of the EIAR including the NPF and the CAP25. I submit that the applicable and relevant provisions of the updated plans remain consistent with the overall objectives of the proposed development, and I have considered these within this cumulative assessment.

The cumulative assessment of permitted/planned projects within the two administrative areas across which the road corridor traverses considered a wide ranging list including multiple residential schemes along the road scheme.

In terms of the residential schemes, I note overlap between construction works and the development of several schemes. I submit that the substantive cumulative impacts which could potentially arise would be associated with the construction periods of the projects should they overlap or occur sequentially. There would be potential for impacts on traffic due to road diversions and increase in HGVs on the road network with potential negative cumulative effects on traffic and transport which would impact on journey characteristics and amenity of motorists. There is also potential for cumulative adverse impact on air quality arising from construction dust in addition to increased noise and vibration which would impact on the local resident population where projects overlap or are in the vicinity of one another. The mitigation measures including CEMPs should result in the impacts being lessened. I submit that any such negative cumulative impacts would be short term, albeit some could potentially be over relatively lengthy construction periods.

Having regard to the nature and extent of the proposed developments the likely cumulative impacts arising and to the mitigation measures proposed including CEMP which would entail traffic management, I accept the conclusions that there would be no significant residual cumulative effects. In terms of the operational phase no significant residual cumulative impacts are predicted with any impacts, in the main, being either none, neutral or positive and long term.

Having regard to the above I am satisfied that a robust and detailed assessment of the potential for cumulative impacts to arise has been carried out.

7.4 Reasoned Conclusion

I consider that the updated EIAR, supported by the documentation submitted by the applicant and the Inspector's Report of 2021 provided information which is reasonable and sufficient to allow the Commission to reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account current knowledge and methods of assessment. I am satisfied that the information contained in the EIAR is up to date and complies with the provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU.

Having regard to the examination of the environmental information contained above, and in particular the EIAR and supplementary information provided by the applicant, and the submissions from third parties and from prescribed bodies in the course of the application and indeed the Inspector's Report of 2021, it is considered that the main significant direct and indirect effects of the proposed development on the environment are as follows:

7.4.1 Population and Human Health

- **Loss of Dwellings:** There are 54 dwellings proposed for demolition or acquisition to facilitate the proposed development. This will result in a significant to profound permanent negative impact on homeowners. This impact will not be avoided, mitigated, or otherwise addressed by means of condition.
- **Severance of Communities due the Physical Road Scheme:** As a result of the loss of 54 dwellings with loss of clusters of dwellings in areas such as Na Forai Maola/Troscaigh, Castlegar, and Dangan, there will be a severance impact on remaining communities which will be a significant long-term negative impact that will not be avoided, mitigated or otherwise addressed by means of condition.
- **Severance of Communities due to changes in Traffic Patterns:** There will be long-term positive impacts for some communities that are currently severed due to traffic volumes because traffic will reduce in villages, such as Bearna and Castlegar, thereby resulting in easier access for pedestrians and cyclists and improved amenities for more vulnerable persons.

- **Severance of Communities due to Road Closures:** Where minor roads are closed, diverted or re-routed severing communities, there will be a significant medium to long-term negative impact depending on density of development and extent of re-route. This will not be avoided, mitigated or otherwise addressed by means of condition.
- **Severance of Communities due to Construction Traffic:** During construction there will be slight negative and short term severance issues caused by construction traffic which will be mitigated by measures outlined in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.
- **General Amenities:** There will be slight to moderate short-term negative impacts during construction on general amenities in areas such as Rosan Glas, Gort na Bro and Bushypark church and school as a result of construction traffic, noise and dust along haul routes. These will be mitigated by measures set out in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. During operation there will be a slight negative impact on amenities.
- **Amenities of University of Galway:** During construction there will be significant negative impacts on the population using the University of Galway Sports Campus as a result of loss of pitches, modification to the sports pavilion, construction works in proximity to walkways as well as noise and visual impacts. These will be mitigated using standard construction practices as detailed in the in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. During operation there will continue to be a long-term moderate impact on the general amenities of the sports campus that will be mitigated by the provision of the right of way and access to the lands under the viaduct as well as noise mitigation measures.
- **Amenities along River Corrib:** During construction there will be restricted access to the riverside in Dangan and there will be noise and visual impacts on both sides of the River Corrib. These will be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. At no time will access to the riverside be completely restricted. Impacts during

construction will be moderate negative and short-term. During operation mitigation measures include the retention of existing vegetation and noise barriers. Impacts will be long-term moderate to significant negative due to the general loss of amenity.

- **Amenities of Galway Racecourse:** Construction impacts on Galway Racecourse can be avoided by measures including the provision of temporary stables (which have received planning permission separately) and the cessation of works during festival seasons. During the operation phase, a positive benefit will result for Galway Racecourse due to the mitigation measures.
- **Socio-Economic:** During construction there will be some negative short-term impacts for businesses as a result of noise and dust which will be mitigated by measures outlined in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. Where visibility to businesses is impacted, mitigation measures include additional signage. Demolition of some industrial and commercial properties will not be avoided, mitigated, or otherwise addressed by means of condition. During operation there will be significant positive impacts with respect to journey times, journey reliability and amenities.
- **Journey Characteristics:** During construction there will be some short-term temporary moderate negative impacts on journeys as a result of road closures or diversions which will be mitigated by the Traffic Management Plan. During operation, the road will have significant permanent positive impacts in terms of improved journey times, journey time's reliability and journey amenities. There will be improved connectivity across and beyond the city, releasing and freeing the existing city centre and inner suburbs from congestion.
- **Health:** During construction potential impacts on health arising from air, noise and water emissions will be mitigated using construction practices set out in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. During operation impacts will be avoided having regard to the proposed development's compliance with air and noise standards set out in TII guidelines.

7.4.2 Biodiversity

- Significant residual effect on habitats as a result of the loss of priority Annex I habitat (outside of any European Site) comprising Limestone Pavement [*8240],

active Blanket Bog [*7130], and a Petrifying Spring [*7220] which cannot be avoided, mitigated, or otherwise addressed by means of condition

- Significant residual effect on habitats as a result of the loss of Annex I habitat (outside of any European Site) including Annex I Wet Heath [4010], Dry heath habitats and other habitats of international to local value, including within areas designated as Local Biodiversity Areas, which cannot or will not be avoided, fully mitigated, or otherwise addressed by means of condition
- Significant residual effect as a result of the loss of, or damage to, populations of plant species and one invertebrate species included in the Irish red data books, which will not be avoided, mitigated, or otherwise addressed by means of condition.
- Significant residual effect on barn owl, Peregrine falcon, lesser horseshoe bat, red squirrel and pine marten which will not be avoided, fully mitigated, or otherwise addressed by means of condition.

7.4.3 Soils and Geology

- There will be a significant negative impact on geology as a result of the loss of small areas of limestone pavement (Annex I habitat) outside of the Lough Corrib SAC or any other Natura 2000 site. This impact will not be avoided, mitigated or otherwise addressed by means of condition. This loss is primarily associated with the construction of footings for a viaduct which will span over a larger area of limestone pavement.
- There will be impacts associated with the loss of soil along the route and the use of natural resources, including aggregates, to construct the proposed development. This will be mitigated by the re-use of excavated materials in the construction process and in the formation of material deposition areas for excess/unsuitable material and habitat creation. Other construction phase impacts including soil contamination, blasting impacts, tunnelling works, slope stability and earthworks impacts will be avoided, managed and/or mitigated by the measures which form part of the proposed development , the proposed mitigation measures included in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments .

7.4.4 Hydrogeology

- There will be impacts on a number of existing wells which will be lost as a result of the proposed development. This will be mitigated by the provision of replacement wells, alternative water sources or compensation, as appropriate.
- Impacts on groundwater quality will be mitigated through the implementation of the i.e. Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments, including the associated Karst Protocol and Sediment, Erosion & Pollution Control Plan during the construction phase, and in the operational phase through the design of the drainage system, which includes water attenuation and treatment ponds, wetlands and controlled discharge. Impacts on groundwater levels due to dewatering and recharge will arise but will be mitigated through the retention of run-off within the same water catchment area or groundwater body and in areas such as the Lackagh Tunnel, through the timing of construction works to avoid the need for dewatering. Structural impacts on properties in the vicinity of areas where groundwater levels will be lowered will be mitigated and monitored with property condition surveys.
- Impacts on groundwater dependent habitats will be avoided through the alignment and design of the road development or mitigated through measures such as flow control and pollution control measures. There will be no groundwater lowering within groundwater bodies that support groundwater dependent habitats within a European site.

7.4.5 Hydrology

- Water quality impacts during the construction phase will be mitigated by the implementation of the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments, including the Incident Response Plan and Sediment Erosion and Pollution Control Plan as well as through obtaining necessary consents and consultation with prescribed bodies.
- Impacts on the water supply to the Terryland Water Treatment Plan will be avoided and mitigated through implementation of the Construction Environmental Management Plan (CEMP), consultation and ongoing liaison with Irish Water and the carrying out of works in accordance with best practice construction methods and guidance.

- During the operational phase, water quality impacts arising from road runoff or accidental spillages will be mitigated through the design of the drainage system for the proposed development which is responsive to the differing geologies in the area, and in particular the use of attenuation ponds, settlement ponds, reed beds, infiltration basins, flow control mechanisms etc. Flood risk impacts near the N83 Tuam Road at Twomileditch will be mitigated by flood compensation storage, provision of storm drainage on the N83 at this location and a pumping station to discharge to the existing storm sewer.

7.4.6 Noise and Vibration

- Noise and vibration impacts will arise during the construction phase, including from blasting operations which has the potential to impact upon residential and other sensitive receptors. However, it is considered that these potential impacts would be avoided, managed and mitigated by the measures which form part of the proposed development , the proposed mitigation and monitoring measures, through suitable conditions and noting the relatively short-term duration of the construction phase and the linear nature of the proposed development.
- During the operational phase, the majority of noise sensitive receptors will be in compliance with the design goal set out in the TII Guidelines once noise mitigation measures are incorporated, such as noise barriers and the low noise road surface. There will also be positive impacts on a large number of receptors on the existing road network, due to reductions in traffic volumes on existing roads. A limited number of properties will, however, experience a residual noise impact marginally in excess of the TII Design Goal. Noting the provisions of the TII Guidelines for such a scenario and also noting the need to balance the provision and scale of noise barriers against other consideration, such as visual impact, I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative noise and vibration impacts.

7.4.7 Air Quality

- Potential air quality impacts would be avoided, managed and mitigated by the measures which form part of the proposed development , the proposed mitigation measures such as the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.

7.4.8 Climate

- The proposed development, individually and cumulatively with other identified projects, is likely to result in a permeant, moderate and adverse impacts on climate . Therefore, the proposed development results in an increase in greenhouse gas emissions and does not meet Ireland’s target of net zero.
- There are mitigation measures available during the construction phase, such as ground granulated blast furnace slag (GGBS) and green procurement, to reduce the generation of embodied carbon, which results in a moderate construction phase impact.
- There are no mitigation measures available during operation phase to reduce generation of carbon emissions. For the purposes of this EIA, the proposed development does not rely on wider governmental mitigation measures as set out in the Climate Action Plan 2025.

7.4.9 Traffic and Transportation

- Potential impacts associated with construction traffic will be avoided or mitigated by the Construction Environmental Management Plan, including the Construction Traffic Management Plan.
- During the operational phase, the proposed development will have positive impacts on traffic congestion, journey times on key routes, network statistics and the ratio of flow to capacity at key junctions. It will also facilitate the implementation of various measures contained within the Galway Transport Strategy to increase active travel and public transport provision in the city and will have a positive impact on sustainable transport mode share when considered together with the other Galway Transport Strategy measures that it will support.
- The proposed development will assist in enabling the significant population and employment growth forecast for the city by adding additional links to the road network, including a new river crossing and linkages between various radial routes serving the city, thereby improving accessibility and providing a basis for the compact growth of the city.

7.4.10 Landscape and Visual

- The construction phase of the proposed development will result in a range of landscape and visual impacts on certain landscapes and receptors, including

significant and profound impacts. The mitigation measures proposed during this phase will have limited effect due to the scale and nature of the development, and negative landscape and visual impacts will continue during the construction phase.

- During the initial operation stage, landscape and visual impacts will continue, but the significance and severity of these impacts will generally abate over time as the proposed landscape mitigation proposals become established and increasingly effective at screening the proposed development and/or incorporating it into the landscape. However, significant and profound negative residual visual impacts will continue to arise for numerous residential properties located close to or adjoining the boundary of the proposed development, and particularly in the vicinity of major engineering structures at post-establishment stage.
- Significant residual impacts on landscape character will also continue to arise at a number of locations. The proposed mitigation measures, and particularly the extensive and comprehensive landscaping planting proposals will not fully mitigate these significant or profound impacts, however they will ameliorate the impacts to a certain extent and this will increase over time as planting matures.
- Significant residual visual impacts will also occur in the River Corrib valley at Menlo Castle and the University of Galway Sporting Campus, primarily due to the visual intrusion associated with the proposed River Corrib Bridge and associated viaduct.

7.4.11 Cultural Heritage

- There will be significant negative direct and indirect impacts on a number of archaeological and built heritage sites which will be mitigated by the undertaking of detailed photographic and written records prior to construction and the use of test trenching and monitoring.
- There will also be a very significant impact on a thatched cottage (protected structure, BH12) which it is proposed to demolish and which will not be fully mitigated by the preparation of a record. Potential impacts on unknown archaeological features will be mitigated or avoided through monitoring of construction works by an archaeologist and excavation where appropriate. There

will be a very significant impact on a bullaun stone (RMP, AH 2) and structure (proposed RMP., AH 42), tomb (CH 49), boulder (CH 51).

7.4.12 Material Assets Agriculture

- The acquisition of the land required to construct the proposed development will have a range of negative impacts, including significant and profound impacts on landowners. There will be significant or profound negative impacts on a number of farm enterprises and equine enterprises, due to issues such as severance, impacts on farm viability, disruption and impacts on the availability of services.
- The loss of land will not be avoided, mitigated or otherwise addressed by means of condition. There is no mitigation for this impact within the EIA process. Impacts due to land severance are mitigated to a degree through the proposed provision of alternative access arrangements and services, however the agricultural enterprises that are significantly or profoundly adversely affected are likely to require major changes to their operations, management and scale and there is no mitigation for this impact within the EIA process.

7.4.13 Material Assets Non-Agriculture

- **Loss of Dwellings:** There are 54 dwellings proposed for demolition or acquisition to make way for this project. This will result in a significant to profound permanent negative impact on homeowners. This impact will not be avoided, mitigated, or otherwise addressed by means of condition.
- **Commercial and Industrial Buildings:** There is no mitigation for the loss of commercial and industrial buildings within the EIA process. This will result in a moderate to significant impact. This impact will not be avoided, mitigated, or otherwise addressed by means of condition. There will be construction impacts on some businesses which will be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.
- **Public and Community Buildings:** During construction noise and air emissions can be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. During operation there will be positive impacts on Galway Racecourse by way of a permanent access from Parkmore Link Road.

- **Utilities:** The proposed development will result in some relocation of utilities. This impact will be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.

