Response to Observations

In repect of a Part X & XAB
(S175 and S177AE)
Planning Application for

Phase 1 Corrib Causeway
Development at

Dyke Road, Terryland,
Galway

Comhairle Cathrach na Gaillimhe
Galway City Council

in partnership with

LDA
An Ghníomhaireacht Forbartha Talún
The Land Development Agency

July 2025

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Table of Contents

1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, have been instructed by **Galway City Council, City Hall, College Road, Galway, H91 X4K8** in partnership with the Land Development Agency, 4th Floor Ashford House, Tara Street, Dublin 2, D02 VX67 to prepare this Response to the third party observations received for the proposed residential development at Dyke Road, Terryland, Galway, as registered under An Coimisiún Pleanála Ref. ABP-322166-25.

We note that the relevant response date is 29 July 2025 and this response is lodged within this timeframe.

We confirm that this report outlines a response prepared on behalf of Galway City Counil that the Commission should consider in reviewing the key matters raised by third parties. For clarity, we wish to acknowledge that there were a total of 14 submissions on the proposed develompent lodged by:

1. **Artspace Studios**
2. **An Taisce**
3. **Brendan Mulligan**
4. **Cleverson Limited**
5. **Colin Barry**
6. **Derek McDonagh**
7. **Galway Internatinal Arts Festival**
8. **Galway Retail (Management) Park CLG**
9. **Intersport Elverys**
10. **Irish Aviation Authority**
11. **Niall Murphy**
12. **Transport Infrastructure Ireland**
13. **National Transport Authority**
14. **Uisce Éireann**

The observations submitted raise a variety of issues, and this report concisely outlines the key matters which we submit should be considered by the Commission in their assessment. For clarity, the full extent of enclosures to be considered as part of this submissions response are identified as follows:

- Brock McClure – Response to Third Party Appeals (This Report)
- Drawing No. DRG-MOLA-ZZ-ZZ-DR-A-0216 prepared by MOLA Architecture (enclosed)

This response has been collectively prepared by a wider design team with direct input from:

- Brock McClure Planning and Development Consultants
- MOLA Architecture
- AECOM
- Punch Consulting Engineers

2 Response to Observations

A total of 14 submissions were lodged regarding the proposed development for the Phase 1 – Corrib Causeway - Dyke Road Part X and Part XAB application.

In the interests of clarity and efficiency, the matters raised have been grouped thematically rather than addressing each submission in isolation. This approach avoids repetition and ensures a focused and evidence-based response to the planning issues identified.

The key themes raised by the observers, and to which responses are provided herein, are as follows:

1) Car Parking
2) Bicycle Parking
3) Construction Impacts
4) Wastewater Capacity
5) Water Pumping Station at Cleverson's Site
6) Permeability
7) Flood Risk
8) Impact on the Black Box Theatre
9) Engagement with IAA
10) Detailed Design and Fire Safety
11) Environmental Impact
12) Unit Mix & Residential Typology

Each theme is set out below under sub section with a summary of the matters raised followed by a response prepared by the design team on behalf of Galway City Council.

2.1 Car Parking

Submissions received during the consultation period highlighted several concerns in relation to car parking, including:

- The substantial reduction in existing car parking provision.
- Anticipated overflow parking into adjacent retail park areas.
- The absence of alternative parking or transport mitigation strategies.
- Increased parking pressures during peak drop-off and pick-up times associated with the proposed childcare facility.
- Reference to the Headford Road multi-storey car park proposal, questioning its feasibility.
- Lack of clarity regarding car parking allocation within the proposed development.
- Overall insufficiency of car parking spaces relative to the scale of the residential development, with particular reference to the proposed ratio of 0.15 spaces per unit.

Response:

Reduction in Existing Car Parking Provision

The proposed development will result in the removal of 389 existing car parking spaces on the site, with 311 spaces being removed from Car Park 1 and an additional 78 spaces from Car Park 2. Despite these proposals for removal, a total of 165 car parking spaces will be retained within Car Park 2. While the loss of car parking is a notable aspect of the proposal, it is essential to recognise that this outcome is entirely consistent with long-established planning policies and objectives at national, regional, and local levels, which have persistently identified this site as a key strategic location for significant residential-led redevelopment.

At the national level, the site's redevelopment aligns with the policy ambitions of the National Planning Framework (NPF), particularly NPO 21**,** which explicitly supports the role of the Land Development Agency (LDA) in active land management and the development of underutilised, strategically located sites for housing delivery. The NPF also specifically refers to key regeneration sites in Galway City, including Headford Road, where the subject site is located.

The Regional Spatial and Economic Strategy (RSES**)** for the Northern and Western Region reiterates the strategic importance of urban regeneration for the subject site within Galway City. Chapter 3 of the RSES identifies Headford Road as a critical opportunity site with the potential to deliver a significant quantum of new housing to meet the city's targeted population and employment growth. RPO 3.6.4 specifically calls for the Assembly's support for the regeneration of city-centre sites, including Galway Harbour, Ceannt Station, and **Headford Road**, highlighting their importance in achieving regional compact growth and urban renewal goals. Page 57 of the RSES specifically notes that the Headford Road area *"has the benefit of having a large publicly owned site with development potential (Dyke Road surface car park).*

At the local level, the Galway City Development Plan 2023-2029 provides clear and robust policy support for the site's regeneration. The site is governed by a 'CI' zoning objective, which explicitly facilitates the redevelopment of "Regeneration and Opportunity Sites" for a mix of uses, including residential. In particular, the Dyke Road Car Park Regeneration Site; which encompasses the subject site; is identified as one of three key Headford Road Regeneration Sites within Section 10.7 of the Development Plan. This designation reflects its strategic significance in delivering on both national housing objectives and the city's own compact growth targets.

In addition, Policy 10.2 of the Development Plan outlines a proactive approach towards the redevelopment of such strategic sites, setting out clear priorities to:

1. Facilitate and enable the redevelopment of Regeneration and Opportunity Sites to support compact and sustainable urban growth, aligned with the National Strategic Outcomes of the NPF and the RSES.
2. Prioritise the delivery of new residential neighbourhoods within these sites, particularly where they are supported by appropriate zoning, such as 'CC' and 'CI', as defined in the Development Plan's Core Strategy and Land Use Zoning Objectives.

The Development Plan further recognises the importance of delivering a mix of housing tenure, including affordable housing, as a central component of the LDA's project at Dyke Road.

It is also notable that the Draft Headford Road Framework Plan (2009), while never formally adopted nor carrying statutory weight, has long anticipated the transition of this site from surface car parking to built form. The principle of redeveloping the existing car park for urban regeneration purposes was a central theme of that draft plan and reflects a longstanding policy vision for the area.

In summary, the subject lands are unequivocally zoned and designated for substantial residential-led redevelopment, supported by the CI zoning objective, the Core Strategy, and multiple policies within the Galway City Development Plan. The reduction in car parking provision is not an unintended consequence but rather an expected and necessary step in implementing these long-standing strategic objectives.

Furthermore, this shift (reduction in overall surface car parking at a key city centre site) reflects a broader national policy direction towards sustainable mobility, promoting a transition away from private car dependency towards more sustainable transport modes such as walking, cycling, and public transport. Given the site's highly accessible city-centre location, within walking distance of essential services, employment hubs, and benefitting from high-frequency public transport connectivity, the development is inherently aligned with this modal shift. By reducing reliance on surface car parking, the proposal actively contributes to more compact, sustainable, and liveable urban growth, in line with contemporary planning principles at all levels.

The Traffic and Transportation Assessment (TTA) prepared by PUNCH Consulting Engineers forming part of the application documentation had carried out an assessment of the impact of the removal of car parking space (Section 3.4 of the TTA, refers). A car park usage survey was carried out over three consecutive days from Thursday 16th November 2023 to Saturday 18th November 2023 between the

hours of 07:00 – 19:00. This gathered representation of both weekday and weekend usage data. Throughout the entire survey period, Carpark 2 (of which 165 no. spaces are being retained) had a higher occupancy than Carpark 1 (subject site of proposed development), with users choosing to use Carpark 1 only when Carpark 2 had started to fill up. The overall carpark tended to fill up from the southern end (city-site) first with user preference to park closer to the Headford Road.

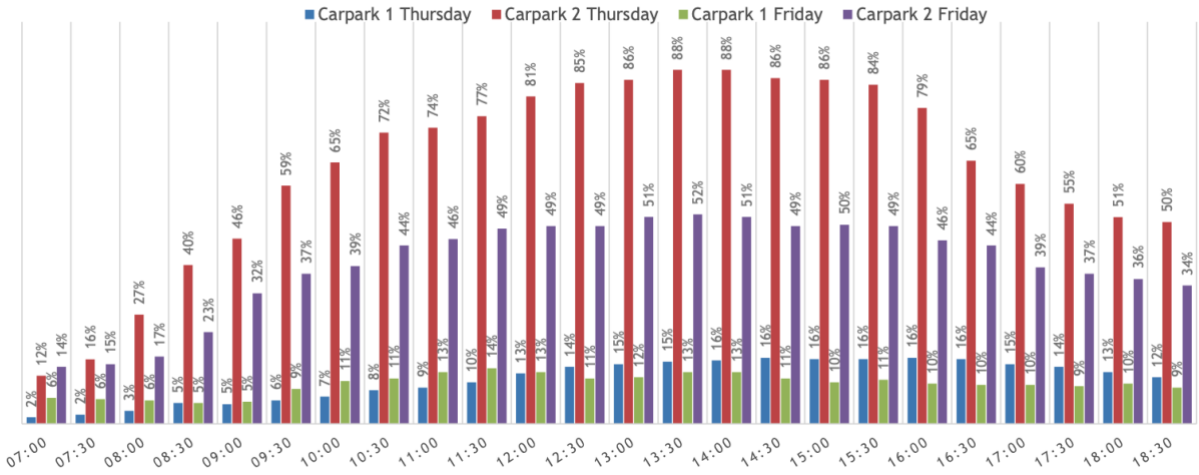

Figure 1 - Dyke Road Carpark Occupancy Rates - Weekdays (Source: PUNCH TTA)

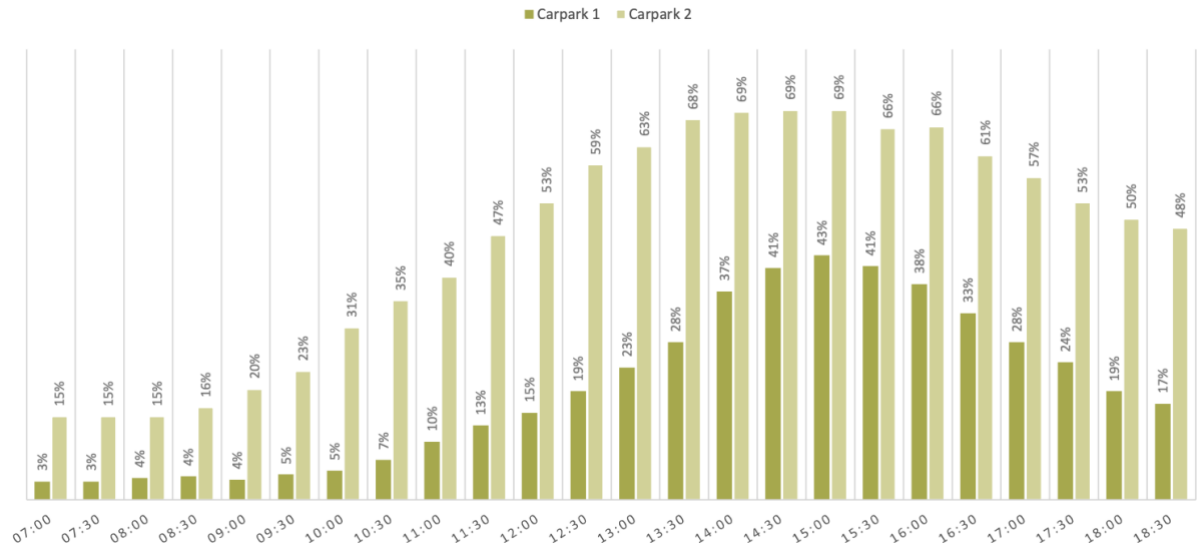

Figure 2 - Dyke Road Carpak Occupancy Rates - Saturday (Source: PUNCH TTA)

The maximum occupancy rates were recorded as follows:

- Weekday Carpark 1 maximum occupancy = 16%
- Weekday Carpark 2 maximum occupancy = 88%
- Weekend Carpark 1 maximum occupancy = 42%
- Weekend Carpark 2 maximum occupancy = 69%

The overall surveyed maximum capacity of the combined overall carpark area was 263 on the weekday and 350 on the weekend.

Further, the survey showed that spaces at the northern end of the carpark were almost never used with most spaces occupied for less than 10% of the survey time. In Carpark 1, 171 spaces out of 311 spaces (55% of spaces) were occupied less than 10% of the survey time. Overall, 179 spaces in the carpark were in use less than 10% of the time and 276 spaces were in use less than 20% of the time.

Across the entire carpark (554 spaces), 112 spaces were not used during the survey, this include 109 spaces in Carpark 1 not used at all during the 3-day survey period.

These findings clearly indicate that a substantial portion of the existing parking provision is underutilised, validating the rationale for rationalising parking supply in favour of a higher-order land use that delivers on strategic housing and regeneration objectives.

Figure 3 - Dyke Road Carpark Average Space Usage (Source: PUNCH TTA)

The proposed development will provide 33 no. car parking spaces for the 219 no. residential apartment units. The proposed car parking provision is in line with both the Galway City Development Plan 2023-2029 and the Sustainable Residential Development and Compact Settlements Guidelines, 2024 which seek to minimise, substantially reduce or wholly eliminate car parking in city centre and urban neighbourhood locations, as discussed further below.

Potential for Overflow Parking into Neighbouring Retail Park

A number of submissions raised concerns regarding the potential displacement of parking demand into adjacent retail park facilities as a result of the proposed reduction in car parking spaces on the subject site. Specifically, it was suggested that the removal of a significant portion of the existing surface car parking could lead to increased pressure on parking resources within neighbouring commercial premises.

This issue has been carefully assessed as part of the Traffic and Transport Assessment (TTA) prepared by PUNCH Consulting Engineers, which includes detailed parking occupancy surveys and demand analysis. Surveys undertaken in November 2023 across the existing car parks revealed that, of the 554 available spaces, only 263 spaces were observed to be actively used during peak periods. This represents a utilisation rate of approximately 47%, indicating that existing parking demand is already considerably below capacity.

