

2. BACKGROUND TO THE PROPOSED DEVELOPMENT

2.1 Introduction

The Proposed Development is a component of a larger residential development project (Proposed Project). The Proposed Project involves the construction of more than 500 residential units, and the development will require separate, individual planning applications for each part of the project. The Proposed Project forms part of an overarching masterplan for the wider landholding that was extensively discussed and refined in collaboration with the planning authority. The master planning process, initiated in 2023 for the Knocknacarra District Centre (South) and the adjoining “Kingston lands” considered access, connectivity, permeability, and a balanced mix of uses across the broader area, ensuring that each subsequent application, including the present proposal, is informed by a cohesive and coordinated design framework.

An LRD meeting was held between representatives of the Design Team, Applicant and Galway City Council under Section 32C of the Planning and Development (Amendment) (Large Scale Residential Development) Act 2021, on 27th March 2025. The Planning Authority issued a Notice of LRD Opinion on 17th April 2025. It was the opinion of the Planning Authority that there was a reasonable basis on which to make an application for the proposed LRD. The LRD Opinion outlined specific items to be addressed in the formal application, as well as advising of any additional documentation that should accompany said application. In accordance with Schedule 7 of the Planning and Development (Large-Scale Residential Development) Regulations 2021, MKO have provided a Statement of Response to the items set out in the LRD Opinion.

2.2 Site of the Proposed Development

2.2.1 Site Location

The Proposed Development is located south of the Western Distributor Road, Knocknacarra, Galway approximately 3 kilometres (km) west of Galway City Centre. The surrounding area is characterised by the established residential suburb of Knocknacarra. The lands to the north are the location of the Gateway Retail Park which is the primary district retail centre serving the surrounding area. A number of well-known retailers have premises at this location, including Dunnes Stores and B&Q. The existing Retail Park is made up of Phase 1 and 2 of the overall development strategy for the ‘Gateway Site’. St. John the Apostle, Knocknacarra National School is situated west of the Proposed Development, on School Road. While another primary school, Gaelscoil Mhic Amhlaigh, is found north of the Proposed Development adjoining the Gateway Retail Park (See Figure 2-1).

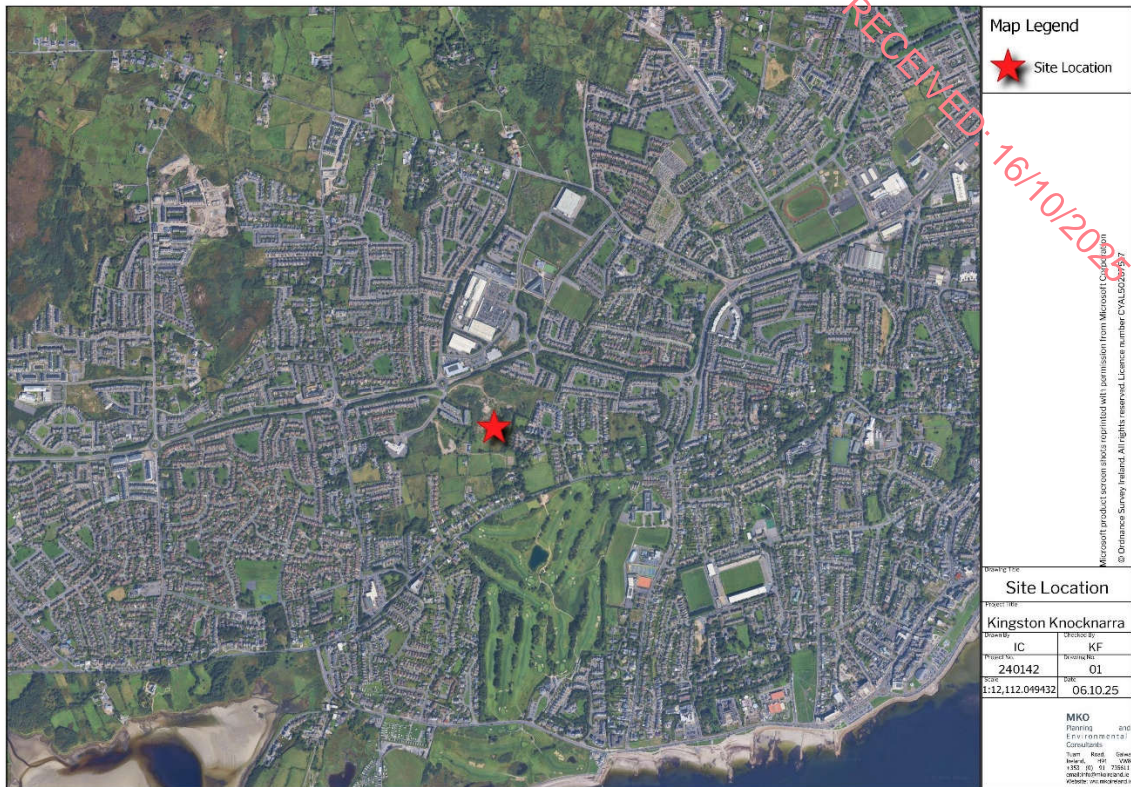


Figure 2-1 Proposed Development Site Location

2.2.2 Physical Characteristics of Site and Surrounding Lands

The Proposed Development site extends to approximately 5.37 hectares. Part of the Proposed Development site is currently utilised for low-intensity agricultural purposes, while the remainder predominantly comprises scrubland with scattered small trees throughout.

The Proposed Development site’s topography is generally flat. The surrounding area of Knocknacarra is primarily residential in character, supplemented by commercial and educational facilities, including the Gateway Retail Park and two primary schools: Gaelscoil Mhic Amhlaigh and St. John the Apostle, Knocknacarra National School.

Under the Galway City Development Plan 2023-2029 (GCDP 2023-2029), the lands are zoned for ‘Enterprise, Light Industry and Commercial’ as well as ‘R - Residential’ uses, both of which permit residential and commercial development. Furthermore, the site is subject to a site-specific zoning objective ‘Knocknacarra District Centre South Opportunity Site,’ as outlined in Section 3.4.1 of this chapter. A review of National Monuments Service mapping indicates that there are no archaeological records or protected structures located on the Proposed Development site. Given the location of the Proposed Development site in a heavily developed area it is considered that the archaeological potential of the Proposed Development site is low to negligible.

A Flood Risk Assessment (FRA) was prepared by Tobin for the Proposed Development. The assessment determined that the site is located within Flood Zone C and concluded that the proposed residential development is appropriate for this flood zone classification.

A review of National Parks and Wildlife Service mapping indicates that the nearest designated sites to the Proposed Development site are the Moycullen Bogs Natural Heritage Area (NHA) (Site Code: 002364), the Lough Corrib Special Area of Conservation (SAC) (Site Code: 000297), the Galway Bay

Complex SAC (Site Code: 000268) and the Inner Galway Bay Special Protection Area (SPA) (Site Code:004031). The location of these sites in the context of the Proposed Development site are identified in Figure 2-2 below.



Figure 2-2 Designated Sites nearest Proposed Development

2.2.3 Site Access

The Proposed Development site is accessed via the Altan Road to the west and Kingston Road to the south. From the Altan Road there is one access point just south of the Altán Apartments. Pedestrian and cyclist access from the south of the site is via an existing roadway that joins the Kingston Road. For more information in respect of the access, traffic and transportation arrangements associated with the Proposed Development please see refer to the Traffic and Transport Assessment prepared by TOBIN Engineering, accompanying this planning application.

2.2.4 Proposed Development in context of adjacent developments

The Proposed Development is part of a ‘Masterplan Development’ at Knocknacarra District Centre South. By incorporating adjacent lands to the north and northeast, zoned as ‘Regeneration and Opportunity Sites’, and coordinating a joint approach among project developers, the land bank’s full potential could be realised through a number of distinct planning applications, which were informed by early master planning exercises in consultation with the planning authority. Through this process, a cohesive plan for access, connectivity, permeability and a diverse mix of uses could be established, with individual developers and landowners then progressing to detailed design and eventually would seek permission for individual development from Galway City Council. Key emergent principles for the lands were identified as Links & Connectivity, Transport, Green infrastructure & Neighbourhoods. The emerging masterplan strategy identified the Proposed Development site as a prime location for residential development. This site is strategically connected to the proposed urban village to the north,

with accessible routes from Millers Lane and the future Kingston Park. The resultant masterplan is illustrated in Figure 2-3 below.

