



THORNTON O'CONNOR
TOWN PLANNING

Planning Report and Statement of Consistency

**Prepared in Respect of a Proposed
Development that Constitutes a Large-
Scale Residential Development (LRD) at
a Site at Galway Port, Galway City**

**On Behalf of The Land Development
Agency**

September 2025

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Planning Department
Galway City Council
City Hall
College Road
Galway
H91 X4K8

Friday, 19th September 2025

Dear Sir/Madam,

RE: PLANNING REPORT AND STATEMENT OF CONSISTENCY IN SUPPORT OF A PROPOSED DEVELOPMENT THAT CONSTITUTES A LARGE-SCALE RESIDENTIAL DEVELOPMENT (LRD) AT A SITE AT GALWAY PORT, GALWAY CITY

1.0 INTRODUCTION

Thornton O'Connor Town Planning¹, along with ALTU Architects² (ALTU), TOBIN Consulting Engineers³ (TOBIN), Axiseng⁴, Stephen Diamond Associates Consultant Landscape Architects⁵ (SDACLA), NRB Consulting Engineers⁶ (NRB), Arbor-Care⁷, Model Works⁸, John Cronin & Associates⁹, AWN Consulting¹⁰ (AWN), B-Fluid¹¹, ISM¹², Wave Dynamics¹³, Ground Investigations Ireland¹⁴ (GII), JBA Consulting¹⁵ (JBA), Aramark Property¹⁶ and DNV¹⁷, and in association with Scott Tallon Walker Architects¹⁸ and MKO¹⁹, have been retained by The Land Development Agency²⁰ (the Applicant / LDA) to prepare and submit this Planning Application for a Large-scale Residential Development (LRD) to Galway City Council.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14

² Nos. 14–15 Camden Street Lower, Saint Kevin's, Dublin 2

³ Block 10-4, Blanchardstown Corporate Park, Dublin 15

⁴ No. 47 Mount Street Upper, Dublin 2

⁵ No. 68 Pearse Street, Dublin 2

⁶ First Floor, Apollo Building, Dundrum Road, Dundrum, Dublin 14

⁷ Unit No. 1a, Crossagalla Enterprise Centre, Ballysimon Road, Limerick

⁸ The Old Courtyard, Newtownpark Ave, Glebe, Blackrock, Co. Dublin

⁹ No. 3A Westpoint Trade Centre, Ballincollig, Co. Cork

¹⁰ The Tecpro Building, Clonshaugh Business & Technology Park, Dublin 17

¹¹ The Studio, 55 C Maple Avenue, Stillorgan, Co. Dublin

¹² No. 77 Camden Street, Dublin 2

¹³ Unit 302 Nesta Business Centre, Old Airport Road, Santry, Dublin 9

¹⁴ Catherinestown House, Hazelhatch Road, Newcastle, Co. Dublin

¹⁵ Second Floor, Lincoln House, Lincoln Lane, Arran Quay, Dublin 7

¹⁶ Fifth Floor, St Stephens Green House, Earlsfort Terrace, Dublin 2

¹⁷ Unit 3D, Core C, Block 71, The Plaza, Park West, Dublin 12

¹⁸ Nos. 19–20 Merrion Square North, Dublin 2

¹⁹ Tuam Road, Galway City

²⁰ Ashford House, Tara St, Dublin 2

The LRD is proposed at a site of approximately 1.621 Ha at Galway Port in Galway City Centre. The development principally comprises 356 No. residential units, a crèche (255.9 sq m), a retail unit (156.0 sq m) and 2 No. café/restaurant units (totalling 428.4 sq m), primarily in 4 No. blocks (A–D) ranging in height from 6 No. to 13 No. storeys.

1.1 Large-Scale Residential Development

It should be noted that the proposed development is classified as a Large-Scale Residential Development (LRD) as defined under the *Planning and Development (Amendment) (Large-Scale Residential Development) Act 2021*:

- "a) the development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;**
- b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;*
- c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or*
- d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c).*

where the LRD floor space of—

- (i) in the case of paragraph (a), the buildings comprising the houses,*
- (ii) in the case of paragraph (b), the student accommodation,*
- (iii) in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation,*

***is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development."* [emphasis added]**

As the proposed development includes 356 No. residential units and a range of non-residential uses which do not exceed 30% of the overall floor area, it is considered to be an LRD.

1.2 Previous Consultation with Galway City Council

As required by legislation, the lodgement of this Planning Application has been preceded by:

- A Section 247 Pre-Planning Consultation (PPC) meeting held with the Council on 10th October 2024²¹. We note the PPC Ref. No. as LRD 04/24.