While the proposed development will result in the removal of 389 car parking spaces, leaving 165 spaces retained within Car Park 2, this represents a 38% decrease in overall physical parking availability. However, it is important to note that the anticipated trip generation profile of the proposed residential development is fundamentally different from the current commuter-focused usage of the site. The TTA projects a peak hour reduction of approximately 33 vehicle trips in the AM period and 47 vehicle trips in the PM period, reflecting a conservative and robust estimation of future demand. This forecast

indicates that the overall parking demand associated with the proposed development will reduce, not increase, in the post-development scenario.

Moreover, the change in land use from a surface-level commuter car park to a predominantly residential development will inherently alter the pattern and nature of vehicle movements. The current car park functions as a significant destination for external commuter traffic, which generates concentrated peak-hour parking demand and associated pressure on the surrounding road network. In contrast, the proposed residential scheme is designed to foster sustainable, localised travel patterns, with residents' trips being more evenly distributed throughout the day and significantly less reliant on private car use, particularly for daily commuting purposes.

The development's location within walking and cycling distance of Galway City Centre, coupled with access to high-frequency public transport services, supports a modal shift towards more sustainable transport modes. In line with national and regional transport policy, the development will be complemented by a Mobility Management Plan, promoting active travel options and reducing dependence on car ownership.

Additionally, the availability of 165 parking spaces retained within Car Park 2 will ensure that adequate on-site parking remains available to the wider public. These retained spaces provide a managed parking resource that can accommodate short-term parking needs without necessitating reliance on external facilities.

Crucially, the design of the proposed development will incorporate clear and transparent car parking strategies, communicated effectively to future residents and visitors. Parking allocations will be managed through a formal residential parking plan, ensuring that car parking provision is appropriately controlled and that expectations regarding car parking availability are set from the outset. As a city-centre urban infill project, this development is not anticipated to generate high levels of car parking demand, particularly given the broader policy context encouraging compact growth, reduced car dependency, and a transition towards sustainable modes of transport.

In conclusion, the potential for overflow parking into the neighbouring retail park has been comprehensively assessed and is not expected to materialise. The combination of existing underutilised parking capacity, the reduction in trip generation, the modal shift anticipated from the change in land use, and the provision of retained on-site parking collectively address the concerns raised. The proposed development aligns with contemporary urban planning and sustainable transport objectives, ensuring that parking demand is managed effectively within the site without adverse spill-over impacts on surrounding commercial operations.

Alternative Transport and Mitigation Measures:

The accessible location of the proposed development provides the future workers and residents with ample choice for sustainable travel options that will not require a permanent car. This is dealt with in detail within the MMP prepared by PUNCH Consulting Engineers. The development incorporates a comprehensive suite of mobility measures aimed at reducing private car dependency:

- **Car Clubs**: 5 no. dedicated car club parking spaces will be provided, supporting shared mobility schemes (GoCar). Industry data from GoCar suggests that each car club vehicle can replace up to 15 privately-owned vehicles.
- **Cycling Infrastructure**: A total of 465 no. secure bicycle parking spaces, including 25 no. cargo bike spaces (5.5%), will be provided, exceeding Development Plan requirements. Cycle charging points are also integrated into the design.
- **Public Transport Accessibility**: The site benefits from excellent public transport connectivity, including proximity to Galway Ceannt Station (900 m) and its direct services to Dublin, Athenry, Waterford, Clonmel and Limerick (with connections to Cork and Tralee). The proposed development is also situated along the BusConnects Cross-City Link corridor, ensuring frequent and reliable bus services with enhanced priority measures.

  The subject site is located 300m (4-minute walk) from the closest bus stops at Headford Road (Stop ID: 523711) and Woodquay Court (Stop ID: 525411). Both stops are served by the 407 bus

route. Located 550 metres (7-minute walk) from the subject site is Saint Francis Street (Stop ID: 523021). This stop is served by the following routes; 402, 404, 405, 407, 410, 411, 412, 419 and 424. Approx. 600 m from the site (9-minute walk) is Bóthar Bhreandán Ui Eithir (Stop ID: 523211) which is served by routes: 401, 404, 409, 430. In addition, the subject site is located approx. 650 m (9-minute walk) from Eyre Square which is a significant node and starting point for the majority of the urban bus routes in the city.

The Public Transport Capacity Assessment prepared by PUNCH Consulting Engineers forming part of the application documentation concludes that there is sufficient capacity in the network to accommodate the proposed development. The surveyed bus stops in the local area indicated a high rate of available capacity for potential public transport commuters from the proposed development, with most buses running with 75% available capacity.

These measures collectively offer viable and convenient alternatives to private car use, in line with the Sustainable Residential Development and Compact Settlements Guidelines, 2024 and the Galway City Development Plan's emphasis on mobility management in regeneration areas.

Drop-Off and Pick-Up Pressures Associated with Proposed Childcare Facility

Concerns have been raised regarding potential congestion impacts associated with drop-off and pick-up activities during the operational hours of the proposed childcare facility. It is important to clarify from the outset that the childcare facility is primarily designed to serve the childcare needs of residents within the proposed development itself. It is not anticipated that the facility will function as a significant attractor of external traffic trips from the wider area. Consequently, the majority of the childcare facility users will be local residents who live within walking distance of the facility, greatly reducing the likelihood of additional car-based trips being generated during peak times.

The central location of the site, within Galway City Centre, further supports the expectation that a significant proportion of creche drop-offs and collections will be undertaken on foot, by bicycle, or through other non-car-based means. This is substantiated by data from Census 2022, which indicates that 43.3% of commuters residing within a 1km radius of the site already use sustainable transport modes, including walking, cycling, and public transport, while only 29% rely on private car journeys. This strong existing modal share for sustainable transport reflects the site's inherent accessibility and the availability of alternative transport options.

Moreover, the proposed development's overall Mobility Management Plan will actively promote active travel choices for all residents, embedding sustainable travel habits into daily routines. For parents and guardians living within the development, the creche's proximity will allow for seamless, car-free access as part of their typical walking or cycling journeys to work or other daily destinations. The convenience of on-site childcare provision will inherently reduce the need for car-based drop-off and collection trips.

The Traffic and Transport Assessment undertaken by PUNCH Consulting Engineers has specifically examined the potential impacts of the crèche on local traffic conditions, including peak-hour scenarios. The assessment confirms that the expected level of vehicular movements associated with the crèche will be minimal and can be comfortably accommodated within the existing and proposed site access arrangements. Additionally, the TTA confirms that the development will not introduce any material adverse impacts on surrounding junction performance, with overall traffic volumes remaining well within acceptable operational thresholds.

Design considerations have also been incorporated into the site layout to manage any short-term parking or set-down needs effectively. Designated set-down and pick-up areas are proposed within the development, within immediate proximity to the entrance of the childcare facility ensuring that any vehicular activity associated with the facility is managed safely and efficiently within the site boundary, without causing spill-over onto adjacent streets or neighbouring premises.

The childcare facility is conceived as a localised amenity designed to meet the needs of future residents, with minimal reliance on external trip generation. The site's highly accessible location, existing sustainable transport behaviours in the surrounding area, and embedded sustainable travel initiatives will all serve to minimise car-based movements. The Traffic and Transport Assessment has robustly concluded that the creche will not create congestion pressures on the local road network, and all

anticipated demand will be effectively managed on-site through considered design and operational strategies.

Headford Road Multi-Storey Car Park Reference

We acknowledge that Chapter 4 of the Galway City Development Plan 2022-2028 references the following:

> *'A replacement of the existing surface car park on the Dyke Road is accepted on lands included in the Headford Road Regeneration area where re-development accommodating the car parking in a multi-story format would enable more efficient use of the land'.*

This policy context recognises the potential for a multi-storey car park to be incorporated as part of a comprehensive, phased regeneration of the wider Headford Road area. Such a provision is envisaged to occur in tandem with broader redevelopment initiatives, aimed at facilitating more compact and sustainable urban growth, while optimising the efficient use of strategically located urban lands.

While the subject site is within the identified Regeneration and Opportunity Site designation, it is important to emphasise that its zoning objective, and specific policy under the Development Plan is for residential-led regeneration. The proposed development aligns directly with this objective, seeking to deliver a high-quality, affordable and social housing scheme that contributes to meeting critical housing demand in the city.

There is no specific requirement for the delivery of the multi storey car park at the subject site nor is there a supporting Development Plan policy or objective for same.

Furthermore, the location of the site is inherently suited to promoting sustainable modes of transport, consistent with the principles of compact urban form and the "15-minute city" model. The site benefits from:

- Proximity to existing public transport corridors and pedestrian/cycling infrastructure.
- Walkable access to key services, employment, and recreational amenities.
- A central location that encourages reduced dependency on private car usage.

In this context, the proposed development represents a far more efficient and sustainable use of urban lands than a surface or standalone multi-storey car park. It is a key component of delivering on compact growth objectives, ensuring that valuable urban land is utilised to its full potential in accommodating much-needed housing supply, while still supporting sustainable transport patterns.

The current proposal does not preclude or prejudice the delivery of such infrastructure at a later phase. However, given the urgent demand for affordable housing and the site's suitability for immediate residential development, it is appropriate that the subject site is brought forward in a manner that aligns with both local planning policy and national housing objectives.

Proposed Car Parking Ratio

It is proposed to provide 33 No. residential car parking spaces for the 219 no. units, equating to 0.15 car spaces per unit. The lower provision is aimed at reducing the additional traffic loading in the area due to the good sustainable transport connectivity available in the area. The proposed car parking provision is aligned with the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities, 2024 and the Galway City Development Plan, 2023-2029.

Section 11.3 of the Development Plan sets out that the approach to car parking for the purpose of assessment of planning applications is applied to developments based on spatial location, public transport services with flexibility to achieve performance-based outcomes, in particular for infill and brownfield developments.

This approach will be applied to the varying standards between the four defined neighbourhood areas and are centred on the following:

- Parking is set at a maximum level of provision.
- Flexibility is encouraged where grouped car parking is provided.
- Reduced requirement is encouraged in mixed use areas in particular where peak demands do not coincide and where multi-purpose trips are anticipated and in circumstances where mobility management measures are deemed satisfactory.
- Consideration of reduction in requirements will also apply along existing and planned strategic public transport corridors depending on the prevailing level of service at that time.

In the city centre area where the Galway Transport Strategy (GTS) includes for significant investment in sustainable modes and where the most strategic Regeneration and Opportunity Sites are located the requirements for car parking will be linked to performance-based outcomes. All developments will be subject to the standard traffic and transport assessments.

Section 11.3.4 (d) of the Galway City Development Plan 2023-2029 sets out that in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. It is considered that the following circumstances of subject site and proposed development would allow for a substantially reduced car parking ratio to be considered:

1. City Centre Location: The site is located in close proximity (and within walking distance) to Galway's city centre, an area that benefits from excellent access to public transport, services, and amenities. As outlined in the Development Plan, the city centre is a strategic area for regeneration and compact growth, where the emphasis is placed on reducing reliance on car use and encouraging sustainable transport options. This location naturally supports a reduction in car parking provision, as residents and users of the development will have convenient access to public transport, cycling infrastructure, and local services within walking distance.
2. Proximity to Public Transport and Sustainable Mobility: The site is well-connected to existing and planned public transport corridors, including the future Connemara Greenway and Headford Road cycle routes. Additionally, the development is strategically located to benefit from the ongoing investment in sustainable mobility as part of the Galway Transport Strategy (GTS), which encourages a reduction in car use. As a result, the reduced car parking provision aligns with the city's sustainable transport objectives, supporting the shift towards active travel and public transport as the primary modes of transport for residents.
3. Regeneration and Opportunity Site: The subject site is designated as a Regeneration and Opportunity Site within the Galway City Development Plan. The policy for these sites prioritizes sustainable and compact growth and encourages developments that are well-integrated with public transport and pedestrian networks. Given the site's strategic location, the proposal seeks to support the regeneration objectives by providing a reduced number of car parking spaces, thereby encouraging a more sustainable and walkable urban environment that aligns with the overarching goals of the regeneration strategy.
4. Mixed-Use and Multi-Purpose Trips: The proposed development is designed to accommodate a range of uses, including residential units and potentially community and commercial facilities. In accordance with the policy, flexibility is encouraged in mixed-use areas, where peak demands for car parking may not coincide and where multi-purpose trips are anticipated. The development is situated in an area where residents and visitors are likely to use a variety of sustainable modes of transport, further justifying the reduced provision of car parking spaces.
5. Traffic and Transport Assessments: As required by the Development Plan, a traffic and transport assessment has been carried out for the proposed development to ensure that the reduced car parking provision is appropriate for the site's context. The

assessment confirms that the development is well-served by public transport, has access to key cycling routes, and is located within a highly walkable area, ensuring that the reduced parking provision will not compromise the functionality or accessibility of the site.

6. Masterplan Alignment: The development aligns with the broader masterplan for the Headford Road Regeneration Sites, which promotes higher density development, reduced car parking provision, and an emphasis on sustainable transport. The development's design, which minimises car parking, supports this broader vision for a more sustainable, urban, and well-connected community.

7. Census 2022 Travel Data: 2022 Census data for means of travel to work, school or college for the District Electoral Divisions intersecting the subject site at 1 km radius showed that sustainable transport modes on foot, bicycle, bus, minibus, coach or train is the leading means of travel across the surrounding area at 43.3%. It is therefore reasonable to assume that future residents of the proposed development will exhibit similar commuting patterns, with a substantial proportion of residents opting to use public transport, walking, cycling, or car-sharing as their primary modes of travel. This data supports the rationale for reducing the number of private parking spaces provided.

The proposed car parking provision is fully consistent with the guidance set out in Section 11.3 of the Galway City Development Plan. The reduction in car parking spaces is appropriate given the site's central location, its proximity to public transport, the site's regeneration context, and the proposed development's alignment with sustainable mobility strategies. The proposal not only supports the city's goal of reducing car dependency but also contributes to the creation of a more liveable, walkable, and sustainable urban environment.

Further, we note that the Sustainable Residential Development and Compact Settlements Guidelines, 2024, is the overriding planning policy context and SPPR 3 sets out the following in relation to car parking provision:

> ***"It is a specific planning policy requirement of these Guidelines that:***
>
> ***(i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling…***
>
> ***Applicants will be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on–street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking."***

In accordance with SPPR3, the proposed car parking provision is minimised given the subject site's city centre location, proximity to public transport nodes, services and amenities.

