

2 BACKGROUND TO THE PROPOSED DEVELOPMENT

2.1 Site of the Development

2.1.1 Site Location

The subject site extends to 5.12 ha and is located in the north-east of Galway City in Mervue, at the junction of the Monivea Road and Joyce's Road. The subject site is approximately 2.5km from Galway City Centre.

The IDA Business Park and Mervue Industrial Estate are located to the west/south-west of the site and the Eircom Telecommunications site immediately borders the subject site to the north-east. Medium density residential development is located to the east of the site along the Monivea Road.

2.1.2 Site Access

The application site has direct frontage onto Joyce's Road and Monivea Road. The site is currently an active construction site with boundary hoarding but has vehicular access from Joyce's Road. The site is approximately 175m to the south of the Bothar Na Dtreabh (N6) and 100m to the south east of the Tuam Road (R336).

2.1.3 Physical Characteristics of Site and Surrounding Lands

Development permitted under Pl Ref. 06/223/ ABP Ref. PL 61.220893 has previously commenced and substantial works have been completed. Following the onset of the economic recession, development was put on hold and the site was hoarded up. An Extension of Duration was granted until 12/09/2017 which has since expired. Phase 1 of the current site masterplan was given permission by Galway City Council under Pl Ref 18/363, and the site has recently become active. A summary of the site's planning history is provided below in Section 3 of this submission for reference.

There are no Protected Structures or Recorded Monuments on the proposed site. The nearest Recorded Monument to the subject lands comprises a 18th/19th Century House (Recorded Number GA082-088), located circa 200 metres south of the site. The building is also designated as a Protected Structure under the extant Development Plan (RPS no. 6002).

The Galway Bay Complex Special Area of Conservation (Site Code 000268) and Inner Bay Special Protection Area (Site Code 004031) is located circa 1km south west of the proposed site.

2.2 Planning History

There is an extensive planning history associated with the site as summarised below in chronological order:

Pl Ref 18/363: Planning permission sought by Crown Square Developments Ltd. for a ten-year permission for a mixed-use development located at the former Crown Equipment site, at the junction of Monivea Road and Joyces Road, Mervue, Galway. The proposed development comprises Phase 1 of a mixed-use scheme and forms part of a larger landholding which extends to 51,148 sqm in total. The development consists of:

1. 5 no. blocks of commercial offices which range in height from 3-6 stories over ground floor level (40,405 sqm).

2. A hotel development with 5 floors over ground floor level, comprising 175 no. bedrooms, conferencing facilities and restaurant/bar areas (8,675 sqm).
3. A double basement which includes a 'high bay' area for service, delivery and waste management vehicles; in addition to the provision of plant, car and bicycle parking, changing/shower areas and locker/amenity facilities (62,175 sqm), incorporating alterations to the existing structures on site permitted under PL Ref. 06/223/ ABP Ref. PL 61.220893.
4. Public realm and landscaping works, including pedestrian and cyclist linkages.
5. The provision of vehicular access/egress via Monivea Road and Joyces Road, public transport set-down areas and cycle lanes.
6. The provision of substations and associated ancillary works.
7. All other associated site development and servicing works.

Galway City Council (GCC) granted planning permission for the proposal on 10th May 2019 subject to 27 no. conditions.

PL Ref. 12277: Extension of Duration on PL Ref 06/223 was granted unconditionally until 12/09/2017. This permission has now expired.

PL Ref. 08/580: Permission for the construction of ESB Substations and associated Meter Switch Rooms at the previously approved Crown Square Development site (PL Ref. No. 06/223). A total of 7 no. ESB Substations with associated Meter Switch Rooms are proposed which amount to 253 sqm gross floor area. These are to be positioned in four different locations on site as follows; (a) Substation No.'s 1 & 2 are to be located to the north eastern / northern corner of the site, (b) Substation No. 3 is to be located at the south eastern corner of the site adjacent to the Monivea Road, (c) Substation No.'s 4 & 5 are to be along the Monivea road and (d) Substation No.'s 6 & 7 are to be positioned to the south western corner of the site near the junction of Joyces Road / Old Monivea Road. Permission granted subject to 3 conditions.

PL Ref. 06/223/ ABP Ref. PL 61.220893: Permission for the redevelopment of the existing Crown Equipment Site (5.12 Hectares). The new development consists of the construction of a mixed-use development (56,751sqm), consisting primarily of bulky goods retail, offices, 134 no. residential units, Motor sales, Hotel, Leisure Centre, Creche, foodcourt with some small-scale retail uses for local needs along with ancillary parking (1340 no. spaces) and all associated landscaping, site works and services. The height of the proposal will be two storeys overground along Monivea road and rising to four storeys overground towards the north western and north eastern perimeter of the site, with the entire development over two basement levels. All vehicular and pedestrian access is to be taken from Joyces Road only. Permission granted subject to conditions.

An Bord Pleanála subsequently directed the Planning Authority to amend Condition No. 20 and to remove Condition No. 23 under first party appeal PL 61.220893.

PL Ref. 93/45: Permission for extension to existing factory granted unconditionally.

2.3 Strategic Planning Context

2.3.1 National Planning Policy Context

2.3.1.1 National Planning Framework

The Department of Housing, Planning, Community and Local Government recently published the National Planning Framework (NPF) entitled '*Ireland 2040*' to succeed the NSS. The NPF comprises the Government's proposed long-term strategic planning framework to guide national, regional and local planning and investment decisions over the next 25 years. The NPF is a high-level document which provides a framework for future development and investment in Ireland, providing a long-term and place-based aspect to public policy and investment, and aiming to coordinate sectoral areas such as housing, jobs, transport, education, health, environment, energy and communications, into an overall coherent strategy.