7.4.14 Resource Management, Major Accidents and Disasters

- Waste and surplus materials will be generated throughout the construction and operation phases. The impacts can be mitigated through measures which would be standard, good practice and readily implementable in a project of this nature such as the Construction and Demolition Resource and Waste Management Plan (CDRWMP).
- The proposed development has inherent design measure to reduce risks of major accidents and disaster particularly major road traffic accidents. There is also suite of plans and procedures to manage and minimise risks including the CEMP, CDRWM, CTMP, Non-Native Invasive Species Management Plan, Sediment, Erosion, Pollution Control Plan, Environmental Incident Response Plan and Pest Control Plan. Post mitigation, there is low risk assigned to events like ground collapses, utility disruption, major traffic accidents, bio-security events, industrial accidents. Following the implementation mitigation measures no significant residual impacts are accepted.

Notwithstanding the conclusion reached in respect of the inability of the proposed measures to fully mitigate the significant negative residual impacts in respect of various environmental matters as set out above, it is considered that these environmental impacts would not justify a refusal, having regard to the overall benefits of the proposed development including its identified strategic importance at European, National, Regional and local level, its role in alleviating congestion and underpinning the sustainable transport measures of the GTS and its role in facilitating Galway to grow in a more compact manner, as identified in the NPF.

With regard to the significant adverse impact on carbon emissions and climate, it is noted that this arises due to the sensitivity of the receiving environment. Noting the role of the proposed development in facilitating the implementation of active travel and public transport measures as set out in the GTS and its role in supporting the compact and more sustainable development of the city, it is not considered that the

proposed development would undermine, or be contrary to Ireland's climate obligations, given that climate action requires a broad sectoral and economy-wide approach. Ireland has committed to becoming climate neutral / zero emission by 2050, and carbon emissions associated with necessary infrastructural projects such as the proposed development can be mitigated through reductions in other areas as mechanisms such as demand management measures in CAP25 , carbon tax and carbon budgets are developed and will be increasingly mitigated in the operational phase as electric vehicles are adopted.

The Commission should be satisfied that the reasoned conclusion is up to date at the time of making the decision and that the information contained in the EIAR complies with the provisions of Article 3, 5 and Annex (IV) of EU Directive 2014/52/EU.

8.0 Water Framework Directive Assessment

The subject site is located close to several waterbodies, twenty nine of which are illustrated in Figures 11.1.001-11.1.002 of the EIAR. Given the linear nature of the proposed development, it crosses several rivers, streams and surface water drains, most notably the River Corrib which is of European importance given its designation as a SAC and SPA. It is in proximity to the coast and with all rivers and streams interacting with Galway Bay.

I have assessed the proposed development, the N6GCRR, which includes 17 culvert crossing and on bridge crossing of the River Corrib. Please refer to the Section 7.3.5 and 7.3.6 above. I have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration.

Having considered the nature, scale and location of the proposed development, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

The reason for this conclusion is due to the nature and location of the proposed works which will be subject to extensive mitigation measures during the construction and operational phases as tabulated in Chapter 23 of the updated EIAR and individually in Chapters 10 and 11, hydrology and hydrogeology, respectively. I am satisfied in the detailed consideration of reasonable alternatives and the applicant has undertaken extensive route selection exercises which considered water impacts as a criteria and generally avoided impact to same.

Where impacts could not be avoided detailed surface water control measures and best practice construction methods are included in the design. The applicant also intends to monitor the water quality during the construction phase and post construction and can take relevant action as required.

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, streams, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a

temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

9.0 Appropriate Assessment

The applicant has submitted an updated AA Screening Report and NIS which are dated February 2024 and March 2025 respectfully as part of the particulars supporting the planning application. The documentation is in line with current best practice guidance and provides adequate information to allow a complete examination and identification of any potential significant effects of the development, alone, and in combination with other plans and projects on European sites.

The documentation was prepared by Scott Cawley who are scientifically and technically competent to do so and the qualifications and experience of the authors of the report and various appendices associated with it are suitable and relevant. I am satisfied that all survey work has been undertaken and prepared by competent experts also in line with best practice and scientific and technical methods.

The application documentation includes information required in respect of the methodology applied, a description of the existing sites and 'Stage 1' and 'Stage 2' assessments. The scientific assessment to inform AA is presented in Sections 9 and 11 of the NIS submitted to the Commission as part of the application. The conservation objectives of the various Qualifying Interests (QI) features and Special Conservation Interest (SCI) species are listed. Impact pathways are identified and the assessment of likely significant effects which could give rise to adverse effects on site integrity presented. Mitigation measures are presented from Section 10 of the NIS under each site heading. The NIS is supported by a Construction Environmental Management Plan which provided detailed mitigation measures. An assessment of potential in-combination effects is presented in Section 12 of the NIS.

The NIS submitted with the application concluded that, following the implementation of the mitigation measures proposed, that the proposed development will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects, and there is no reasonable scientific doubt in relation to this conclusion.

The requirements of Article 6(3) as related to AA of a project under Part XAB of the PDA are considered fully below. The areas addressed in this assessment includes an AA of the implications of the proposed development on the integrity of each European site.

The observations on the proposed development received by the Commission were circulated to the applicant for comment and its response is noted. Regard is had to the said submissions.

The Commission should also have regard to other sections of this report including.

- Planning Assessment (Section 6.0)
- EIA (Section 7.0)
- WFD (Section 8.0)
- AA (this Section)
- CPO (Section 10.0)

Each assessment has had regard to all submissions made by parties to the planning application. There is an inevitable overlap between the assessments with certain matters falling into the planning assessment, EIA, AA, WFD and CPO. In the interest of brevity, matters are not repeated but the Commission should have regard to all sections when deliberating and reaching its conclusions in respect of the planning application and each discrete assessment under EIA, WFD, AA and CPO.

The Commission should refer to the consideration of submission in Section 6.5 and 10.2 in particular in completing its AA.

The proposed development is not directly connected with the management of European Sites and therefore it needs be determined if the development is likely to have significant effects on European site(s). I am satisfied that all possible European Sites that could in anyway be affected have been considered by the applicant. I am also satisfied that all potential impact mechanisms have been considered and appropriately assessed within the NIS document.

The Commission should note that an ecologist was engaged in the assessment of the application that supported the Inspector's Report of 2021. This complete and independent assessment of the proposed development, both Screening and Appropriate Assessment stages, was undertaken by Consultant Ecologist Mr Richard Arnold of Thomson Environmental Consultants to facilitate the final Appropriate Assessment determination by the Commission. This has been reviewed and updated by a further report prepared by Dr. Flynn who is the Senior Ecologist in the Commission. I concur with the conclusions in respect of both reports – which now form part of this report.

It should be noted that the applicant references and incorporates the information provided in Inspector's Report (2021) and Appendix 6: Appropriate Assessment Report prepared by Richard Arnold of Thomson Environmental Consultants. It has also sought to incorporate all supplemental information furnished in relation to the NIS including further information sought by the Commission and responded to by the applicant in relation to the Natura Impact Statement and during the oral hearing;

The Commission should satisfy itself that the proposal will not adversely affect the integrity of the European site before consent can be given.

Since the submission of the initial AA Screening Report and NIS in 2018, the Commission should note the follow changes which have occurred.

- Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC (European Commission, 2021)
- Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC (European Commission, 2019)
- OPR Practice Note PN01. Appropriate Assessment Screening for Development Management (Office of the Planning Regulator, 2021)

9.1 Receiving Environment

In respect of the receiving environment, its description has been updated to reflect surveys undertaken between 2022 and 2024. It is noted that four additional species, which are an SCI for several SPA sites were recorded including common gull, gadwall, ringed plover, whooper swan.

There has also been changes to European site boundaries most notably Lough Corrib SAC which the proposed development crosses. The applicant has stated that the revisions in the boundary results in a slight reduction in the overlap between the site and proposed development by approximately 0.2ha.

The qualifying interests/special conservation interests and objectives of many European sites have changed since 2018 also including

- Inner Galway Bay SPA – addition of the Black-Throated Diver *Gavia artica*
- Inner Galway Bay SPA – removal of the Shoveler *Anas clypeata*

- Inishmore Island SAC, Kilkieran Bay and Islands SAC and fourteen other sites – addition of bottlenose Dolphin *Tursiops truncatus* and harbour porpoise *Phocena phocena*

I am satisfied that the wider hydrological and hydrogeological baseline environment related to the European sites has not changed. While minor changes have occurred to the habitat baseline within the Lough Corrib SAC, there has been no changes to their location or extent. Similarly, the distribution and abundance of species have remained consistent.

The site the proposed development overlaps with one European site – Lough Corrib SAC. This is a result of the linear nature of the site, which transects the Corrib River. Given the sites proximity to the Galway Bay and the coast and Lough Corrib and other lakes and waterways there are significant number of European sites in proximity to the site. Overall, there are 23 European sites (18 SACs and 5 SPAs) located within the vicinity of the Proposed Development and within the Zone of Influence (Zoi) of the Proposed Development.

9.2 Screening for Appropriate Assessment (Stage 1)

The AA Screening Report describes the proposed development , its receiving environment and relevant European Sites in the Zone of Influence (Zoi) of the development. The proposed development is not directly connected with or necessary for the management of any European site and is, therefore, subject to the provisions of Article 6(3). The first test of Article 6(3) is to establish if the proposed development could result in likely significant effects to a European site, in which case the development is ‘screened in’ for further detailed assessment AA (Stage 2).

The AA Screening concluded that there is the possibility for significant effects, in the absence of mitigation, either arising from the proposed development alone, or in combination with other plans and projects, as a result of several factors set out in Table 2 of the AA Screening Report, including inter alia habitat loss, degradation and fragmentation, hydrological impacts during construction and operation; introducing / spreading non-native invasive species during construction; shading impacts. It is noted that the applicant has factored in additional impacts identified in Dr Arnold’s Report including potential deterioration/decline in European site QIs/SCIs due to

associated effects from loss of supporting habitats/populations; increase in recreational pressure; increase in construction-related traffic.

It is noted that the applicant has included an operation impact raised in the Inspector's Report of 2021 and associated specialist reports in relation to increase in recreational pressure as various European sites in the area will be more readily accessible to visitors. On this basis Maumturk Mountains SAC and The Twelve Bens / Garraun Complex SAC were screened in. I am satisfied that the impacts identified is extensive and abundantly cautious and the applicant has identified that relevant sites in Table 3. It is not intended to repeat this table in this report and the Commission can simply adopt it.

In determining the potential significant effects of the proposed development , the applicant took account of the potential for ex-situ effects for foraging birds and mammals such as Otter. It is of note that a precautionary approach has been taken in including SAC and SPA sites in the wider area in the screening exercise. Given that bird species can travel from designated sites the applicant has included sites at some remove from the proposed development site. Similarly, a precautionary approach has been taken in relation to SCIs associated with SACs in the wider area. The approach is considered reasonable and on this basis the sites should be carried forward for assessment.

Kilkieran Bay and Island SAC (25 km) and Inishmore Island SAC (29 km) have been considered in the updated AA Screening Report. While these are a considerable distance from the proposed development and outside a nominal distance of 15 km, these sites now include bottlenose Dolphin *Tursiops truncatus* and harbour porpoise *Phocena phocena* as Qis. These species could be impacted by water quality degradation. There is a long list of sites on the west coast of Ireland designated for either bottlenose dolphin or harbour porpoise. However, I am satisfied that these are a sufficient distance from the proposed development not to give rise to any significant impacts

I note that the applicant has screened out Ballyvaughan Turlough SAC, which is 15 km south of the proposed development, on the opposite side of Galway Bay and located inland. There are no hydrological or hydrogeological links. It is a reasonable conclusion to screen it out from further consideration. Given its geographical

separation I am satisfied that the proposed development would not result in recreational pressure at the proposed development on the basis of the transport appraisal. I am satisfied that there are no other sites which could interact in combination with other plans and projects to boost tourism and recreation in Connemara or north Clare and the Burren area. I note the Traffic Assessment in Appendix A of the AA Screening report which was used to inform the assessment of recreational pressures in the area.

This Zone of Influence (Zoi) was established based on the extent at which potential impacts may be carried via identified pathways (i.e., hydrological connection, ornithological behaviours). Having regard to the nature of the proposed development, the nature of the receiving environment and the source-pathway-receptor model. It is considered that the Zones of Influence identified are reasonable.

Having regard to the information presented in the AA Screening Report, submissions, the nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source pathway receptor principle and sensitivities of the ecological receptors, I concur with the applicant's screening determination.

In summary, the potential impacts identified would affect the following European sites (no. 23),

SACs

1. Lough Corrib SAC
2. Galway Bay Complex SAC
3. Kilkieran Bay and Island SAC
4. Inishmore Island SAC
5. Ardrahan Grassland SAC
6. Castletaylor Complex SAC
7. Kiltiernan Turlough SAC
8. Lough Fingall Complex SAC
9. Rahasane Turlough SAC
10. Connemara Bog Complex SAC
11. East Burren Complex SAC
12. Moneen Mountain SAC

13. Black Head - Poulsallagh Complex SAC
14. Gortnandarragh Limestone Pavement SAC
15. Ross Lake and Woods SAC
16. Maumturk Mountains SAC
17. The Twelve Bens/Garraun Complex SAC

SPAs

18. Lough Corrib SPA
19. Inner Galway Bay SPA
20. Rahasane Turlough SPA
21. Cregganna Marsh SPA
22. Connemara Bog Complex SPA

Further analysis in the AA (Stage 2) is required to determine the significance of such impacts to these sites and QIs and to apply any mitigation measures to exclude adverse effects.

No measures designed or intended to avoid or reduce any harmful effects of the proposed development on a European Site have been relied upon in this screening exercise.

9.3 Appropriate Assessment (Stage 2)

The following objective assessment of the implications of the proposed development on the relevant conservation objectives of the European sites is based on the scientific information provided by the applicant and taking into account submissions on nature conservation. It is based on an examination of all relevant documentation and submissions, analysis and evaluation of potential impacts, findings conclusions. A final determination will be made by the Commission.

This assessment has had regard to relevant guidance including:

- Office of the Planning Regulator (OPR) (2021) AA Screening for Development Management: OPR Practice Note PN01
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites. Methodological guidance on Article 6(3) and 6(4) of the Habitats Directive 92/43/EC.

- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- Department of Environment, Heritage and Local Government (2010) AA of Plans and Projects in Ireland – Guidance for Planning Authorities
- NPWS (2010) AA under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10.

All aspects of the proposed development which could result in significant effects are assessed and mitigation measures designed to avoid or reduce any adverse effects on site integrity are examined and evaluated for effectiveness.

A description of the sites and their Conservation Objectives and QIs/SCIs, including relevant attributes and targets for these sites, are set out in Section 9 Examination and Analysis of Potential Direct and Indirect Impacts on European Sites of the NIS.

The NIS, in Section 4, outlines the methodology used for assessing potential impacts on the habitats and species within the European Sites that have the potential to be affected by the proposed development. It predicts the potential impacts for these sites and their conservation objectives, it suggests mitigation measures, assesses in-combination effects with other plans and projects and it identifies any residual effects on the European sites and their conservation objectives. The NIS was informed by a desk top study and several field based studies and surveys.

Ecological surveys carried out on various dates and across seasons between 2013 to 2024 (over ten years). Survey details can be found in the appendices of the NIS and include Hydrogeology and Hydrology reports, Historical birds survey findings, current to historical habitat survey data, Breeding bird and Wintering bird survey findings, Fish and other aquatic survey results, Eco-hydrogeology, Traffic Assessment to inform Recreational Pressure Assessment, Aquatic habitat, Air quality report and Shading analysis. The Commission should refer to Section 4.1.1. and Tables 4.1 for the details of surveys including dates and surveyors used. It is not intended to repeat this information here.