The proposed development will provide a total of 33 no. residential car parking spaces (0.15 ratio) including 2 no. accessible spaces. 10% of the spaces will have EV Charges and the remainder of the spaces will be ducted for future EV use. A set down area / loading bay is proposed at the southern access route in front of the childcare facility.

The proposed development has been designed to minimise reliance on car use and encourage and support the use of sustainable modes of transport. In summary, the proposed residential car parking ratio is considered to be both appropriate and acceptable for the following reasons:

- The site's location within the city centre provides excellent access to a wide range of public transport options, including bus, train, and cycle routes, reducing the need for residents to rely on private car ownership. In addition, the site is well-positioned near major employment hubs, educational institutions, retail outlets, and leisure facilities, all of which

contribute to a highly accessible urban environment where residents can easily walk, cycle, or use public transport for their daily activities.

- A comprehensive Mobility Management Plan (MMP) has been developed by PUNCH Consulting Engineers as part of the subject proposal, which includes strategies to promote sustainable transport and reduce the need for private car use. The plan outlines measures such as the introduction of a car-sharing scheme and initiatives to encourage the use of public transport, cycling, and walking. These strategies will help mitigate any potential reliance on private vehicles and ensure that the parking provisions remain in line with the sustainable goals of the development.
- The wider characteristics of the Development Framework development. The development aligns with the broader vision for the site, which prioritises connectivity, walkability, and the integration of public transport options. By minimising car parking, the development contributes to the goal of fostering a pedestrian-friendly environment that supports the green infrastructure and public spaces in the vicinity.

Census Data

CSO 2022 data for 8 no. District Electoral Divisions (St. Nicholas, Menlough, Castlegar, Eyre Square, Nuns Island, Newcastle, Shantalla and Claddagh) intersecting the subject site at a 1 km radius data was used to establish the most utilised means of transport to travel to work, school or college as per the table below.

Means of Travel	No. of People	% Total
On foot	5,379	30%
Bicycle	911	5%
Bus, minibus or coach	1,452	8%
Train, DART or LUAS	59	0.3%
Motorcycle / Scooter	49	0.3%
Car Driver	4,004	22.5%
Car Passenger	1,551	9%
Van	276	1.5%
Other (incl. lorry)	28	0.1%
Work mainly from home	1,295	7.3%
Not Stated	2,822	16%

Table 1 – Means of Travel to Work, School or College (CSO, 2022)

Sustainable transport modes on foot, bicycle, bus, minibus or coach or train is the leading means of travel across the Study Area at 43.3.%. This is significantly higher than the State average of 26.64% for the same transport methods. Travelling by car either as a driver or passenger equates to 31.5% in the Study Area. This is significantly lower than the State average of 53.8%. It is therefore reasonable to assume that future residents of the proposed development will exhibit similar commuting patterns, with a substantial proportion of residents opting to use public transport, walking, cycling, or car-sharing as their primary modes of travel. This data supports the rationale for reducing the number of private parking spaces provided, as it reflects a trend toward more sustainable commuting options, in line with SPPR 3.

Allocation of Car Parking Spaces

The allocation strategy for car parking spaces within the proposed development has been carefully considered to balance the provision of private vehicle parking with broader national and local planning objectives promoting sustainable modes of transport.

The LDA has noted that in instances where the ratio of car parking spaces to cost rental units falls below a one-to-one provision, parking spaces will be allocated to residents on a "first-come, first-served" basis. This approach ensures a fair and transparent process for residents who require a car parking space, while also recognising that private car ownership is not a necessity for all households,

particularly in a development of this nature, which benefits from excellent access to sustainable travel options.

Given that cost rental housing is provided at fixed, below-market rental levels, the allocation of a car parking space will involve a modest supplementary monthly charge.

Residents will be fully informed of the reduced car parking provision prior to occupation, with clear communication at the letting stage regarding the availability of spaces and the alternative travel options that are easily accessible from the development. This transparency ensures that future occupants are aware of the development's mobility strategy and the prioritisation of sustainable transport choices**.** This is dealt with in detail within the MMP.

With respect to on-street parking, any issues related to undesignated parking on public roads fall within the remit of Galway City Council's parking enforcement policies. The management of public domain parking is outside the control of this planning application and will continue to be governed by Galway City Council's existing enforcement procedures.

The proposed parking strategy has been designed to fully comply with the Galway City Council Development Plan standards, taking into account the site's high level of connectivity to sustainable transport infrastructure. Furthermore, the parking provision aligns with national planning policy objectives, including the Sustainable Residential Development and Compact Settlements Guidelines, 2024 which encourage reduced car dependency in urban developments located in areas with strong public transport accessibility.

2.2 Bicycle Parking

The National Transport Authority noted that design of cycle parking is unclear. Design and location of cycle parking provided should include for a range of cycle types including cargo and heavier bikes / e-bikes are accommodate with a significant proportion of Sheffield stands. All cycle infrastructure should comply with the Cycle Design Manual.

Response:

The proposed development will provide a total of 465 no. bicycle parking spaces broken down as follows:

Type	Total
Resident Long Stay	345 (incl. 15 cargo)
Resident Visitor	110 (incl. 8 cargo and 2 no. universally accessible spaces)
Childcare Facility Staff	10
Total	**465**

Table 2 - Proposed Bicycle Parking

Resident long stay bicycle parking will be secure and covered located at the lower ground floor level. In addition, locations for cycle maintenance are proposed within building Core C for residents to utilise.

Visitor cycle parking spaces and childcare facility staff spaces are proposed at surface level.

We now refer the Commission to the accompanying drawing no. DRG-MOLA-ZZ-ZZ-DR-A-0216 prepared by MOLA detailing the proposed bicycle parking provision which is in line with the Cycle Design Manual.

2.3 Construction Impacts

Submissions have raised concerns regarding potential negative impacts associated with the construction phase of the proposed development. The principal issues identified include:

- Noise levels during construction activities.

- Traffic disruption, including construction-related vehicular movements.
- Lack of clarity on construction parking provisions and management strategies to prevent the displacement of vehicles into surrounding streets and neighbouring premises.
- Construction Noise Impacts

Response:

Noise Impacts During Construction Phase

In response to concerns regarding noise levels, Chapter 9: Noise and Vibration of the Environmental Impact Assessment Report (EIAR), comprehensively addresses the potential noise impacts associated with construction activities. Chapter 9 of the EIAR outlines a series of robust mitigation measures designed to minimise and manage noise emissions throughout the duration of the construction phase.

While there are currently no statutory guidance in relation to construction noise in Ireland, the project will adhere to best practice guidelines set out in the 'Code of Practice for Noise and Vibration Control on Construction and Open Sites – Part 1'. This Code provides practical guidance on assessing and mitigating noise impacts from typical construction operations, ensuring that activities are conducted with due consideration for surrounding residential and commercial receptors.

Key sources of construction noise will include:

- Site clearance operations (demolition, excavation, and foundation works).
- Material handling and spoil removal.
- Operation of machinery such as excavators, cranes, concrete mixers, dumper trucks, compressors, and generators.
- Movements of heavy goods vehicles (HGVs) associated with material deliveries and waste removal.

Existing road traffic noise dominated the noise climate at this residential location and construction noise is unlikely to be a significant issue due to the significant buffer distance and prevailing daytime noise climate between the subject site and the nearest sensitive receptors (130 m from the subject site). It is acknowledged that these activities are likely to result in intermittent, short-term increases in noise levels at the nearest sensitive receptors. However, the following noise mitigation measures will be implemented to manage these impacts effectively:

- Limit of daytime construction noise at 65 dB $L_{Aeq,\ 12\ hour}$.
- Restriction of high-noise activities to designated working hours, avoiding evenings, night-time, Sundays, and public holidays.
- Selection of low-noise equipment, where feasible.
- Use of temporary acoustic barriers or hoardings along sensitive site boundaries.
- Implementation of proactive communication strategies with neighbouring residents to provide advance notice of high-noise activities.
- Regular noise monitoring at the site perimeter to ensure adherence to best practice noise thresholds.

It is important to emphasise that construction noise impacts will be temporary in nature and progressively reduce as works transition from heavy civil works to above-ground structural and internal fit-out phases. As such, Chapter 9 of the EIAR concluded that the relative construction noise impact will not be significant.

Construction Traffic and Parking Management

Regarding traffic-related impacts during construction, Chapter 13: Traffic and Transport of the EIAR and the Mobility Management Plan (MMP) prepared by PUNCH Consulting Engineers outlines a structured approach to managing construction-related traffic movements and minimising disruption to the surrounding area. It is important to clarify that, relative to the existing baseline traffic volumes on the local road network, the additional traffic generated by construction activities is expected to be modest and manageable.

A Construction Traffic Management Plan (CTMP) will be prepared by the appointed contractor in advance of any site works commencing. This CTMP will be developed in coordination with Galway City Council and An Garda Síochána, ensuring that all necessary safeguards are put in place to manage construction traffic movements efficiently and safely. The CTMP will include detailed strategies for:

- Scheduling deliveries and heavy vehicle movements outside of peak traffic periods to minimise congestion impacts.
- Establishing wheel-wash facilities at site egress points to prevent mud and debris being tracked onto the public road network.
- Consolidating delivery loads to reduce the frequency of vehicle trips.
- Providing clear routing instructions to all suppliers and contractors, ensuring that site access is strictly via Dyke Road, with primary approach routes from the N6/Headford Road corridor.
- Utilising off-peak and night-time deliveries for oversized or heavy loads, where necessary and feasible.

Construction worker parking will be accommodated entirely within the development site boundary. Sufficient space will be designated for contractor vehicles, preventing any overspill of parking demand into neighbouring streets or retail car parks. Furthermore, contractors and site operatives will be actively encouraged to utilise sustainable travel modes, including public transport, cycling, and car-sharing schemes. Travel information and public transport timetables will be prominently displayed on-site to support this initiative.

To further reduce construction traffic volumes and associated impacts, the project will incorporate:

- Increased use of prefabricated and modular construction elements to minimise on-site activities.
- On-site reuse of excavated materials wherever possible, reducing the volume of material that requires off-site disposal.
- Efficient storage and logistics planning to limit unnecessary movements of materials and equipment.
- Development of a resource-efficient materials procurement strategy to minimise quantities and trips.

While temporary impacts on the eastern public footpath on Dyke Road are anticipated during certain phases of construction, pedestrian access will be maintained via the western footpath, ensuring continued safe and accessible pedestrian movement in the vicinity.

In summary, a comprehensive set of measures and management strategies will be put in place to ensure that construction-related noise and traffic impacts are effectively mitigated. The construction phase will be closely managed through proactive planning, site logistics, and coordination with local authorities, ensuring that potential disruption to the local community is minimised and that all construction activities are carried out in accordance with best practice standards.

2.4 Wastewater Capacity

Concerns have been raised regarding the existing wastewater infrastructure's ability to accommodate additional flows from the proposed development. The primary issues cited include:

Frequent significant spills from stormwater overflows: 13 stormwater overflows included in EPA Waste Water Discharge Licence Ref. D0050-1 granted in 2010 and a further 113 known stormwater overflows on the drainage network which are unlicensed.

Refers to the Drainage Area Plan Stage 3 Risk Assessment and Needs Identification Report published in June 2024 which notes that the weir level on the SWO at the Long Walk needs to be raised to prevent inflow from the River Corrib under high tide conditions. The Long Walk SWO has not been brought into compliance and the proposed development will be connecting into it.

The capacity of the two existing siphons under the estuary of the River Corrib:

- The DAP Stage 3 Report includes no assessment of the adequacy of the capacity of the two existing siphons.
- A lack of capacity in the siphons is likely to be contributing to the frequency of spills from the Long Walk SWO.
- Several structural defects discovered in the larger of the two siphons.

Wastewater that will arise from the proposed development:

No evidence in the CoF submitted that the capacity of the two siphons is adequate to cater for proposed development.

No evidence that UE propose to carry out urgent remedial works to the larger of the two siphons.

There is a problem with and a solution is needed for the existing wastewater siphons under the River Corrib.

Development considered premature pending Galway City wastewater network upgrade.

Concerns over recent sewerage issues and potential for associated pest control.

Response:

The concerns raised regarding stormwater overflows; the condition and capacity of the siphons under the River Corrib; and the ability of the wastewater network to accommodate flows from the proposed development are noted.

It is important to clarify that all of the existing infrastructure including the stormwater overflows (SWOs), the Long Walk SWO and the twin siphons under the Corrib, are operated and maintained by Uisce Éireann. The responsibility for assessing, upgrading and ensuring the compliance and capacity of these assets rests with Uisce Éireann as the statutory provider. Galway City Council, as the applicant, is not in a position to assess or carry out works on infrastructure that falls within Uisce Éireann's remit. While the concerns about overflows and siphon capacity are acknowledged, these relate to the wider public wastewater network and remain the responsibility of Uisce Éireann.

As part of the standard pre-connection enquiry process, the project team has engaged with Uisce Éireann to review the proposals. Uisce Éireann is required to assess whether the existing network, including key infrastructure such as the siphons, has sufficient capacity to serve the development. Following this process, Confirmation of Feasibility (CoF) letters have been issued by Uisce Éireann confirming the feasibility of a connection for the proposed development, as well as for the required wastewater diversion and new wastewater pumping station. Wastewater from the development itself will be managed through a new, separate on-site drainage system and pumping station which will discharge to the public network.

Regarding the suggestion that the development might be premature pending wider network upgrades, it is noted that Uisce Éireann operates a regulated and structured process for managing new development connections. As part of this process, Uisce Éireann has identified and set out the upgrade works that are required to facilitate the proposed development. These works are described in the Infrastructure Report and Engineering drawings submitted as part of the application.

Following further consultation with Uisce Éireann in July 2025, the relevant Connections and Developer Services Manager of Uisce Éireann noted the following on 25 July 2025 with respect to the proposed development:

> *'The applicant submitted a Pre-Connection Enquiry and received a 'Confirmation of Feasibility' letter from Uisce Éireann for this development. The capacity of the downstream network to cater for this development was assessed by us under that PCE case and water and wastewater connections deemed feasible (subject to the specific upgrades outlined in the Confirmation of Feasibility Letter).*
>
> *A review of the applicant's detailed designs will be carried out at connection application stage that will consider opportunities to reduce the pass forward wastewater flow rate from the site by using storage at the proposed new wastewater pumping station, which could facilitate discharging at off peak times, if necessary. As a brownfield site there may also be an opportunity to remove stormwater from the combined sewer network in this immediate area, by transferring existing surface water connections to the new surface water network proposed in this development. Please note the Confirmation of Feasibility is not a connection offer and capacity in Uisce Éireann's network(s) may only be secured by entering into a connection agreement with Uisce Éireann following an application being made by the applicant.'*

In summary, the current proposal delivers on the appropriate specific upgrades referenced in the Confirmation of Feasibility that accompanies this application. Matters outside of this are for the consideration of Uisce Eireann as the statutory undertaker.