2.3.1.2 Planning Policy Statement 2015

The Department of Environment, Community and Local Government's (DECLG) *Planning Policy Statement 2015* encourages Planning Authorities to engage in active land management by leading and managing the development process and ensuring that land zoned for development comes into use in accordance with Development Plan/Local Area Plan policy and in tandem with supporting infrastructure.

The policy statement acknowledges that creating a consolidated urban form fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure.

2.3.1.3 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas

The '*Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas*'¹ and the accompanying '*Urban Design Manual: A Best Practice Guide*'² (2009) set out the criteria on planning for sustainable neighbourhoods under four main themes, namely, provision of community facilities, efficient use of resources, amenity or quality of life issues and conservation of the built and natural environment.

The Guidelines advocate an urban design and quality-led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban villages and neighbourhoods. A varied typology of residential units is promoted within neighbourhoods in order to encourage a diverse choice of housing options in terms of tenure, unit size, building design and to ensure demographic balance in residential communities.

2.3.1.4 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities

The DECLG published the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities*³ in March 2018. The new guidelines are

¹ Available on: <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload,19164,en.pdf>

² Available on: <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload,19216,en.pdf>

³ Available on: http://www.housing.gov.ie/sites/default/files/publications/files/design_standards_for_new_apartments_-_guidelines_for_planning_authorities_2018.pdf

the result of an updating of previous Departmental guidelines published in 2015 and have been prepared, taking account of up-to-date evidence of projected future housing demand, the overall policy context of Rebuilding Ireland and the National Planning Framework, as well as circumstances prevailing in the housing market.

The focus of this guidance is on the apartment building itself and on the individual units within it. The 2018 guidelines specify planning policy requirements for:

- General locational consideration;
- Apartment mix within apartment schemes;
- Internal space standards for different types of apartments;
- Dual aspect ratios;
- Floor to ceiling height;
- Apartments to stair/lift core ratios;
- Storage spaces;
- Amenity spaces including balconies/patios;
- Car parking; and
- Room dimensions for certain rooms

2.3.1.5 Urban Development and Building Heights Guidelines for Planning Authorities December 2018

These guidelines, published by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework.

Traditional building heights in most urban areas in Ireland vary somewhat within a limited and generally low-rise range. To meet the needs of a growing population and to limit the expansion of urban areas outwards, planning policy requires more focus on building up urban infill sites and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage.

2.3.1.6 Design Manual for Urban Roads and Streets

Design Manual for Urban Roads and Streets⁴ (DMURS) was published by the Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government in April 2013. DMURS provides guidance relating to the design of urban roads and streets. DMURS encourages designers to give due consideration to creating a 'sense of place' which is of core significance to the creation of safe and more integrated street designs. The guidance document notes that four interlinked characteristics influence the sense of place within a street, including:

- **Connectivity:** The creation of vibrant and active places requires pedestrian activity. This in turn requires walkable street networks that can be easily navigated and are well connected.
- **Enclosure:** A sense of enclosure spatially defines streets and creates a more intimate and supervised environment. A sense of enclosure is achieved by orientating buildings toward the street and placing them along its edge. The use of street trees can also enhance the feeling of enclosure.

⁴ Available on: <http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload%2C32672%2Cen.pdf>

- **Active Edge:** An active frontage enlivens the edge of the street creating a more interesting and engaging environment. An active frontage is achieved with frequent entrances and openings that ensure the street is overlooked and generate pedestrian activity as people come and go from buildings.
- **Pedestrian Activity/Facilities:** The sense of intimacy, interest and overlooking that is created by a street that is enclosed and lined with active frontages enhances a pedestrian's feeling of security and well-being. Good pedestrian facilities (such as wide footpaths and well-designed crossings) also make walking a more convenient and pleasurable experience that will further encourage pedestrian activity.

The DMURS guidance emphasises that these four characteristics represent the basic measures that should be established in order to create people friendly streets that facilitate more sustainable neighbourhoods.

2.3.1.7 Childcare Facilities Guidelines for Planning Authorities

In all new housing areas over 75 units, the provision of one childcare facility with a minimum of 20 childcare spaces is required, in line with the Ministerial Guidelines for Planning Authorities on Childcare Facilities (DECLG 2001) and to create sustainable residential neighbourhoods. With regard to larger housing developments, Section 2.4 of the guidelines state planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary. Appendix I of the Guidelines sets out general standards and minimum floors areas for proposed childcare facilities.

2.3.2 Regional Planning Policy Context

2.3.2.1 Regional Planning Guidelines for the West 2010 – 2022

The Regional Planning Guidelines (RPGs) for the West Region 2010 – 2022 provide a framework for long-term strategic development in the West Region, which comprises the administrative areas of Galway County Council, Galway City Council, Mayo County Council and Roscommon County Council. The current RPGs were adopted in October 2010 and are set within the context of national planning policy, including the National Spatial Strategy, providing a statutory link between national and local planning policy and objectives. RPGs have become much more influential within the planning policy hierarchy with the enactment of the Planning and Development (Amendment) Act 2010, which requires all relevant Development Plans to comply with the RPGs.

The RPGs set out the aims for the West Region through a number of strategic policies and objectives, including in relation to Economic Development, Population and Housing, Transport and Infrastructure, Environment and Amenities, Social Infrastructure and Community Development.