The report concluded that, taking into account the proposed development design and the implementation of mitigation measures identified in the NIS, the proposed development will not result in adverse effects on the integrity of any Natura 2000 site.

Having reviewed the NIS and the supporting documentation, I am satisfied that it provides adequate information in respect of the baseline conditions, clearly identifies the potential impacts, and uses best scientific information and knowledge to assess any potential impacts. Details of mitigation measures are provided, and they are summarised in Section 10 of the NIS. I am satisfied that the information is sufficient to allow for an appropriate assessment of the proposed development.

9.3.1 Assessment of Sites

There have been changes to the relevant sites and in particular their boundaries and published Qis/SCIs. This is in addition to the changes in the receiving environment outlined in Section 9.1 of this report. The Inspector's Report of 2021 which was supported by Dr Arnold's specialist report on Appropriate Assessment should be noted by the Commission. The applicant has effectively incorporated changes made in the course of the previous planning process and provided the assessment of relevant sites in a holistic document – whereas previously it would have been added to over the course of the process. While this has provided for a change in presentation of the information, it has not materially changed the assessment and I rely on the Inspector's Report of 2021. The Commission should note Inishmore Island SAC [00213] and Kilkieran Bay and Islands SAC [002111] however, which are were previously not assessed.

For clarity, the following sites have been fully presented in the updated document despite no material change occurring to the site and its qualifying interests and objectives: Ardrahan Grassland SAC, Castletaylor Complex SAC, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Rahasane Turlough SAC, Rahasane Turlough SPA and Cregganna Marsh SPA. The primary concern in respect of these sites was the potential for them to be impacted by construction phase traffic. Mitigation measures in this respect related to other direct and indirect impacts included for hydrogeological, hydrology impacts, air quality impacts, invasive species impacts which are readily implemented.

Similarly and for clarity, the following sites have been fully presented in the updated document despite no material change occurring to the site and its qualifying interests and objectives: Lough Corrib SAC, Galway Bay Complex SAC, Lough Corrib SPA and Inner Galway Bay SPA: Maumturk Mountains SAC, The Twelve Bens/Garraun

Complex SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA, Ross Lake and Woods SAC, Ardrahan Grassland SAC and Castletaylor Complex SAC. The primary concern in respect of these sites was the potential for them to be impacted by recreational pressure which may increase during the operation of the proposed development. I am satisfied that given the absence of direct access from the proposed development to European sites, the increase in recreation traffic will not be significant being typically 10% (and not all recreational traffic is destined for European sites). This does not give rise to any likely significant impacts and no mitigation measures are required.

The applicant has also identified that the potential deterioration or decline in European site QIs/SCIs due to loss of supporting habitats/populations of typical species and positive indicator species could affect the following additional sites: Ardrahan Grassland SAC, Castletaylor Complex SAC, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA, Rahasane Turlough SAC, East Burren Complex SAC, Moneen Mountain SAC, Black Head-Poulsallagh Complex SAC, Gortnandarragh Limestone Pavement SAC and Ross Lake and Woods SAC. However, in examining these sites and their respective QIs/SPIs, there will be no deterioration or loss that would effect conservation objectives of these European sites. The only direct loss of habitat is at Lough Corrib SAC. Therefore, no mitigation is required in this respect. Even the loss of habitat within Lough Corrib SAC is so discrete and limited to common habitats it has minimal impact and no Annex I habitat has been identified in any case.

In respect of the Black-Throated Diver *Gavia artica*, which the applicant notes as a new species of conservation interest in Galway Bay SPA added in June 2019. The Commission should note paragraph 4.8.36 of Inspector's Report of 2021. I would concur with this assessment in respect of black-throated diver. The updated NIS has had the opportunity to now incorporate consideration of this species and I am satisfied the conclusion of the Inspector's Report of 2021 remains applicable.

The following table summarises the additional sites, Inishmore Island SAC [00213] and Kilkieran Bay and Islands SAC [002111] were identified as a result of new qualifying interests being added in March 2024 including the harbour porpoise and bottlenose dolphin.

Table 3: Appropriate Assessment Summary Matrix			
Detailed Conservation Objectives available: https://www.npws.ie/protected-sites			
1. Inishmore Island SAC [00213]			
Summary of Appropriate Assessment			
QI	Conservation Objectives	Potential Adverse Effects	Mitigation Measures
<i>Coastal lagoons [1150]</i>	Restore	The proposed development does not pose a risk to these qualifying interests given the distance and absence of any direct source-pathway-receptor.	Not applicable.
<i>Reefs [1170]</i>	Maintain		
<i>Perennial vegetation of stony banks [1220]</i>	Maintain		
<i>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]</i>	Maintain		
<i>Embryonic shifting dunes [2110]</i>	Maintain		
<i>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120]</i>	Maintain		
<i>Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]</i>	Restore		
<i>Dunes with <i>Salix repens</i> ssp. <i>argentea</i> (<i>Salicion arenariae</i>) [2170]</i>	Maintain		
<i>Humid dune slacks [2190]</i>	Maintain		

<i>Machairs (* in Ireland)</i> [21A0]	Restore		
<i>European dry heaths</i> [4030]	Maintain		
<i>Alpine and Boreal heaths</i> [4060]	Under Review		
<i>Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)</i> [6210]	Maintain		
<i>Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis)</i> [6510]	Maintain		
<i>Limestone pavements</i> [8240]	Restore		
<i>Submerged or partially submerged sea caves</i> [8330]	Maintain		
<i>Vertigo angustior (Narrow-mouthed Whorl Snail)</i> [1014]	Maintain		
<i>Phocoena phocoena (Harbour Porpoise)</i> [1351]	Maintain	While this site is a considerable distance from the proposed development (53.2 km	Detailed pollution control measures to protect water quality are outlined within Section 10.5 of the NIS and include

<p><i>Tursiops truncatus</i> (Bottlenose Dolphin) [1349]</p>	<p>Not defined</p>	<p>southwest) due to their foraging range they may be present in Galway Bay.</p> <p>During construction, contaminants, pollutants and other water runoff into water receptors has the potential to affect water quality. This may result in habitat degradation including mortality in a sustained pollution event.</p> <p>An accidental pollution event during construction or operation could affect surface water downstream and in Galway Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could affect the quality of the intertidal habitats and the fauna communities they support.</p>	<p>high standard treatment facilities specified in TII Guidelines to ensure any water discharged does not undermine the SACs.</p> <p>I generally consider these mitigation measures good practice and the applicant have sufficiently demonstrated its commitment to ensuring no water quality event occurs through the appointment of an Environmental Manager responsible for a Sediment, Erosion and Pollution Control plan as well as the Incident Response Plan.</p> <p>A CEMP will be implemented during construction to manage water quality and will be prepared by the contractor and agreed with the applicant.</p> <p>No operational phase mitigation is required.</p> <p>No residual impacts arise as water quality impacts have been fully mitigated.</p>
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			It is noted that these mitigation measures are not new measures in the context of the NIS and were included in the 2018 NIS.
2. Kilkieran Bay and Islands SAC [002111]			
Summary of Appropriate Assessment			
QI	Conservation Objectives	Potential Adverse Effects	Mitigation Measures
<i>Mudflats and sandflats not covered by seawater at low tide [1140]</i>	Maintain	The proposed development does not pose a risk to these qualifying interests given the distance and absence of any direct source-pathway-receptor.	Not applicable.
<i>Coastal lagoons [1150]</i>	Maintain		
<i>Large shallow inlets and bays [1160]</i>	Maintain		
<i>Reefs [1170]</i>	Maintain		
<i>Atlantic salt meadows (Glauco-Puccinellietalia maritima) [1330]</i>	Restore		
<i>Mediterranean salt meadows (Juncetalia maritimi) [1410]</i>	Restore		
<i>Machairs (* in Ireland) [21A0]</i>	Restore		

<i>Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130]</i>	Not defined		
<i>Lowland hay meadows (Alopecurus pratensis, Sanguisorba officinalis) [6510]</i>	Maintain		
<i>Lutra lutra (Otter) [1355]</i>	Restore		
<i>Phoca vitulina (Harbour Seal) [1365]</i>	Maintain		
<i>Najas flexilis (Slender Naiad) [1833]</i>	Maintain		
<i>Phocoena phocoena (Harbour Porpoise) [1351]</i>	Not defined	<p>While this site is a considerable distance from the proposed development (41.7 km west) due to their foraging range they may be present in Galway Bay.</p> <p>During construction, contaminants, pollutants and other water runoff into water receptors has the potential to affect water quality. This may result in habitat degradation including mortality in a sustained pollution event.</p>	<p>Detailed pollution control measures to protect water quality are outlined within Section 10.5 of the NIS and include high standard treatment facilities specified in TII Guidelines to ensure any water discharged does not undermine the SACs.</p> <p>I generally consider these mitigation measures good practice and the applicant have sufficiently demonstrated its commitment to ensuring no water quality event occurs</p>
<i>Tursiops truncatus (Bottlenose Dolphin) [1349]</i>	Not defined		

		<p>An accidental pollution event during construction or operation could affect surface water downstream and in Galway Bay. An accidental pollution event of a sufficient magnitude, either alone or cumulatively with other pollution sources, could affect the quality of the intertidal habitats and the fauna communities they support.</p>	<p>through the appointment of an Environmental Manager responsible for a Sediment, Erosion and Pollution Control plan as well as the Incident Response Plan.</p> <p>A CEMP will be implemented during construction to manage water quality and will be prepared by the contractor and agreed with the applicant.</p> <p>No operational phase mitigation is required.</p> <p>No residual impacts arise as water quality impacts have been fully mitigated.</p> <p>It is noted that these mitigation measures are not new measures in the context of the NIS and were included in the 2018 NIS.</p>
<p>Overall Conclusion: Integrity test</p>			
<p>The applicant determined that following detailed assessment of potential impacts and the implementation of mitigation, the construction and operation of this proposed development alone or in combination with other plans and projects will not adversely affect the integrity of these European sites in view of the conservation objectives of those sites as set out in Table 9.39 of the NIS.</p>			

Based on the information provided, I am satisfied that adverse effects can be excluded for these SACs, Inishmore Island SAC [00213] and Kilkieran Bay and Islands SAC [002111] that are remote from the proposed development site and that no effects of any significance will occur.

No habitat loss within the European designated sites will occur. Adverse effects from water contamination and pollution release can be effectively prevented by mitigation measures ensuring the protection of the watercourses which drain into Galway Bay. No increase in existing runoff rates will occur and appropriate treatment will ensure runoff quality.

Therefore, based on the information submitted, surveys carried out and analysis provided I am satisfied that no uncertainty remains.

The proposed development would not delay or prevent the attainment of the Conservation objectives of any of Inishmore Island SAC [00213] and Kilkieran Bay and Islands SAC [002111].

9.3.2 Potential for Adverse Effects

Having reviewed the development proposal I submit that the main aspects that could adversely affect the conservation objectives of the above-mentioned European Sites include:

- Habitat loss/fragmentation and habitat loss in Lough Corrib SAC and QI habitats within Lough Corrib SAC during construction
- Habitat degradation- tunnelling/excavation and structural integrity of Limestone pavement during the construction of the proposed Lackagh Tunnel (and its western approach)
- Habitat degradation - hydrogeology
- Habitat degradation – hydrology
- Habitat degradation - air quality and dust emissions during construction
- Habitat degradation – shading
- Habitat degradation - non-native invasive species
- Disturbance/displacement and effects of blasting on wintering birds using Ballindooley Lough
- Barrier effect
- Mortality risk of QI species
- Construction-related traffic
- Recreational pressures
- Potential deterioration or decline in Qis/SCIs due to the loss of supporting habitats/populations

The associated effects of a reduction of surface water quality, albeit unlikely, could potentially extend for a considerable distance downstream of the location of the accidental pollution event or the discharge. The potential changes to water quality from pollution and sedimentation of watercourses and given the proximity of the coast, the Galway Bay Sea, during the construction phase could potentially result in adverse effects on the downstream habitat degradation/effects on QI species and habitat degradation and could affect the quality of intertidal/coastal habitat that support SCI bird species. As a worst-case scenario there is potential to affect mobile SCI bird species that commute, forage, and loaf along coast. It could also negatively affect the quantity and quality of prey available to SCI bird species.

Based on the information provided and mitigation measures included in relation to protection of water during the construction period, adverse effects from water contamination and sediment release can be effectively prevented by mitigation measures ensuring the protection of the relevant watercourses and piped networks.

Regard is also had to the potential for habitat degradation as a result of introducing/spreading invasive species during construction phase. As noted, such invasive species are recorded within and in the vicinity of the proposed development. Invasive species can be controlled via mitigation measures, including pre-construction surveys, implementation of a management plan and monitoring in subsequent years following treatment.

Potential Adverse effects in relation to noise disturbance and vibration have been examined by the applicant and are not considered to be likely to give rise to significant adverse effect due to the distance of Natura 2000 sites and known ex-situ sites from the proposed works. Effects would not be expected beyond 150 m for mammals such as otter and 300 m for wintering birds. Noise levels arising from construction would attenuate to existing background noise levels at that distance. In Combination Assessment

Chapter 12 of the NIS addresses the potential for in combination effects to arise. The potential is considered in the context of other permitted and planned development in the area as well as the existing/approved plans and programmes.

The primary concern I would raise in an in combination context would be any effects from water contamination and sediment release from other plans and projects in the water catchments and other catchments that are connected to Galway Bay. Were there a cumulation of events this would result could adversely affect the water quality and in turn the SCIs and Qis of the various European sites that rely on it.

This being said, plans and projects, as identified in Appendix R - In Combination Assessment of the NIS, would have and/or will be subject to the relevant regulatory process in order to receive consent or permission. The city and county development plans have clear policies and objectives for the protection of water quality and European sites. It should be noted that the relevant development plans were themselves subject to AA.

I have identified projects most notably transport and infrastructure projects that are in the public domain/at preliminary design i.e., not active/granted but have the potential for cumulative effects with the proposed development. These include the following:

- N59 Maigh Cuilinn (Moycullen) Bypass Road Project
- Galway to Dublin Cycleway
- Connemara Greenway (from Galway City to Clifden))
- Galway to Spiddal Greenway (Bearna to Spiddal Cycleway)
- R336 Bearna to Scrib via Ros an Mhil Upgrade/Improvements
- Sáilín to Silverstrand Coastal Protection Scheme
- Proposed Galway Harbour Port Extension
- Galway BusConnects Programme

It is accepted that the NIS was written at a point in time and proposals come and go in the planning system while any proposed development is being assessed by the Commission. I have reviewed the relevant planning registers in January 2026 to ensure no other projects arose. I note the submission of the observers also who identify certain projects, mainly residential schemes in their areas. These are all noted and considered in the assessment.

It is accepted that if construction works for these other supporting projects coincide with the proposed development there would be an increased likelihood of a pollution event. These construction impacts are well understood and readily mitigated, as demonstrated by the applicant. In any case construction periods are generally temporary and often short-term and with appropriate management provisions being made through the relevant CEMPs which will be updated throughout construction will ensure avoidance of effects.

I note overlap between construction works and the development of residential schemes in proximity to the proposed development. I submit that the substantive in combination impacts which could potentially arise would be associated with the construction periods of the projects should they overlap or occur sequentially. There would be potential for impacts on water quality and also potential for in combination effects on air quality arising from construction dust in addition to increased noise and vibration which would impact species and habitats where projects overlap or are in the vicinity of one another. The mitigation measures including CEMPs should result

in the impacts being avoided in the context of European sites. There is also a material distance between these residential schemes and European sites in any case.