As a separate comment, it is worth noting that there has been a recent decision to grant permission for a new circa 950 cubic metre underground storage tank at Merlin Park, Old Dublin Road Galway. Reference ABP-320864-24 refers. This development will provide additional waste water storage capacity to the Merlin Park Pumping Station, which is a consideration for the wider capacity of infrastructure in the Galway City Area.

2.5 Water Pumping Station at Cleverson's Site

The main issues raised regarding the water pumping station:

Proposed wastewater pumping station as part of Cleverson's permitted scheme forms part of a connection agreement with UE (Ref. CDS2100601701). A separation distance of 6-7m is maintained between the permitted wastewater pumping station and the proposed building.

Response:

It is noted that the permitted wastewater pumping station which is to be delivered as part of Cleverson's approved scheme (connection agreement reference CDS2100601701), is located adjacent to the proposed development.

The location of this existing WWPS was considered in the design of the proposed development layout and internal unit configuration. In terms of proximity, the part of the proposed building closest to the permitted pumping station accommodates a stair core and ground floor plant area rather than residential units. The nearest residential unit with an openable window is set at least 6 metres above ground level (based on a finished floor level +10.58m OD Malin, the window level is 1.1 m above FFL to provide a level of + 11.68 OD Malin), providing a greater vertical separation than would be apparent from a plan view alone. This design approach ensures there is no material impact on residential amenity.

2.6 Permeability

The main issues raised regarding permeability:

The proposed future pedestrian / cycle route from Corrib Causeway site through the Cleverson's site is within an area comprising 'back of house' service, delivery and staff car parking.

Lack of designated crossing points with user friendly dropped kerbs and tactile surfaces in general in the area and Galway City.

The 'potential future permeability link' to the east of the development should be ensured.

Response:

The Proposed Future Pedestrian / Cycle Route through Cleverson's Site

As part of the design evolution of the proposed development and in the context of the wider Corrib Causeway Masterplan, careful consideration has been given to future opportunities for enhanced pedestrian and cycle connectivity. In particular, the potential for an eastward connection has been identified, which would facilitate a strategic link between the subject site, the permitted (but yet to be constructed) Student Accommodation development, Headford Road, and the Galway Retail Park.

This envisaged connection aligns with and complements the permitted development layout on the Cleverson Site, providing a coherent and integrated movement network that promotes sustainable transport modes and enhances permeability across the wider Headford Road Regeneration Area.

We note specifically that the RFI Response Document prepared by Simon J Kelly Architects for Reg. Ref. 20/184 on behalf of Cleverson Ltd., in Response to FI Item 6 stated the following:

> *In a future scenario, whereby lands to the Dyke Rd Car Park undergo development, we envision the access road as a "shared surface" – used by both pedestrians, cyclists and vehicles in a similar manner to the pattern which presently occurs in Galway City Centre at Shop Street."*

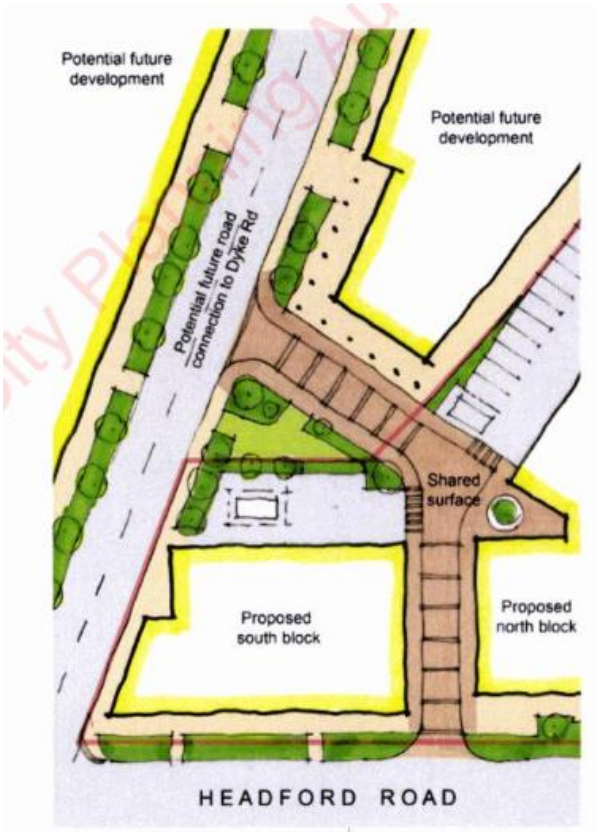

Figure 4 - "Diagram illustrating shared surface area and potential future connection to development at rear site"

In response to FI Item 7, the following was stated:

> *"The access route proposed in the application is designed to cater for 2 scenarios:*

1. *Scenario 1: Service access to rear. As presently proposed a gated, secure entrance for service use to the rear of the site. To be in place until such a time as development occurs to the Dyke Road Car Park.*
2. *Scenario 2: Active connection to Dyke Rd Potential future, the route is designed to be used as a 'shared surface' which prioritises pedestrians and cyclists while enabling infrequent vehicle access to service the rear of the site. To be initiated in the event of future development to the Dyke Road Car Park.*

Figure 5 - "Visualisation of view from the west illustrates scenario 2, demonstrating future connection between Headford Rd, and the Dyke Road Car Park Site"

Further, we highlight to the Commission the relevant conditions attached to the grants of permission for the Cleverson's site (we note that no pre-commencement compliance submissions are available on the e-planning portal files in relation to these conditions):

Cond. 7 of Ref. 20184 / ACP-309673-21

The access route from the Headford Road and the area highlighted as 'SHARED SURFACE' on the submitted site layout plan, shall allow for general public accessibility and shall, from first occupation of the building, allow for direct access to lands at the rear of the site currently used as a public car park. The exact extent of this area, any alterations required to activate this access on the western site, agreement with respect to operation and the provision of a public right-of-way or transfer of land shall be agreed with the planning authority in writing prior to commencement of development.

Cond. 6 of Ref. 22259

The access route from the Headford Road shall allow for general public accessibility and shall from first occupation of the building allow for direct access to lands at the rear of the site currently used as a public car park. The exact extent of this area, any alterations required to activate this access on the western site, agreement with respect to operation and the provision of a public right-of-way or transfer of land shall be agreed with the planning authority in writing prior to commencement of development.

In recognition of this future link, the proposed development has been masterplanned in a manner that safeguards and facilitates the delivery of this east-west connection. The layout of the scheme has been designed to integrate seamlessly with this potential linkage, ensuring a cohesive and coordinated approach to connectivity across adjoining development parcels.

The proactive inclusion of this future connection aligns with best practice urban design principles, supporting permeability, walkability, and the delivery of a legible and accessible movement network. It also complements Galway City Council's wider objectives in promoting sustainable transport modes, reducing car dependency, and enhancing active travel infrastructure in line with national policy directives.

This future route is an important element in delivering a coherent regeneration vision for the Headford Road area, ensuring that all adjoining development sites can be integrated into a unified and accessible urban quarter, enhancing both the functionality and quality of the public realm.

Lack of Designated Crossing Points and User Friendly Services

The design of the development has been guided by an integrated, sustainable urban design approach that prioritises pedestrian and cyclist movement, enhances safety, and encourages a shift away from private car dependency. This aligns with the principles and objectives set out in the Design Manual for Urban Roads and Streets (DMURS) 2019, which establishes best practice in urban street design.

Key DMURS objectives reflected in the proposals include:

1. Prioritising pedestrian and cyclist movement while balancing essential vehicular access.
2. Ensuring high levels of pedestrian permeability and convenient, direct route options.
3. Integrating speed-reducing design measures for safe pedestrian-cyclist-motorist interactions.
4. Designing attractive and functional streetscapes, incorporating high-quality landscaping, materials, and finishes.

There are currently no pedestrian crossing points on the Dyke Road after the Dyke Road/Headford Road signal-controlled junction.

As referenced in Section 3.5.4 of the TTA, planning permission was granted for the Galway BusConnects scheme Cross-City Link (University Road to Dublin Road) in October 2024 (Reg. Ref. ABP 314597). This section of the BusConnects scheme includes a new signal-controlled junction on the Dyke Road with new pedestrian crossings on each arm and significantly improved pedestrian routes in this section of Dyke Road, as shown in the figure below:

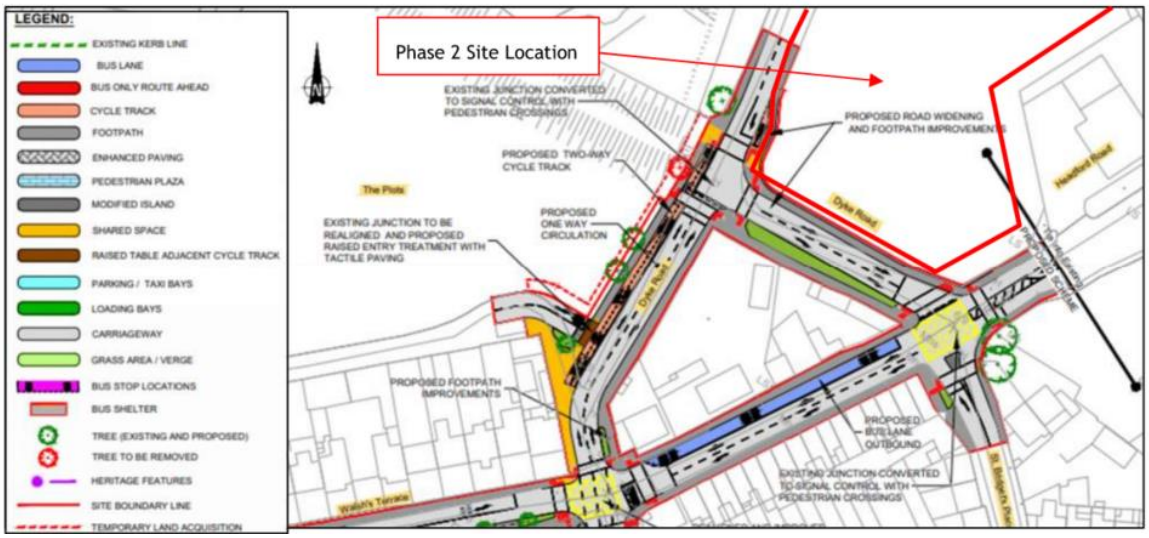

Figure 6 - Permitted BusConnects Cross City Link

The proposed toucan crossing of the Dyke Road that is included in this proposed development application is approximately 220m from this permitted new pedestrian crossing and approximately 300m from the existing pedestrian crossing of the Dyke Road/Headford Road junction. The proposed location of the new crossing point is positioned at the northern end of the proposed development providing good connections for the development entrance and the Black Box Theatre.

A Stage 1 Quality Audit is included in the planning documentation submitted with the application. The Audit includes an Access and Walking Audit which considers the infrastructure provision in the area surrounding the proposed development. As referenced in Section 10 of the TTA, the recommendations of the audit have been incorporated into the current site design which included improved pedestrian crossings, including dropped kerbs and tactile paving, along the Dyke Road development crossings.

In addition, tactile paving and dropped kerbs are proposed at all intersections within the proposed development of the footpaths with the proposed internal roads. Drawing No. 60710277-ACM-XX-XX-DR-CE-10-0751 prepared by AECOM illustrates this.

<u>The 'potential future permeability link' to the east of the development should be ensured.</u>

The provision of a 'potential future permeability link' to the east of the proposed development is recognised as an important urban design consideration to support long-term connectivity objectives. The proposed scheme has been carefully designed to safeguard and facilitate such future permeability, ensuring that the eastern boundary retains the capacity to evolve in response to subsequent development opportunities in the adjoining lands, including the Galway Retail Park and potential connections to Headford Road.

A new north-south pedestrian and cyclist link is proposed along the eastern edge of the Phase 1 Corrib Causeway site. The design of this link has been developed with a deliberate degree of flexibility to accommodate potential future modifications. In particular, a section of the proposed hedgerow planting along the eastern boundary has been strategically designed to be adaptable, allowing for a portion of the hedgerow to be removed or reconfigured in the event that a direct connection into the Galway Retail Park or a link to Headford Road is pursued through future, separate planning applications.

In addition to the adaptable boundary treatment, the communal open space adjacent to this boundary has been intentionally oversized, with a landscape buffer zone incorporated into its design. This buffer not only enhances the amenity value for residents in the short term but also provides a spatial reserve that could seamlessly transition into a future public street or permeability link, without compromising the overall quality or functionality of the open space provision within the development.

From a residential amenity and security perspective, the current approach is considered entirely appropriate. Until such time as adjacent lands, including the Galway Retail Park, come forward for redevelopment, it is critical that the eastern boundary provides a secure and well-defined edge, ensuring the privacy and safety of the Phase 1 Corrib Causeway residents. This phased approach respects the current urban context while prudently anticipating future opportunities for integration and permeability.

Ensuring a safe, enclosed, and high-quality living environment for residents in the interim is the current key design priority with flexibility to adapt the approach at a later date. The scheme has been deliberately planned to allow the eastern boundary to transform over time into a vibrant, active frontage, supporting the development of a mixed-use streetscape in the event of future regeneration of the adjacent retail park lands.

The masterplanning principles underpinning the current proposal ensure that the eastern boundary can adapt to a broader urban regeneration vision. Should future development proposals emerge for the Galway Retail Park, the design of the eastern edge can be modified to create a new active street frontage, promoting permeability, vibrancy, and the integration of a mix of uses, in line with compact growth and urban placemaking objectives.

Visual representations provided below illustrate:

- The currently proposed eastern boundary treatment, showing landscaped hedgerows and buffer zones (Figure 7).

- A conceptual visualisation of how this boundary could be reconfigured in the future to accommodate a permeability link and evolve into a dynamic mixed-use street frontage as part of a coordinated redevelopment of adjacent lands (Figure 8).