2.3.2.2 Regional Spatial and Economic Strategy Issues Paper (Northern & Western Regional Assembly)

The Northern & Western Regional Assembly (NWRA) recently published the Draft Regional Spatial and Economic Strategy (RSES) on the 19th November 2018. The RSES outlines arrangements for a co-ordinated metropolitan area strategic plan (MASP) for the Galway Metropolitan Area. The MASP has been provided with statutory underpinning to act as 12-year strategic planning and investment framework. The MASP is an opportunity for Galway to address recent growth legacy issues and build

on key strengths, including a vibrant arts and cultural scene, year-round tourism and an attractive natural setting. As outlined in the MASP, in Section 3.6(A) of the RSES, the Galway Metropolitan Area has considerable land capacity that can significantly contribute to meeting the housing demands based on population targets set out in the NPF and the RSES. The targets are that:

- “1. Population of Galway MASP to grow by 25,000 to 2026 and by 38,300 to 2031 with the population of the City and Suburbs accommodating 19,200 to 2026 and 28,000 to 2031.*
- 2. Deliver at least half (50%) of all new homes that are targeted within the MASP to be within the existing built-up footprint.”*

2.3.3 Local Planning Policy Context

2.3.3.1 Galway City Development Plan 2017

The *Galway City Development Plan 2017-2023* (Development Plan) came into effect on Saturday 7th January 2017. The subject lands are designated ‘Commercial/Industrial’ (CI with a stated objective ‘to provide for enterprise, light industry and commercial uses other than those reserved to the City Centre zone’. The site is also identified as a ‘Neighbourhood Centre’ in the retail hierarchy of the City. The extant Development Plan includes a specific development objective pertinent to the proposed site, as set out below:

‘Former Crown Equipment Site zoned CI. The majority of retail floor space to be dedicated for bulky goods retailing and the balance for local retailing needs. Parking shall be kept back from Monivea Road and separated from the Monivea Road by buildings. The design of frontage facing Monivea Road shall be of a high architectural standard’.

The following land uses are deemed appropriate for ‘CI’ zoned land:

Table 1: Zoning Objective

Zoning Objective CI To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone.	
Uses which <u>are compatible with</u> and contribute to the zoning objective, for example	<ul style="list-style-type: none"> ▪ Warehousing/Storage ▪ Retail of a type and of a scale appropriate to the function and character of the area ▪ Specialist offices ▪ Offices of a type and of a scale appropriate to the function and character of the area ▪ Light Industry ▪ Accommodation for Travellers ▪ Childcare facilities ▪ Community and cultural facilities
Uses which <u>may contribute to</u> the zoning objectives, dependant on the CI location and scale of development, for example:	<ul style="list-style-type: none"> ▪ General industry (small scale) ▪ Service retailing ▪ Residential content of a scale that would not unduly interfere with the primary use of the land for CI purposes and would accord with the principles of sustainable neighbourhoods outlined in Chapter 2 ▪ Offices ▪ Car parks (including heavy vehicle parks) ▪ Waste management facility ▪ Public transportation facility ▪ Public utilities

- Outdoor recreation
- Commercial leisure/indoor recreation
- Places of worship

Table 11. 3 of the Development Plan provides density standards for CI zoned lands as follows:

- Maximum Site Coverage 0.80
- Maximum Plot Ratio 1.37

In terms of open space requirements, the Development Plan standard for 'CI' zoned land requires 5% of the total site area and 50% of the gross floor area of the residential content where a residential element is proposed.

2.3.3.2 Galway Transportation and Planning Study

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

The proposed measures were arrived at following transport modelling which included defining the existing transport problems, predicting future travel demands, access mode share and assessing their mutual impacts and interdependencies. The strategy includes traffic management, giving priority to walking cycling and bus movements, modifications to the traffic network, management of parking activities and heavy goods vehicles, improvements to the public realm and use of 'smarter mobility'. These measures are designed to both address the current significant problems and inefficiencies in the movement of people and goods within and around the city and to establish a long-term transport plan that will underpin the future sustainable growth of the city as supported by the Core Strategy.

2.4 Alternatives

2.4.1 Introduction

Article 5 of the Environmental Impact Assessment (EIA) Directive as amended by Directive 2014/52/EU states that the information provided in an Environmental Impact Assessment Report (EIAR) should include a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the final choice, taking into account the environmental effects. The consideration of alternatives typically refers to alternative sites, designs and processes.

This section of the EIAR contains a description of the alternatives that were considered for the proposed development, in terms of site selection, other land-use options for the site, design and site layout.

The consideration of alternatives is an effective means of avoiding environmental impacts. As set out in the 'Draft Guidelines on The Information to be Contained in Environmental Impact Assessment Reports' (EPA, 2017), the presentation and

consideration of reasonable alternatives investigated is an important part of the overall EIA process.

2.4.2 Alternative Sites

As outlined above the site is zoned for 'Commercial/Industrial' use within the *Galway City Development Plan 2017-2023*. As such consideration of alternative sites for the construction of commercial and office units proposed in this development proposal was not considered necessary. It is considered that the proposed site is the only suitably zoned CI site available to the applicant for the proposed development. During the design process for the proposed development several iterations of the site layout and alternative designs were considered. This planning application demonstrates that the subject site and the surrounding area have the environmental capacity to accommodate the proposed development without any significant risk of impact upon environmental sensitivities due to the site location.

2.4.3 Alternative Layouts

This section provides an overview of how the proposed development has evolved to date. The design process was an iterative process, where findings at each stage of the assessment were used to further refine the design, always with the intention of minimising the potential for environmental impacts.

Alternative Option 1 Previously Permitted Development (Pl Ref. 06/223)

The previously permitted site layout is indicated below in Figure 2.1. This is an enclosed site with limited pedestrian permeability with a single central public space. This is a retail park site plan with substantial underground car-parking and service access. The character of open amenity space is one of hard landscape providing maximum visible frontage for the retail units. The design effectively turns its back on the external public realm. There is vehicular circulation and parking at ground / podium level. The planning permission for the previously proposed development has lapsed. The permitted use was primarily (bulky goods) retail with roof level residential as well as office and hotel use. These were arranged in three large ranges or blocks of retail, hotel and office accommodation with residential use at roof level in two of the blocks. A public plaza was proposed between the blocks. The eastern elevation to the Monivea Road was proposed as a relatively continuous elevation of retail warehousing behind with a break opposite the Monivea Road, McDonough and Clarke Avenue residential area. The previously permitted (pre-2009) retail use is advised as being no longer commercially viable and potentially inconsistent with current best practice design standards and guideline publication.