The assessment of a range of plans and programmes is included in Table 12.1 of the NIS and considers a suite of national, regional and local policy documents. I consider that the documents considered is comprehensive. I note that a number of the plans have been updated since the preparation of the EIAR including the NPF and the CAP25. I submit that the applicable and relevant provisions of the updated plans remain consistent with the overall objectives of the proposed development, and any changes therein do not materially change the outcome of this Appropriate Assessment.

Having regard to the nature and extent of the projects the likely in combination effects arising and to the mitigation measures proposed including CEMP and other management plans related to waste management, sediment, erosion and pollution control, non-native invasive species incident response, construction traffic, pest control and other environmental communication strategies, I accept the conclusions that there would be no significant in combination effects. I am satisfied that a robust and detailed assessment of the potential for in combination effects to arise has been carried out.

9.3.3 Mitigation Measures and Monitoring

A summary of mitigation measures is presented in the Table 10.1. It also provides a matrix relating the mitigation measures to the QIs/SCIs and conservation objectives of Lough Corrib SAC, Galway Bay Complex SAC, Lough Corrib SPA, Inner Galway bay SPA, Inishmore Island SAC & Kilkieran Bay and Islands SAC, Ardahan Grassland SAC, Castletaylor Complex SAC, Cregganna Marsh SPA, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Rahasane Turlough SAC and Rahasane Turlough SPA

Full details are provided in the NIS and CEMP. I consider that all measures proposed are implementable and will be effective in their stated aims.

The applicant has cited its CEMP as an integral components of the mitigation strategy. This is found in Appendix C of the NIS. I am satisfied that the CEMP has been set out in line with best practice. I also note that it will include a number of site

specific method statements or management plans including Construction and Demolition Waste Management Plan; Sediment, Erosion and Pollution Control Plan; Non-native Invasive Species Management Plan; Pest Control Plan; Incident Response Plan; Construction Traffic Management Plan; Environmental Awareness Training Strategy; Communications Strategy; Inspections, Auditing and Monitoring Compliance Strategy;

Furthermore, where deemed necessary a suitably experienced and qualified ecologist will be employed by the appointed contractor. The ecologist will advise the appointed contractor on ecological matters during construction, communicate all findings in a timely manner to the applicant, its contractors and statutory authorities, acquire any licences / consents required to conduct the work, and supervise and direct the ecological measures associated with the proposed development .

In respect of being consistent with previous expert advice from Mr Arnold the applicant has included additional mitigation measures that were recommended for the NIS. These were agreed to in the Inspector’s Report of 2021. There are four measures which the applicant has not incorporated into its assessment and include:

Table 4: Mitigation Measures not included from Inspector’s Report of 2021	
Measure	Justification
The mitigation area 6210 RI should be restored by management, using the existing seed bank, rather topsoil stripping or translocation of turves to reduce the risk of suspended solid pollution of the River Corrib from this location	I accept the applicant’s response that mitigation in Section 9 of the CEMP which related to invasive species management are sufficient to mitigate risk of sedimentation, erosion and the pollution control.
Construction traffic travelling to/from Galway to primarily use recently constructed roads with a modern drainage design (pollution control) or avoiding the R458, N67 and N84 where these pass Natura 2000 sites	I am satisfied that this is not a practical measure is an undesirable precedent given these roads are already extensively used by construction and general traffic for a myriad of projects and uses. They are primary arteries in to Galway City. The CEMP has full addressed construction traffic and the routes to be used have restricted through the CEMP. I am satisfied restrictions on road use are not required to avoid impacts on European sites.
Add a pond within the barn owl/lesser horseshoe bat habitat enhancement area in proximity to Menlo Castle	Having re-examined the NIS, I am satisfied that no impact is identified on breeding coot and no mitigation is therefore required. I also accept that such

which will be suitable for breeding coot	a measure would undermine the barn owl/lesser horseshoe bat compensation measures.
The population of <i>Rhynchospora fusca</i> should be identified, mapped and protected during the construction phase	With the benefit of additional desk studies and field surveys since, no populations of the species have been identified which would render the mitigation measure unrequired.

I note the Department of Housing Local Government submission in respect of biodiversity. The applicant has reviewed this submission and is accepting of enhancements of existing mitigation measures to satisfy the Department. On this basis and in agreement with the Supplementary Appropriate Assessment Report these have been included as a condition of the approval below should the Commission be so minded. These include that the applicant:

- treat all third Schedule non-native species subject to restrictions under Regulations 49 and 50 Part 1: Plants listed in S.I. No. 477/2011 European Communities (Birds and Natural Habitats) Regulations 2011 before construction starts.
- agree details of water quality monitoring with the NPWS to ensure the effectiveness of the mitigation measures outlined in the NIS and Environmental Impact Assessment Report (EIAR).
- ensure no stockpiling occurs within any Annex I habitat area

The Department has also stated that the Statutory Instrument for the Lough Corrib SAC was published in 2022 - *European Union Habitats (Lough Corrib Special Area Of Conservation 000297) Regulations 2022' - S.I. no 384 of 2022*. I note that textual errors in respect of the word 'candidate', however, I am satisfied the applicant and relevant assessment has considered the site as an SAC.

Similarly, the Department notes the aquatic vegetation in the River Corrib has been reclassified, on a precautionary basis, as corresponding to the Annex 1 habitat 'Vegetation of Flowing Waters 3260'. I note the errors in maps which have not been updated to reflect this change. The error is noted and considered in the assessments.

The Department also highlights the requirement for an Ecological Clerk of Works (ECoW) is stated in the NIS and EIAR. However, the CEMP makes reference to an

Environmental Manager (EM) and there is no ECoW role outlined. The Department recommends An Coimisiún Pleanála takes this into account. This is noted, and while the Commission could expressly condition the requirement for an ECoW in the CEMP, it would be duplication of mitigation measure already committed to in the EIA and AA. On that basis I am satisfied no additional condition is required.

I have considered the mitigation measures identified in the applicant's NIS as well as the additional mitigation measures as proposed by Mr Arnold in the initial AA Report. Taking into consideration the information presented, which I consider the best scientific information available, the measures detailed will be effective and reliable in avoiding and reducing any effects to a non-significant level. The timing of the application of measures has been considered and will be applied as detailed. The integration of all these measures including the additional measures (see conditions) into the CEMP and the ecological supervision of the proposed development will ensure that they will be delivered as designed and achieve their objectives which is to ensure no adverse effects on the site integrity of the suite of European Sites as detailed below

The Commission on concluding on the potential for adverse effects should review Section 11 of the updated NIS. This section presents an examination of residual impacts, i.e. any impacts that remain after the application of mitigation measures. I concur with the applicant's conclusion that none will arise and the applicant clearly tested the integrity of the European sites and it can be reasonably concluded that residual direct or indirect impacts can be excluded, reasonable scientific doubt can also be excluded.

9.4 Appropriate Assessment Conclusion: Integrity Test

In screening the need for AA, it was determined that the proposed development, Galway Ring Road which will run to the north of Galway City and include a new crossing of the River Corrib had the potential to result in significant effects on European Sites, and that AA was required in view of the conservation objectives of those sites.

Following a detailed examination and evaluation of the NIS all associated material submitted with the application as relevant to the AA process and taking into account, the specialist report from Dr Maeve Flynn, the Inspector's Report of 2021 including

the expert report from Mr Arnold and submissions of third parties, I am satisfied that based on the design of the proposed development , combined with the proposed mitigation measures, adverse effects on the integrity of:

SACs

- Lough Corrib SAC
- Galway Bay Complex SAC
- Kilkieran Bay and Island SAC
- Inishmore Island SAC
- Ardrahan Grassland SAC
- Castletaylor Complex SAC
- Kiltiernan Turlough SAC
- Lough Fingall Complex SAC
- Rahasane Turlough SAC
- Connemara Bog Complex SAC
- East Burren Complex SAC
- Moneen Mountain SAC
- Black Head - Poulsallagh Complex SAC
- Gortnandarragh Limestone Pavement SAC
- Ross Lake and Woods SAC
- Maumturk Mountains SAC
- The Twelve Bens/Garraun Complex SAC

SPAs

- Lough Corrib SPA
- Inner Galway Bay SPA
- Rahasane Turlough SPA
- Cregganna Marsh SPA
- Connemara Bog Complex SPA

can be excluded with confidence in view of the conservation objectives of those sites.

This conclusion is based on the following:

- A detailed assessment of all aspects of the proposed development that could result in significant effects or adverse effects on European Sites within a Zone of Influence (Zol) of the development site.
- Consideration of the conservation objectives and conservation status of QI habitats and species.
- A full assessment of risks to SCI bird species and QI habitats and species
- Application of mitigation measures designed to avoid adverse effects on site integrity and likely effectiveness of same.

The proposed development would not undermine the favourable conservation condition of any QI feature or delay the attainment of favourable conservation condition for any QI habitats and species for these European sites.

10.0 Compulsory Acquisition Assessment

The Commission is reminded that this application contains two schemes, including:

- **Protected Road Scheme** – single Carriageway between Bearna West roundabout (R336) to Ballymoneen Road junction and dual carriageway portion from Ballymoneen Road to the proposed N59 Junction.
- **Motorway Scheme** - the dual carriageway between the N59 Junction to the existing N6 at Coolagh.

The application includes a series of Schedules in Volume 1 of which the following are noted:

Table 5: Schedules of the Compulsory Purchase Order	
Schedule	Title
Schedule-1	land or substratum of land proposed to be compulsorily acquired
Schedule 2	description of the rights proposed to be compulsorily acquired in relation to land for the purposes of the proposed motorway/protected road
Schedule-3	description of the public and private right of way proposed to be extinguished
Schedule-4	land in respect of which it is proposed to prohibit, close, stop up, remove, alter, divert or restrict a means of direct access to or from the proposed motorway/protected road
Schedule 5	land used for a specified purpose in respect of which it is proposed to prohibit, close, stop up, remove, alter, divert or restrict a means of direct access to or from a proposed motorway/protected road
Schedule 6	Part 1 - types of traffic or classes of vehicles proposed to be prohibited from using the proposed motorway/protected road or a particular part thereof
	Part 2 - types of traffic of classes of vehicles proposed to be restricted in their use of the proposed motorway/protected road or a particular part thereof
Schedule 7	Part 1 - particulars of planning permissions for the development of land proposed to be revoked
	Part 2 - particulars of planning permissions proposed to be modified and the extent of any such modification

As noted in Section 2.0 of this report, there have been updates incorporated into these schedules as a result of changes during the planning process and due to the passage of time.

The applicant advised that potentially impacted landowners/occupiers were contacted as soon as the need for land acquisition at their property was identified with property owners' names identified via Property Registration Authority of Ireland (PRAI) searches. Consequent to the lodgement of the application there are instances where this data was found to be out-of-date. I acknowledge that this is a matter outside the control of the applicant, and it has continued to update the property owner database where new information has become available in the course of the engagement process.

10.1 General Assessment

The matters that the Commission must consider before confirming the compulsory acquisition of lands are not clearly prescribed in legislation. Case law indicates that the Commission must be satisfied that the applicant has demonstrated that the compulsory acquisition "is clearly justified by the common good".

Legal commentators have stated that this phrase requires the following minimum criteria to be satisfied:

- There is a community need that is to be met by the acquisition of the lands in question,
- The particular lands are suitable to meet that community need,
- Any alternative methods of meeting the community need have been considered but are not demonstrably preferable (taking into account environmental effects, where appropriate), and
- The works to be carried out should accord with or at least not be in material contravention of the provisions of the statutory development plan.

Another test set out in Simons on Planning Law Third edition' David Browne requires consideration of whether the proposed compulsory acquisition measures will have a disproportionate or excessive effect on the interests of the affected persons. This issue of proportionality, along with other issues arising from the matters raised by the objectors to the compulsory acquisition are discussed in the following sections. In assessing the compulsory acquisition, I have considered throughout whether the lands/rights being acquired are necessary and suitable to facilitate the provision of the Galway Ring Road. The Commission will note that some of these issues, namely justification/need for the scheme, development plan compliance and assessment of

alternatives have also been addressed in other sections of this report, and, therefore, this section should be read in conjunction with same, where relevant.

Matters relating to compensation for land/property acquisition are not within the remit of the Commission and will be subject to separate compulsory purchase practice and procedures, should the Commission approve the motorway/protected road scheme.

There has been no material change, in my opinion, in respect of the criteria for CPO being since the 2021 decision.

10.1.1 Community Need

In terms of community need, the transport issues that arise in Galway City remain and the proposed development is an integral part of the solution as underpinned in policy by the GTS. Overall, the proposed development as facilitated by the compulsory acquisition will deliver critical and necessary physical infrastructure which is required to support urban compact growth, to sustain and cater for the existing and projected population growth as identified for Galway by the NPF which will benefit the community as a whole at a local, county, regional and national level.

From the above it is clear that there remain a distinct and obvious community need and justification for the proposed development – the community need is clearly supported in national, regional and local policy. The road infrastructure facilitated by the acquisition will provide greater opportunities and enhanced connectivity the local community and assist in delivering the wider GTS which intends to promote modal shift, reduced congestion, and reduced emissions, as well as providing more sustainable transport options.

In conclusion, I would agree and refer the Commission to Section 13.1 of the Inspector's Report of 2021. Whilst there will be adverse impacts for individual landowners and occupiers whose lands it is proposed to acquire, I consider that the proposed acquisition can be justified by the exigencies of the common good. I submit that the community need for the proposed development has been established.

10.1.2 Suitability of Lands

It is proposed to acquire lands (both on a permanent and temporary basis) and restrict or otherwise interfere with public rights of way along and in proximity to the road corridor.

The lands subject to compulsory acquisition are currently used for a range of land uses including greenfield and brownfield sites. Habitable dwellings are proposed to be acquired.

The schedules identify all lands that are being acquired on both a permanent and temporary basis and identifies lands on which public and private rights of ways will be altered or interfered with. Individual submissions/objections received in relation to the lands to be acquired and impacts on rights have been summarised in this report.

I have reviewed the submitted drawings and application documentation, considered the submissions made and conducted a site inspection. Having considered these matters, I am satisfied that the extent of land that would be permanently or temporarily acquired is necessary and proportionate to ensure the delivery of the proposed development to appropriate standards and I do not consider that the applicant is seeking to acquire lands in excess of the minimum required to achieve the project objectives.

I refer the Commission to the Inspector's Report of 2021 which I consider remains entirely valid. In conclusion, I am satisfied that the land and rights subject to the compulsory acquisition are suitable for the uses and purposes for which the compulsory acquisition is being sought i.e. to facilitate the Galway Ring Road project and all associated works.

10.1.3 Alternative Methods

The consideration of alternatives is addressed in Chapter 4 - Alternatives Considered for the Project of the EIAR, is assessed in Section 7.2 of this report and under various headings of my planning assessment. I concur with and reaffirm the Inspector's Report of 2021 in their assessment of alternative methods.

The consideration of alternatives has been extensive includes an evaluation of Do-Nothing and Do-Minimum scenarios; Do-Something road based alternatives; Light rail alternative; other alternatives to a road; alternative route options; and optimisation alternatives within the preferred route corridor.