²¹ Section 247 attendees – GCC: James Russell, Brendan Dunne, Fiona Glynn, Edel Finan, Anne Hackett, Joanne Georges, Brendan Gallagher, Fiona Holland, Colm O’Riordan, Ronan O’Reilly, Pádraic Mac Giolla Bhríde, Sharon Connolly. Applicant and Design Team: Arlene van Bosch, Niall O’Byrne, Ryan Connell, Niall O’Shea, Patricia

- A Section 32C LRD Meeting (LRDM) held with the Council on 11th March 2025²². We note the LRDM Ref. No. as LRD 24/04 (a minor variation on the PPC Ref. No.).

The LRD Opinion was issued on 7th April 2025, but dated 4th April 2025. Thus, we have conservatively assumed that the 6-month 'life' of the Opinion runs until 3rd October 2025. This Planning Application is lodged prior to 3rd October 2025.

1.3 Purpose and Structure of this Report

The purpose of this *Planning Report and Statement of Consistency* is to introduce the subject site and proposed development, with the intention being to demonstrate how the scheme (1) complies with / is consistent with relevant planning policy and (2) will deliver proper planning and sustainable development.

The Report continues with the following structure:

Section 2 – Site Location, Description, Context and Accessibility

Section 3 – Planning History

Section 4 – Development Description

Section 5 – Strategic Policy Context and Compliance

Section 6 – Planning Assessment

Section 7 – Planning Administration

Section 8 – Conclusion

Thornton, Daniel Moody, Patrick Tay, Jim Gallagher, Daniel Egan, Ryan Bragge Brian McMahon, Stephen Diamond, Catherine Keogan.

²² Section 32C attendees – GCC: James Russell, Eimear O'Doherty, Fiona Glynn, Edel Finan, Jason Roche, Brendan Gallagher, Michael Scott, Lisa Smyth, Theo McLoughlin, David Walsh, Emmett Humphreys, Ruairi Keane, Liam Flynn, Kevin Neary. Applicant and Design Team: Niall O'Byrne, Arlene van Bosch, Aoife O'Connor Massingham, Fiona Shannon, Patricia Thornton, Daniel Moody, Jim Gallagher, Patrick Tay, Daniel Egan, Ryan Bragge, Brian McMahon, Stephen Diamond, John Cronin, Richard Butler, Catherine Keogan, Niall O'Shea, Aristotelis Tegos.

2.0 SITE LOCATION, CONTEXT, DESCRIPTION AND ACCESSIBILITY

The following Section provides an introduction to the subject site's location and context within the Galway City area. It also highlights its accessibility and connectivity, as facilitated by both existing and proposed infrastructure.

2.1 Site Location, Context and Description

The subject site measures approximately 1.621 Ha and is located within the existing operational area of Galway Port. The site is somewhat irregular in shape and is generally bound as follows: by the Lough Atalia inlet/outlet to the east; by Dock Road to the south and south-west; and by lands in use for port activities and as a service station to the west (Figure 2.1). The site also extends to include parts of Dock Road and Lough Atalia Road to the south-west and north-west respectively.