Figure 7 - CGI of Currently Proposed Eastern Boundary

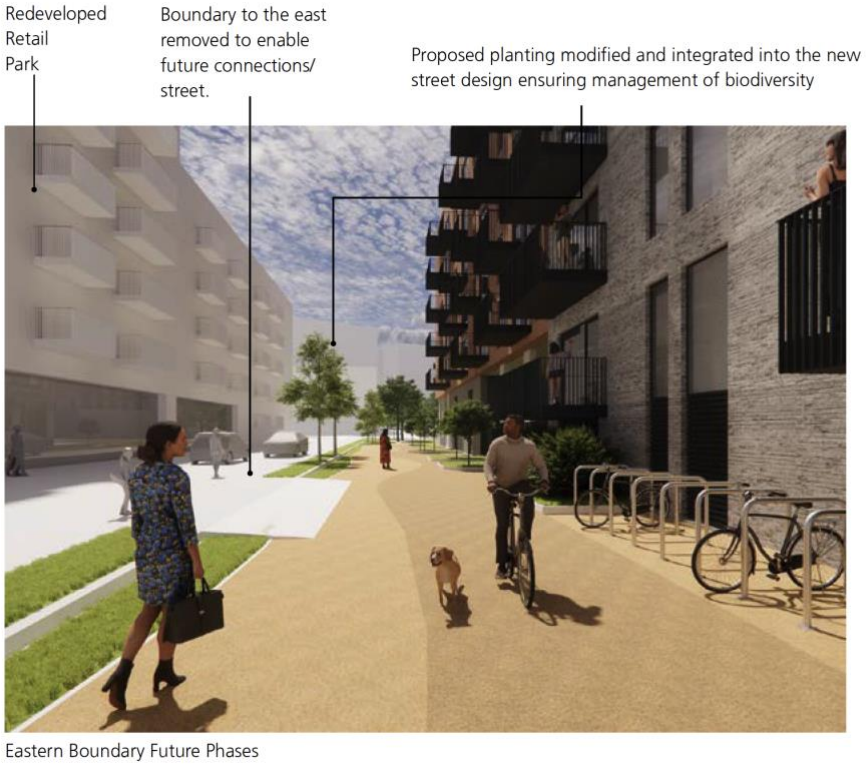

Figure 8 - CGI of Potential Future Eastern Boundary

2.7 Flood Risk

The main issues raised regarding flood Risk:

> Queries whether the embankment is in danger and what steps will be taken to remedy; Queries timeframe of construction of apartments should Galway's Flood defences not due to start until 2030;
>
> All the Flood Risk mitigation measures were completed prior to the publication of the UCG - Storm Eowyn Research Document appended to submission;

Response:

A detailed Site-Specific Flood Risk Assessment (SSFRA) covering Stages 1 to 3 was prepared by AECOM to accompany the planning application for the proposed development. In preparing the SSFRA, AECOM considered the requirements Galway City Council Development Plan (2023 - 2029) (GCCDP) Chapter 9, which focuses on Environment and Infrastructure, the GCCDP Strategic Flood Risk Assessment (SFRA) along with The Planning System and Flood Risk Management - Guidelines for Planning Authorities (OPW, 2009).

The primary source of flood risk at the site is fluvial (river) flooding from the River Corrib. To assess this risk to the proposed development, detailed hydraulic modelling was undertaken using the Coirib go Cósta (CgC) Flood Relief Project hydraulic model of the River Corrib. In line with the conservative approach set out in the Guidelines, the proposed development has been assessed against both the 1% Annual Exceedance Probability (AEP) flood event plus climate change and the more extreme 0.1% AEP event plus climate change. The CgC baseline hydraulic model was modified to exclude the existing Dyke Road embankment so as to represent a conservative baseline condition for the site.

Mitigation measures proposed for the development have been designed to be independent of the existing Dyke Road embankment and the future Coirib go Cósta Flood Relief Scheme. The measures incorporated in the design of the proposed development include:

- Finished floor levels set above predicted 1% AEP flood levels, with suitable freeboard and climate change allowances included,
- Compensatory flood storage provided to avoid increasing flood risk elsewhere,
- A comprehensive emergency plan has been prepared which includes defined evacuation procedures.

As a result of including these mitigation measures in the proposals, the development is not reliant on the progression of the Corrib go Cósta Flood Relief Scheme. This scheme is currently at Public Engagement - Day No.2 for Options Development and the information published is available here: https://coiribgocosta.virtual-engage.com/.

As part of the SSFRA submitted with the planning application, coastal flood risk mapping published as part of the OPW Western CFRAM study, ICPSS project and Corrib go Cósta Flood Relief Scheme project were reviewed to evaluate the coastal flood risk to the Proposed Development. These maps do not show any flooding within the subject site during coastal flood events. Figure 9 is an extract from the OPW Western CFRAM Study Mapping. Figure 10 is an extract from the ICPSS project mapping and Figure 11 is an extract from the Corrib go Cósta Flood Relief Scheme project mapping. While the findings of the Storm Eowyn research document are noted, the Site-Specific Flood Risk Assessment addresses the primary flood risk to the site, fluvial (river) flooding from the River Corrib. As the site of the proposed development is located within Flood Zone C with respect to coastal flooding, the findings of the research document do not affect the conclusions or mitigation measures set out in the SSFRA.

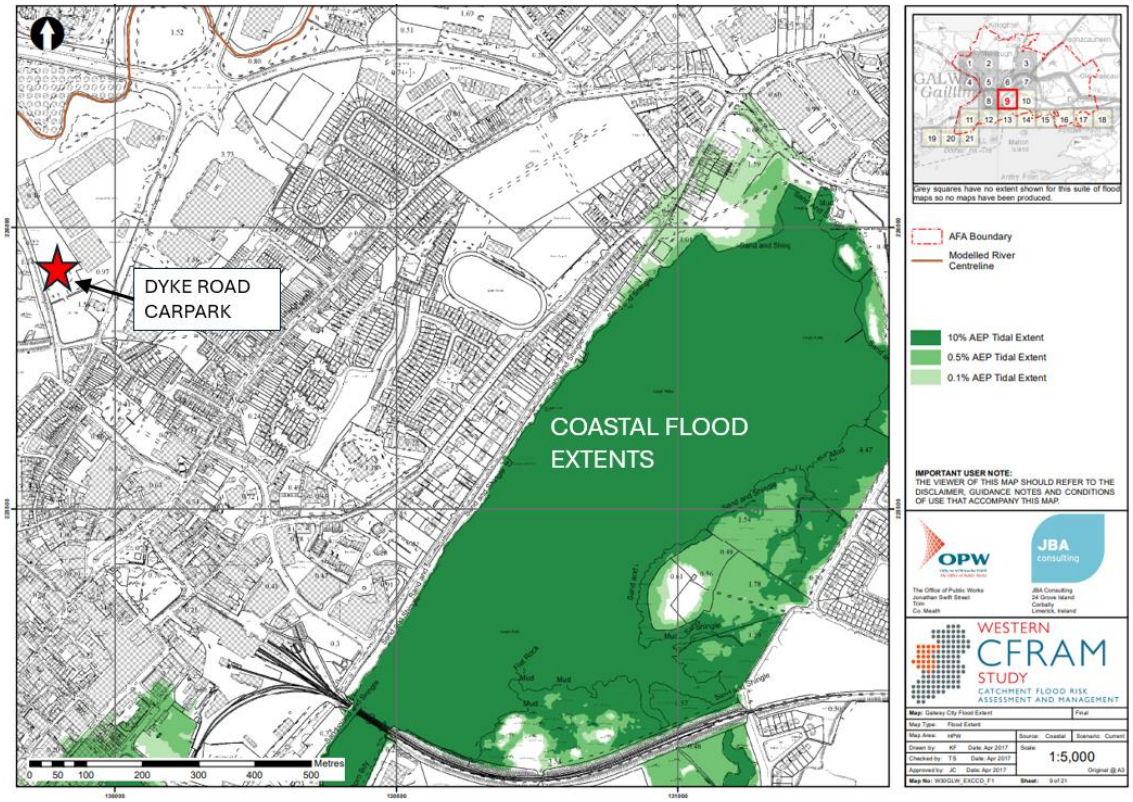

Figure 9 - Western CFRAM Coastal Flood Risk Mapping

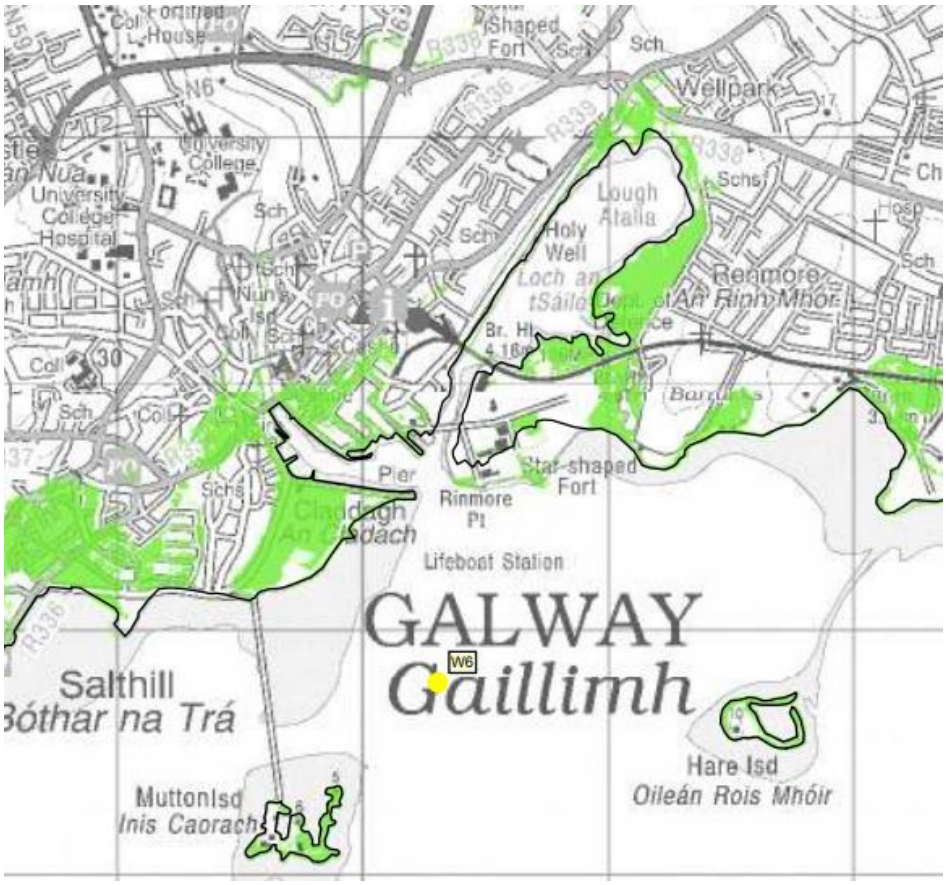

Figure 10 - ICPSS Flood Risk Mapping

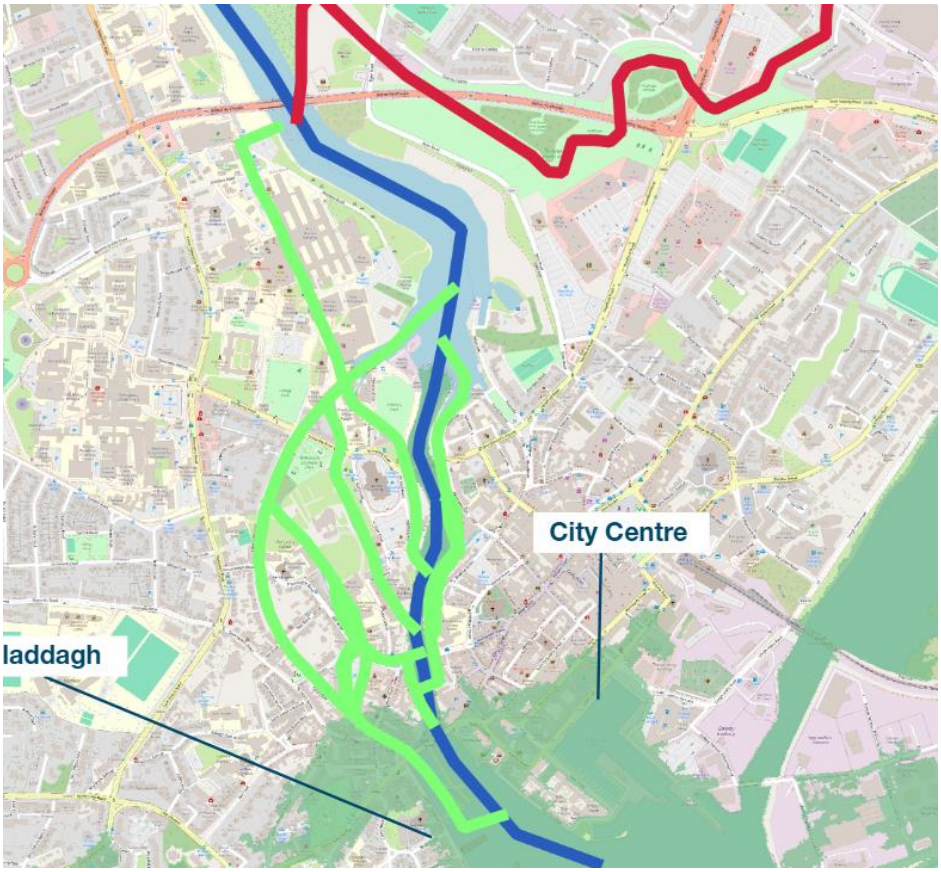

Figure 11 - CgC Coastal Flood Risk Mapping

2.8 Impact on the Black Box Theatre

The main issues raised regarding the impact on the Black Box Theatre:

The proposed development risks undermining the operational viability of the Black Box Theatre;
Requests that an independent acoustic impact survey on the Black Box Theatre be commissioned before a decision is reached;
The subject site is the only viable access point for large vehicles servicing the theatre at present. Its loss will severely restrict the logistical operations of the theatre and parking for audiences;
Requests for alternative accessible routes and parking arrangements to be clearly planned and communicated to ensure continued inclusive access to the venue;
Impact of proposed development on the Black Box Theatre and the arts community:
Noise disruption
Access Issues / Parking;
Air Quality during construction;
Reduced Natural Light;
Utility Disruption.