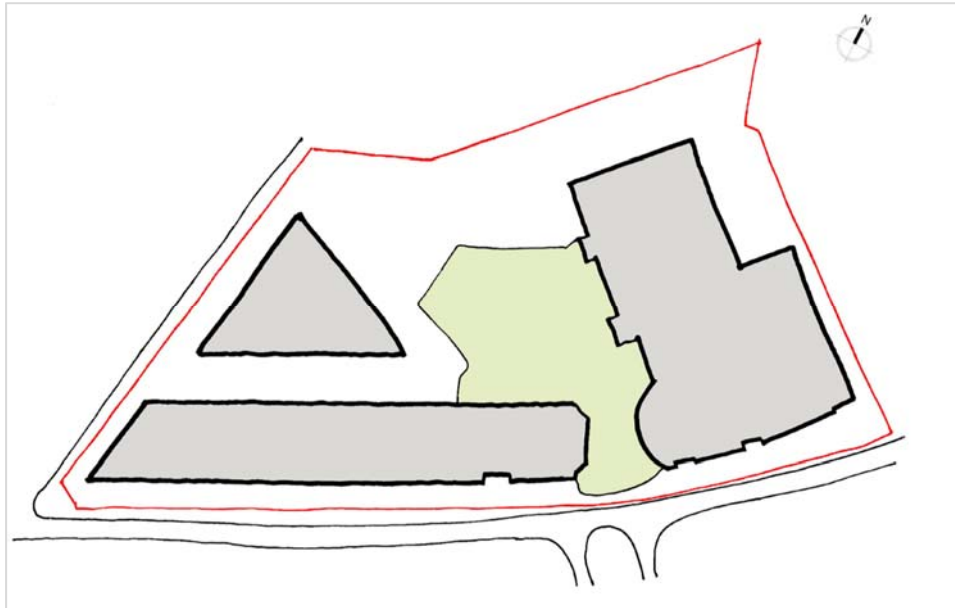


Figure 2.1: Alternative Option 1 Layout

Alternative Option 2

Alternative Option 2 is indicated below in Figure 2.2. This layout proposes the completion of the basement structure as permitted and office/commercial and residential development. Vehicular access and carparking is proposed in basement with the ground level reserved for pedestrian/cycle access and public amenity space. An open and permeable site is proposed with active restaurant/retail frontage addressing the main central amenity space.

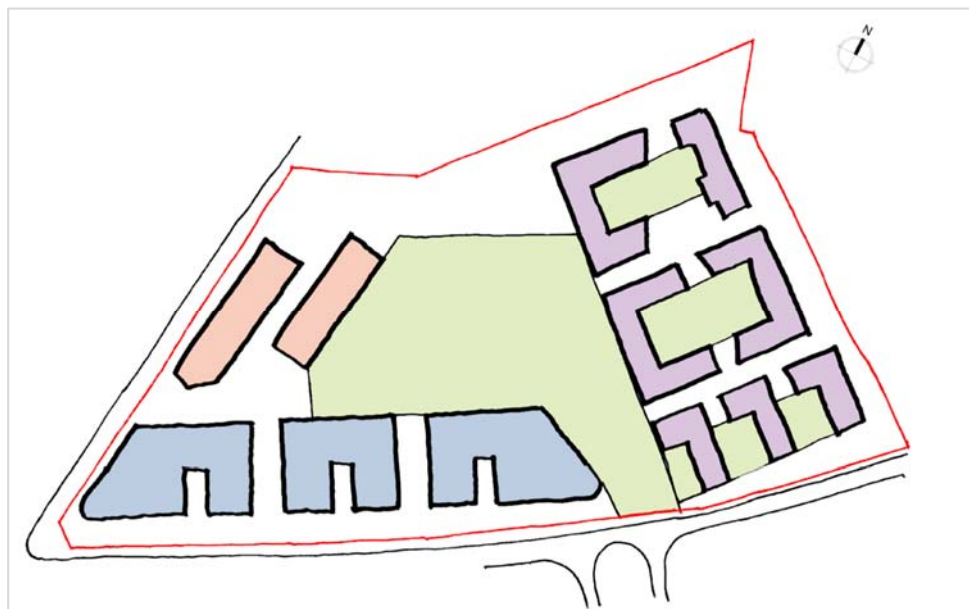


Figure 2.2: Alternative Option 2 Layout

Alternative Option 3

Alternative Option 3 is indicated below in Figure 2.3. This layout proposes that one level of basement car park is completed (lower second level) and that the existing completed structure along the Monivea Road is completed as office / commercial space. The level of the centre of the site is lowered in steps to that of the permitted basement. An open and permeable site is proposed with active hotel, restaurant/retail frontage addressing the main central amenity space and Joyce Road.