RECEIVED: 16/10/2025



Figure 2-3 Resultant Masterplan

2.3 Planning History

This section sets out the relevant planning history of the site and its immediate surrounds.

2.3.1 Planning Applications within the Application Boundary

An overview of the planning history within the application boundary is provided below in Table 2-1.

Table 2-1 Planning Application History within Application Boundary

Pl. Ref	Description	Decision
97512	Permission for retention of temporary information signage.	Refused 14/10/1997 Refused on appeal 11/03/1998

Pl. Ref	Description	Decision
99461	Permission 1. A business technology/office building incorporating medical consulting rooms and an underground car park 2. A shopping centre including a 2493 mt sq supermarket, a shopping mall with 14 shops, off licence, offices and medical consulting rooms, a creche, a pharmacy, a banking hall and ATM, a drive in take-away restaurant, 15 apartments, 6 screen cinema children's play centre and a underground car park.	Granted subject to 50 no. conditions 26/01/2000 Granted on appeal subject to 22 no. conditions 24/07/2001
99466	Permission for the temporary retention of land fill.	Granted subject to 3 no. conditions 22/12/1999
17167	RETENTION: Permission for retention of existing security fencing around the perimeter of the site.	Granted permission 14/09/2017
21148	Permission for development which will consist of Phase 1 of two-phased masterplan for a new urban village 'Kingston Cross' on lands zoned CI on the south side of the Western Distributor Road at the Knocknacarra District Centre. Phase 1 the subject of this application is for a mixed-use development comprising a licensed supermarket with undercroft parking (258 parking spaces); a retail warehouse unit with a surface area car park (137 parking spaces); 9 no. flexible shop/retail service units; 2 no. flexible medical/community units; a café/restaurant unit, together with ancillary office use, entrance lobbies, lifts, travellers, trolley bays, a substation, a new pedestrian/cycle route, boundary treatments, landscaping, a central civic space including play and exercise areas and together with a covered sports court; a new access road off the Western Distributor Road, service access and signage as well as ancillary development and all associated site development works.	Refused 02/07/2021 Refused on appeal 22/04/2022
2460370	Forbairt Snámh Thiar Cuideachta Faoi Theorainn Ráthaíochta, intend to apply to Permission for development which consists of; Galway City Council for permission for the development of a swimming pool and sports facility at a 0.87ha site accessed from Altán Road and Millers Lane, in the townlands of Ragoon, Knocknacarra, Galway. The Proposed Development will consist of the construction of a prefabricated aluminium frame and fabric tensile envelope with independently constructed facilities building within the envelope and will include the following: 1. Provision of a 35 x 25m competition standard swimming pool with adjustable floor (max depth 2m); 2. Ground floor changing rooms 'wet village' including steam room, sauna and first aid (425 sq.m.), pool deck and spectator area (476 sq.m), reception and staff offices (57 sq.m.), gymnasium (576 sq.m), storage areas and plant spaces (52 sq.m.); 3. Provision of ancillary spaces on the mezzanine floor including multifunctional sports court (760sq. m), gymnasium (92 sq.m), staff offices (54 sq.m.); bathroom facilities and plant spaces (389 sq.m.); 4. Provision of plant area at basement level (495 sq.m.); 5. Provision of a coffee dock at ground floor level (85 sq. m.); 6. The provision of new vehicular and	Granted subject to 19 conditions 23/07/2025

RECEIVED: 16/10/2025

Pl. Ref	Description	Decision
	pedestrian access from Altán Road along with the provision of upgraded cycle and pedestrian infrastructure along Altán Road; 7. The provision of new active travel cycle and pedestrian access from Millers Lane; 8. Provision of site landscaping, wall mounted signage, public lighting, bike parking (89 no. Spaces), car parking (75 no. Spaces), bus parking (2 no. Spaces), 1 no. ESB Substation, 1 no. LV Switch room, ground mounted solar PV (250 sq. m) and all associated site development and site enabling works. A Natura Impact Statement (NIS) has been prepared in respect of the Proposed Development.	

RECEIVED: 16/10/2025

2.3.2

Other Planning Applications within the Vicinity of the Application Site

Appendix 2-1 provides a list of the other relevant planning applications within a 1km radius which relate to the Proposed Development and has been compiled following a review of Galway City Councils Planning Register and applications made to An Coimisiún Pleanála. The planning search area was defined following a review of parameters to be assessed as part of an Environmental Impact Assessment (EIA). To this extent, from this search area, a long list of projects considered for the assessment was compiled and is included in Appendix 2-2. Within each chapter of the EIAR, the projects considered for the cumulative assessment are selected from this list as are deemed relevant for each discipline. The planning history search area (1km buffer) is illustrated in Figure 2-4 below. The results are listed in Appendix 2-1 below.



2.4 Planning Policy

This section of the report sets out the relevant national, regional and local planning policies and objectives of relevance to the Proposed Development.

2.4.1 National Planning Policy

2.4.1.1 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 actually comes into use in accordance with Development 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.

2.4.1.2 National Planning Framework

In February 2018 the Department of Housing, Planning, Community and Local Government published the National Planning Framework (NPF) entitled 'Ireland 2040' to succeed the National Spatial Strategy. The NPF comprises the Government's 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.

The NPF consists of a range of National Strategic Outcomes. Relevant to this application are:

- **NSO 1:** Compact Growth
- **NSO 4:** Sustainable Mobility
- **NSO 5:** A Strong Economy Supported by Enterprise, Innovation, and Skills
- **NSO 6:** High-Quality International Connectivity
- **NSO 8:** Transition to a Low Carbon and Climate Resilient Society
- **NSO 10:** Access to Quality Childcare, Education, and Health Services

In relation to Ireland's cities, including Galway, the NPF:

- Supports ambitious growth targets to enable the four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% to 2040 and to enhance their significant potential to become cities of scale.
- Enables the four cities to be regional drivers and to lead in partnership with each other and as partners in regional/inter-regional networks as viable alternatives to Dublin.
- Focuses investment to improve the collective 'offer' within each of the four cities, i.e. infrastructure, quality of life and choice in terms of housing, employment and amenities.

In addition, the NPF has a number of directly relevant national policy objectives that articulate delivering on a compact urban growth programme. These include:

- **NPO 1b:** relating to population growth in the region.

- **NPO 2(a):** relating to growth in our cities.
- **NPO 3b:** relating to targets for new homes in Galway City and suburbs within existing built up footprints.
- **NPO 4:** relating to attractive, well-designed liveable neighbourhoods.
- **NPO 5:** relating to sufficient scale and quality of urban development.
- **NPO 6:** relating to increased residential population and employment in urban areas.
- **NPO 13:** is that, in urban areas, planning and related standards including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth.
- **NPO 27:** is to provide alternatives to travel by private car and to prioritise walking and cycling in development.
- **NPO 32:** To target the delivery of 550,000 additional households to 2040.
- **NPO 33:** Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- **NPO 34:** Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.
- **NPO 35:** is to increase residential density in settlements through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building height.
- **NPO 43** To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.
- **NPO 46** is to increase residential density in settlements through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building height.

2.4.1.2.1 Updated First Revision of the National Planning Framework

The First Revision of the NPF was released in April 2025. The Updated Revision focuses on the need to update the NPF to appropriately reflect changes to government policy that have taken place since its initial publication six years ago. Key drivers of change that were identified as part of the process include: the climate transition, regional development, changing and diverse demographics, digitalisation, and investment and prioritisation.

As part of the policy revision, several updates and additions were made to the National Policy Objectives contained in the NPF. This resulted in the amendment of policies and objectives. For the purposes of this Proposed Development, the following key relevant changes are noted. The new text is either summarised or provided below with additions to the original text shown in bold, and removals struck through.