Response:

Operational Viability of the Black Box Theatre

While it is acknowledged that the construction phase may cause temporary disturbances to the surrounding area, a comprehensive Construction Management Plan (CMP) will be developed and

implemented to mitigate such impacts. This plan will specifically address measures to minimise disruption to the Black Box Theatre during construction activities.

In the operational phase, the development is not anticipated to negatively affect the theatre's functionality. Conversely, the addition of new residents will enhance local vibrancy and has the potential to increase audience footfall and community support for the theatre and other cultural facilities.

The subject site is currently used as a surface car park. According to the Corrib Causeway Masterplan, future phases of development (Phase 2 and beyond) envisage the southern portion of the car park being redeveloped for civic, commercial, or cultural purposes. Should the Black Box Theatre eventually relocate, a matter which is separate to this planning application, these lands offer potential for future residential or cultural uses overlooking Terryland Forest Park. Importantly, the Black Box Theatre and its associated parking are unaffected by Phase 1 and will remain fully operational during and after the proposed works.

Acoustic Impact on the Black Box Theatre

Submissions received have requested that an independent acoustic impact survey be undertaken to assess potential noise implications of the proposed development on the operations of the nearby Black Box Theatre. In response, it is important to clarify that the proposed development is a residential scheme, which, once operational, will not give rise to any significant noise emissions that could interfere with theatre activities. Typical residential uses are inherently low in noise output, particularly when compared to commercial or industrial developments, and are therefore not anticipated to introduce any acoustic conflict with the theatre's performance schedule or operations.

The design of the proposed development has also taken account of the site's urban context, ensuring that building orientation, façade treatments, and internal layouts maintain appropriate separation from existing neighbouring uses, including the Black Box Theatre. Consequently, no material acoustic impacts on theatre operations are expected once the development is complete and occupied.

While operational noise impacts are expected to be negligible, it is acknowledged that construction activities will result in temporary, short-term increases in noise levels, particularly during the early phases involving heavy civil works. These potential impacts have been fully assessed in Chapter 9: Noise and Vibration of the Environmental Impact Assessment Report (EIAR), which outlines a comprehensive series of mitigation measures to manage and minimise noise emissions throughout the construction programme, as briefly outlined in Section 2.3 above.

It is important to emphasise that any construction noise impacts will be temporary and transient, with noise levels progressively diminishing as works move from the early groundwork and structural phases to less intrusive internal fit-out and finishing works.

The EIAR has concluded that, with the implementation of the identified mitigation measures, the overall noise impact from construction activities will be short-term, effectively managed, and will not result in significant adverse effects on surrounding uses, including the Black Box Theatre.

Access & Parking Arrangements

Contrary to concerns raised, the proposed development does not obstruct or compromise the current access arrangements or parking provisions serving the Black Box Theatre:

- The theatre has its own dedicated vehicular entrance and on-site parking area, both of which are situated outside the boundaries of the proposed development.
- These existing arrangements will remain fully operational and unaffected by Phase 1 of the development.
- Car Park 2 will contain 165 no. spaces for any overflow car parking requirements.

During construction, a Construction Traffic Management Plan (CTMP) will be developed in consultation with Galway City Council and An Garda Síochána to ensure theatre operations continue with minimal disruption. Key elements will include:

- Construction traffic will access the site via the Dyke Road, with primary routing through the N6/Headford Road.
- Delivery schedules will avoid peak performance and audience arrival times.
- Construction worker parking will be accommodated within the development site, with efforts to promote public transport usage among site personnel.
- Temporary footpath diversions will be implemented if necessary; however, alternative pedestrian routes on the western side of Dyke Road will ensure continuous safe pedestrian access.

There are no permanent changes proposed to existing roads, access points, or service routes that would restrict access to the Black Box Theatre during the operational phase of the development.

Air Quality During Construction

Chapter 10: Air Quality of the Environmental Impact Assessment Report (EIAR), prepared by AONA, has examined potential air quality impacts during construction. The assessment specifically considered the Black Box Theatre and adjoining car park. Key findings include:

- The primary impact during construction will be temporary dust and particulate (PM) emissions, particularly during earthworks and heavy vehicle movements.
- These impacts are assessed as short-term and slight, with no significant residual effects anticipated, provided that mitigation measures outlined in the Construction Environmental Management Plan (CEMP) are implemented effectively.
- Dust suppression measures, vehicle washing facilities, and ongoing air quality monitoring will be in place throughout construction.

Reduced Natural Light.

Concerns regarding the potential reduction of natural light to the Black Box Theatre are noted. However, it is important to clarify that theatres are not reliant on natural daylight for their core functions, as performances and backstage operations occur in purpose-lit, controlled environments.

The Daylight and Sunlight Assessment Report prepared by 3D Design Bureau as part of the application documentation identified that 7 out of 9 windows will experience a 'negligible' impact as a result of the proposed development and two windows (Bb and Bc) on the theatre's façade that will experience a 'minor adverse' level of impact. These windows already have baseline Vertical Sky Component (VSC) values below 27%, due to an existing overhead metal structure that currently limits light penetration. While the development may result in a further modest reduction in VSC for the two windows (Bb and Bc), it will not materially impact the theatre's functionality or viability.

Figure 12 - The Black Box windows categorised as 'negligible' in green and 'minor adverse' in yellow

Utility Disruption

Concerns have been raised regarding the potential for utility service interruptions to the Black Box Theatre and surrounding premises during both the construction and operational phases of the proposed development. In response, it is important to clarify that no disruptions to utility services serving the Black Box Theatre are envisaged as a result of the proposed works.

The proposed development has been designed to ensure that existing utility networks such as electricity, water, wastewater, telecommunications, and gas remain fully operational and unaffected throughout both construction and post-completion phases.

The majority of existing utility connections to the Black Box Theatre are independent of the subject site's proposed services layout and will not require diversion, disconnection, or alteration as part of the development works.

The existing wastewater pumping station (WWPS) that serves the Black Box Theatre is to be decommissioned and a new WWPS constructed. The new WWPS has been positioned based on the flood extents within the site and to maximize the separation from buildings. An emergency tank with 24-hour storage capacity at Dry Weather Flow (DWF) has been provided to serve Phase 1 development and the Black Box Theatre. This will be constructed in a phased manner to ensure no or minimal disruptions.

As part of the wider infrastructure upgrades, the existing wastewater pumping station (WWPS) that currently serves the Black Box Theatre is scheduled to be decommissioned and replaced with a new, modern WWPS. This upgrade is being undertaken to improve resilience and long-term operational capacity:

- The location of the new WWPS has been selected to align with site flood risk assessments and to ensure appropriate separation distances from new and existing buildings.
- To ensure uninterrupted wastewater services, an emergency storage tank with a 24-hour capacity at Dry Weather Flow (DWF) is incorporated into the Phase 1 infrastructure. This will cater to both the proposed development and the Black Box Theatre, providing a contingency buffer in case of any operational issues.
- The decommissioning of the existing WWPS and the commissioning of the new facility will be carefully phased and sequenced to avoid service interruptions. Where transitional works are necessary, these will be planned to ensure minimal or no disruption to the Black Box Theatre's operations.

During construction, all utility-related works will be carefully coordinated through the Construction Environmental Management Plan (CEMP) and in direct liaison with utility providers and Galway City Council to ensure continuity of service. Where any temporary or minor works to public utility connections are necessary (such as connections to new service mains within the public domain), these will be scheduled outside of performance times and will not interfere with theatre operations. Any such works will also be undertaken in accordance with best practice procedures to avoid inadvertent service outages.

From an operational perspective, the proposed development will not place undue strain on existing public utility networks. Adequate capacity assessments have been conducted as part of the design process in collaboration with the relevant utility service providers to ensure that the development integrates seamlessly into existing infrastructure systems without compromising service levels to adjacent properties, including the Black Box Theatre.

In summary, the proposed development has been carefully designed to ensure the ongoing viability and functionality of the Black Box Theatre are preserved. While temporary impacts during the construction phase are acknowledged, robust mitigation measures will be in place to minimise disruption. The operational phase of the development is expected to have neutral or positive impacts, increasing local activity and supporting cultural assets such as the Black Box Theatre. Furthermore, the project incorporates strategic infrastructure upgrades and access arrangements to ensure long-term sustainability and operational continuity for the theatre and the surrounding community.

2.9 Engagement with IAA

Engagement required directly with the HSE and the Aeromedical & Special Operations Section and University Hospital Galway with regard to the potential impact of the proposed development and any cranes utilised during the construction phase would have on helicopter operations;

Recommends condition to contact IAA and University Hospital Galway in relation to all crane operations with at least 30 days prior notification of their erections. A suitable lighting scheme shall be agreed with the IAA prior to commencement of development. Additional information regarding crane type and dimensions and co-ordinates will also be required by the IAA.

Response:

In response to the submission raised by the Irish Aviation Authority (IAA), it is noted that prior to the lodgement of the planning application, Brock McClure Planning & Development Consultants engaged with the Planning Section of the IAA on 5th March 2025 via email. A response was received on 7th March 2025 which noted the following (refer to Appendix I for a copy of the correspondence):

> *"Thank you for your email and the associated documents for the proposed residential development to be located at Dyke Road, Terryland, Galway City.*
>
> *Based on the information provided, the proposed development will be located approximately 1km NW of the helipads at University Hospital Galway. As such, it is the observation of the Irish Aviation Authority that Galway City Council and the applicant should engage directly with the HSE and the Aeromedical & Special Operations Section and University Hospital Galway with regard to the potential impact of the proposed development and any cranes utilized during the construction phase would have on helicopter operations to and from University Hospital Galway…*
>
> *In the event of planning consent being granted, the applicant should be conditioned to contacting the Irish Aviation Authority and University Hospital Galway in relation to all crane operations, with at least 30 days prior notification of their erection in accordance with S.I. 215 OF 2005 Irish Aviation Authority (Obstacles to Aircraft in Flight) Order .*
>
> *A suitable marking and / or lighting scheme shall be agreed with the Authority prior to commencement of construction. Additional information regarding crane type (tower, mobile), elevation of the highest*

point of crane, dimensions of crane, ground elevation and location co-ordinates in WGS-84 format will also be required by the Authority to allow for an aviation safety assessment, as necessary."

A recommendation was made to contact Mr. Richard Quinlan, General Manager Operations Support National Ambulance Service Directorate.

On 11th March 2025, Brock McClure Planning & Development Consultants engaged with Mr. Richard Quinlan via email. A response was received on 19th March 2025 which stated the following (refer to Appendix I for a copy of the correspondence):

"We have looked at the detail and this will likely have to be viewed by an aviation consultant and go to Irish Aviation Authority."

The applicant acknowledges the importance of maintaining unobstructed and safe flight paths for aeromedical operations associated with University Hospital Galway. To that end, the applicant fully accepts the recommended planning condition requiring formal engagement with the IAA and University Hospital Galway in advance of all crane activities. The design and construction teams are committed to:

- Providing all necessary technical information (crane specifications, elevations, coordinates) in a timely manner.
- Ensuring that all crane operations are notified to the IAA at least 30 days prior to erection.
- Agreeing appropriate obstacle lighting and marking schemes to mitigate any potential aviation safety risks.
- Facilitating any additional assessments or operational coordination measures requested by the IAA or HSE Aeromedical Services.

Given the proactive engagement already undertaken and the applicant's commitment to full compliance with aviation safety protocols, it is considered that potential impacts on helicopter operations will be effectively managed. The development will not give rise to any obstruction or interference with the safe operation of emergency air services to and from University Hospital Galway.

2.10 Detailed Design and Fire Safety

Submissions have expressed concerns regarding the lack of detail provided in the planning application with respect to:

No standards of quality detailed for design, construction and management of the development;
No reference to fire safety in the application given close proximity to a forested area.

Response:

It is important to clarify that matters relating to the detailed design, construction methodologies, and fire safety compliance are primarily addressed at the post-planning (compliance) stage of the development process. These technical aspects fall under the regulatory frameworks of Building Control Regulations, the Fire Services Acts, and the associated Technical Guidance Documents (TGDs), which ensure that developments meet or exceed the mandatory standards of safety and quality prior to the commencement of construction.

Detailed Design

While the planning application primarily addresses site layout, scale, use, and overall development strategy, it is an implicit requirement that all buildings will be designed and constructed in accordance with:

- The Building Regulations 1997–2024 (as amended), which establish minimum standards of quality and safety across all aspects of building design and construction, including structure, fire safety, sound insulation, energy performance, and materials durability.
- The long-term management and maintenance of the development will be governed by a Management Company, which will oversee the upkeep of communal areas and ensure the development is maintained to a high standard over its lifespan. An Operational Management Plan prepared by Savills accompanies the planning application documentation.

As part of the compliance process, detailed architectural, structural, mechanical, and electrical designs will be submitted to the Building Control Authority for assessment and approval, prior to the commencement of construction works.

Fire Safety Considerations

Fire safety has been a central consideration throughout the design development of the proposed scheme. The project team includes Jensen Hughes, fire safety consultants, who have provided ongoing specialist input into the layout, configuration, and technical detailing of the development to ensure that fire safety best practices are embedded from the earliest design stages. Their involvement has informed key aspects of the site layout, building orientation, and structural design, ensuring the development is inherently designed to facilitate future compliance with statutory fire safety requirements.

Fire safety compliance is a statutory requirement that is rigorously assessed at the Fire Safety Certificate (FSC) application stage, which occurs post-planning but prior to construction. A Fire Safety Certificate will be obtained from the relevant Fire Authority, confirming that the development's design adheres to the requirements of Part B (Fire Safety) of the Building Regulations.

Specific fire safety measures will include:

- Provision of appropriate fire-resistant construction materials.
- Adequate means of escape, including safe evacuation routes and emergency exits.
- Installation of fire detection and alarm systems throughout the development.
- Access for firefighting and emergency services in compliance with regulatory standards.
- Implementation of fire compartmentation within the building to prevent the spread of fire.

In addressing concerns related to the site's proximity to Terryland Forest Park, it is important to clarify that the proposed development is physically separated from the immediate forested areas. A significant buffer exists between the development footprint and the wooded zones, notably including the Black Box Theatre and associated infrastructure, which provide a built-form barrier. This spatial separation inherently reduces the risk of direct fire transmission from the forested area to the proposed residential buildings.