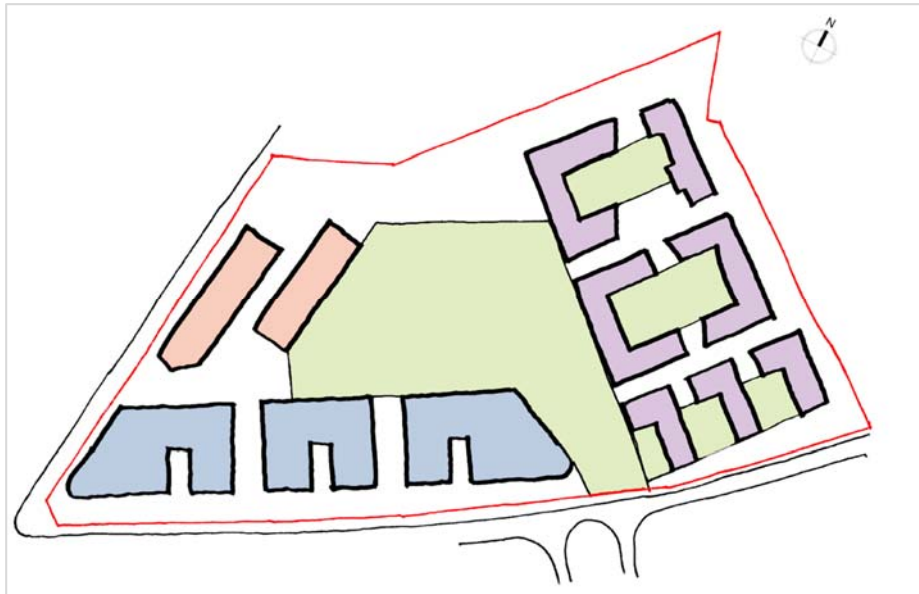


Figure 2.3 Alternative Option 3 Layout

Alternative Option 4

Alternative Option 4 is indicated below in Figure 2.4. This design proposes a higher quantum of office space, relocating the hotel to a central location between office and residential use and providing two separate central open amenity spaces. One is static central around the office/commercial use and the other is more active suggesting permeability along a diagonal east-west route from Monivea to Joyce Road. The quality of open space to the north of this block and the viability of the diagonal east-west route (clashing with the main site vehicular access) is questionable.



Figure 2.4: Alternative Option 4 Layout

Alternative Option 5

Alternative Option 5 is indicated below in Figure 2.5. The hotel use is moved to Joyce Road to provide visibility and an active dual aspect frontage. Vehicular access is proposed on both Joyce and Monivea Roads.

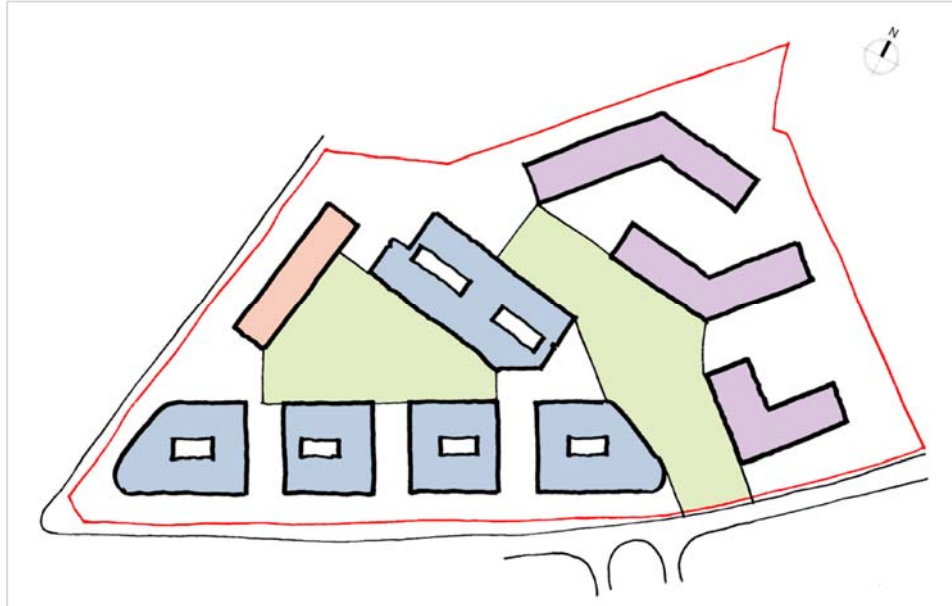


Figure 2.5: Alternative Option 5 Layout

Proposed Development

The proposed development layout is indicated below in Figure 2.6. In this layout the ground plane is substantially restored with a double basement built below the office/commercial use and a single/high basement proposed below the residential Phase 2 site. This facilitates improved level access and increased permeability across the site. The central office block is re-orientated to create a second more 'static' open amenity space with active frontage along its eastern (residential) side. The diagonal east-west pedestrian/cycle route is omitted.