What was originally **NPO 1b** is now **NPO 3**. The revision updated population targets for each region. It revised the projected number of additional people living between 2016-2040 in the Western Region from 160,000-180,000 additional people to 210,000 additional people resulting in a future regional population of just over 1 million.

What was originally **NPO 6** is now **NPO 14**.

*“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design **and placemaking** quality, in order to sustainably influence and support their surrounding area **to ensure progress toward national achievement of the UN Sustainable Development Goals.**”*

What was originally **NPO 17** is now **NPO 90**.

*“Enhance, integrate and protect the special physical, ~~social~~, **environmental**, economic and cultural value of built heritage assets, **including streetscapes, vernacular dwellings and other historic buildings and monuments**, through appropriate and sensitive use now ~~and for future generations~~ **investment and conservation.**”*

What was originally NPO 13 is now NPO 22.

“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. ~~These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.~~”

What was originally NPO 32 is now NPO 42.

*“To target the delivery of ~~550,000~~ **housing to accommodate approximately 50,000** additional ~~households~~ **homes per annum** to 2040.”*

What was originally NPO 35 is now NPO 45.

*“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, ~~and~~ **increased building heights and more compact forms of development**”*

Finally, the updated NPF has included the addition of a number of new National Planning Objectives. Several of these are relevant to the Proposed Development including:

- **NPO 10:** *“Deliver **Transport Orientated Development (TOD)** at scale at suitable locations, served by high capacity, public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.”*
- **NPO 11:** *“Planned growth at a settlement level shall be **determined at development plan-making stage** and addressed, within the objectives of the plan. The consideration of individual development proposals on zoned and, serviced development land subject of consenting processes under the Planning and Development Act **shall, have regard to a broader set of considerations beyond the targets including, in particular, the receiving, capacity of the environment.**”*
- **NPO 79:** *“Support the management of stormwater, rainwater and surface water flood and pollution risk through the **use of nature-based solutions and sustainable drainage systems**, including the retrofitting of existing environments to support nature-based solutions.”*

The changes to the National Policy Objectives, and wider National Planning Framework have been considered by the Applicant and the Design Team and integrated into the design of the Proposed Development. National policy in Ireland strongly supports the development of residential units, as a central component of supporting the sustainable growth of Irish cities. The Proposed Development will deliver more than 362 no. residential units in Galway which will enable the potential to reach growth targets set out in national policy.

2.4.2 Section 28 Ministerial Guidelines

There are various Ministerial Guidelines in respect of residential development, with those most relevant to the Proposed Development included below.

2.4.2.1 Design Manual for Urban Roads and Streets (DMURS)

The *Design Manual for Urban Roads and Streets* (DMURS) was published by the Department of Transport, Tourism and Sport and the Department of Environment, Community and Local Government in April 2013, with a revised version published in May 2019. 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.
- **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. The Proposed Development has due regard to the above. A Design Manual for Urban Roads and Streets has been prepared by Tobin Consulting Engineers to accompany this planning application.

2.4.2.2 Urban Development and Building Heights Guidelines for Planning Authorities 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 NPF.

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.

RECEIVED: 16/10/2025

The Proposed Development is in line with Urban Development and Building Heights Guidelines as it is located in an 'Outer Suburb' in the southwest region of the city, as stated in the Galway Urban Density and Building Heights Study 2021. The Study indicates that a height of 3-4 storeys may be considered in this location which is compliant with national policy and SPPR 4 of the Urban Development and Building Heights Guidelines. It is reasoned that the Proposed Development of 2-6 storeys is appropriate in this location.

2.4.2.3 **Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025**

The Planning Design Standards for Apartments Guidelines for Planning Authorities (2025) set national planning policy and guidance in relation to the planning and development of apartment schemes to take account of current Government policy and economic, social and environmental considerations. The Guidelines which were published in July 2025 replaced The Sustainable Urban Housing: Design Standards for New Apartments (2023).

Since the publication of previous guidelines relating to apartment standards, the Sustainable Residential Development and Compact Settlement Guidelines (SRDCSGs) were issued in 2024 under Section 28 of the Act and the revised National Planning Framework (NPF) was approved in April 2025, thereby providing an updated planning policy context for apartment development. In addition, the Government's plan for housing, Housing for All, was published in 2021, setting out the ambition to significantly increase housing supply.

The Apartment Guidelines set out criteria in relation to -

- Apartment mix;
- Internal space standards for different types of apartments;
- Dual aspect ratios;
- Floor to ceiling heights;
- Apartments to stair/lift core ratios;
- Storage spaces; and
- Amenity spaces including balconies/patios.

The Proposed Development aligns with the Design Standards for New Apartments Guidelines as it connects to adjacent nodes including Millers Lane, Kingston Road, Altan, St. John the Apostle School, and future pitches and park. It provides a variety of apartment mix within an apartment scheme ranging from 1 bed to 3 bed apartments. The proposals had been designed to maximise opportunities for dual aspect apartments. Dual aspect units make up a 60% of units in Block A and 55% in Block B. Please refer to the Design Report, as prepared, by Reddy's Architecture & Urbanism to accompany this planning application.

2.4.2.4 **Sustainable Residential Development and Compact Settlements: Guidelines for planning Authorities 2024**

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* (hereafter referred to as the '2024 Guidelines') constitute Ministerial Guidelines under Section 28 of the *Planning and Development Act 2000* (as amended). These Guidelines replace the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* issued as Ministerial guidelines under Section 28 of the Act in 2009. There is a renewed focus in the 2024 Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

The layout of the guidelines is as follows:

1. *Introduction and Context*; provides an overview of the document, describes the key characteristics of sustainable and compact growth and sets out a summary of Government policy in the areas of spatial planning and housing, climate and sustainable mobility that inform the policy approach;
2. *Implementation*: addresses the interaction of these Guidelines with the plan making and development management processes and with other relevant Section 28 Guidelines;
3. *Settlement, Place and Density*: sets out policy and guidance in relation to the key growth priorities for settlements at each tier in the national settlement hierarchy in relation to residential density and exemptions of such;
4. *Quality Design and Quality Placemaking*: sets out policy and guidance in relation to quality design and placemaking to be applied in the plan making process and the key indicators of quality design and placemaking that will be assessed in individual planning applications;
5. *Development Standards for Housing*: sets out 4 no. specific planning policy requirements (SPPRs) in relation to housing standards to be applied in support of greater innovation within the housing sector and to facilitate more compact forms of residential development.

The Proposed Development aligns with the Sustainable Residential Development and Compact Settlement Guidelines as it aligns with the density standards set out for Galway with 35 to 50 dwellings per hectare (dph) in an area designated as accessible suburban/urban extension and 100 dph (net) open for consideration at 'accessible' suburban / urban extension locations. It aligns with the quality design and quality placemaking through the creation of a masterplan for the site and engagement with Galway City Council. The Proposed Development aligns with the Guidelines as it adheres to separation distances, minimum private open space standards for houses, public open space, car parking, cycle parking and storage.

2.4.2.5 **Childcare Facilities - Guidelines for Planning Authorities 2001**

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.

The Proposed Development provides for a 440m² crèche to accommodate up to 99 children, which exceeds the requirement for the 362-unit development (after excluding one-bedroom apartments and age-friendly units). This provision is calculated on the basis 3.70m² floor area per child for ages 0-1, 2.80m² floor area per child for ages 1-2 and 2.32m² floor area per child for ages 2-6. This calculation excludes non-play areas such as kitchens, toilets, sleeping rooms and other ancillary spaces.

2.4.2.6 **The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)**

The Planning System and Flood Risk Management Guidelines were published by the Minister for the Environment, Heritage & Local Government in November 2009 under Section 28 of the Planning & Development Act 2000 (as amended). The Guidelines require the planning system at all levels to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere; adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

A FRA had been prepared by Tobin Consulting Engineers to accompany this planning application. The FRA concluded that the estimated risk of flooding to the Proposed Development is minimal and that the development will not increase the risk of flooding elsewhere. Highly vulnerable residential properties and the ESB substation area are appropriately located in Flood Zone C, and with appropriate drainage design, the risk to the site from pluvial flooding will be minimal.

