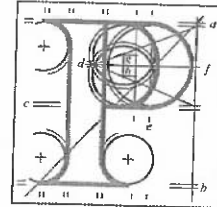


Our Case Number: ABP-314597-22



An
Bord
Pleanála

Development Applications Unit
The Manager
Government Offices
Newtown Road
Co. Wexford
Y35 AP90

Date: 21 November 2022

Re: BusConnects Galway Cross-City Link Scheme.
University Road to Dublin Road, Galway City.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA03A

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1890 275 175
(01) 872 2684
www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Niamh Thornton

From: SIDS
Sent: Friday 18 November 2022 10:24
To: Niamh Thornton
Subject: FW: Your Ref: BusConnects Galway: Cross City Link (University Road to Dublin Road) Scheme Our Ref: SID-GE-2022-014
Attachments: SID-GE-2022-014.pdf

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Friday 18 November 2022 09:20
To: SIDS <sids@pleanala.ie>
Subject: Your Ref: BusConnects Galway: Cross City Link (University Road to Dublin Road) Scheme Our Ref: SID-GE-2022-014

A Chara,

Attached please find the Nature Conservation and Heritage related observations/recommendations of the Department in relation to the aforementioned SID Planning Application.

Kindly forward a copy of your decision to manager@npws.gov.ie as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager@npws.gov.ie

Kind regards,

Edel Griffin
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta
Department of Housing, Local Government and Heritage
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90



Your Ref: BusConnects Galway: Cross City Link (University Road to Dublin Road) Scheme
Our Ref: SID-GE-2022-014
(Please quote in all related correspondence)

18 November 2022

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902
Via email to sids@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended.

Proposed Strategic Infrastructure Development (SID): construction of the BusConnects Galway: Cross City Link (University Road to Dublin Road) (Proposed Scheme) together with all ancillary and consequential works associated therewith for the purpose of facilitating public transport, overall length of approximately 6.7km and is routed along the University Road, St Vincent's Avenue, St Francis Street, Eglinton Street, Eyre Square, Forster Street, College Road and Dublin Road and also encompasses numerous roads within the city centre including Fairgreen Road, Bothar Uí Eithir, Prospect Hill, Bothar na mBan, St Brendan's Avenue, Headford Road, Dyke Road, Woodquay, Daly's Place, Merchants Road, Forthill Street, Queen Street and Dock Road, all in the County of Galway and within the Galway City Council (GCC) administrative areas.

A chara

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations of the Department co-ordinated by Development Applications Unit under the stated heading(s).

Archaeology

It is noted that the Environmental Impact Assessment Report (EIAR) submitted as part of the planning application incorporates a desk-based Archaeological Impact Assessment which was carried out in relation to the proposed development by IAC Ltd (EIAR Chapter 15; date August 2022). The Department has reviewed the EIAR and is broadly in agreement with the findings in relation to Archaeology and Cultural Heritage as set out therein.

Therefore, the Department advises that the following should be included as a condition of any grant of permission. Note these recommended conditions align with Sample Conditions C5 and C6 as set out in *OPR Practice Note PN03: Planning Conditions (October 2022)*, with



appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

Archaeological Requirements:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 15 of the EIAR (IAC Ltd; date August 2022) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 15 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
3. A Project Archaeologist shall be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
4. The planning authority and the Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

Nature Conservation

The project area falls within the zone of influence of several designated Natura 2000 sites, Galway Bay Complex Special Area of Conservation (SAC) (Site Code: 000268) and Inner Galway Bay Special Protection Area (SPA) (004031) via bridge crossing over the River Corrib and canals and works adjacent to Lough Atalia, proposed drainage also provides additional connections between the project areas and these designated sites. The project also interacts with the River Corrib part of Lough Corrib SAC (Side Code: 000297) via bridge crossings and existing drains within the project area. The Department has reviewed the



Natura Impact Statement (NIS) and the EIAR Biodiversity Chapter and recommends all mitigation measures outlined be strictly adhered to.