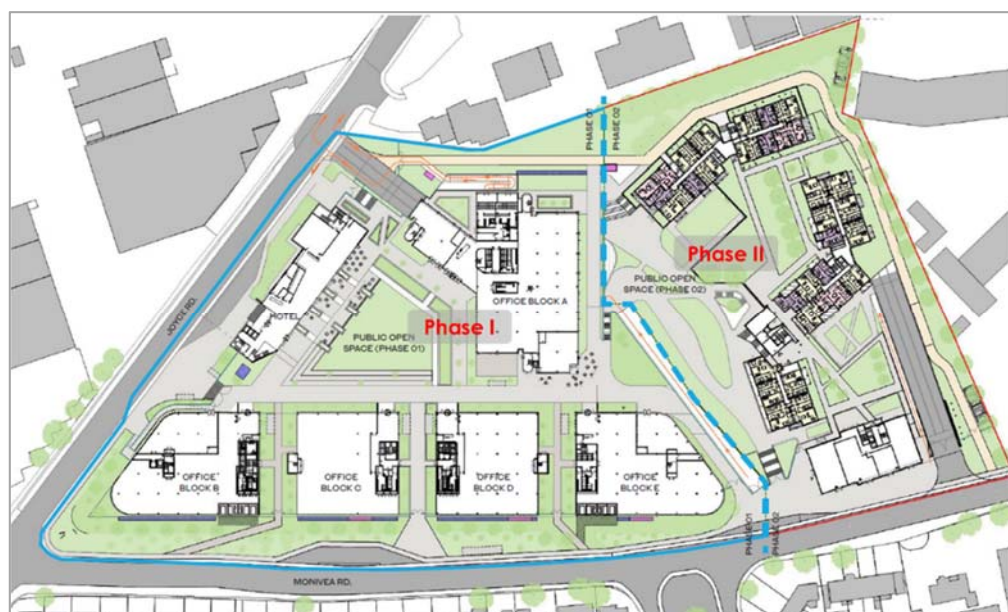


Figure 2.6: Proposed Development Layout

2.4.4 Alternation Design Considerations

A substantial element of the previously permitted development has been completed. Almost the entire site has been excavated through rock to a structural formation level. There is extensive foundation construction across the site and three levels (lower basement to ground) of the range of retail buildings proposed along the Monivea Road complete structurally. This structure extends to approximately 26,800m² over ground and two basement slab levels. Rising column elements extend from ground floor slab in this area. Given the extent of this structure, its retention, adaptation and reuse is proposed as a sustainable development. The existing completed development has a significant impact on the proposed site layout planning and design. The long range of completed structure along the Monivea Road is proposed to be re-used, most suitably as office. The entire site has been excavated already to lower basement level. This suggests the development of the western part of the site substantially as commercial office, technology and hotel over the previously proposed basement level car-parking.

The proposed mix of uses are mutually compatible and support the viable completion of development on site as well as complementing existing adjacent land use. Increased public access to the site facilities and amenities benefit both the local community and city.

The proposed residential development has been prepared in accordance with the requirements of the *Galway City Development Plan 2017-2023* and has been the subject of a number of pre-application meetings with the Planning Authority prior to lodgment. A detailed account of the pre-planning discussions is set out in Section 2.5.3 below.

2.4.5 Alternative Land Uses

The proposed development comprises commercial office, technology and hotel use on an integrated campus with residential, leisure, local service and ancillary accommodation. It is proposed as a phased development with Phase 1 comprising commercial and basement/infrastructural works and with Phase 2 comprising residential, leisure and local service elements. It is considered that the proposed land uses are deemed appropriate for 'C1' zoned land as outlined in the *Galway City Development Plan 2017-2023*. As such consideration of alternative land uses were not considered necessary.

2.4.6 Alternative Processes

The management of processes that affect the volumes and characteristics of emissions, residues, traffic and the use of natural resources has formed part of the alternatives considerations through the projects development.

The construction of the site will require the use of raw materials in the form of energy to supply plant and machinery, standard building materials including stone, metals, pipework, concrete, electrical, plumbing etc and raw materials are consumed to manufacture the solar array and electrical infrastructure. The use of these resources will be controlled by the employment of best practice construction techniques including waste management practices. Where relevant, alternative processes are considered through the EIAR.

2.4.7 Alternative Mitigation

The best practice design and mitigation measures set out in this EIAR will contribute to reducing any risks and have been designed to break the pathway between the site and any identified environmental receptors. The alternative is to either not propose

these measures or propose measures which are not best practice and neither of these options is sustainable.

2.4.1 “Do Nothing” Alternative

An alternative land-use option to developing the project at the proposed development site would be to leave the site as it is, with no changes made to the current land-use. A ‘do-nothing’ scenario was considered to be an unsustainable and inefficient use of these strategically located CI zoned lands; particularly having regard to the substantial element of the previously permitted development has been completed. The site would remain in a state of poor repair and abandonment, with continued deterioration likely. Public access to the site would continue to be prohibited. The suitability of the lands for development, i.e. located within a broad corridor of industrial, commercial and institutional lands and adjacent to public transport and excellent road infrastructure, were also key considerations. Phase 1 of the development (which includes Commercial Offices (Blocks A-E), Hotel and Site Infrastructure, including all basement structures for the entire site) has received permission, and will be constructed regardless of whether this currently proposed phase 2 is permitted or not.

2.5 Scoping and Consultation

2.5.1 Scoping Document

Scoping is the process of determining the content, depth and extent of topics to be covered in the environmental information to be submitted to a competent authority for projects that are subject to an Environmental Impact Assessment (EIA). This process is conducted by contacting the relevant authorities and Non-Governmental Organisations (NGOs) with interest in the specific aspects of the environment likely to be affected by the proposal. These organisations are invited to submit comments on the scope of the EIA and EIAR and the specific standards of information they require. Consultees are invited to contribute to the EIA process by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the EIA process and in its preparation. Comprehensive and timely scoping helps ensure that the EIAR refers to all relevant aspects of the proposed development and its potential effects on the environment. In this way, scoping not only informs the content and scope of the EIAR, it also provides a feedback mechanism for the proposed design itself.

A scoping letter providing details of the application site and the proposed development, was prepared by McCarthy Keville O’Sullivan Ltd. and circulated on 29th November 2018 in relation to this Phase 2 EIAR. Prior to this, a scoping letter for Phase 1 of the development (located on the same site footprint) was circulated on 27th September 2018. These letters were sent to the agencies, NGOs and other relevant parties listed in Table 2.1.

McCarthy Keville O’Sullivan Ltd. requested the comments of the relevant personnel/bodies in their respective capacities as consultees with regards to the EIA process.

2.5.2 Scoping Responses

Table 2.1 lists the responses received to the scoping document circulated on 27th September 2018 and the 29th November 2018. The scoping replies are given for both as they both relate to the same site, and cognisance was given to both sets of scoping responses when producing this EIAR. Copies of all scoping responses received are included in Appendix 2-1 (Phase 1) and Appendix 2-2 (Phase 2) of this EIAR. The recommendations of the consultees have informed the EIA process and the contents

of the EIA. If further responses are received, the comments of the consultees will be considered to further to assist documenting any impacts the development may have had on the surrounding environment during its lifetime.

The responses of the consultees are summarised below and in Table 2.1.