2.4.3 Regional Planning Policy Context

2.4.3.1 Regional Spatial and Economic Strategy Northern & Western Regional Assembly 2020-2032

The Regional Spatial and Economic Strategy (RSES) Northern & Western Regional Assembly (NWRA) 2020 – 2032 provides 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 Northern & Western Regional Assembly (NWRA) published the Regional Spatial and Economic Strategy (RSES) in March 2020 and are set within the context of national planning policy, including the NPF, providing a statutory link between national and local planning policy and objectives. 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 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. *“The population of Galway MASP to grow by 27,500 to 2026 and by a further 14,500 to 2031 with the population of the city and suburbs accommodating 23,000 to 2026 and a further 12,000 to 2031.*
2. *“Deliver at least half (50%) of all new homes that are targeted within the MASP to be within the existing built-up footprint.”*

The Proposed Development aligns with the RSES as it is providing the delivery of 362 no. units to accommodate the growing population of Galway City. Regional policy provides a clear support for the development of residential units to enable the targeted growth of our cities.

2.4.4 Local Planning Policy Context

2.4.4.1 Galway City Development Plan 2023-2029

The current statutory planning policy document for the Proposed Development site is the Galway City Development Plan 2023-2029 (GCDP) which was adopted by the City Council in November 2022 and came into effect on the 4th of January 2023. Under the current GCDP, the site in question zoned as the ‘Knocknacarra District Centre South Opportunity Site’ and ‘Residential’. The GCDP lists uses which may contribute to the zoning objectives and is outlined in Table 2-2 below.

Table 2-2 Residential Land Use Zoning Objectives

<p>Zoning Objective R ‘To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods’</p>	
<p>Uses which <u>are compatible with</u> and contribute to the zoning objective, for example</p>	<p><u>Residential</u></p> <ul style="list-style-type: none"> -Residential institution -Outdoor recreational use -Accommodation for the Traveller Community -Local shops, local offices, licensed premises, banks and other local services -Buildings for education -Childcare facilities -Buildings for the care of the health, safety or welfare of the public -Buildings for community, cultural or recreational use
<p>Uses which <u>may contribute to</u> the zoning objectives, dependant on the R and R2 location and scale of development, for example:</p>	<ul style="list-style-type: none"> -Hotel, Guesthouses, Hostels and B&Bs -Part conversion or extension of private residence to home office, childcare facility or small enterprises by the occupier of the dwelling, at a scale as would not unduly interfere with the primary use of the dwelling or prevailing residential amenity -Places of worship -Public utilities

The Proposed Development site is part of a parcel of land identified as ‘Knocknacarra District centre South’ in the GCDP. This land has a number of specific development objectives associated with them as follows:

- *Include for a minimum of residential/residential commercial development of a scale equivalent to 50% of the development capacity of the site which shall be integrated into the overall scheme.*
- *Provide mixed uses which shall include for a number of small retail /service retail units which can be demonstrated to deliver a broad range of District Centre uses. This shall be assessed in the light of the scale and nature of uses delivered on the site at that period.*
- *Provide a good balance of use mixes, including uses which can include healthcare and primary health care, commercial leisure uses, hotel and educational uses, which would by virtue of their use and scale serve the needs of the surrounding neighbourhood area.*
- *Provide a strong frontage and address of the Western Distributor Road and internal street network with the avoidance of dead frontages.*
- *Provide quality pedestrian and cycle connections with the adjacent neighbourhood, schools, open space lands and wider green network.*
- *Demonstrate a structured hierarchy of spaces within the layout maximizing the opportunities for linkage with adjacent developments/future developments.*
- *Ensure pedestrian priority in the access network and accommodate public transport access or easy access to the public transport network and incorporating emerging bus route proposals along the Western Distributor Road.*
- *Demonstrate divisible viable phases of development.*
- *Having regard to investment in public transport and sustainable mobility measures, the level of car parking provision will be considered having regard to performance based standards, urban design, sustainability, location and scale of development proposed and should reflect the designated location being a multi-purpose trip destination.*
- *The site shall include for a civic open space/park which shall be reserved on any layout for this purpose and should be of a size and function to reflect the scale of the*

overall development and shall be over and above the requirement for open space on these lands.

- *Each phase of the development shall include for the front loaded delivery of a public / community facility which can be in the form of a community facility, an educational establishment, a community health facility, a transport facility, a park and play area over and above normal open space requirements.*

2.4.4.2 Galway Urban Density and Building Heights Study 2021

The Galway Urban Density and Building Heights Study 2021 is set out to examine the optimal building heights and density to allow for continued population growth and sustainable development. As Galway City continues to grow it becomes increasingly important to protect the unique character and built heritage of the city while providing for the increasing need for residential development. The study was prepared to inform development which seeks to respond to a compact growth agenda at a national level, while nurturing what is unique to Galway City, in particular the historic core, the coastline and river landscapes. The Proposed Development is located in an 'Outer Suburb' in the southwest region of the city. The Study indicates that a height of 3-4 storeys may be considered in this location which is compliant with national policy and SPPR 4 as set out in the Urban Development and Building Heights Guidelines. It is reasoned that the Proposed Development of 2-6 storeys is appropriate in this location.

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 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, but provides a feedback mechanism for the proposed design itself.

A scoping letter providing details of the EIAR Study Area and the Proposed Development, was prepared by MKO and circulated on 30th April 2024 in relation to this EIAR. These letters were sent to the agencies, NGOs and other relevant parties listed in Table 2-3.

MKO 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 2-3 lists the responses received to the scoping document circulated on 30th April 2024. Copies of all scoping responses received are included in Appendix 2-3 of this EIAR. The recommendations of the consultees have informed the EIA process and the contents of the EIAR. 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 in Table 2-3.

RECEIVED: 16/10/2025

Table 2-3 EIAR Consultees and Responses

No.	Consultee	Response
1	An Taisce	No response
2	Bat Conservation Ireland	No response
3	Bird Watch Ireland	No response
4	Commission for Regulation of Utilities, Water and Energy	No Response
5	Department of Agriculture, Food and the Marine	Response Received 30 th April 2024 Automatic Response
6	Department of the Environment, Climate and Communications	No response
7	Department of Defence	No Response
8	Department of Housing, Local Government and Heritage	<p>Response received on 12th June 2024</p> <p><u>General ecological considerations</u></p> <p>Assessment of the direct, indirect and cumulative significant effects of the project on biodiversity should be made with regard to:</p> <p>Natura 2000 sites, i.e. Special Areas of Conservation (SAC) designated under the EC Habitats Directive (Council Directive 92/43/EEC) and Special Protection Areas (SPA) designated under the EC Birds Directive (Directive 2009/147 EC)</p> <ul style="list-style-type: none"> ➤ Habitats and species protected under the Habitats Directive – Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur), Bird species protected under the Birds Directive ➤ Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) ➤ Other designated sites, or sites proposed for designation, such as Natural Heritage Areas and proposed Natural Heritage Areas, Nature Reserves and Refuges for Fauna or Flora, designated under the Wildlife Acts 1976 to 2023 ➤ Species protected under the Wildlife Acts including protected flora (note Flora (Protection) Order 2022) ➤ Important bird areas such as those identified by Birdwatch Ireland