The option selection aligns with the Common Appraisal Framework (CAF) now Transport Appraisal Framework for Transport Projects and Programmes (Department of Transport Tourism and Sport, March 2016 and updated October 2020). The CAF Guidelines require projects to undergo an MCA under a common

set of six CAF criteria pertaining to economy, integration, environment, accessibility, safety and physical activity.

I accept that due to the geography of Galway which is constrained by waterbodies in Galway Bay and Lough Corrib and the urban form of Galway which has resulted in a dispersed settlement pattern north of the city the scope of reasonable alternatives is constrained. Thus, the focus of the interventions required are, primarily within or directly adjacent to the built up area.

I also note that new road infrastructure has the specific requirements in terms of its position relative to the existing road network and links to same and in many cases, this restricts alternative locations – regardless, I am of the view that the applicant has presented all reasonable alternative design options and considered issues related to technical and design matters including the configuration and access arrangements.

I consider that the process undertaken by the applicant has included a robust assessment of alternative options having regard to planning and environmental considerations, safety, economic and social factors, and the stated project need and objectives, and I generally concur with the reasons for choosing the preferred options in terms of the River Corrib crossings, tunnelling and unavoidable demolition of property.

Furthermore, I note that the design of the scheme has, in so far as is possible, minimised impacts on individual landowners. Where land take requirements are necessary the EIAR shows that a number of alternatives were considered and reviewed before the final option was selected.

Based on the information before the Commission, it is clear that a significant amount of work has been conducted over the duration of the proposed development with respect to alternatives following on from the legal judgements relating to the 2006 GCOB. This is in underpinning the choices made in respect of the proposed development given there remains negative impacts and that the route chosen will result in, the demolition and acquisition of 54 residential properties and other commercial properties. The Commission should remember to consider this evidence again prior to confirming the CPO, or otherwise.

On the basis of the above I am satisfied that the proposed development chosen is the one which best meets the stated scheme objective, to support as urban compact

growth and contribute to reducing transport congestion and emissions in Galway by enabling a modern high-quality road network which removes car trips through the city centre. I am, therefore, satisfied that any alternative means of meeting the community need have been considered and are not demonstrably preferable to that set out in the application.

10.1.4 Accordance with Planning Policy

As detailed in Section 6.1 of this report and Section 10.3 of the Inspector's Report of 2021, I am satisfied that the proposed development is consistent with all applicable planning policy and, more particularly, is supported by and in accordance with policies and objectives of the development plans of Galway County and Galway City and is also consistent with the applicable transport policies at national and regional levels most notably the GTS. It is part of the TEN-T Comprehensive Network and identified in the NDP for which the Irish state is committed to delivering.

Objections submitted by landowners, occupiers and residents have identified potential impacts on properties and lands, as well as planning and environmental issues including impacts on human health, noise, air, climate, visual impacts and on biodiversity. The planning and environmental issues, and how they relate to planning policy in particular the relevant county development plans, have been addressed in detail in the preceding sections of this report.

10.2 Assessment of Objections

There is a commonality to many of the issues raised by affected landowners/occupiers. Many of the matters arising pertain to planning and environmental issues rather than issues directly relating to the proposed land acquisition per se and, as such, are addressed in detail in the relevant sections of this report. Of note in this regard is the assessment on noise, vibration and structural integrity of properties, dust and air quality, public health considerations, vermin control and drainage and flood risk.

The submissions and issues raised have been summarised in Section 4.3 of this report. The submissions were circulated to the applicant who submitted a response. The Inspector's Report of 2021 considered these issues extensively and adequately.

However, I would remind the Commission again of the 54 no. dwellings that it is proposed to acquire of which 44 are to be demolished. The number of dwellings to be acquired is significant in and of itself and I am unaware of any project in recent times in the state with such extensive acquisition. The Commission should reconsider this issue again and all the issues set out in the Inspector's Report of 2021 given the significance of the impact this will have on homeowners. The number of homes to be acquired is extensive and warrants very careful consideration given the constitutional protection afforded to property rights, and the principle of proportionality must be considered.

It is acknowledged that the proposed development will result in significant or profound impacts on many residential property owners, as well as agricultural operations and a lesser number of commercial operations. These impacts will, in many cases, be permanent impacts notwithstanding the mitigation measures proposed. Issues relating to severance and loss of lands arising are primarily matters to be addressed by way of compensation.

I would agree with the Inspector's Report of 2021 that given the geography of Galway and the dispersed nature of housing this issue is unavoidable. Many objectors have written in submissions again and it is clear that the situation and lengthy planning process is not satisfactory and is impacting their daily lives. Regardless, the Commission are bound to consider the CPO criteria in this instance and I am satisfied that the community need exists and the CPO is proportional. The CPO required clearly justified by the exigencies of the common good.

10.2.1 Aidan Donnelly (PRS 176)

I note Mr. Donnelly's acceptance of the proposed development in principle and concern to the specific route identified. I remind the Commission of the extensive body of evidence submitted by the applicant in terms of the consideration of alternatives, notably summarised in Chapter 4 of the EIAR and supported by a number of appendices. I consider it complete and robust and has considered economic, environmental and social factors at length. The issue of alternatives was also discussed in the Inspector's Report of 2021 based on oral evidence from the oral hearing. I concur with Section 11.3 of the Inspector's Report of 2021 and conclusions therein.

The objector also considers there to be a lack of engagement and consultation with the affected landowners particularly over the seven years since the application was first made. While this may be the case, and engagement is always recommended, there is no requirement for the applicant to continue to engage during the planning application process.

The objector maintains concern that the proposed development will split the landholding into three parts and undermines the agricultural viability, access and future development potential with no measure proposed to mitigate this injurious effect. However, I note that Access Road AR 2/01 is provided which does provide access via Ann Gibbons Road (L13215). The applicant has considered severance of landholdings in its impact assessment and it is unavoidable in this instance.

I note matters of surface water runoff are extensively addressed both by the applicant and in the Inspector's Report of 2021 and the proposed development is designed to TII specification factoring in best practise drainage design and considers flood risks and climate change.

I am satisfied that the application particulars have adequately addressed issues in respect of Natura 2000 sites, humans, noise, climate and air. The applicant has categorised the impacts correctly and provided measures to equity mitigate same. It is widely acknowledged that construction phase impacts are significant and these also have been adequately mitigated. The Construction Environmental Management Plan is a key document to ensure the implementation of relevant mitigation measures and compliance with relevant standards and guidance.

Mr Donnelly has sought an alternative alignment for the proposed development a further 100 m to 150 m further north on its approach to Barna which in his view would improve road safety, minimise displacement and land fragmentation and better integrate future transport infrastructure and residential lands. The applicant has considered such an alternative in its submission of October 2025 and cite issues such as Annex I habitat being present, a cluster of 14 dwellings and the Moycullen Bogs NHA. There are numerous constraints in this area and I am satisfied the applicant has been methodical in its identification of the proposed development alignment before the Commission now.

10.2.2 Cairn Homes Properties Ltd. (PRS 261)

Cairn Homes is concerned that the blasting impacts and buffer zones imposed in a recent LRD Application (ABP-321970-25) on lands beyond the CPO boundary are not explicitly detailed in the updated EIAR. The consequence of this could potentially create a negative precedent which would influence all other residential proposals on Residential 'R' and 'R2' zoned lands within proximity of proposed and potential blasting sites required for the delivery of the proposed N6 GCRR.

The applicant is of the view that no such defined buffer zone exists and that there is no specific reference to a 100 m buffer zone in the Updated EIAR, nor was a specific 100 m buffer zone ever mentioned in the context of Galway County Council's observations on the planning application referred to in this submission. Further, there was no mention of a specific 100 m buffer zone included in the decision of ACP (ABP Ref. 321970-25).

I am satisfied that the updated EIAR has defined blast zone buffers and has sought to understand the feasibility of blasting adjacent to sensitive receptors. Appendix A.9.2 - Blast Feasibility and Exclusion Requirements is evidence based and methodical. The analysis concluded that blasting in areas of Granite is feasible where the receptor (structure) is greater than 12.5 m from a blast and in areas of Limestone a distance greater than 15 m from the edge of the expected blast. I also concur with the Inspector's Report of 2021 in which it concluded that there is a clear and comprehensive protocol for blasting operations, including blast design, trial blasts and the application of suitable limit values. I also agree that blasting is likely preferable to elongated periods of mechanical rock breaking and associated potential impacts on the surrounding population.

It is noted that where blasting is not viable, were it the case on Cairn lands for example, due to the existence of a sensitive receptors within the blasting exclusion zone then the applicant has stated that alternative methods will be employed as described in Section 4.1.3 of A.9.2 - Blast Feasibility and Exclusion Requirements in the Updated EIAR and includes hydraulic breaking, hydraulic splitting or chemical splitting.

I am satisfied on this basis that the updated EIAR and associated application documentation, that there is no requirement for a 100 m buffer to be imposed on

lands adjacent to the proposed N6 GCRR for the purposes of blasting and the identified blasting exclusion zones do not impose a sterilisation of lands outside of the land acquisition boundary and there are no uncertain or unpublished constraints. Any proposed blasting will be mitigation through Appendix A.9.2 which includes alternative measures where it is not feasible.

I am satisfied that access arrangements to Cairn's multiple landholdings are adequate and have taken into account DMURS and other relevant technical standards.

10.2.3 Frank and Pauline Joyce (PRS 133)

This submission from Frank and Pauline Joyce summarises the unbearable toll that the proposed development has taken on them and their family over the past ten years and highlights that process is still ongoing. The unbearable toll knowing their home may be demolished is acknowledged and so too is their wish that the Commission should now seek to make a decision as expeditiously as possible in respect of this planning application.

Before concluding on alternatives, it would be remiss of the Commission not to reconsider the required land acquisition included as part of the preferred scenario which includes the demolition of 54 properties, many of which are homes, including that of this objector. The exercise of considering reasonable alternatives is the key approach to avoiding significant environmental effects. There is a balance to be struck between several criteria, however, be it biodiversity or human impacts. In this case the Commission will need to accept that that significant environmental effects relating to acquisitions and in particular demolition of homes cannot be avoided. I am satisfied the consideration of alternatives has justified such significant environment effects.

10.2.4 JFC Property Development Ltd and Jon Concannon (PRS 238)

The submission relates to lands in Mincloon on the Clybaun Road in Galway which are zoned Residential R and where residential development is ongoing or planned to occur. The observer plans to imminently submit a planning application for same. The submission seeks to ensure the objective to deliver residential development on these lands is not undermined.

Nosie is a primary issue for the objector. The applicant has implemented the relevant TII standards Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014) which are commonly applied for these types of road schemes. However, it is not, proposed to extend noise barriers over the full extent of retained lands in the event that future development may occur.

I am satisfied that noise mitigation for new developments which do not have planning permission would not to be considered in the context of planning application for that scheme. It is not possible to design noise mitigation for notional developments with unconfirmed site layout plans. I see no requirement to extend noise barriers at this time.

I am also satisfied that the integrated approach to storm water management will prevent drainage and flooding issues arising JFC Property Development Ltd lands as detailed in Appendix A.11.1 - Flood Risk Assessment Study, drainage documentation/drawings and relevant sections of the EIAR.,

Similar to Cairn Homes Property lands. I am satisfied that the updated EIAR has defined blast zone buffers based on feasibility of blasting adjacent to sensitive receptors. Appendix A.9.2 - Blast Feasibility and Exclusion Requirements is a evidence based and methodical. I would agree that blasting is likely preferable to elongated periods of mechanical rock breaking and associated potential impacts on the surrounding population.

10.2.5 Kevin Gill, Eavan Flanagan, Aoibheann & Fionn Flanagan-Gill (PRS 220)

This submission from Kevin Gill, Eavan Flanagan, Aoibheann & Fionn Flanagan-Gill summarises the toll that the proposed development has taken on them and their family over the past decade and highlights that process is still ongoing. The unbearable toll knowing their home may be demolished is acknowledged and the Commission should now seek to make a decision as expeditiously as possible in respect of this planning application.

The objectors are of the view that the route selection process prioritises natural heritage impacts over humans. I remind the Commission of the extensive body of evidence submitted by the applicant in terms of the consideration of alternatives, notably summarised in Chapter 4 of the EIAR and supported by a number of appendices. I consider it complete and robust and has considered an economic,

environmental and social factors at length. The issue of alternatives was also discussed in the Inspector's Report of 2021 based on oral evidence from the oral hearing. I concur with the Inspector's Report of 2021 in this respect.

I am satisfied that the applicant, throughout their EIAR has adequately assessed the impact on urban and rural residential communities across Galway City and County resulting in the demolition of homes, destruction of farms, community division, amenity damage and associated impacts of light pollution, noise, dust, vibration and health deterioration. Overall, I am satisfied that the need for the road has been established; sufficient examination of alternatives has been carried out; and the number of dwellings to be demolished, albeit high, has been minimised.

In relation to light rail, I am satisfied that light rail has been extensively considered and that there is no sufficient demand in Galway presently and based on the National Transport Authority (NTA) Galway Light Rail Transit Feasibility Study Report is it a longer term objective for the city. A bus-based public transport network, which is being developed under BusConnects, can cater for short and medium term demands.

I am satisfied that the majority of other issues raised in the submission have been addressed in the Inspector's Report of 2021, with respect to biodiversity, Natura 2000 sites, traffic impacts and safety.

10.2.6 Linda Rabbitte (PRS 584)

The objector is concerned that the construction and operation of the proposed development will have a significant adverse impact on the environment in Galway. Again, I am satisfied that the proposed development has sought to avoid the most significant constraints and while environmental impacts do occur, the option chosen is the best option in this respect. As noted in Section 9.0 I am satisfied with the conclusions of the NIS that supported the planning application and also the European Sites and zone of influence of the proposed development.

In respect of Menlo Castle and its setting which is 140 m northwest of the proposed development will not have limited direct impact. The visual impact and impact to the associated demesne landscape is unavoidable. No impacts to the foundations or structural integrity of Menlo Castle are predicted. It is noted that a photographic and written record of the demesne landscape associated with Menlo Castle. I am

satisfied that the measures proposed will be sufficient to mitigate impacts to cultural heritage, in particular Menlo Castle whose visual setting will be materially changed given the proximity of the proposed development to the south at the location of the River Corrib crossing. I am satisfied on this basis that the applicant is in compliance with GCDP which has policy measures to protect cultural heritage and areas of high scenic amenity including Menlo Village and specifically Menlo Castle.

The construction phase will be disruptive; however, the applicant has a phased approach (Appendix A.7.4) which will minimise impacts on racing events. Effectively construction works during the summer/autumn racing schedule will cease. The EIAR expects a slight negative residual effect post mitigation which is acceptable. It is noted that the temporary and permanent stables matter has been resolved by the applicant outside of this planning application.

The objector has raised the continuing operation at Lackagh Quarry. However, site visits undertaken by the applicant in 2024 and 2025 have confirmed that there are no changes to the quarry face that will in any way impact on the construction or operation of the proposed N6 GCRR at this location. With the implementation of the Construction Environmental Management Plan (CEMP), including measures related to blasting and schedule of environmental commitments I am satisfied that the impacts from air quality, materials deposition impacts, traffic and access at the objector's home is minimised to acceptable level. I am satisfied that the tunnelling and associated works at the quarry have been fully reevaluated prior to any further consideration being given to its future use.

10.2.7 Marian Rabbitte (PRS 576)

The objector has raised the continuing operation at Lackagh Quarry. However, site visits undertaken by the applicant in 2024 and 2025 have confirmed that there are no changes to the quarry face that will in any way impact on the construction or operation of the proposed N6 GCRR at this location. I am satisfied that the tunnelling and associated works at the quarry have been fully reevaluated prior to any further consideration being given to its future use.