Table 2.1 Scoping Consultees

No.	Consultee	Response (Phase 1 Scoping)	Response (Phase 2 Scoping)
1	An Taisce	Letter on 18 th November 2018 requesting clarification on a number of points.	No response
3	Department of Agriculture, Food and the Marine	Email acknowledgement on 5th October 2018 stating that they have no submissions or observations to make on the proposed scheme	Email acknowledgement on 31st December 2018 repeating Phase 1 response
4	Department of Culture, Heritage and the Gaeltacht	Response received 1 st November 2018 They stated: It appears that EIA scoping is being undertaken on a non-statutory basis. Any opportunity to Consult Galway City Council (or An Bord Pleanala), as the EIA authority, at pre-planning stage should be availed of, including in relation to formal EIA scoping, available environmental data and any plan-level mitigation that may apply whether to the location, or the type of site or development. -In relation to nature conservation and biodiversity the ‘planning’ section of the NPWS website should be reviewed as well as the habitat mapping that is available for the area. -Any new standards, guidance and legislation of relevance should be taken into account, noting any changes in approach or application arising from case law relating to the EIA and AA processes in particular.	Response received 18th January 2019 Response focused on likely significant effects on the environment, including European sites, biodiversity and implications for proper planning and sustainable development in the area.
5	Galway City Council (Economic Development & Planning Department)	No response	No response
6	Galway City Council (Transportation and Infrastructure Department)	No response	No response

No.	Consultee	Response (Phase 1 Scoping)	Response (Phase 2 Scoping)
7	Galway City Council (Environmental Section)	No response	No response
8	Galway City Council (Heritage Officer)	No response	No response
9	Failte Ireland	Response received 9 th October 2018. A copy of Failte Ireland’s Guidelines for the treatment of tourism in an EIS was attached	No response
10	Geological Survey of Ireland	Response received 18 th October 2018. They stated: -County Geological Sites (CGS) include additional sites that may also be of national importance, but which were no selected as the very best example for NHA designation. The GSI has identified two GCSs within 2.25km of the proposed site. 1. Roadstone Quarry on the Tuam Road 2. Merlin Park Quarry With the current plans, there is no envisaged impact on the integrity of County Geological Sites by the proposed developments. Should development go ahead, GSI would appreciated a copy of reports detailing any site investigations carried out.	No response
11	Health Service Executive West	No response	No response
12	Inland Fisheries Ireland	No response	No response
14	Irish Water	No response	No response
15	Irish Wildlife Trust	No response	No response

No.	Consultee	Response (Phase 1 Scoping)	Response (Phase 2 Scoping)
16	Office of Public Works	No response	No response
17	The Heritage Council	No response	No response
18	Transport Infrastructure Ireland	<p>Response received 18th October 2018</p> <p>They state:</p> <ul style="list-style-type: none"> -Consultations should be had with the relevant local authority/National Roads Design Office with regard to locations of existing and future national road scheme. -The EIAR should demonstrate that the development can proceed complementary to safeguarding the capacity, safety and operational efficiency of the N6 junction with the R336 and the N83, and other relevant national roads -The EIAR should identify the methods/techniques for any works traversing/in proximity to the national road network to demonstrate development can proceed complementary to safeguarding the capacity, safety and operational efficiency of that network. -EIAR shall include provision for travel planning/mobility management planning in the interests of protecting national roads capacity. -Advises to view assessments, design and construction and maintenance standards and guidance available at TII Publications -Should assess visual impacts from existing national roads and future road schemes -Should review TII's Assessment and Construction Guidelines, including the Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes as well as the Guidelines for the Treatment of Noise and Vibration in National Road Schemes 	Response received 19 th December 2018 with similar points as Phase 1 response
19	ESB Networks	Email acknowledgement on 2 nd October 2018. A further email was received to state that it was forwarded to the correct contact. No comment was given.	Email acknowledgement on 29 th November 2018. A further email was received on 30 th November 2018 to state that it was forwarded to the correct contact. No comment was given.
20	National Transport Authority	Email acknowledgement on 27 th September 2018	Email acknowledgement on 30 th November 2018

2.5.3 Pre-Planning Meetings

2.5.3.1 Tripartite Meeting with GCC and An Bord Pleanála – 18th April 2019

An Board Pleanála convened a tripartite meeting with the Applicant and Galway City Council on the 18th April 2019. The meeting agenda focused on compliance with SHD/Environmental legislation; zoning provisions; development strategy; car parking rationale and site services. The applicant and the design team took full cognisance of the issues raised and the overall planning documentation has evolved since the pre-planning meeting to reflect these discussions.

2.5.3.2 Section 247 Pre-Planning Meeting

A pre-application consultation meeting took place on the 7th November 2018 with the relevant officers GCC and representatives of the applicant and their design team. The pre-application discussions focused on, *inter alia*, the proposed planning strategy for the landholding, the scheme masterplan, traffic impacts, governance/management proposals, landscaping and public realm considerations and drainage proposals. The applicant and the design team took full cognisance of the issues raised and the overall scheme has evolved since the pre-planning meeting to reflect these discussions.

2.5.3.3 Meeting with GCC Housing Section

The applicant met with the GCC Housing Section on 11th December 2018 to discuss the Part V proposal for the proposed scheme. The proposed scheme includes 287 no. residential units. The applicant proposes providing 10% of the dwelling units to fulfil the scheme's Part V obligation. Proposals relating to Part V provision were agreed in principle with the GCC Housing Section.

2.5.3.4 Phase 1 Meetings

The Phase I planning application for a mixed-use office, hotel and related use has been submitted to Galway City Council (Pl. Ref. 18/363). Meetings on Phase I which are relevant to the current scheme include the following:

- Crown Square Phase 1 – Pre-Planning Meeting- 4th September 2018;
- Meeting with GCC Parks and Recreation Section – 12th October 2018;
- Meeting with GCC Transportation Department to discuss the Further Information Request issued on Pl Ref 18/363 – 23rd January 2019; and
- Meeting with GCC Transportation Department-14th August 2018.