RECEIVED 16/10/2025

No.	Consultee	Response
		<ul style="list-style-type: none"> ➤ Features of the landscape, which are of major importance for wild flora and fauna, such as those with a “stepping stone” and ecological corridors function, as referenced in Article 10 of the Habitats Directive ➤ Other habitats of ecological value in a national to local context (such as those identified as locally important biodiversity areas within Local Biodiversity Action Plans and County Development Plans) ➤ Red data book species ➤ Biodiversity in general <p>Reference should be made to the up-to-date National Biodiversity Action Plan, Galway City Development Plan, Galway City Biodiversity Action Plan, as well as the All-Ireland Pollinator Plan.</p> <p><u>Likely significant effects on European sites:</u></p> <p>The Department notes that the Galway Bay Complex SAC (Site Code: 000268) is located 1km to the southwest and that Lough Corrib SAC (Site Code: 000297) is 2.8km east of the site. The scope of works includes these for assessment however, the Inner Galway Bay SPA (Site Code: 004031) and Lough Corrib SPA (Site Code: 004042) have not been mentioned, and should be included for assessment.</p> <p>In relation to potential significant effects on a European site, assessments are carried out with respect to the implications for the conservation objectives of that site. Where available, the attributes, targets and notes specified as part of the conservation objectives will determine the scope and detail of surveys, data and analyses required to produce an NIS, if required. The NIS should present the scientific examination of all necessary evidence and data. It should be noted that the conservation objectives of a European site are wider in scope than the qualifying interests or special conservation interests alone, and will encompass other habitats and species, as well as aspects of habitat structure and function, and existing environmental problems and trends. The final analyses are carried out with respect to whether the conservation objective is to maintain or to restore the favourable conservation condition of the habitat or species in question within the site.</p> <p>The key concerns in relation to likely significant effects of the project alone and in combination with other plans and projects, on these European sites, in view of their conservation objectives, include the following:</p> <ul style="list-style-type: none"> ➤ Disturbance of potential resting/roosting sites for Annex II species (e.g. Lesser Horseshoe Bat) ➤ Increased disturbance and displacement of species, and progressive habitat loss, fragmentation and deterioration surrounding European sites arising from the development, and loss of important ecological corridors

RECEIVED: 16/10/2025

No.	Consultee	Response
		<p>➤ Added pressures on existing water services</p> <p><u>Likely significant effects on the environment:</u></p> <p>Under Article 10 of the Habitats Directive, member states must maintain and where possible enhance landscape features to improve the coherence of the Natura 2000 network. Particular note should be given to the EU Green Infrastructure Strategy. Opportunities for landscape enhancement should be considered within the landscape plan which should seek to integrate Green Infrastructure and ‘Nature Based Surface Water Management’ into the project design and consideration of Sustainable Drainage Systems (SuDS) requirements. At a minimum, it is advised that areas of woodland and treelines on and bordering the site should be retained and protected by appropriate setback distances, landscaping and boundary treatments. The development of the site should be consistent with protective policies and objectives in the Galway City Development Plan. Recent habitat mapping is available for much of Galway City and should be sourced. Substantial data on species, particularly the more mobile species such as bats, are also available for parts of the city and the environmental assessment documentation associated with the proposed N6 Galway City Ring Road should be consulted.</p> <p>The Landscape Management Plan should be guided by valuable resources available as part of the National All-Ireland Pollinator Plan1 and planting of potential invasive species such as <i>Cotoneaster franchetii</i> avoided.</p> <p>The procedures outlined in ‘Guidance Note 08/18 Bats and Artificial Lighting in the UK’ and Eurobats ‘Guidelines for Consideration of Bats in Lighting Projects’ should be consulted with respect to the overall lighting design. This should also take into consideration Dark Sky Ireland guidance “Best practice in public lighting”, notably that “warm” colour temperatures should be used at 2700K or less. Final sign off and testing of the lighting scheme should be carried out at night to ensure that the lighting is directional and targeted and should not spill over onto treelines and hedgerows which can have adverse impacts on bats and biodiversity in general. Bat species are strictly protected under Annex IV of the Habitats Directive.</p> <p><u>Ecological surveys required.</u></p> <p>Ecological surveys should be carried out in accordance with recognised methodologies, and should provide a comprehensive description and evaluation of the ecological baseline of the site, and an assessment of the likely direct, indirect and cumulative effects of all aspects of the Proposed Development. Surveys should be carried out by suitably qualified persons at an appropriate time of the year depending on the species being surveyed for. The Environmental Impact Assessment Report</p>

RECEIVED 16/10/2025

No.	Consultee	Response
		<p>(EIAR) should include the results of the surveys, and detail the survey methodology and timing of such surveys. It is expected by the Department, that in any survey methodology used, best practice will be adhered to and if necessary non-Irish methodology adapted for the Irish situation. The Chartered Institute of Ecology and Environmental Management’s (CIEEM’s) recent advice titled ‘Advice note on the Lifespan of Ecological Reports and Surveys’ should be noted. Specific attention should be given to the assessment of:</p> <ul style="list-style-type: none"> ➤ Hedgerows and ecological connectivity ➤ Bird usage of the site and surrounding areas (notably for feeding and roosting) ➤ Bats, including building inspections, roost presence/absence activity surveys, walked transects and automated static detectors. Any losses of semi-natural habitat associated with this Proposed Development such as woodland, scrub, hedgerows and other habitats should in the first instance be avoided where possible, and mitigated for where not. <p><u>Mitigation measures</u></p> <p>Mitigation measures need to be assessed against the adverse effects the project or plan is likely to cause (alone or in-combination with other projects or plans). To assess mitigation measures, the following tasks must be completed:</p> <ul style="list-style-type: none"> ➤ List each of the measures to be introduced (e.g. noise bunds, tree planting) ➤ Explain how the measures will avoid the adverse impacts on the site ➤ Explain how the measures will reduce the adverse impacts on the site Then, for each of the listed mitigation measures: ➤ Provide evidence of how they will be secured and implemented and by whom ➤ Provide evidence of the degree of confidence in their likely success ➤ Provide a timescale, relative to the project or plan, when they will be implemented Where residual impacts remain, further mitigation measures may be required. <p><u>Monitoring</u></p> <p>Evidence should be provided of how the mitigation measures will be monitored, and, should mitigation failure be identified, how that failure will be rectified. The applicant should not use any proposed post construction monitoring as mitigation to supplement inadequate information in the assessment.</p> <p><u>Biodiversity will be addressed in Chapter 6 of the EIAR.</u></p>

RECEIVED: 16/10/2025

No.	Consultee	Response
9	Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	<p>Response received 8th May 2025.</p> <p>I acknowledge receipt of your recent consultation which was forwarded to the Department by the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.</p> <p>Please note that the Development Applications Unit (DAU) is the co-ordinating unit for the Department of Housing, Local Government and Heritage, co-ordinating responses/submission from National Parks and Wildlife Service, National Monuments Service, the Underwater Archaeology Unit and Architectural Heritage.</p> <p>All Correspondence in relation to preplanning consultations is to be issued to Development Applications Unit. It should not be issued to the Minister’s Office, Minister of State’s Office, Customer Service etc as the duplication can cause unnecessary confusion and delays.</p> <p>In the event of observations, you will receive a co-ordinated heritage-related response by email from the Development Applications Unit (DAU).</p> <p>The normal target turnaround for pre-planning and other general consultations is six weeks from date of receipt. In relation to general consultations from public bodies under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 to 2011, the Department endeavours to meet deadline dates, where requested.</p> <p>If you have not heard from DAU and wish to receive an update, please email manager.dau@npws.gov.ie.</p>
10	Department of Transport	<p>Response received 4th June 2024</p> <p>There have been important policy developments which are relevant to accessible, integrated and sustainable public transport. The Department of Transport (DoT) considers these should be reflected in the Proposed Development (Page 11 of EIA Scoping Document, reference 3.2.1 Galway City Council Development Plan 2023 – 2029).</p> <p><u>Accessible public transport for All, and especially for Persons with Disabilities, Reduced mobility and Older People</u></p>