Galway City is home to several species of bats. The Department notes that the only Bat Survey carried out was in relation to the two proposed building demolitions and city centre habitats on 17 July 2019 and that no bats were recorded. The Department would have concerns over the validity of such data on the basis of the passage of time since these surveys were undertaken. There may have been significant changes in the habitats and availability of roosts in the study area in the intervening period. As there will be a loss of 56 trees associated with this development, the impact on potential foraging bats in these areas has not been adequately addressed. Furthermore, the upgrading and installing of new public lighting may have a negative impact on bats as the report states that any new lighting will be Light Emitting Diode (LED) type which is directional and reduces light spill to the surrounding environment. A recent paper outlined negative impacts of LED lights compared to conventional sodium lighting (<https://advances.sciencemag.org/content/7/35/eabi8322/tab-pdf>). Negative impacts were more pronounced under white light-emitting diode (LED) street lights compared to conventional yellow sodium lamps. This indicates that Artificial Light at Night (ALAN) and the ongoing shift towards white LEDs (i.e., narrow- to broad-spectrum lighting) will have substantial consequences for insect populations and ecosystem processes. The project must therefore ensure that the use of energy efficient (LED) lighting does not have adverse effects on biodiversity by limiting lighting only to where it is required and using 'warm white' lighting with a Correlated Colour Temperature (CCT) of below 2700 kelvins. The Department recommends the use of smart control systems to allow cut-off periods during hours of darkness and dimming at dawn and dusk.

The National Biodiversity Action Plan aims to conserve and restore Ireland's biodiversity. A key objective of the plan is to achieve no net contribution to biodiversity loss arising from development projects occurring within the lifetime of the plan. The EIAR has not outlined how the project will avoid a net loss of biodiversity, and no compensatory measures have been proposed.

Built Heritage

Having regard to the submitted information, The Department notes that Built Heritage were not part of the pre-planning discussion on route selection etc. for this discussion. The Department understands the importance of providing a public transport corridor that will link the western and eastern suburbs and that alternative transport means are integral to the quality of life and encouraging people to live in cities. A modal shift away from cars to restore and sustain historic urban centres based on a holistic and integrated approach to the



planning, design and implementation is necessary. The EIAR submitted indicates that the majority of the scheme is within existing carriageways.

The historical origins and cultural significance of the built fabric of Galway is recognised and the integrity of surviving fabric defines the character of the historic place. Careful consideration of the overall impact of interventions including accumulated and incremental losses and adjustments made along the route are integral to a positive cultural heritage outcome. The information at this stage of the process is largely report based and drawings are engineer led and at a scale that the grain and character of the individual sites is not sufficiently detailed to appraise fully. A further concern in this instance is the absence of an Architectural Conservation Officer within the Local Authority and the oversight that they may bring to the understanding of the place and its layering over time. For this reason the Department, based on past-experience of infrastructural projects of this nature, recommends the appointment of a Grade 1 Conservation Architect with urban design skills to the Design team to work as an integral part of a multi-disciplinary team to inform the implementation of the works in accordance with the architectural heritage guidelines from the outset. A conservation input is recommended to ensure that enabling works and protection of sites and places are fully planned for, safe guarded and that high quality design and conservation outcomes are delivered in terms of making good areas of intervention. Selection of appropriate materials, elements to be salvaged and conservation details to be agreed with the Department as necessary.

Recommendations:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in Chapter 15 of the EIAR (IAC Ltd; date August 2022) should be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The Construction Environment Management Plan (CEMP) should include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in Chapter 15 of the EIAR and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.



3. A Project Conservation Architect Grade 1 with urban design skills and expertise should be appointed to oversee and advise on all aspects of the scheme from design, through inception to completion.
4. The scope of conservation works to be in accordance with the architectural heritage guidelines and have regard to the Advice Series for historic paving.

Reason: To safeguard the sites, elements and fabric that provide the special interest of the historic places and streetscapes.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.dau@npws.gov.ie, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

Julie Sullivan
Assistant Principal
Development Applications Unit
Administration