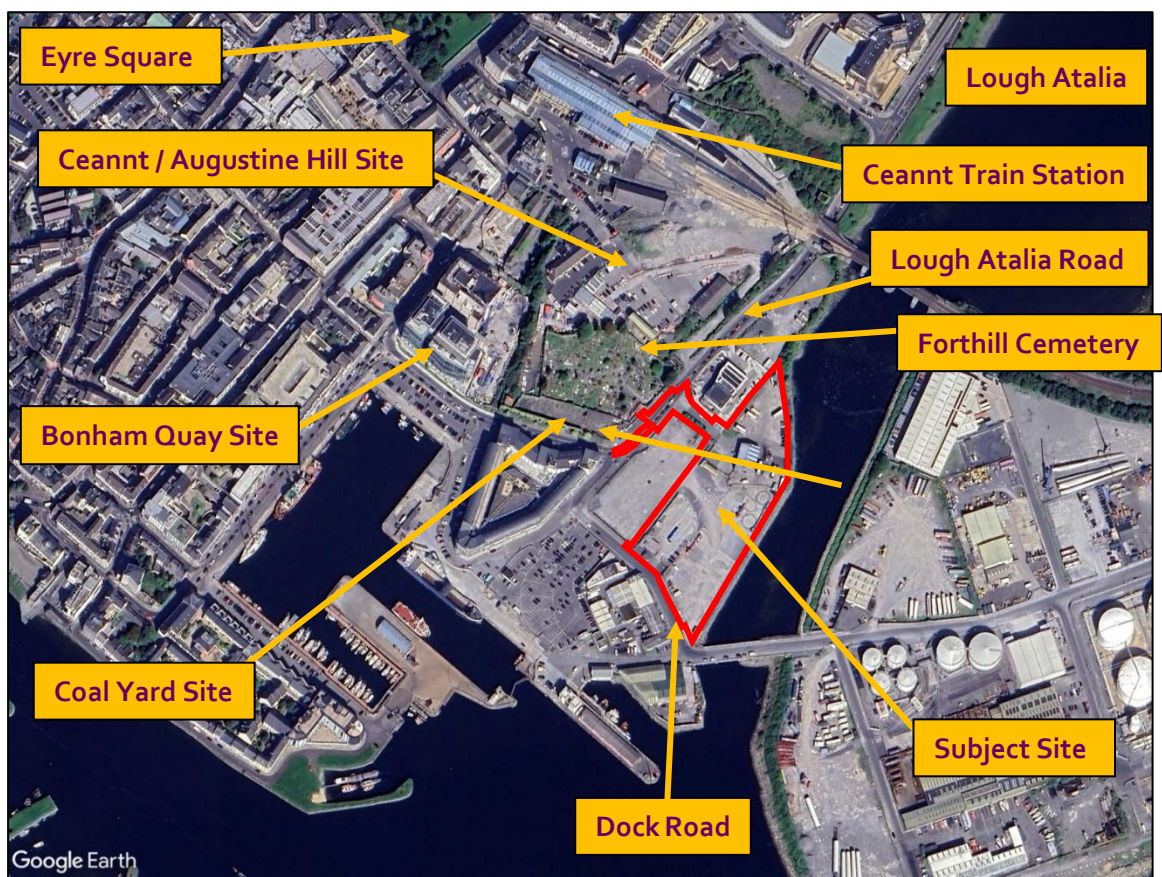


Figure 2.1: Location and context of the subject site (indicatively outlined in red)

Source: Google Earth (image from September 2023), annotated by Thornton O'Connor Town Planning (2025)

The site is currently primarily used for storage ancillary to port use, and we understand that it is currently utilised for storage of wind farm components and bus parking, with the depot building for the latter present at the site's north-eastern extent. Previously, it was used as a fuel storage compound with tanks for petrol, diesel and kerosene, although these features have been removed to ground level. Structures currently on-site include a 2-storey office-type building at the site's northern extent (the aforementioned depot building), a single-storey sub-station

building to the south-west and a pump-station to the south (adjacent to the bridge traversing the Lough Atalia inlet/outlet).

The site's position is within the designated City Centre; approximately a 9-minute walk from Eyre Square and 'Shop Street'. It benefits from its adjacency to a host of shopping and employment opportunities, public transport links and other key services, facilities and amenities.

The City Centre is served by multiple bus routes, accessible within a short distance from the site, and Ceannt Train Station just an 8-minute (550m) walk to the north.

Local features and amenities include Forthill Cemetery and Lough Atalia, which respectively contain cultural/heritage and ecological/environmental sensitivities that have been considered in the design and planning of the proposed development. However, their attributes positively add to the context of the area and its unique, attractive composition.

We note that the environs of the subject site are currently experiencing changes, with 3 No. sites in particular being redeveloped (or proposed for same). These include:

- The 'Bonham Quay Site', where a mixed-use development of offices and retail/restaurant/café up to 8 No. storeys is effectively complete (Reg. Refs. 1783 and 20367);
- The 'Ceannt Station / Augustine Hill Site', where a mixed-use development of residential, café/restaurant/bar, hotel, office, cinema, community uses of up to 21 No. storeys has been Permitted (Reg. Ref. 2047 / ABP Ref. 310568)²³; and
- The 'Coal Yard Site', where a Planning Application for a 15-storey, 189-bedroom hotel is on appeal to An Bord Pleanála (Reg. Ref. 24/60108 / ABP Ref. 320100) with a decision outstanding.

2.2 Site Accessibility

The following sub-section will discuss the accessibility of the subject site for future residents, visitors, staff and patrons of the proposed development. Given the trend towards reduced car parking in both national and regional policy to address climate change and better placemaking, it is important that people are provided with efficient public transport options in proximity to the subject site and a range of services, facilities and amenities within walking or cycling distance (in accordance with the '15-minute city' concept promoted by Development Plan Policies 4.2 (Land Use and Transportation) point 6 and 3.3 point 8²⁴).