As noted in Section 9.0 I am satisfied with the conclusions of the NIS that supported the planning application and also the European Sites and zone of influence of the proposed development.

In respect of Menlo Castle and its setting which is 140 m northwest of the proposed development will not have limited direct impact. The visual impact and impact to the associated demesne landscape is unavoidable. No impacts to the foundations or structural integrity of Menlo Castle are predicted. It is noted that a photographic and written record of the demesne landscape associated with Menlo Castle. I am satisfied that the measures proposed will be sufficient to mitigate impacts to cultural heritage, in particular Menlo Castle whose setting will be materially changed. I am satisfied on this basis that the applicant is in compliance with GCDP which has policy measures to protect cultural heritage and areas of high scenic amenity including Menlo Village and specifically Menlo Castle.

I note the submissions request to consider other alternatives including light rail and buses which would help ease the traffic congestion and negate the need for the proposed development. The objector is of the view that car travel may not be the viable in future. I am satisfied that the proposed development and bus infrastructure and indeed light rail (should demand in future be met) are complementary measures under the GTS and the solution is not one or the other. I am satisfied that the need for light rail is sufficiently addressed in national Transport Authority's (NTA) Galway Light Rail Transit Feasibility Study Report, published in October 2024, and that it may not be required in the short/medium term.

10.2.8 McHugh Property Holdings Ltd (PRS 583)

The submission urges An Coimisiún Pleanála to carefully consider the justification for permanent land take at Lackagh Quarry and ensure it is proportionate, legally sound and environmentally responsible outcome. The objector considers that issues remain unresolved. The applicant states that the acquisition is required for Material Deposition and slope stabilisation. The applicant has also accounted for headroom in the acquisition based on experience of other projects. I am satisfied that the material deposition is required for the safe operation of the road given the blast damage on the exposed quarry presently. This is the primary requirement for the acquisition; the secondary is for compensatory habitat. I am satisfied the primary requirement for the acquisition provide sufficient proportionality. I am satisfied that the quarry lands are most suitable and while the objector identifies approximately 4.89 hectares of land owned by GCC immediately east of Lackagh Quarry and other more distant sites, which are potential suitable alternatives for this use. However, I am satisfied that the

dual use of the acquisition for slope stabilisation and compensatory areas is most efficient, sustainable and economical solution. This has been extensively discussed in the Inspector's Report of 2021.

It is noted that lands immediately to the south of Lackagh Quarry are zoned R2, however, I am satisfied that the proposed development and incidental work such as the MDS does not undermine the development of residential schemes on McHugh lands.

I am satisfied that the applicant has provided access that aligns with the current use. It is not the responsibility of the applicant to provide access for any future use. Should the lands be developed in future the access can be amended in any planning application and it is not expected that the proposed ring road would undermine it.

I am satisfied that the applicant has examined the scheme in the context of TII current design standards DMURS and the National Transport Authority's National Cycling Manual.

I consider that the final layout is a reasonable compromise between minimising land acquisition and meeting the requirements for the proposed development

10.2.9 Michael and Annette Kerin (PRS 521)

It is requested that all matters raised by the observer originally are again assessed 'de novo' in the context of the further information. The submission maintains its objection to the proposed development for the reasons outlined previously.

While I note the request for a *de novo* assessment, the Commission has requested a supplementary report to that of the Inspector's Report of 2021. The applicant has not provided any new information specifically in respect of this updated information or changes. I am satisfied Section 13.9.94 of the Inspector's Report of 2021 remains valid with respect to the issues raised by this objector.

The principal issues raised by the objectors related to air, noise and vibration impacts, health impacts, landscape and visual impacts and issues related to construction traffic and construction activities. Other issues raised included community severance, the need for the proposed development and traffic issues. The updated matters in relation to these issues are addressed in detail in the

relevant sections of this report which supplements that of the Inspector's Report of 2021.

The significant impacts that the objector will experience as a result of the construction and operation of the proposed development are fully acknowledged in the updated EIAR.

I remain satisfied that the applicant has adequately demonstrated the need and justification for the proposed development, that alternative means of meeting the need have been adequately examined, and that the lands in question are suitable and are required to construct the proposed development. Having regard to the particular characteristics of Plots 517 and 521 and the design of the proposed development in this area, I consider that the extent of acquisition is proportionate to the legitimate aim being pursued and I do not consider that the applicant is seeking to acquire any excess or surplus lands.

10.2.10 Padraig Mac Donnacha

The observation raises deficiencies and unresolved issues in traffic management, hydrology, archaeology, geology, and Planning Enforcement protection measures, including air and water pollution, and it further establishes how a section of the proposed route for the N6GCRR is currently a series of unauthorised developments.

With respect to construction traffic, I am satisfied the applicant has adequately assessed and mitigated the impacts arising. A Construction Traffic Management Plan will be in place to ensure mitigation measures are implemented. The objector is especially concerned about traffic at Lackagh Quarry and I note commitments made for a pedestrian crossing (Ref: 19.15) in its proximity as well as other good practice measures such as speed limits.

I note the concern about alleged unauthorised activity at Lackagh Quarry. I am satisfied that this matter does not relate to the proposed development or the applicant. These lands have not been acquired by the applicant at this time. Any unauthorised quarrying or excavation activities is a matter for the relevant planning authority and its enforcement remit. The applicant surveyed the quarry again in October 2025 and do not note any material changes at the quarry.

I am satisfied based on information contained in the EIAR and NIS that the proposed development does not pose a risk to groundwater or surface water feeding Coolagh Lakes, Lough Corrib and the water supply for Galway.

10.2.11 Paul and Anne Mulhern (Plot 569)

I am satisfied that I have addressed issues raised in this objector's submission of Galway's transport and environmental challenges, national climate objectives (Section 6.4 of this report), transport alternatives (Section 7.2 of this report), and risks communities (Section 7.3.1.3 of this report) and ecosystems impact (Section 7.3.2 and Section 9.0 of this report), in this report and in considering the Inspector's Report of 2021.

The applicant in its EIAR has been careful to present the impact on residents, from compulsory acquisition and associated air pollution, noise and community impacts for those living in proximity.

10.2.12 Peter and Michelle Connolly (PRS 116)

This submission from summarises the toll that the proposed development has taken on them and their family over the past decade and highlights that process is still ongoing. The toll is acknowledged and the Commission should now seek to make a decision as expeditiously as possible in respect of this planning application.

The objector notes the "Dedicated Badger Survey" which indicates that an active sett and a secondary sett, on the objector's property (listed as "S23 and S24" in Figure 8.4.1) were described as 'possibly inactive'. The objector states that S23 which is approximately 70 m from the proposed development is active. It is noted that in 2023 when the sett was surveyed, the applicant identified it as possibly active but I am satisfied that there are sufficient mitigation measures at the pre-construction stage to confirm the status of setts and ensure appropriate actions are taken including seasonal restrictions. I am satisfied with the approach set out in Appendix A.8.26 which align with guidelines for the treatment of badger prior to construction of national road schemes.

I note the issues of stone boundary walls was addressed in the oral hearing in 2020 and I concur with the conclusion taken in the Inspector's Report of 2021, that stone boundaries along the mainline of the road would somewhat be unnatural in the context of the proposed development in the landscape. I am satisfied that the

applicant has sufficient measures to protect and retain natural boundaries and stone walls at the appropriate locations.

The objector queries the expected uptake in electric vehicles and considers it optimistic as the market is still very much in development stage with issues regarding battery safety and disposal options. I am satisfied that the applicant has used the most reliable source available in its modelling, ENEVAL and Department of Transport figures.

I am satisfied that The Bearna Inner Relief Road which remains an objective of the Galway County Development Plan would not negate the need for the proposed N6 GCRR given the traffic modelling provided by the applicant.

The objector is of the view that they are unfairly restricted in their options until this project is decided on and if it is approved, they may have to wait until it is completed to get planning permission for dwellings on their land. The Commission is reminded that the future development potential of any site is a matter under the Development Plan and an application to the planning authority for planning permission.

10.2.13 Ruth and Ronan Burke (PRS 232)

I have examined PRS 232 and remain satisfied all lands identified are needed to be acquired for works including drainage, utility diversion, environmental mitigation and to provide access arrangements. The Commission is reminded of the extensive ancillary works required to deliver the proposed development which often requires permanent or temporary acquisition beyond the primary space required for a road.

In respect of the lack of bus services, the NTA's BusConnects programme has redesigned the network in Galway and the applicant has noted Route 9 which will service Upper Ballymoneen Road.

The objector makes the point that there is an overreliance on cars as the roads around Kearaun are not fit for purpose and have no cycle lanes or footpath. In this proposed development no changes are proposed within the Kearaun area except for the redesign of the Ragoon Road to facilitate an overbridge. It is acknowledged that there is significant housing development occurring in this area and I note the city development plan expect to continue to expand its cycle network.

The issues raised by the objector and noted and acknowledged.

10.2.14 Shane Kelly (PRS 216)

The objector disputes points made by the applicants at the oral hearing in 2020 and considered them erroneous in relation to AR 4/05. The objector claims there is misuse of the CPO process and in aiming to provide agricultural access and like-for-like replacement to the Boleybeg Bóthrin and the land take should be reduced from 6 m to 2 m in width. A two lane, 6 m wide access road with grass verging either side is disproportionate. I am satisfied the applicant has implemented an appropriate design standard for the access road, TII publication CC-SCD-00706, which justified the proportionality of the road in this instance. This facilitates safe use for users to multiple plots and meets required standards.

The objector raises Plot 223 which is in the ownership of Galway City Council. These lands are zoned agricultural and is currently unsuitable for residential development save for local needs as Mr Kelly suggests.

I am satisfied that the applicant has address the source of the Recurring Flood and that it is occurring outside the site of the proposed development and the proposed development will have no impact on it. Any waters that do arise will be addressed by the surface water management plan which includes interceptor drains to capture water. I am also satisfied that the applicant has fully considered drainage along the Access Route AR 4/05 and it will be managed under Ref: 14.11 in the Schedule of Environmental Commitments in the Updated EIAR.

It is noted that a 1.2 m high above ground level stonework wall shall be provided to the property boundary with the proposed access road AR 4/05 in accordance construction detail GCR-SK-C-001. This is a satisfactory response for this access route.

I note Commitment 15.34 of the Environmental Commitments includes a field gate for AR 4/05 to address, in so far as possible, anti-social behaviour. I am satisfied with its location on the basis of access requirements for other properties. In relation to anti-social behaviour. It is not considered the proposed development in of itself would generate an anti-social or general social nuisance. These matters are wider social issues and would be subject to general criminal and civil laws and policing by An Garda Siochana, should it arise.

10.3 Assessment of Other Changes

In respect of land acquisition, the total area remains unchanged since the previous planning application save for lands related to Galway Racecourse. It is accepted that matters in relation to stables at Galway Racecourse are now outside the remit of this acquisition.

It is noted that Plot number 651a.202 is to be reduced in area so as to include only those lands required for the construction of the northern portion of Access Road 13/02 along the alignment of the existing bóithrin. This is acceptable and the Commission will note that it was a modification of the recommendation made in the initial inspector's report of 2021. Such an amendment is not now required. There is no submission from the owner/occupier on the current file. The assessment contained in the 2021 inspectors report is noted.

Plot number 713a.203 shall be subject to temporary acquisition, Plot number 713a.204, Plot number 713a.101 and Plot number 713b.101 shall be subject to temporary acquisition to a depth of 1.5 metres below ground level and subject to permanent acquisition to a depth beyond 1.5 metres below ground level. Plot 195a.202 and Plot 246a.203 (save for a portion) shall be subject to permanent acquisition. I am satisfied that the changes from permanent to temporary or vice versa are satisfactory. I do not note any objections from owner/occupiers on the file.

As expected, land ownership and occupancy have changes since 2018. The applicant has identified this and notified new parties as required.

In respect of Plot 123a.202 and 123b.201, these remain in the relevant schedule. The applicant is of the view that there are significant environmental effects owing to the properties location that it should be maintained for acquisition. While there is no submission from the owner/occupiers, the applicant has advised that following engagement in 2024 the owner/occupier's initial objection still stands. In examining the issues again, I tend to agree with the Inspector's Report of 2021 in that the triangular parcel of land (123a.202) is directly required for the proposed development. The owner/occupier in the previous oral hearing was satisfied with the impacts and stated that the visual impact would be mitigated as planting matures and that they would undertake additional screening planting on their side of the

boundary. It is noted that the applicant is proposing to acquire the objector's house but not demolish it.

While the house will be very close to the road and working area, if the owner/occupier seeks to keep the dwelling, I do not see a reason to acquire it and there is extensive mitigation which can be deployed to ensure the site is returned to a habitable form post construction. While living in such proximity to motorways/roads has its impacts, it is not uncommon particularly in urban areas. I am conscious the applicant still needs to carry out construction works and this will be disruptive, therefore, a condition requiring alternative accommodation is recommended for the construction phase.

Given the constitutional protections afforded to private property and the onerous imposition on such rights that the acquisition of a dwellinghouse represents, I do not consider that the applicant has satisfactorily demonstrated the need to acquire the entirety of this plot (Plots 123a.202 and 123b.201) on a permanent basis.

In conclusion, I do not consider that the acquisition of the entirety of this plot has been adequately justified. I recommend that the portion of the plot which incorporates the objectors' house and entrance (Plots 123a.202 and 123b.201) should be omitted from the CPO Schedule, with only the triangular portion of land (Plot 123.a.101) to the rear (south) of the plot, which is required to provide the protected road, included in the Schedule. I have recommended a condition in respect of construction phase alternative accommodation for the occupants.

10.4 Conclusion

I am satisfied that the process and procedures undertaken by Galway County Council have been fair and reasonable, that it has demonstrated the need for the lands and that all the other lands being acquired are both necessary and suitable to facilitate the provision of Galway City Ring Road.

Having regard to the constitutional and convention protection afforded to property rights, I consider that the permanent and temporary acquisition of lands, restriction/interference with public rights of way, acquisition of private rights, restriction/interference with private rights, and temporary restriction/interference with private rights, as set out in the schedules and deposits is pursuant to, and is

rationally connected to, a legitimate objective in the public interest, namely the development of Galway City Ring Road.

I am also satisfied that the acquiring authority has demonstrated that the means chosen to achieve that objective impair the property rights of affected landowners as little as possible; in this respect, I have considered alternative means of achieving the objective referred to in submissions to the Commission, and am satisfied that the acquiring authority has established that none of the alternatives are such as to render the means chosen and the compulsory acquisition made by the acquiring authority unreasonable or disproportionate.

The effects of the compulsory acquisition on the rights of affected landowners are proportionate to the objective being pursued. I am further satisfied that the proposed permanent and temporary acquisition of lands, restriction/interference with public rights of way, acquisition of private rights, restriction/interference with private rights, and temporary restriction/interference with private rights would be consistent with the policies and objectives of the Galway City Development Plan and Galway County Development Plan all of which support the provision and roll out of Galway City Ring Road Accordingly, I am satisfied that that the confirmation of the compulsory purchase is clearly justified by the exigencies of the common good.

11.0 Consideration of Conditions

In respect of conditions, the Commission should note the following.