2.6 Cumulative Impact Assessment

This Environmental Impact Assessment Statement (EIAR) includes a description of likely significant impacts of the project, includes an assessment of cumulative impacts that may arise. The factors considered in relation to cumulative effects include human beings, flora and fauna, soil, water, climatic factors, landscape, cultural heritage and material assets.

The potential for cumulative impacts arising from the proposed development in combination with other projects has therefore been fully considered throughout this Environmental Report. This section of the Environmental Report provides an overview of other projects located within the wider area that have been considered within the cumulative impact assessments.

2.6.1 Methodology for the Cumulative Assessment of Projects

The potential for cumulative effects to arise from the proposed development was considered in the subject areas of human beings, flora and fauna, soil, water, climatic factors, landscape, cultural heritage and material assets. To comprehensively consider potential cumulative impacts, the final section of each relevant section within this Environmental Report includes a cumulative impact assessment where appropriate.

The potential cumulative impact of the proposed residential development and other relevant developments has been carried out with the purpose of identifying what influence the proposed development will have on the surrounding environment when considered cumulatively and in combination with relevant permitted, proposed and constructed projects in the vicinity of the proposed site.

The Cumulative Impact Assessments (CIA) of projects has four principle aims:

1. To establish the range and nature of existing projects within the cumulative impact study area of the proposed residential development.
2. To summarise the relevant projects which have a potential to create cumulative impacts.
3. To establish anticipated cumulative impact findings from expert opinions within each relevant field. Detailed cumulative impact assessments are included in each relevant section of the EIAR.
4. To identify the projects that hold the potential for cumulative interaction within the context of the proposed development and discard projects that will neither directly or indirectly contribute to cumulative impacts.

Assessment material for this cumulative impact assessment was compiled on the relevant developments within the vicinity of the proposed development. The material was gathered through a search of the Galway City Council online Planning Register, reviews of relevant Environmental Report, or Environmental Impact Assessment Report (EIAR) documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts. These projects are summarised in Section 2.5.2 below.

2.6.2 Projects Considered in Cumulative Assessment

The comprehensive review of the Galway City Council planning register documented relevant general development planning applications within the vicinity of the proposed works, most of which relate to the provision mixed use development. The following developments have been included in the context of the cumulative assessment.

Permitted Phase I Development Crown Square – Pl Ref 18/373

Crown Square Developments Ltd received planning permission from Galway City Council for a mixed-use development comprising 5 no. blocks of commercial offices which range in height from 3-6 stories, a hotel development comprising 175 no. bedrooms, conferencing facilities and restaurant/bar areas, double basement parking and all other associated site development and servicing works. The application was submitted to Galway City Council on 12th November 2018. Galway City Council issued a request for Further Information on the 11th January 2019 seeking clarification and additional information on a number of items. A comprehensive response which addressed all of the items raised was submitted to the Planning Authority on the 18th February 2019. Galway City Council (GCC) granted planning permission for the proposal on 10th May 2019 subject to 27 no. conditions.

N6 Galway City Ring Road -ABP Ref PL 07.302848

Galway County Council (“the road authority”) on its own behalf and on behalf of Galway City Council pursuant to an agreement under section 85 of the Local Government Act, 2001(as amended) and as approved by Transport Infrastructure Ireland (the operational name of the National Roads Authority) pursuant to section 14(8) of the Roads Act 1993 (as amended), has applied under section 51(2) of the Roads Act, 1993 (as amended by section 9(1)(e)(i) of the Roads Act 2007) to An Bord Pleanála (‘the Board’) for approval in relation to the proposed road development. The proposed road development would consist of a dual carriageway, a single carriageway, new link roads, the realignment of existing roads, diversion of electricity networks, and ancillary and consequential works associated therewith. The application was submitted to An Bord Pleanála on 23rd October 2018. The site is located approximately 1.3km to the north of the site.

Office Development Ballybrit Business Park – PL Ref 18/338

McDonogh Capital Investments Limited are applying to Galway City Council for a 10-year planning permission for 3 no. office blocks and a café. The application was submitted to Galway City Council on 26th October 2018. The site is located approximately 500m to the north east of the site. The proposal was granted permission on the 23rd May 2019 subject to 26 no. conditions.

Office Development Wellpark Road – PL Ref 18/271

Shaun Hennelly applied to Galway City Council for permission for an office development which consists of a four to six storey, Grade A office building over a partial basement car park, new vehicular site access, road and surface car parking with all ancillary site works, landscaping and service connections. Galway City Council granted permission for the development 27th November 2018 subject to 18 no. conditions. The site is located approximately 200m to the south west.

Mixed Use Development Bonham Quay – PL Ref 17/83 / ABP Ref PL 61 .300275

Bonham Dock Limited applied to Galway City Council Permission for a 10 year permission for development of a mixed use office development provided in 4 no. blocks (7/8storey) over a single basement, public realm improvements and all associated works. An Bord Pleanála granted permission for the development following a third party appeal on the 31st August 2018 subject to 22 no. conditions. The site is located approximately 2.5km to the south west of the proposed development.

Mixed-Use Development Monivea Road – PL Ref 16/332 / ABP Ref PL 61 .248815

Green Way Estates (Sligo) Ltd. applied to Galway City Council for planning permission for development of 52 no houses, a commercial building of 2786 sqm gross floor area and associated works. An Bord Pleanála granted permission for the development following a third party appeal on the 6th November 2017 subject to 17 no. conditions. The site is located directly to the east of the proposed development on the on the eastern side of the Monivea Road.

Also considered as part of the cumulative impact assessment are local small-scale developments such as alterations to single dwellings houses and commercial and industrial premises.

Each chapter of the EIAR includes a cumulative impact assessment of the proposed development with other planned projects in the immediate area, which primarily relates to the permitted development adjacent to the proposed development site.

Where relevant the EIAR also takes account of other small developments within the area.