RECEIVED: 26/10/2025

No.	Consultee	Response
		<ul style="list-style-type: none"> ➤ The “whole of Government” National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities. For example, action 108 relates to the ‘dishing’ of footpaths and action 109 relates to accessible infrastructure, including bus stops. Lack of dishing is often cited as a major concern for wheelchair users. The National Disability Inclusion Strategy came to an end at the end of 2022. The Department of Children, Equality, Disability, Integration and Youth are working with the Disability Inclusion Strategy Steering Group to commence work on the development of a UNCRPD implementation strategy. ➤ The United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) ratified by Ireland in 2018. The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas. ➤ The Design Manual for Urban Roads and Streets (DMURS) Interim Advice Note – Covid-19 Pandemic Response published in 2020. It includes guidance that designers should ensure that <ul style="list-style-type: none"> ○ measures align with the principles of universal design, ○ consider Government policy on accessibility for people with disabilities and ○ consult people with disabilities to further appraise measures. ➤ References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response. ➤ To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’. This refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment’. This including footpaths, tactile paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters. <p><u>Traffic and Transport will be addressed in Chapter 15 of the EIAR. Compliance with Design Manual for Urban Roads and Streets (DMURS) will be addressed in the DMURS Report prepared by Tobin’s Consulting Engineers.</u></p>
11	Eirgrid	No response
12	Forest Service	<p>Response received on 7th June</p> <p>If the Proposed Development will involve the felling or removal of any trees, the developer must obtain a Felling License from this Department before trees are felled or removed. A Felling Licence application form can be obtained from Felling Section,</p>

RECEIVED: 16/10/2025

No.	Consultee	Response
		<p>Department of Agriculture, Food and the Marine, Johnstown Castle Estate, Co. Wexford. Email: felling.forests@agriculture.gov.ie or Web gov.ie - Tree Felling Licences (www.gov.ie)</p> <p>A Felling Licence granted by the Minister for Agriculture, Food and the Marine provides authority under the Forestry Act 2014 to fell or otherwise remove a tree or trees and/or to thin a forest for silvicultural reasons. The Act prescribes the functions of the Minister and details the requirements, rights and obligations in relation to felling licences. The principal set of regulations giving further effect to the Forestry Act 2014 are the Forestry Regulations 2017 (S.I. No. 191 of 2017). The developer should take note of the contents of Felling and Reforestation Policy document which provide a consolidated source of information on the legal and regulatory framework relating to tree felling; gov.ie - Tree Felling Licences (www.gov.ie) As this development is within forest lands, particular attention should be paid to deforestation, turbulence felling and the requirement to afforest alternative lands.</p> <p>In order to ensure regulated forestry operations in Ireland accord with the principles of sustainable forest management (SFM), as well fulfilling the requirements of other relevant environmental protection laws, the Department (acting through its Forest Service division) must undertake particular consultations, and give certain matters full consideration during the assessment of individual Felling Licence applications.</p> <p>This includes consultation with relevant bodies, the application of various protocols and procedures (e.g. Forest Service Appropriate Assessment Procedure), and the requirement for applicants on occasion to provide further information (e.g. a Natura Impact Statement). Consequently, when the Forest Service is considering an application to fell trees, the following applies:</p> <ol style="list-style-type: none"> 1. The interaction of these proposed works with the environment locally and more widely, in addition to potential direct and indirect impacts on designated sites and water, is assessed. Consultation with relevant environmental and planning authorities may be required where specific sensitivities arise (e.g. local authorities, National Parks & Wildlife Service, Inland Fisheries Ireland, and the National Monuments Service); 2. Where a tree Felling Licence application is received, the Department will publish a notice of the application before making a decision on the matter. The notice shall state that any person may make a submission to the Department within 30 days from the date of the notice. The notices are published online at: gov.ie - Felling Licence Applications (www.gov.ie) 3. Third parties that make a submission or observation will be informed of the decision to grant or refuse the licence, and on request, details of the conditions attached to the licence, the main reasons and considerations on which the

RECEIVED
16/10/2025

No.	Consultee	Response
		<p>decision to grant or refuse the licence was based, and where conditions are attached to any licence, the reasons for the conditions. Both third parties and applicants will be also informed of their right to appeal any decision within 14 days to the Forestry Appeals Committee. Felling Licence decision are published online at: gov.ie - Felling Licence Decisions (www.gov.ie)</p> <p>It is important to note that when applying to a Local Authority, or An Coimisiún Pleanála, for planning permission where developments are:</p> <ul style="list-style-type: none"> a. subject to an EIA procedure (including screening in the case of a sub-threshold development) and any resulting requirement to produce an EIAR; and/or b. subject to an Appropriate Assessment procedure (including screening) and any resulting requirement to a Natura Impact Statement (NIS); and c. the Proposed Development in its construction or operational phases, or any works ancillary thereto, would directly or indirectly involve the felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species, <ol style="list-style-type: none"> 1. that there is a requirement inter alia under the EIA Directive for an overall assessment of the effects of the project or the alteration thereof on the environment to be undertaken, including the direct and indirect environmental impact of the project; and 2. pursuant to Article 2(3) of the EIA Directive, the Department of Agriculture, Food and the Marine strongly recommends that, notwithstanding the fact that a parallel consent in the form of felling licence may also have to be applied for, any EIAR and/or NIS produced in connection with the application for planning permission to the Local Planning Authority or An Coimisiún Pleanála, should include an assessment of the impact of and measures, as appropriate, to prevent, mitigate or compensate for any significant adverse effects direct or indirect identified on the environment arising from such felling and replanting of trees, deforestation for the purposes of conversion to another type of land use, or replacement of broadleaf high forest by conifer species. 3. Please note that there must be absolute spatial consistency between the felling licence areas submitted to DAFM (second authority) and all related planning documents submitted to the first authority in respect of the felling area(s).

RECEIVED: 16/10/2025

No.	Consultee	Response
13	Fáilte Ireland	No Response
14	Geological Survey of Ireland (GSI)	<p>Response Received on 09th May 2024</p> <p>GSI highlighted that concerning the Knocknacarra Residential Development Scoping Exercise, they would encourage use of and reference to the GSI datasets. They attached a list of their publicly available datasets that may be useful to the environmental assessment and planning process. GSI recommend that this list is reviewed and MKO should refer to any datasets which are considered relevant to this assessment. The remainder of the letter and following sections provided more detail on some of these datasets.</p> <ul style="list-style-type: none"> ➤ Geoheritage - GSI Stated that their records show no County Geological Sites (CGSs) in the vicinity of the proposed residential development. ➤ Groundwater - GSI Stated their Groundwater Data Viewer indicates an aquifer classed as a ‘Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones’ underlies the proposed development. The Groundwater Vulnerability map indicates the range of groundwater vulnerabilities within the area covered is variable. GSI stated that they would therefore recommend use of the Groundwater Viewer to identify areas of High to Extreme Vulnerability and ‘Rock at or near surface’ in the assessments, as any groundwater-surface water interactions that might occur would be greatest in these areas. ➤ Geohazards - GSI has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map. GSI is also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans. ➤ Natural Resources (Minerals/Aggregates) - GSI recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area.
15	Health Service Executive (HSE)	No Response
16	Iarnród Eireann	<p>Response Received on 30th April 2024</p> <p>No comment to make</p>
17	Inland Fisheries Ireland	Response received 27 th May 2024

RECEIVED: 26/10/2025

No.	Consultee	Response
		<p>IFI note that the site is located within the Galway Bay North Catchment (catchment OD 31) and the Knock[Furbo]_SC_010 Sub catchment under the Water Framework Directive (WFD). There are no mapped watercourses within the site. The nearest EPA mapped watercourse to the site is the Knocknacarragh River (EPA Code: IE_WE_31K160960 – Order 1) which is at its closest to the site approximately 257 metres to the north.</p> <p>IFI recommend the incorporation of SuDS into the Proposed Development. Also attached a copy of the IFIs Urban Watercourse Planning Guide for reference.</p> <p><u>Hydrology & Hydrogeology will be addressed in Chapter 8 of the EIAR.</u></p>
18	Irish Peatland Conservation Council	No response
19	Irish Raptor Study Group	No Response
20	Irish Red Grouse Association	No Response
21	Irish Wildlife Trust	<p>Response received.</p> <p>Irish Wildlife Trust do not have staff capacity to respond to this consultation at the moment but will endeavour to respond if possible.</p>
22	Office of Public Works	No response
23	The Heritage Council	No response
24	Sports Ireland	No response
25	Sustainable Energy Authority of Ireland	No Response
26	Transport Infrastructure Ireland	<p>Response received on 24th May 2024</p> <p>The developer should have regard, inter alia, to the following:</p> <ul style="list-style-type: none"> ➤ Consultations should be had with the relevant Local Authority/National Roads Design Office, with regard to the locations of existing and future national road schemes, i.e. the N6 Galway City Ring Road in the vicinity of the site.