Furthermore, the future phases of the Corrib Causeway Masterplan redevelopment are anticipated to further reinforce this separation. Should the Black Box Theatre be relocated and the lands redeveloped, comprehensive urban design strategies will be implemented to enhance safety and resilience, including the provision of public realm upgrades and additional hard-landscaped zones, which will act as passive firebreaks between vegetated areas and residential environments.

Furthermore, the Construction Management Plan (CMP) will incorporate site-specific fire safety protocols during construction, including emergency response procedures, safe material storage practices, and strict adherence to Health and Safety legislation.

In summary, while detailed design quality and fire safety strategies are not typically elaborated upon at the planning application stage, these matters are strictly regulated through statutory compliance processes at subsequent stages. The development will fully comply with the requirements of Building Regulations, Fire Safety Certification, and Building Control (Amendment) Regulations (BCAR) prior to commencement. Additionally, specific measures relating to fire safety in proximity to forested areas

will be addressed through design interventions and consultations with the relevant fire authority to ensure a safe and resilient development.

2.11 Environmental Impact

Submissions have raised concerns regarding the potential environmental impacts of the proposed development, particularly in relation to the protection of local wildlife and the broader ecological integrity of the area.

Response:

A comprehensive suite of environmental assessments (including Appropriate Assessment Screening Report, Natura Impact Statement and Environmental Impact Assessment Report) have been undertaken as part of the application process to identify and address any potential ecological impacts arising from the proposed development. These assessments confirm that the project will not result in significant adverse effects on biodiversity, wildlife, or designated conservation sites.

Existing Site Conditions

The subject site is currently dominated by hardstanding surfaces, functioning as a surface-level car park with negligible ecological value. Baseline ecological surveys, including habitat assessments and species audits, confirm the absence of significant flora, fauna, or habitats of conservation concern within the site boundaries. As such, the site presents limited existing biodiversity function.

However, the proposed redevelopment offers a tangible opportunity to enhance the site's ecological value, transitioning it from a low-value, impermeable surface to a biodiversity-enhancing urban environment through the integration of green infrastructure and habitat creation.

Enhancement of Biodiversity

The proposed development will result in a net biodiversity gain compared to existing conditions. Key measures include:

- Extensive green infrastructure, comprising landscaped communal courtyards, green roofs, and rain gardens designed with pollinator-friendly and native plant species.
- Integration of Sustainable Drainage Systems (SuDS) that provide both water management benefits and ecological habitat opportunities.
- The establishment of biodiversity corridors and buffer zones, enhancing ecological connectivity within the urban setting and promoting urban wildlife presence.
- A Planting Palette specifically curated to support local ecosystems, improve species diversity, and enhance climate resilience.

Collectively, these measures will transform the site into an active contributor to Galway City's urban ecology, enhancing both visual amenity and ecological function.

Natura Impact Statement (NIS)

A detailed Natura Impact Statement (NIS) was prepared by Scott Cawley Ltd., which evaluates potential impacts of the proposed development on nearby European Sites (Natura 2000 network). The assessment considered:

- The zone of influence of the development in relation to designated sites including Lough Corrib SAC, Galway Bay Complex SAC, Lough Corrib SPA, and Inner Galway Bay SPA.

- Potential impact sources and pathways, including hydrological connections, air quality, and disturbance factors.
- An assessment of how the development could impact the Qualifying Interests (habitats and species) and Special Conservation Interests of these sites.

The NIS concludes that, following a detailed analysis of the predicted impacts and with the implementation of identified avoidance, design, and mitigation measures, there will be no adverse effects on the integrity of any European Sites during the construction or operational phases of the development.

Environmental Impact Assessment Report (EIAR)

A voluntary EIAR under Schedule 5, part 2 of the Planning and Development Regulations, 2001 (as amended) and has been prepared for this application given the Development Framework masterplan context of the site. The EIAR has been prepared in accordance with Directive 2011/92/EU as amended by Directive 2014/52/EU on the assessment of the effects of certain public and private projects on the environment as adopted on 16 April 2014.

Chapter 6 of the Environmental Impact Assessment Report (EIAR) provides an in-depth assessment of the proposed development's impact on local habitats, flora, fauna, and designated sites. Key findings of the EIAR include:

- The proposed development will not result in significant direct, indirect, or cumulative impacts on any nationally designated sites or protected species.
- The potential impacts on the surrounding environment are deemed not significant at any geographical scale.

The Chapter 6 of the EIAR outlines a suite of mitigation measures, including:

- Appointment of a qualified Ecological Clerk of Works (ECoW) to oversee ecological compliance during the construction phase, ensuring that all works adhere to ecological best practice and mitigation requirements.
- Implementation of a Landscape Monitoring Plan post-construction, to verify the successful establishment of planted areas and ongoing habitat management measures.

Through a combination of careful design, robust environmental assessments, and enforceable mitigation measures, the proposed development has been designed to avoid significant environmental impacts, while actively contributing to the enhancement of biodiversity on a currently low-value site. The findings of the NIS and EIAR conclusively determine that the project will not adversely affect the integrity of any designated European or national conservation sites, nor will it negatively impact local wildlife populations.

Overall, the entire EIAR has assessed the impacts and resulting effects likely to occur as a result of the proposed development on the various aspects of the receiving environment. Mitigation measures are included to reduce impacts on the environment, where considered necessary. Mitigation measures have also been incorporated into the design of the proposed development to avoid or reduce the effects on the environment, as appropriate:

> *"The Proposed Development will be operated in a manner that will ensure that the potential impacts on the receiving environment are avoided where possible. In cases where impacts or potential impacts have been identified, mitigation measures have been proposed to reduce the significance of particular impacts. These mitigation recommendations are contained within each chapter exploring specific environmental aspects."*

Once complete, the development will not place undue pressure on local environmental resources. The inclusion of green roofs, rainwater harvesting systems, and SuDS features will contribute to sustainable water management, while the enhanced green infrastructure will foster urban biodiversity in the long term. Furthermore, the scheme's low-carbon design principles will support Galway's climate resilience objectives.

Through a combination of sensitive design, comprehensive environmental assessment, and robust mitigation measures, the proposed development has been carefully planned to avoid significant environmental impacts. In fact, the project will deliver a net ecological and biodiversity gain, enhancing a currently underutilised and ecologically poor site.

The findings of the NIS and EIAR conclusively demonstrate that:

- There will be no adverse effects on the integrity of designated conservation sites.
- There will be no significant negative impacts on local wildlife or broader ecological networks.
- The development will positively contribute to Galway's urban biodiversity and environmental quality.

2.12 Unit Mix & Residential Typology

Submissions received in relation to the unit mix of the proposed development have raised several concerns:

- A greater provision of family-type units (3-bedroom units) is recommended to support family living.
- A preference for avoiding "Build-to-Rent" (BTR) schemes and prioritising home ownership or affordable tenure options.
- Requests for further clarity on the long-term stewardship and management of the development structures and shared facilities.
- Concern regarding the provision of units that are universally suitable for a wide demographic, including families, couples, older persons, and individuals with reduced mobility.
- Objections to the inclusion of student accommodation or co-living units within the proposed scheme.

Response:

The proposed development has been carefully designed to respond to the specific housing needs of the area, providing a balanced and inclusive mix of unit types and tenures. The primary objective of this development is to deliver high-quality, affordable, and social housing that actively contributes to the regeneration of the area and aligns with broader national housing policy objectives.

Increased Provision of Family-Type Units Desirable

A Statement of Housing Mix, prepared by Brock McClure Planning & Development Consultants, undertook a comprehensive analysis of the demographic profile of the surrounding area (1km study radius encompassing 8 Electoral Divisions). This study assessed local demographics and household sizes to ensure that the proposed unit mix appropriately reflects current and projected housing demand.

Key findings from this analysis include:

- 34% of households in the Study Area are 2-person households.
- 26% of households are single-person households.
- Combined, 60% of households comprise 1-2 persons, indicating a significant demand for smaller units.
- 23% of families in the Study Area consist of an adult child. This could be attributed to the difficulty in securing appropriate housing due to lack of supply of smaller, affordable units and affordable rental accommodation due to the overall chronic undersupply of housing apparent in the State.

- The average household size in the Study Area is 2.49 persons, reinforcing the need to accommodate smaller household formations, while still providing for larger family units.

We also note that the First Revision to the National Planning Framework – Project Ireland 2040 in Section 6.6 highlights that *"currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country. In Dublin City, one, two and three person households comprise 80 percent of all households. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms."*

In response to these findings, the proposed development provides a broad spectrum of unit sizes, as follows:

- 109 x 1-bedroom units (suitable for 1-2 person households) – 49.8%
- 22 x 2-bedroom units (3-person capacity) – 10%
- 78 x 2-bedroom units (4-person capacity) – 35.6%
- 10 x 3-bedroom units (5-person capacity) – 4.6%

While the percentage of 3-bedroom units is modest, the overall unit mix is designed to reflect current demographic realities and housing need, with an emphasis on providing for 1-4 person households which make up the vast majority of the surrounding area's population. Additionally, national demographic trends, as noted in the 2025 Apartment Guidelines (Section 3.3), indicate a continued increase in smaller households (1-2 persons), highlighting the pressing need for appropriately sized apartments in urban areas. The key reference is set out below:

> *"Ongoing demographic and societal changes mean that a greater variety of apartment types is required to house those that may wish to be accommodated in apartments, including:*
>
> - *those seeking to relocate to more central or accessible locations;*
> - *those first entering the home ownership or rental market, seeking more affordable housing options;*
> - *young professionals and workers generally;*
> - *households without dependents and 'downsizers';*
> - *older persons, in both independent and assisted living settings.*
>
> *Such factors are combined with the trend whereby employment opportunities have been increasingly located in and around Ireland's cities and larger towns and, notwithstanding improvements in technology, the availability of broadband and a greater incidence of remote working. This is likely to continue and indeed is promoted under the NPF from the perspective of providing a sustainable approach to commuting patterns.*
>
> *While the availability of a range of employment opportunities is one of the reasons why people are more likely to seek to reside in or relocate to urban areas, this is also dependent on the availability of a choice of suitable and affordable accommodation. Such accommodation must cater for a range of people's needs in the short, medium and longer term as changes in personal circumstances arise throughout their life cycle."*

It is recognised that the proposed development meets with the higher requirements of the Apartment Guidelines (2023) with clear compliance shown in relation to SPPR 1 in terms of unit mix, which was the appropriate context at the time of lodgement. This standard has been relaxed further under the Apartment Guidelines (2025) which apply to applications submitted after their publication in July 2025. Notwithstanding this, the application submitted remains compliant with both sets of standards.

Given the current shortage of such units within the Study Area, this proposal actively addresses that deficit by diversifying the housing stock and offering a meaningful increase in affordable apartment options for a range of household types.

Suitability for Diverse Demographics (Families, Elderly, Reduced Mobility)

All of the 219 proposed units are designed to accommodate a broad spectrum of residents, including:

- Families with children
- Couples and single-person households
- Older persons and downsizers
- Persons with reduced mobility or specific accessibility requirements.

The scheme will comply fully with relevant Building Regulations and Universal Design principles, ensuring ease of access and functionality for all users. A proportion of units will be specially adapted for accessibility needs as per Part M requirements of the Building Regulations, promoting inclusivity within the development.

Tenure – Avoidance of Build-to-Rent (BTR)

Contrary to concerns regarding Build-to-Rent schemes, it is important to clarify that the proposed development is not a private BTR development. Instead, it is a social and affordable apartment scheme designed to deliver:

- 197 affordable cost rental apartments (90%), managed by the Land Development Agency (LDA).
- 22 social housing units (10%), delivered in accordance with Part V of the Planning and Development Act, 2000 (as amended), managed by Galway City Council.

The cost rental model, established under the Affordable Housing Act, 2021, is specifically designed to provide secure, long-term rental accommodation at below-market rates to households that do not qualify for social housing but face affordability challenges in the private rental sector. This tenure model is aligned with current housing policy objectives to ensure affordability, security of tenure, and long-term community building.

Co-Living and Student Accommodation

In response to specific concerns:

- Co-living accommodation is not proposed as part of this development.
- Student accommodation is not proposed as part of this development

The entire scheme is aimed at providing long-term affordable housing solutions for permanent residents, with a focus on sustainable community building rather than transient accommodation models.

Stewardship of Structures

A key concern raised relates to the long-term maintenance and stewardship of the development's structures, shared facilities, and communal areas. In this regard, an Operational Management Plan (OMP) has been prepared by Savills and a Building Lifecycle Report prepared by MOLA Architecture, which accompanies the planning application documentation.

The OMP and Building Lifecycle Report outlines the framework for the ongoing professional management of the development post-completion, ensuring that all aspects of the scheme from structural maintenance to communal amenity management are overseen to a high standard. Key components of the stewardship strategy include:

- Establishment of a dedicated Management Company responsible for day-to-day operations, maintenance, and upkeep of common areas.

- Scheduled maintenance regimes for building structures, mechanical and electrical systems, and landscape areas.
- Proactive asset management strategies to ensure the long-term durability and aesthetic quality of the development.
- Clear governance structures to ensure transparency and accountability in the management of shared amenities, including open spaces, parking areas, and internal communal facilities.

This robust management framework will ensure that the development is maintained to a high standard over its lifecycle, supporting the creation of a sustainable and vibrant residential community.

3 Conclusion

On review of the key issues raised by third parties, it is our respectful submission that the planning application documentation submitted with the application together with this response document sets out a robust and detailed analysis of the subject site and surrounding area.