11.1 Condition 1

This is a standard condition and the Commission will note the proposed development will be carried out in accordance with plans and particulars lodged in April 2025. This submission in April 2025 incorporated relevant changes that were either committed to by the applicant or sought by the Commission in the course of the planning process which included further information and an oral hearing. Condition 2 of the Inspector's Report of 2021 is not required now as the change has been incorporated into the April 2025 submission.

11.2 Condition 2 and 3

These are standard conditions and simply seek compliance with the mitigation and monitoring measures contained in the NIS and EIAR. For convenience, the Commission can refer to Chapter 10 Design Requirements and Mitigation Measures of the NIS for Condition 2 and Chapter 23 Schedule of Environmental Commitments of the EIAR for Condition 3 to understand the extensive commitments made by the applicant. This condition is effectively the same as Condition 4 and 5 of the Inspector's Report of 2021 albeit worded differently. The Commission should be reminded that the commitments made have incorporated the additional requirements that arose in the course of the planning process which included further information and an oral hearing. Therefore, I am satisfied Condition 5 of the Inspector's Report of 2021 is now not required and the NIS has incorporated additional mitigation as relevant and provided justification where it is not incorporated.

11.3 Condition 4

In respect of Condition 6 of the Inspector's Report of 2021, all these additional commitments have been incorporated in to the Schedule of Environmental Commitments including (a) property condition surveys is now Item 18.19, (b) dust monitoring at Castlegar Nursing Home is in Item 16.4, (c) additional pedestrian access between AR 13/06 and the N83 Tuam Road for pedestrians (in drawings) (d) in relation to Item 12.7 early planting has been updated to 'phase 2 of the project', (e) use of paladin fencing at attenuation ponds is covered under Item 12.12.

In respect of (f), this requirement arose due to the exclusion of Plot 123a.202 and 123b.201 from the CPO and alternative accommodation being required during construction phase. The physical footprint of the road following construction results in the house remaining habitable. The applicant has not excluded this acquisition in the updated information submitted in 2025. In examining this issue again, I do not see any real justification put forward by the applicant for this acquisition and it is recommended excluding these plots again and facilitating the owner/occupier remaining in the home. On this basis, this environmental commitment to provide alternative accommodation should be maintained to ensure impacts are mitigated for the owner/occupier during the construction phase. It has now been renumbered as Condition 4 (a).

Conditions 4 (b) and (c) are recommendations from the Department of Housing, Local Government and Heritage who in their submission sought additional enhancements to existing mitigation measures. The applicant indicated a willingness to accept these in the interest of clarity, control of construction phase environmental impacts, residential and visual amenity and to protect the integrity of European Sites. It does not affect the assessment or outcome the assessments including EIA, WFD or AA.

11.4 Condition 5

In respect of hydrogeology, the expert report from Mr James Dodds based on submission from the Department of Housing, Local Government and Heritage has recommended additional monitoring as part of the high standard needed for the implementation of the CEMP, and to ensure protection of protected sites. Given the scale of the impacts, an additional commitment in respect of same has been sought for groundwater monitoring including water quality parameters, sampling intervals and locations and detailed response plan. It is considered appropriate that any monitoring requirement be agreed with the NPWS. The applicant also being the local authority for the area cannot agree monitoring with itself. This is included as Condition 5. It does not affect the assessment or outcome of the assessments including EIA, WFD or AA.

12.0 Recommendation

Roads Scheme - Section 51 of the Roads Act 1993, as amended

APPROVE the above proposed road development in accordance with the said documentation based on the following reasons and considerations and subject to the conditions set out below.

Compulsory Purchase - Section 49 of the Roads Act 1993, as amended

CONFIRM the compulsory purchase order for the reasons and considerations set out below subject to the modifications set out in the Schedule.

13.0 Reasons and Considerations (Roads Scheme)

In performing its functions in relation to the making of its decision, the Commission had regard to the following in coming to its decision:

(a) European legislation, including of particular relevance:

- Directive 2014/52/EU amending Directive 2011/92/EU (EIA Directive) on the assessment of the effects of certain public and private projects on the environment,
- Directive 92/43/EEC (Habitats Directive) and Directive 79/409/EEC as amended by 2009/147/EC (Birds Directives) which set the requirements for Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union, and
- Directive 2000/60/EC (Water Framework Directive) and the requirement to exercise its functions in a manner which is consistent with the provisions of the Directive, and which achieves or promotes compliance with the requirements of the Directive.
- Regulation No. 1315/2013 (Trans-European Transport Network (TEN-T)) and related European Union transport infrastructure policy *Infrastructure TEN-T – Connecting Europe*

(b) National planning and related policy, including:

- Section 15(1) of the Climate Action and Low Carbon Development Act 2015, as amended by Section 17 of the Climate Action and Low Carbon Development (Amendment) Act 2021, and the requirement to, in so far as practicable, perform its functions in a manner consistent with Climate Action Plan 2024 and Climate Action Plan 2025 and the national long term climate action strategy (Ireland's Long-term Strategy on Greenhouse Gas Emissions Reduction 2024), national adaptation framework (National Adaptation Framework 2024) and approved sectoral adaptation plans (Transport Sectoral Adaption Plan (T-SAP-II) 2025-2030) set out in those Plans and in furtherance of the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State).
- National Development Plan 2021-2030, and review in 2025,
- Project Ireland 2040 National Planning Framework, as revised April 2025,

- National Sustainable Mobility Policy, 2022,
 - National Biodiversity Action Plan 2023-2030;
 - Water Action Plan 2024: A River Basin Management Plan for Ireland;
- (c) Regional level policy, including:
- Regional Spatial Economic Strategy for the Northern and Western Region 2020-2032
- (d) local planning policy, including:
- Galway Transport Strategy 2016-2036 and the road scheme constituting a key action of the transportation strategy therein
 - Galway City
 - Galway City Development Plan 2023-2029 and Sustainable Mobility and Transportation 4.8 Specific Objectives (24)
 - Galway City Biodiversity Action Plan 2025–2030
 - Galway City Heritage Plan 2025–2030
 - Galway City Council Local Authority Climate Action Plan 2024-2029
 - Galway County
 - Galway County Development Plan 2022-2028 and Policy Objective NR1 Key Road Infrastructure Developments
 - Galway County Heritage and Biodiversity Plan 2024-2030
 - Galway County Council Local Authority Climate Action Plan 2024-2029
- (e) the nature, scale, extent and design of the proposed development as set out in the planning application and the characteristics and pattern of development of the Galway City and immediate area and in the vicinity,
- (f) the entirety of the documentation submitted by Galway County Council on behalf of itself and Galway City Council (applicant) in support of the proposed development, including the Environmental Impact Assessment Report and the Natura Impact Statement, the range of mitigation and monitoring measures proposed and in particular to the robust response to submissions made in October 2025
- (g) the submissions made to An Coimisiún Pleanála in connection with the planning application, under the statutory consultation in August 2025,

- (h) the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on European Sites, and
- (i) the examination, analysis and evaluation undertaken in relation to planning and sustainable development, climate action plan, environmental impact assessment, appropriate assessment and, water framework directive assessment and the compulsory acquisition in the
- supplementary Inspector's Report and recommendation of the Inspector,
 - initial Inspector's Report of 2021 and
 - supplementary and initial reporting of specialist ecologists and hydrogeologist.

Proper Planning and Sustainable Development

It is considered that the proposed development, subject to conditions below, would accord with European, national, regional and local planning and that it is acceptable in respect of its likely effects on the environment and its likely consequences for the proper planning and sustainable development of the area.

Environmental Impact Assessment

The Commission completed an Environmental Impact Assessment of the proposed development taking into account:

- (i) the nature, scale and extent of the proposed development,
- (ii) the Environmental Impact Assessment Report and associated documentation submitted in support of the application,
- (iii) the submissions made in the course of the application; and
- (iv) this supplementary Inspector's Report and Inspector's Report of 2021.

The Commission considered that the Environmental Impact Assessment Report, supported by the documentation submitted by the applicant, adequately considers alternatives to the proposed development and identifies and describes adequately the direct, indirect, secondary and cumulative effects of the proposed development on the environment and complies with the provisions of EU Directive 2014/52/EU amending Directive 2011/92/EU.

The Commission agreed with the examination, set out in the inspector's report, of the information contained in the Environmental Impact Assessment Report and associated documentation submitted by the applicant and submissions made in the course of the application.

The Commission considered, and agreed with the inspector's reasoned conclusions, that the main significant direct and indirect effects of the proposed development on the environment are as follows:

Population and Human Health

- **Loss of Dwellings:** There are 54 dwellings proposed for demolition or acquisition to facilitate the proposed development. This will result in a significant to profound permanent negative impact on homeowners. This impact will not be avoided, mitigated, or otherwise addressed by means of condition.
- **Severance of Communities due the Physical Road Scheme:** As a result of the loss of 54 dwellings with loss of clusters of dwellings in areas such as Na Forai Maola/Troscaigh, Castlegar, and Dangan, there will be a severance impact on remaining communities which will be a significant long-term negative impact that will not be avoided, mitigated or otherwise addressed by means of condition.

- **Severance of Communities due to changes in Traffic Patterns:** There will be long-term positive impacts for some communities that are currently severed due to traffic volumes because traffic will reduce in villages, such as Bearna and Castlegar, thereby resulting in easier access for pedestrians and cyclists and improved amenities for more vulnerable persons.
- **Severance of Communities due to Road Closures:** Where minor roads are closed, diverted or re-routed severing communities, there will be a significant medium to long-term negative impact depending on density of development and extent of re-route. This will not be avoided, mitigated or otherwise addressed by means of condition.
- **Severance of Communities due to Construction Traffic:** During construction there will be slight negative and short term severance issues caused by construction traffic which will be mitigated by measures outlined in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.
- **General Amenities:** There will be slight to moderate short-term negative impacts during construction on general amenities in areas such as Rosan Glas, Gort na Bro and Bushypark church and school as a result of construction traffic, noise and dust along haul routes. These will be mitigated by measures set out in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. During operation there will be a slight negative impact on amenities.
- **Amenities of University of Galway:** During construction there will be significant negative impacts on the population using the University of Galway Sports Campus as a result of loss of pitches, modification to the sports pavilion, construction works in proximity to walkways as well as noise and visual impacts. These will be mitigated using standard construction practices as detailed in the in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. During operation there will continue to be a long-term moderate impact on the general amenities of the sports campus that will be mitigated by the provision of the right of way and access to the lands under the viaduct as well as noise mitigation measures.

- **Amenities along River Corrib:** During construction there will be restricted access to the riverside in Dangan and there will be noise and visual impacts on both sides of the River Corrib. These will be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. At no time will access to the riverside be completely restricted. Impacts during construction will be moderate negative and short-term. During operation mitigation measures include the retention of existing vegetation and noise barriers. Impacts will be long-term moderate to significant negative due to the general loss of amenity.
- **Amenities of Galway Racecourse:** Construction impacts on Galway Racecourse can be avoided by measures including the provision of temporary stables (which have received planning permission separately) and the cessation of works during festival seasons. During the operation phase, a positive benefit will result for Galway Racecourse due to the mitigation measures.
- **Socio-Economic:** During construction there will be some negative short-term impacts for businesses as a result of noise and dust which will be mitigated by measures outlined in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. Where visibility to businesses is impacted, mitigation measures include additional signage. Demolition of some industrial and commercial properties will not be avoided, mitigated, or otherwise addressed by means of condition. During operation there will be significant positive impacts with respect to journey times, journey reliability and amenities.
- **Journey Characteristics:** During construction there will be some short-term temporary moderate negative impacts on journeys as a result of road closures or diversions which will be mitigated by the Traffic Management Plan. During operation, the road will have significant permanent positive impacts in terms of improved journey times, journey time's reliability and journey amenities. There will be improved connectivity across and beyond the city, releasing and freeing the existing city centre and inner suburbs from congestion.
- **Health:** During construction potential impacts on health arising from air, noise and water emissions will be mitigated using construction practices set out in the Construction Environmental Management Plan (CEMP) and the Schedule of

Environmental Commitments. During operation impacts will be avoided having regard to the proposed development's compliance with air and noise standards set out in TII guidelines.

Biodiversity

- Significant residual effect on habitats as a result of the loss of priority Annex I habitat (outside of any European Site) comprising Limestone Pavement [*8240], active Blanket Bog [*7130], and a Petrifying Spring [*7220] which cannot be avoided, mitigated, or otherwise addressed by means of condition
- Significant residual effect on habitats as a result of the loss of Annex I habitat (outside of any European Site) including Annex I Wet Heath [4010], Dry heath habitats and other habitats of international to local value, including within areas designated as Local Biodiversity Areas, which cannot or will not be avoided, fully mitigated, or otherwise addressed by means of condition
- Significant residual effect as a result of the loss of, or damage to, populations of plant species and one invertebrate species included in the Irish red data books, which will not be avoided, mitigated, or otherwise addressed by means of condition.
- Significant residual effect on barn owl, Peregrine falcon, lesser horseshoe bat, red squirrel and pine marten which will not be avoided, fully mitigated, or otherwise addressed by means of condition.

Soils and Geology

- There will be a significant negative impact on geology as a result of the loss of small areas of limestone pavement (Annex I habitat) outside of the Lough Corrib SAC or any other Natura 2000 site. This impact will not be avoided, mitigated or otherwise addressed by means of condition. This loss is primarily associated with the construction of footings for a viaduct which will span over a larger area of limestone pavement.
- There will be impacts associated with the loss of soil along the route and the use of natural resources, including aggregates, to construct the proposed development. This will be mitigated by the re-use of excavated materials in the construction process and in the formation of material deposition areas for excess/unsuitable material and habitat creation. Other construction phase

impacts including soil contamination, blasting impacts, tunnelling works, slope stability and earthworks impacts will be avoided, managed and/or mitigated by the measures which form part of the proposed development , the proposed mitigation measures included in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments .

Hydrogeology

- There will be impacts on a number of existing wells which will be lost as a result of the proposed development. This will be mitigated by the provision of replacement wells, alternative water sources or compensation, as appropriate.
- Impacts on groundwater quality will be mitigated through the implementation of the i.e. Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments, including the associated Karst Protocol and Sediment, Erosion & Pollution Control Plan during the construction phase, and in the operational phase through the design of the drainage system, which includes water attenuation and treatment ponds, wetlands and controlled discharge. Impacts on groundwater levels due to dewatering and recharge will arise but will be mitigated through the retention of run-off within the same water catchment area or groundwater body and in areas such as the Lackagh Tunnel, through the timing of construction works to avoid the need for dewatering. Structural impacts on properties in the vicinity of areas where groundwater levels will be lowered will be mitigated and monitored with property condition surveys.
- Impacts on groundwater dependent habitats will be avoided through the alignment and design of the road development or mitigated through measures such as flow control and pollution control measures. There will be no groundwater lowering within groundwater bodies that support groundwater dependent habitats within a European site.

Hydrology

- Water quality impacts during the construction phase will be mitigated by the implementation of the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments, including the Incident Response Plan and Sediment Erosion and Pollution Control Plan as well as through obtaining necessary consents and consultation with prescribed bodies.

- Impacts on the water supply to the Terryland Water Treatment Plan will be avoided and mitigated through implementation of the Construction Environmental Management Plan (CEMP), consultation and ongoing liaison with Irish Water and the carrying out of works in accordance with best practice construction methods and guidance.
- During the operational phase, water quality impacts arising from road runoff or accidental spillages will be mitigated through the design of the drainage system for the proposed development which is responsive to the differing geologies in the area, and in particular the use of attenuation ponds, settlement ponds, reed beds, infiltration basins, flow control mechanisms etc. Flood risk impacts near the N83 Tuam Road at Twomileditch will be mitigated by flood compensation storage, provision of storm drainage on the N83 at this location and a pumping station to discharge to the existing storm sewer.