RECEIVED 16/10/2025

No.	Consultee	Response
		<ul style="list-style-type: none"> ➤ TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the Proposed Development. ➤ The developer should assess visual impacts from existing national roads. ➤ The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Coimisiún Pleanála regarding road schemes in the area. The developer should, in particular, have regard to any potential cumulative impacts. ➤ The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works). ➤ The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes' (National Roads Authority (NRA), 2014). ➤ The EIAR should consider the 'European Communities (Environmental Noise) Regulations, 2018, (S.I. no. 549 of 2018)', and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes (NRA, 2014)'). ➤ It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site, with reference to impacts on the national road network and junctions of lower category roads with national roads. <p>While it is noted that the EIAR Scoping Report makes reference to the use of the IHT Guidelines for Traffic Impact Assessment, in relation to national roads, TII's 'Traffic and Transport Assessment Guidelines' (2014) should be referred to in relation to Proposed Development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of TII's TTA Guidelines, which addresses requirements for sub-threshold TTA.</p> <p>Any improvements required to facilitate development should be identified. It will be the responsibility of the developer to pay for the costs of any improvements to national roads to facilitate the private development proposed, as TII will not be responsible for such costs.</p> <ul style="list-style-type: none"> ➤ Regard should be had to the Galway Transport Strategy's Public Transport and Sustainable Mobility Provisions and any requirements arising, including any future update to the Strategy. ➤ The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required.

RECEIVED 16/10/2025

No.	Consultee	Response
		<ul style="list-style-type: none"> ➤ In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network. ➤ TII recommends that the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Where abnormal ‘weight’ loads are a feature of the development, e.g., turbine or substation components, separate structure approvals/permits and other licences may be required in connection with the proposed haul route. All national road structures on the haul route through all the relevant County Council administrative areas should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal ‘weight’ load proposed. <p><u>Traffic and Transport will be addressed in Chapter 15 of the EIAR.</u></p>
27	Uisce Éireann	<p>Response received on 20th May 2024</p> <p>No capacity to respond to individual projects but provided general aspects of Water Services that should be considered.</p> <ul style="list-style-type: none"> ➤ Where the development proposal has the potential to impact an Uisce Éireann Drinking Water Source(s), the applicant shall provide details of measures to be taken to ensure that there will be no negative impact to Uisce Éireann’s Drinking Water Source(s) during the construction and operational phases of the development. Hydrological / hydrogeological pathways between the applicant’s site and receiving waters should be identified as part of the report. ➤ Where the development proposes the backfilling of materials, the applicant is required to include a waste sampling strategy to ensure the material is inert. ➤ Mitigations should be proposed for any potential negative impacts on any water source(s) which may be in proximity and included in the environmental management plan and incident response. ➤ Any and all potential impacts on the nearby reservoir as public water supply water source(s) are assessed, including any impact on hydrogeology and any groundwater/ surface water interactions. ➤ Impacts of the development on the capacity of water services (<i>i.e. do existing water services have the capacity to cater for the new development</i>). This is confirmed by Uisce Éireann in the form of a Confirmation of Feasibility (COF). If a development requires a connection to either a public water supply or sewage collection system, the developer is advised to submit a Pre-Connection Enquiry (PCE) enquiry to Uisce Éireann to determine the feasibility of connection to the Uisce Éireann network. All pre-connection enquiry forms are available from https://www.water.ie/connections/connection-steps/. ➤ The applicant shall identify any upgrading of water services infrastructure that would be required to accommodate the Proposed Development.

RECEIVED 16/10/2025

No.	Consultee	Response
		<ul style="list-style-type: none"> <li data-bbox="656 292 1977 379">➤ In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an Uisce Éireann collection network. <li data-bbox="656 387 2000 746">➤ In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks and potential measures to minimise and or / stop surface waters from combined sewers. Uisce Éireann is a statutory consultee under the Planning and Development Act 2000 (as amended). Uisce Éireann's job is to deliver the highest quality drinking water to taps every day and ensure that wastewater is properly treated and safely returned to the environment. To ensure the satisfactory completion of a development, any permission, approval, or consent granted pursuant to the Planning and Development Act 2000 (as amended) that requires a new connection(s) to water services should include a condition that requires the applicant or developer to enter into a connection agreement(s) with Uisce Éireann prior to the commencement of development. Any person discharging trade effluent to a sewer, must have a Trade Effluent Licence issued pursuant to section 16 of the Local Government (Water Pollution) Act, 1977 (as amended). Trade effluent is defined in the Local Government (Water Pollution) Act, 1977 (as amended). <li data-bbox="656 754 2000 810">➤ Any physical impact on Uisce Éireann assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets. <li data-bbox="656 818 1955 978">➤ When considering a development proposal, the applicant is advised to determine the location of public water services assets, possible connection points from the applicant's site / lands to the public network and any drinking water abstraction catchments to ensure these are included and fully assessed in any pre-planning proposals. Details, where known, can be obtained by emailing an Ordnance Survey map identifying the proposed location of the applicant's intended development to datarequests@water.ie <li data-bbox="656 986 1977 1042">➤ Other indicators or methodologies for identifying infrastructure located within the applicant's lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site. <li data-bbox="656 1050 1933 1137">➤ Any potential impacts on the assimilative capacity of receiving waters in relation to Uisce Éireann discharge outfalls including changes in dispersion / circulation characterises. Hydrological / hydrogeological pathways between the applicant's site and receiving waters should be identified within the report. <li data-bbox="656 1145 1955 1265">➤ Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (<i>and resultant potential impact on the capacity of the source</i>) or the potential of the development to influence / present a risk to the quality of the water abstracted by Uisce Éireann for public supply should be identified within the report.

RECEIVED 16/10/2025

No.	Consultee	Response
		<ul style="list-style-type: none"> ➤ Where a development proposes to connect to an Uisce Éireann network and that network either abstracts water from or discharges wastewater to a “protected”/ sensitive area, consideration as to whether the integrity of the site / conservation objectives of the site would be compromised should be identified within the report. ➤ Mitigation measures in relation to any of the above ensuring a zero risk to any Uisce Éireann drinking water sources (Surface and Ground water). <i>This is not an exhaustive list.</i> <p>Please note;</p> <ul style="list-style-type: none"> ➤ Where connection(s) to the public network is required as part of the development proposal, applicants are advised to complete the Pre-Connection Enquiry process and have received a Confirmation of Feasibility letter from Uisce Éireann ahead of any planning application. ➤ Uisce Éireann will not accept new surface water discharges to combined sewer networks. <p><u>Hydrology and Hydrogeology will be addressed in Chapter 8 of the EIAR.</u></p>
28	Waterways Ireland	Response received 3 rd May 2024 No comment to make
29	Commission for Regulation of Utilities, Water and Energy	No response
30	GCC - Roads Department	No response
31	GCC - Environment Department	No response
32	GCC - Heritage Officer	No response

2.5.3 Pre-Planning Meetings

2.5.3.1 Stage 1: LRD Preplanning Meeting with Galway City Council

A Pre-planning meeting between the Applicant and Galway City Council was held in January 2023 under the provisions of Section 247 of the Planning and Development Act (2000) as amended. The scheme and alterations to the Proposed Project were introduced to the Council representatives in attendance. The agenda was focused on the following key items:

- > Landscaping and boundary treatments
- > Unit types and mix
- > Public open space and design
- > Pedestrian movement strategy
- > Active travel strategy and parking
- > Creche access
- > Biodiversity and green infrastructure

From this meeting the Applicant and 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 Stage 2: LRD Preplanning Meeting with Galway City Council

Under Section 32B of the Planning and Development Act 2000 (as amended) the applicant requested a Stage 2 Large Scale Residential Development (LRD) Meeting with the Planning Authority. The statutory meeting was held on the 26th March 2025 via Microsoft Teams. In accordance with Section 32D of the Act, the LRD Opinion was issued to the applicant by Galway City Council. The LRD Opinion outlined issues to be addressed by the Applicant and design team prior to the submission of a planning application. 36 no. issues were raised by Galway City Council to be addressed, related but not limited to relevant planning policy, active travel, water & drainage, wind and micro-climate and recreation & amenity. The LRD Opinion provided a comprehensive list of assessments and reports that should be included in an application. A Statement of Response to the LRD Opinion accompanies the planning application.