We invite An Comisiún Pleanála to positively consider the proposal now put forward in the application documents attached herewith. We note the following key summary points:

- The subject site is located at the Dyke Road, a large, underutilised site (currently occupied by a public car park) that is opportunely located, in terms of proximity to public transport and local amenities/services, to deliver much needed residential accommodation.
- The proposed development involves the construction of 219 no. residential apartment units as part of one block ranging in height from 5 – 9 storeys.
- This site is identified at both a national, regional and local level for residential development and it has the potential to act as a catalyst for the redevelopment of future phases 2 and 3 of a 3 phase Development Framework and also the redevelopment of the wider Headford Road regeneration sites.
- 197 no. apartments (90%) will be provided under the cost rental model and 22 no. apartments (10%) will be provided under the Social Housing scheme.
- The residential units proposed are of exceptional quality, with high amenity layouts, communal facilities.
- The proposed layout of the development has been meticulously designed to optimise the quality of sunlight and daylight for both the residential units and communal open spaces, while simultaneously minimising any potential adverse impact on the surrounding built and natural environment. This careful balance ensures that future residents will benefit from a high standard of living, with ample natural light enhancing the overall quality of life, without impacting the surrounding built and natural environment.
- The proposed communal open space within the development is designed to be a vibrant, multifunctional area that fosters a strong sense of community and enhances residents' quality of life. Located on the eastern side of the building, this area is sheltered from the road and traffic, providing a peaceful, car-free environment where residents can relax, play, and interact. Access is strictly controlled through secure gates along the eastern site boundary, ensuring privacy and safety for the community. This added layer of security, coupled with passive surveillance from the apartments, promotes a sense of exclusivity and safety, while encouraging social interaction among residents. The total area of the proposed communal space is approx. 1,650 sqm, exceeding the required 1,313 sqm for the development.
- The proposed Public Open Space is located to the west of the site, along the Dyke Road, and is envisioned as a linear park that spans approx. 1,313 sqm. This public open space is designed to serve as an inviting and inclusive space, accessible to both residents and the broader public. Its central location along a main thoroughfare ensures that it will be a vibrant community asset, providing a welcoming green retreat in the heart of the urban landscape.
- A key feature of the Public Open Space is a raised pedestrian boardwalk, which runs along the entire length of the park in a north-south direction. This elevated structure serves both a functional and aesthetic purpose, providing visitors with a scenic route to explore the park and its surrounding environment. The boardwalk will offer expansive views of the nearby River Corrib and its natural surroundings, connecting park visitors with the wider landscape and offering an elevated perspective on the local ecology.
- A childcare facility of approx. 241 sqm is proposed at ground floor level at the eastern elevation with a dedicated outdoor play area and drop off facilities.

- The proposed development prioritizes accessibility and permeability, ensuring that both vehicular and pedestrian movement are seamlessly integrated into the surrounding infrastructure, while fostering a connection to the broader urban fabric.
- The proximity of the site to public transport and local amenities and services means the site is opportunely located to provide for higher residential density and additional height in compliance with the national policy mandate.
- The subject site is zoned 'CI' (Enterprise, Light Industry and Commercial). The zoning objective specifically identifies that this 'CI' zoning should allow for the development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.
- The proposed development inherently complies with principles of compact growth.
- The proposal is in accordance with the relevant statutory documents and there is appropriate planning context for this proposal. Furthermore, the proposed heights and density for this scheme is well founded in the context of national planning policy.
- The delivery of housing is currently the subject of a significant national policy mandate with mounting political pressure now accruing to deliver. We note specifically that as part of the Programme for Government, the government has approved revised housing targets in November 2024 for the period 2025 to 2030, aiming to deliver a total of 303,000 new homes across Ireland. This ambitious plan sets an average 50,000 homes per year, with a pathway to achieve 60,000 homes annually in 2030 and thereafter. To reach the total of 303,000 homes by 2030, an annual increase in housing delivery, starting from 41,000 homes in 2025 and rising incrementally to 60,000 homes by the end of the period has been agreed by Government. The First Revision to the NPF under NPO 42 targets the delivery of 50,000 additional homes per annum to 2040.
- The subject site is identified as a key regeneration and opportunity site within the National Planning Framework clearly defining the site as a critical landbank to deliver social and affordable housing within the Galway city area.
- The proposed development has fully satisfied the Development Management Justification Test as outlined in the Guidelines for Planning Authorities on Flood Risk Management. The flood risk to the development has been shown to be manageable, with measures in place to mitigate impacts both on the development itself and on neighbouring areas. Therefore, it can be concluded that the proposed development will not exacerbate flood risk elsewhere and is consistent with both the guidance and the overall strategic planning objectives for flood risk management.
- In summary, this infill, brownfield site offers a significant opportunity for the delivery of social and affordable apartment units within Galway City. This planning report will set out that the current Phase 1 Corrib Causeway proposal is appropriate to the site, the surrounding area and is well founded in planning terms.

We ask that these points are considered in the review of the proposal, and we trust that this planning application will be viewed as a positive move towards the delivery of sustainable development on suitably zoned, underutilised lands.

Appendix I – Correspondence with IAA

Monday, July 28, 2025 at 2:24:38 PM Irish Standard Time

Subject: FW: Proposed Part X Application at Dyke Road, Terryland, Galway City
Date: Wednesday 18 June 2025 at 09:52:08 Irish Standard Time
From: Vitalija Janusonyte
To: Linda McEllin
Attachments: ~WRD2817.jpg, image002.png, image003.png

From: Planning <planning@iaa.ie>
Date: Friday, 7 March 2025 at 15:23
To: Vitalija Janusonyte <vitalija@brockmcclure.ie>
Cc: Linda McEllin <linda@brockmcclure.ie>, Suzanne McClure <suzanne@brockmcclure.ie>, Planning <planning@iaa.ie>
Subject: RE: Proposed Part X Application at Dyke Road, Terryland, Galway City

Dear Vitalija,
Thank you for your email and the associated documents for the proposed residential development to be located at Dyke Road, Terryland, Galway City.
Based on the information provided, the proposed development will be located approximately 1km NW of the helipads at University Hospital Galway. As such, it is the observation of the Irish Aviation Authority that Galway City Council and the applicant should engage directly with the HSE and the Aeromedical & Special Operations Section and University Hospital Galway with regard to the potential impact of the proposed development and any cranes utilized during the construction phase would have on helicopter operations to and from University Hospital Galway.

Please contact: Mr. Richard Quinlan
General Manager Operations Support
National Ambulance Service Clinical Directorate
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Limerick,
Mobile: 087 382 5104
Email: Richard.quinlan@hse.ie

Alternative email address: neoc.aeromedical@hse.ie

During a formal planning process, the IAA Aerodromes Division will likely make the following general observation:

In the event of planning consent being granted, the applicant should be conditioned to contacting the Irish Aviation Authority and University Hospital Galway in relation to all crane operations, with at least 30 days prior notification of their erection in accordance with S.I. 215 OF 2005 Irish Aviation Authority (Obstacles to Aircraft in Flight) Order .
A suitable marking and / or lighting scheme shall be agreed with the Authority prior to commencement of construction. Additional information regarding crane type (tower, mobile), elevation of the highest point of crane, dimensions of crane, ground elevation and location co-ordinates in WGS-84 format will also be required by the Authority to allow for an aviation safety assessment, as necessary.

Kind regards,

Dave

From: Vitalija Janusonyte <vitalija@brockmcclure.ie>
Sent: Wednesday, March 5, 2025 10:52 AM
To: Planning <planning@iaa.ie>; FOD <fod@IAA.ie>
Cc: Linda McEllin <linda@brockmcclure.ie>; Suzanne McClure <suzanne@brockmcclure.ie>
Subject: Proposed Part X Application at Dyke Road, Terryland, Galway City

*** This message originated from outside the Irish Aviation Authority. Please treat hyperlinks, attachments and instructions in this email with caution. ***

Dear Sir / Madam,

On behalf of Galway City Council, we are preparing a Part X Planning Application under Section 175 (3) and Section 177AE (3) of the Planning & Development Act, 2000 (as amended) for lodgement to An Bord Pleanála shortly. The proposal is located at a site situated at Dyke Road, Terryland, Galway City (the site is bounded by the Black Box Theatre to the north; an existing car park to the south; Dyke Road to the west; and Galway Retail Park to the east) and provides for a new residential development of 219 no. residential apartment units, public and communal open spaces, a childcare facility and all ancillary works. Heights of between 5 to 9 storeys over lower ground floor level are proposed.

I have attached a current Site Location Plan, Site Layout Plan and Contiguous Elevations for information purposes within this link: https://we.tl/t-B9yskJbiSx (Please note that this link expires in 3 days on March 8th – let me know if you have any issues and I can resend the link).

As part of the planning application process and in line with requirements published under the Urban Development and Building Height Guidelines of 2018, there is a requirement for us to assess if the proposal *"maintains safe air navigation"*.

Whilst we do not consider the proposal to contain tall buildings (i.e. max height proposed is 9 storeys), we nonetheless wish to engage with the IAA to ensure that the appropriate consultation has taken place and that confirmation would be forthcoming from IAA that the proposed development would not impact on *"safe air navigation"*

The contiguous elevations attached confirms that that tallest part of the proposed building has an overall height of 32.2 m. We note that telecommunication towers are also proposed and the proposed development at the highest point will not exceed 38.23 m inclusive of the telecommunication towers.

I would appreciate if you could review the attached and revert to me at your earliest convenience confirming that the proposal would not impact on *"safe air navigation"*.

I am available at the mobile below should you wish to discuss further.

Kind Regards,

Vitalija Janusonyte
Senior Executive Planner

Brock McClure
Planning & Development Consultants
63 York Road
Dún Laoghaire
Co. Dublin
brockmcclure.ie

vitalija@brockmcclure.ie

Office: +353 1 559 3859

Monday, July 28, 2025 at 2:29:23 PM Irish Standard Time

Subject: RE: Proposed Part X Application at Dyke Road, Terryland, Galway City - Aviation Safety Assessment
Date: Wednesday 19 March 2025 at 11:24:34 Greenwich Mean Time
From: Richard Quinlan
To: Vitalija Janusonyte
CC: neoc aeromedical, Suzanne McClure, Linda McEllin
Attachments: image002.png, image004.jpg, image005.png, image006.jpg, image007.png, image016.png, image017.jpg, image018.png, image019.jpg, image020.png, image021.jpg, image022.jpg, image023.jpg, image024.png

Noted thanks,

Regards,

Richard. Quinlan.
Tacaíocht Oibríochtaí Bainisteoir Ginearálta | General Manager Operations Support

National Ambulance Service Clinical Directorate, Dooradoyle House, Dooradoyle Road, Limerick, V94 HW6E.
Tel: +353 87 382 5104 | Email:richard.quinlan@hse.ie

www.hse.ie | @hselive | youtube.com/HSEIreland | https://www.nationalambulanceservice.ie/

From: Vitalija Janusonyte <vitalija@brockmcclure.ie>
Sent: Wednesday 19 March 2025 11:15
To: Richard Quinlan <Richard.Quinlan@hse.ie>
Cc: neoc aeromedical <neoc.aeromedical@hse.ie>; Suzanne McClure <suzanne@brockmcclure.ie>; Linda McEllin <linda@brockmcclure.ie>
Subject: Re: Proposed Part X Application at Dyke Road, Terryland, Galway City - Aviation Safety Assessment

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Richard,

Thank you for your email. The contents are noted.

We have already engaged with IAA who have given their feedback that during the public consultation process of the application, the IAA Aerodromes Division will likely make a general observation to attach a condition requiring coordination with the IAA and University Hospital Galway regarding crane operations during construction.

Please note that the application is due to lodge at the end of this month and there will be an opportunity to review the application documentation and participate in the public consultation process.

Kind Regards,

Vitalija Janusonyte
Senior Executive Planner

Brock McClure
Planning & Development Consultants
63 York Road
Dún Laoghaire
Co. Dublin
brockmcclure.ie

vitalija@brockmcclure.ie

Office: +353 1 559 3859

Brock McClure
PLANNING & DEVELOPMENT CONSULTANTS

2 of 9

From: Richard Quinlan <Richard.Quinlan@hse.ie>
Date: Wednesday, 19 March 2025 at 09:00
To: Vitalija Janusonyte <vitalija@brockmcclure.ie>
Cc: neoc aeromedical <neoc.aeromedical@hse.ie>, Suzanne McClure <suzanne@brockmcclure.ie>, Linda McEllin <linda@brockmcclure.ie>
Subject: RE: Proposed Part X Application at Dyke Road, Terryland, Galway City - Aviation Safety Assessment

Hi,
We have looked at the detail and this will likely have to be viewed by an aviation consultant and go to Irish Aviation Authority.

Regards,

Richard. Quinlan.
Tacaíocht Oibríochtaí Bainisteoir Ginearálta | General Manager Operations Support

National Ambulance Service Clinical Directorate, Dooradoyle House, Dooradoyle Road, Limerick, V94 HW6E.
Tel: +353 87 382 5104 | Email:richard.quinlan@hse.ie

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From: Vitalija Janusonyte <vitalija@brockmcclure.ie>
Sent: Tuesday 11 March 2025 09:43
To: Richard Quinlan <Richard.Quinlan@hse.ie>
Cc: neoc aeromedical <neoc.aeromedical@hse.ie>; Suzanne McClure <suzanne@brockmcclure.ie>; Linda McEllin <linda@brockmcclure.ie>
Subject: Proposed Part X Application at Dyke Road, Terryland, Galway City - Aviation Safety Assessment

Dear Richard Quinlan,

We are contacting you on behalf of Galway City Council following consultation with the Irish Aviation Authority to inform you that a Part X Planning Application under Section 175 (3) and Section 177AE (3) of the Planning & Development Act, 2000 (as amended) has been prepared for lodgement to An Bord Pleanála shortly.

The proposed development is located at Dyke Road, Terryland, Galway City (the site is bound by the Black Box Theatre to the north; an existing car park to the south; Dyke Road to the west; and Galway Retail Park to the east) and provides for a new residential development of 219 no. residential apartment units, public and communal open spaces, a childcare facility and all ancillary works. Heights of between 5 to 9 storeys over lower ground floor level are proposed.

As required by the statutory planning process, we consulted with the Irish Aviation Authority and we have been referred to engage directly with the HSE and the Aeromedical & Special Operations Section and University Hospital Galway with regard to the potential impact the proposed development would have on helicopter operations to and from University Hospital Galway.

The Irish Aviation Authority has indicated that during the formal planning process, the IAA Aerodromes Division will likely make a general observation that in the event of planning permission being granted, a condition should be attached requiring coordination with the IAA and University Hospital Galway regarding crane operations during construction

For reference, a Site Location Map, Site Layout Plan, and Contiguous Elevations are available via this link: https://we.tl/t-lk4r8BZUuH (Please note that this link expires in 3 days on 14th March. Let me know if you have any issues and I can resend the link)

The contiguous elevations confirm that the tallest section of the proposed development has an overall height of 32.2m, with telecommunication towers bringing the highest point to 38.18m.

We would appreciate your review of the attached materials and would welcome any feedback or confirmation that the proposed development will not impact your operations or air navigation safety.

Please feel free to reach out to me at the number below if you wish to discuss this further.

Kind Regards,

Vitalija Janusonyte
Senior Executive Planner

Brock McClure
Planning & Development Consultants
63 York Road
Dún Laoghaire
Co. Dublin
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vitalija@brockmcclure.ie

Office: +353 1 559 3859