Noise and Vibration

- Noise and vibration impacts will arise during the construction phase, including from blasting operations which has the potential to impact upon residential and other sensitive receptors. However, it is considered that these potential impacts would be avoided, managed and mitigated by the measures which form part of the proposed development, the proposed mitigation and monitoring measures, through suitable conditions and noting the relatively short-term duration of the construction phase and the linear nature of the proposed development.
- During the operational phase, the majority of noise sensitive receptors will be in compliance with the design goal set out in the TII Guidelines once noise mitigation measures are incorporated, such as noise barriers and the low noise road surface. There will also be positive impacts on a large number of receptors on the existing road network, due to reductions in traffic volumes on existing roads. A limited number of properties will, however, experience a residual noise impact marginally in excess of the TII Design Goal. Noting the provisions of the TII Guidelines for such a scenario and also noting the need to balance the provision and scale of noise barriers against other consideration, such as visual impact, I am satisfied that the proposed development would not have any unacceptable direct, indirect or cumulative noise and vibration impacts.

Air Quality

- Potential air quality impacts would be avoided, managed and mitigated by the measures which form part of the proposed development , the proposed mitigation measures such as the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.

Climate

- The proposed development, individually and cumulatively with other identified projects, is likely to result in a permeant, moderate and adverse impacts on climate . Therefore, the proposed development results in an increase in greenhouse gas emissions and does not meet Ireland’s target of net zero.
- There are mitigation measures available during the construction phase, such as ground granulated blast furnace slag (GGBS) and green procurement, to reduce the generation of embodied carbon, which results in a moderate construction phase impact.
- There are no mitigation measures available during operation phase to reduce generation of carbon emissions. For the purposes of this EIA, the proposed development does not rely on wider governmental mitigation measures as set out in the Climate Action Plan 2025.

Traffic and Transportation

- Potential impacts associated with construction traffic will be avoided or mitigated by the Construction Environmental Management Plan, including the Construction Traffic Management Plan.
- During the operational phase, the proposed development will have positive impacts on traffic congestion, journey times on key routes, network statistics and the ratio of flow to capacity at key junctions. It will also facilitate the implementation of various measures contained within the Galway Transport Strategy to increase active travel and public transport provision in the city and will have a positive impact on sustainable transport mode share when considered together with the other Galway Transport Strategy measures that it will support.
- The proposed development will assist in enabling the significant population and employment growth forecast for the city by adding additional links to the road network, including a new river crossing and linkages between various radial

routes serving the city, thereby improving accessibility and providing a basis for the compact growth of the city.

Landscape and Visual

- The construction phase of the proposed development will result in a range of landscape and visual impacts on certain landscapes and receptors, including significant and profound impacts. The mitigation measures proposed during this phase will have limited effect due to the scale and nature of the development, and negative landscape and visual impacts will continue during the construction phase.
- During the initial operation stage, landscape and visual impacts will continue, but the significance and severity of these impacts will generally abate over time as the proposed landscape mitigation proposals become established and increasingly effective at screening the proposed development and/or incorporating it into the landscape. However, significant and profound negative residual visual impacts will continue to arise for numerous residential properties located close to or adjoining the boundary of the proposed development, and particularly in the vicinity of major engineering structures at post-establishment stage.
- Significant residual impacts on landscape character will also continue to arise at a number of locations. The proposed mitigation measures, and particularly the extensive and comprehensive landscaping planting proposals will not fully mitigate these significant or profound impacts, however they will ameliorate the impacts to a certain extent and this will increase over time as planting matures.
- Significant residual visual impacts will also occur in the River Corrib valley at Menlo Castle and the University of Galway Sporting Campus, primarily due to the visual intrusion associated with the proposed River Corrib Bridge and associated viaduct.

Cultural Heritage

- There will be significant negative direct and indirect impacts on a number of archaeological and built heritage sites which will be mitigated by the undertaking of detailed photographic and written records prior to construction and the use of test trenching and monitoring.

- There will also be a very significant impact on a thatched cottage (protected structure, BH12) which it is proposed to demolish and which will not be fully mitigated by the preparation of a record. Potential impacts on unknown archaeological features will be mitigated or avoided through monitoring of construction works by an archaeologist and excavation where appropriate. There will be a very significant impact on a bullaun stone (RMP, AH 2) and structure (proposed RMP., AH 42), tomb (CH 49), boulder (CH 51).

Material Assets Agriculture

- The acquisition of the land required to construct the proposed development will have a range of negative impacts, including significant and profound impacts on landowners. There will be significant or profound negative impacts on a number of farm enterprises and equine enterprises, due to issues such as severance, impacts on farm viability, disruption and impacts on the availability of services.
- The loss of land will not be avoided, mitigated or otherwise addressed by means of condition. There is no mitigation for this impact within the EIA process. Impacts due to land severance are mitigated to a degree through the proposed provision of alternative access arrangements and services, however the agricultural enterprises that are significantly or profoundly adversely affected are likely to require major changes to their operations, management and scale and there is no mitigation for this impact within the EIA process.

Material Assets Non-Agriculture

- **Loss of Dwellings:** There are 54 dwellings proposed for demolition or acquisition to make way for this project. This will result in a significant to profound permanent negative impact on homeowners. This impact will not be avoided, mitigated, or otherwise addressed by means of condition.
- **Commercial and Industrial Buildings:** There is no mitigation for the loss of commercial and industrial buildings within the EIA process. This will result in a moderate to significant impact. This impact will not be avoided, mitigated, or otherwise addressed by means of condition. There will be construction impacts on some businesses which will be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.

- **Public and Community Buildings:** During construction noise and air emissions can be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments. During operation there will be positive impacts on Galway Racecourse by way of a permanent access from Parkmore Link Road.
- **Utilities:** The proposed development will result in some relocation of utilities. This impact will be mitigated using standard construction practices as detailed in the Construction Environmental Management Plan (CEMP) and the Schedule of Environmental Commitments.

Resource Management, Major Accidents and Disasters

- Waste and surplus materials will be generated throughout the construction and operation phases. The impacts can be mitigated through measures which would be standard, good practice and readily implementable in a project of this nature such as the Construction and Demolition Resource and Waste Management Plan (CDRWMP).
- The proposed development has inherent design measure to reduce risks of major accidents and disaster particularly major road traffic accidents. There is also suite of plans and procedures to manage and minimise risks including the CEMP, CDRWM, CTMP, Non-Native Invasive Species Management Plan, Sediment, Erosion, Pollution Control Plan, Environmental Incident Response Plan and Pest Control Plan. Post mitigation, there is low risk assigned to events like ground collapses, utility disruption, major traffic accidents, bio-security events, industrial accidents. Following the implementation mitigation measures no significant residual impacts are accepted.

Notwithstanding the conclusion reached in respect of the inability of the proposed measures to fully mitigate the significant negative residual impacts in respect of various environmental matters as set out above, it is considered that these environmental impacts would not justify a refusal, having regard to the overall benefits of the proposed development including its identified strategic importance at European, National, Regional and local level, its role in alleviating congestion and underpinning the sustainable transport measures of the GTS and its role in facilitating Galway to grow in a more compact manner, as identified in the NPF.

With regard to the significant adverse impact on carbon emissions and climate, it is noted that this arises due to the sensitivity of the receiving environment. Noting the role of the proposed development in facilitating the implementation of active travel and public transport measures as set out in the GTS and its role in supporting the compact and more sustainable development of the city, it is not considered that the proposed development would undermine, or be contrary to Ireland's climate obligations, given that climate action requires a broad sectoral and economy-wide approach. Ireland has committed to becoming climate neutral / zero emission by 2050, and carbon emissions associated with necessary infrastructural projects such as the proposed development can be mitigated through reductions in other areas as mechanisms such as demand management measures in CAP25 , carbon tax and carbon budgets are developed and will be increasingly mitigated in the operational phase as electric vehicles are adopted.

The Commission completed an environmental impact assessment in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures set out in the Environmental Impact Assessment Report, and subject to compliance with the conditions set out below, the effects on the environment of the proposed development, by itself and in combination with other development in the vicinity, would be acceptable. In doing so, the Commission adopted the report and conclusions of the inspector.

Appropriate Assessment

The Commission agreed with and adopted the screening assessment and conclusion carried out in the inspector's report that *Lough Corrib SAC, Lough Corrib SPA, Galway Bay Complex SAC, Inner Galway Bay SPA, Inishmore Island SAC, Kilkieran Bay and Islands SAC, Ardrahan Grassland SAC, Castletaylor Complex SAC, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Rahasane Turlough SAC, Rahasane Turlough SPA, Cregganna Marsh SPA, Maumturk Mountains SAC, The Twelve Bens/Garraun Complex SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA, Ross Lake and Woods SAC, East Burren Complex SAC, Moneen Mountain SAC, Black Head-Poulsallagh Complex SAC or Gortnandarragh Limestone Pavement SAC*, are the European sites for which there is a likelihood of significant effects.

The Commission considered the Natura Impact Statement and all other relevant submissions and carried out an appropriate assessment of the implications of the proposed development for the *Lough Corrib SAC, Lough Corrib SPA, Galway Bay Complex SAC, Inner Galway Bay SPA, Inishmore Island SAC, Kilkieran Bay and Islands SAC, Ardrahan Grassland SAC, Castletaylor Complex SAC, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Rahasane Turlough SAC, Rahasane Turlough SPA, Cregganna Marsh SPA, Maumturk Mountains SAC, The Twelve Bens/Garraun Complex SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA, Ross Lake and Woods SAC, East Burren Complex SAC, Moneen Mountain SAC, Black Head-Poulsallagh Complex SAC or Gortnandarragh Limestone Pavement SAC* in view of the Sites Conservation Objectives. The Commission considered that the information before it was adequate to allow the carrying out of an appropriate assessment.

In completing the assessment, the Commission considered, in particular, the

- Likely direct and indirect impacts arising from the proposed development both individually or in combination with other plans or projects, specifically upon the *Lough Corrib SAC, Lough Corrib SPA, Galway Bay Complex SAC, Inner Galway Bay SPA, Inishmore Island SAC, Kilkieran Bay and Islands SAC, Ardrahan Grassland SAC, Castletaylor Complex SAC, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Rahasane Turlough SAC, Rahasane Turlough SPA,*

Cregganna Marsh SPA, Maumturk Mountains SAC, The Twelve Bens/Garraun Complex SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA, Ross Lake and Woods SAC, East Burren Complex SAC, Moneen Mountain SAC, Black Head-Poulsallagh Complex SAC or Gortnandarragh Limestone Pavement SAC

and

- Mitigation measures which are included as part of the current proposed development ,
- Conservation Objective for these European Sites, and
- Views of prescribed bodies in this regard.
- its appointed Ecologist and Hydrogeologist Consultants' assessments, and

In completing the appropriate assessment, the Commission accepted and adopted the appropriate assessment carried out in the Inspector's report which is supplementary to the Inspector's Report of 2021 in respect of the potential effects of the proposed development on the integrity of the aforementioned European Sites, having regard to the site's conservation objectives.

In overall conclusion, the Commission was satisfied that the proposed development , by itself or in combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the site's conservation objectives.

Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application on the 14th of April 2025, except as may otherwise be required in order to comply with the following conditions.

Reason: In the interest of clarity.

2. The mitigation measures contained in the updated Natura Impact Statement (NIS) submitted on the 14th of April 2025, shall be implemented.

Reason: To protect the integrity of European Sites.

3. The mitigation measures contained in the submitted updated Environmental Impact Assessment Report (EIAR) submitted on the 14th of April 2025, shall be implemented.

Reason: To protect the environment.

4. The updated Schedule of Environmental Commitments shall be updated to incorporate the following additional commitments:
 - (a) Galway County Council will offer to provide or pay for similar alternative accommodation for the occupants of Plot 123 for the duration of earthworks in Construction Section S1.
 - (b) All third Schedule non-native species subject to restrictions under Regulations 49 and 50 Part 1: Plants listed in S.I. No. 477/2011 European Communities (Birds and Natural Habitats) Regulations 2011 shall be treated prior to the commencement of construction works.
 - (c) No stockpiling is permitted within any Annex I habitat area.

Reason: In the interests of clarity, control of construction phase environmental impacts, residential and visual amenity and to protect the integrity of European Sites

5. Prior to the commencement of development, the local authority, or any agent acting on its behalf, shall agree in consultation with the relevant statutory agencies (including the NPWS), the details of surface and groundwater monitoring during construction including water quality parameters, sampling intervals and locations and detailed response plan. Where practical, water quality parameters shall be measured and recorded electronically on an hourly basis, with the monthly and quarterly monitoring being used to verify and calibrate the electronic monitoring. The monitoring report and response plan shall be retained on the file as part of the public record.

Reason: To protect the integrity of European Sites and control of construction phase environmental impacts.

14.0 Reasons and Considerations (Compulsory Purchase)

It is considered that the land take is reasonable and proportional to the stated purpose of the N6 Galway City Ring Road development. The Commission is satisfied that the process and procedures undertaken by Galway County Council have been fair and reasonable and it has demonstrated the need for the lands and that all the lands being acquired, subject to the modifications set out in the Schedule, are both necessary and suitable.

Having considered the objections made to the compulsory purchase order, the report of the Inspector who considered the objections, the purpose of the compulsory purchase order to facilitate the delivery of the Galway City Ring Road, and also having regard to:

- (i) the constitutional and Convention protection afforded to property rights,
- (ii) the strategic need of the scheme in the context of Galway Transport Strategy
- (iii) the community need, and public interest served and overall benefits, including benefits to a road users to be achieved from use of the acquired lands,
- (iv) the proportionate design response to the identified need which requires it to be constructed in accordance with design standards with a consistent cross section with full stopping sight distances along its length and appropriate junction and accesses with visibility in accordance with said design standards,
- (v) the suitability of the lands and the necessity of their acquisition to facilitate the provision of the Galway City Ring Road
- (vi) the policies and objectives of the Galway City Development Plan 2023-2029 and Galway County Development Plan 2022-2028 as well as European, national and regional level policies.
- (vii) the submissions made to the Commission.

(viii) The supplementary Inspector's Report and recommendation of the Inspector, initial Inspector's Report of 2021 and supplementary and initial reporting of specialist ecologists and hydrogeologist

it is considered that the acquisition of these lands on a permanent and temporary basis, restriction, acquisition and interference of rights of way, by Galway County Council on behalf of itself and Galway City Council, as set out in the compulsory purchase order and on the deposited maps, is necessary for the purpose stated, which is a legitimate objective being pursued in the public interest, and that the CPO and its effects on the property rights of affected landowners are proportionate to that objective and justified by the exigencies of the common good. In reaching this conclusion, the Commission agrees with and adopts the analysis contained in the report of the person who conducted the assessment of the objections.

Schedule

The compulsory purchase order associated with the N6 Galway City Ring Road Protected Road Scheme 2018 and the N6 Galway City Ring Road Motorway Scheme 2018 shall be modified as follows:

1. Plots 123a.202 and 123b.201 shall be removed.

Reason: To reduce the extent of acquisition in respect of landholdings, where it is considered that lands surplus to the identified purpose were sought to be acquired.

Professional Declaration

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

T Bradley,

Senior Planning Inspector

4th February 2026

Appendix A

Appendix B

Appendix C

Appendix D