2.6 Cumulative Impact Assessment

The EIA Directive and associated guidance documents state that as well as considering any direct, indirect, secondary, transboundary, short-, medium-, and long-term, permanent and temporary, positive and negative effects of the project (all of which are considered in the various chapters of this EIAR), the description of likely significant effects should include an assessment of cumulative impacts that may arise. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project. The factors to be considered in relation to cumulative effects include population and human health, biodiversity, land, soil, water, air, climate, material assets, landscape, and cultural heritage as well as the interactions between these factors.

To gather a comprehensive view of cumulative impacts on these environmental considerations and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within this EIAR includes a cumulative impact assessment where appropriate.

The potential for cumulative impacts arising from other projects has therefore been fully considered within this EIAR.

2.6.1 Methodology Adopted

To gather a comprehensive view of cumulative impacts on these above environmental considerations and to inform the EIA process being undertaken by the consenting authority, each relevant chapter within the EIAR addresses the potential for cumulative effects where appropriate.

The potential cumulative impact of the Proposed 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 approved, existing, and planned projects in the vicinity of the Site.

The cumulative impact assessment of projects has three principle aims:

- To establish the range and nature of existing and approved projects within the cumulative impact study area of the Proposed Development.
- To summarise the relevant projects which have a potential to create cumulative impacts.
- 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 in relation to the relevant developments within the various zones of sensitivity of and to the Proposed Development from which there may be potential for cumulative impacts to arise. The material was gathered through a search of relevant online Planning Registers, reviews of relevant EIAR (or historical EIS) documents, planning application details and planning drawings, and served to identify past and future projects, their activities and their environmental impacts.

2.6.2 Cumulative Study Area

The geographical boundaries of the various zones of sensitivity of and to the Proposed Development from which there may be potential for cumulative impacts to arise relative to each individual EIAR topic, i.e. each chapter, is presented below in Table 2-4. Following consultation with the EIAR team on each individual topic, the maximum geographical extent and justification for this extent was established and is presented overleaf.

RECEIVED: 16/10/2025

RECEIVED: 18/10/2025

Table 2-4 Cumulative Assessment Study Areas

Individual Topic	Maximum Extent	Justification
Population & Human Health	Electoral Division (EDs)	The Study Area for the Population section of this EIAR was defined in terms of the Electoral Divisions (EDs) where the Proposed Development is located.
Biodiversity	Our cumulative boundary is the WFD Subcatchment – Knock[Furbo]_SC_010 combined with a 1km buffer.	Using the precautionary approach and given the nature and scale of the Proposed Development, the geographical boundary for terrestrial ecological aspects, i.e. habitats, is 1km for cumulative assessment. The geographical boundary for aquatic ecological aspects is the Knock[Furbo]_SC_010 due to potential connectivity downstream with aquatic receptors.
Bat	4 kilometre	The core sustenance zone (CSZ) of bats recorded in the site was considered (Collins, 2023 – Table 3.5). 4km is the CSZ of Natterer bats and includes the CSZ of all other species recorded at the site. While no Natterer bat roosts were recorded on site, the species is known to reside in Galway city and Myotis spp. calls were recorded during the static activity surveys.
Land, Soils and Geology	WFD Subcatchment – Knock[Furbo]_SC_010 as geographical boundary.	The boundary is the Proposed Project site boundary as there is no expected cumulative effect on land soils and geology outside of the Proposed Project site boundary.
Water	WFD Subcatchment – Knock[Furbo]_SC_010 as geographical boundary.	The Proposed Development lies entirely within this sub basin and there is no hydrological connectivity to another sub basin.
Air	1 kilometre	Given dust particles do not generally travel greater than 250m from source (Guidance on the Assessment of Dust from Demolition and Construction, IAQM 2024) the geographical boundary for the cumulative dust impact is 500m. In line with the TII Publication Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107, December 2022, a geographical boundary of 1km was used for cumulative air quality assessment.
Climate	The Climate assessment has been considered on a national basis and not confined to a specific study area.	The Climate assessment has considered the cumulative effects of the Proposed Developments with other developments on a national basis under the relevant national Sectoral Emissions Ceilings.
Noise	500 metres	Construction phase: While there may be construction projects in the surrounding area, daytime ambient noise levels due to traffic are elevated, thus masking construction noise beyond distances of approx. 200 m. Potentially noisy sources

RECEIVED 16/10/2025

Individual Topic	Maximum Extent	Justification
		<p>such as piling, which could be audible beyond 200 m, are not proposed. We therefore need to consider receptors out to 200 m. These receptors could also be influenced by construction noise at locations 200 m further away, resulting in a 400 m zone. A 500 m zone is applied as a conservative measure.</p> <p>Operational phase: The proposed development will not give rise to noise emissions of note. Therefore receptors in the surrounding area will not be impacted by the development, and cumulative impacts will not arise (apart from localised cumulative impacts at properties immediately bordering the site).</p>
Cultural Heritage	1 kilometre	Given the nature and scale of the Proposed Development, the geographical boundary for cultural heritage is 1km for cumulative assessment.
Landscape	2 kilometre	The LVIA determined that effects on landscape and visual amenity will be highly localised. No significant landscape and visual effects will occur in combination with other relevant developments beyond 2 kilometres from the site.
Traffic	As per traffic modelling scenario and the area of influence the Proposed Development has on changing traffic volumes which include all committed or proposed developments that may generate traffic on the road network in the vicinity of the Proposed Development site	The geographical boundary has been informed by traffic modelling scenario and the area of influence the Proposed Development has on changing traffic volumes. Developments to be included in the cumulative impact assessment should therefore include all committed or proposed developments that may generate traffic on the road network in the vicinity of the Proposed Development site.

2.6.3 Projects Considered

The projects considered in relation to the potential for cumulative impacts arising from the construction, operational and decommissioning phases of the Proposed Development and for which all relevant data was reviewed within the cumulative study area are set out in Appendix 2-2 of this EIAR.

The list of projects considered have been categorised into three groups;

- Large-scale projects, plans, and schemes within the cumulative study area;
- Projects identified in a detailed planning history search of all applications within set boundaries specified in Section 2.5 over the last 5 years (2020-2025);
- Projects, plans, applications and schemes relevant to each individual topic within their maximum extent buffer

This EIAR therefore considers the full range of projects that could potentially have a cumulative effect with the current Proposed Development within the identified cumulative study area. As detailed in Section 2.5 above, the planning register has been reviewed and all relevant general development planning applications/permissions and projects in the vicinity of the Proposed Development have been noted and considered, as well as other existing projects. A search was also undertaken of the Environmental Protection Agency's licensing facilities to examine if there were any facilities located within the set study areas. An additional search was undertaken to examine An Coimisiún Pleanála's mapped planning applications for comprehensive examination of existing and permitted developments.

The cumulative impact assessments carried out in each of the subsequent chapters of this EIAR consider all potential significant cumulative effects arising from relevant projects and land uses within the cumulative study area and within the vicinity of the Proposed Development.

Overall, the Proposed Development has been designed to mitigate impacts on the environment and particularly water, and a suite of mitigation measures is set out within the EIAR. The mitigation measures set out in this EIAR have been developed to ensure that significant cumulative effects do not arise during the continued operational or decommissioning phases of the Proposed Development. Additional detail in relation to the potential significant cumulative effects arising and, where appropriate, the specific suite of relevant mitigation measures proposed are set out within each of the relevant chapters of this EIAR.

RECEIVED: 16/10/2025