2.2.1 Active Modes – Walking and Cycling

Due to the central location of the subject site in Galway City, future residents will benefit from a wide range of services, facilities and amenities within the City itself. Figure 2.2 illustrates the approximate 5- and 10-minute walking ranges from the subject site. Table 2.1 provides examples of nearby services, facilities and amenities in proximity.

²³ A review of the National Building Control and Market Surveillance Office indicates that a commencement notice has not yet been served.

²⁴ Policy 4.2 (Land Use and Transportation) point 6: "Aim to achieve the concept of a '15 minute city' where land use policies facilitate residents to access their daily needs within a 15 minute walk or bike ride and thereby reduce the dependence on car transport." Policy 3.3 (Sustainable Neighbourhood Concept) point 8: "Support through policy and design standards the concept of a '15 minute city' where the daily needs of communities can be accessed within a 15 minute walk, cycle or by public transport."

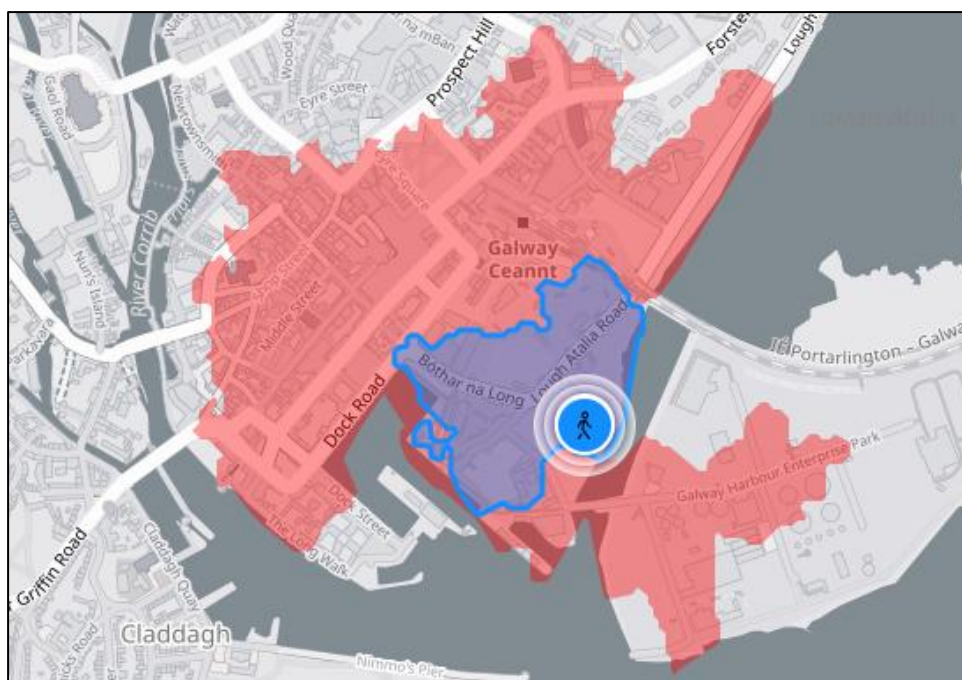


Figure 2.2: The 5-minute (blue) and 10-minute (red) walking range from the subject site taken from the site entrance at the north-west side by the entrance to Texaco (indicatively located by walking icon)

Source: [TravelTime.com](https://www.traveltime.com/), annotated by Thornton O'Connor Town Planning (2025)

Service, Facility or Amenity	Category	Distance	Walk Time
Texaco	Service Station and Shop	50 metres	1-minute
Forthill Graveyard	Graveyard	50 metres	1-minute
Offices at Dock Road	Employment	240 metres	3-minute
Gate Clinic	Dentist	300 metres	4-minute
Hynes Car Park	Car Park	350 metres	5-minute
City Sushi	Restaurant	350 metres	5-minute
Galway Docks	Port	400 metres	6-minute
Grind Coffee & Food Hub	Café	400 metres	6-minute
Eyre Square Shopping Centre	Shopping Centre	450 metres	6-minute
Energize Fitness & Leisure	Gym	450 metres	6-minute
Ureka	Gym	500 metres	7-minute
Atlantic Centre of Education	Education Centre	500 metres	7-minute
Ruibin Bar / Restaurant	Bar / Restaurant	550 metres	7-minute
Galway Bus Station	Bus Station	550 metres	8-minute
Ceannt Train Station	Train Station	550 metres	8-minute
'The Line' Hiking Walk	Hiking Area	550metres	8-minute
Eyre Square	Public Park	550 metres	9-minute
Intreo Centre Galway	Government Office	550metres	8-minute
An Post	Post Office	750 metres	10-minute
The Shed	Art Centre	850 metres	11-minute
Galway Cathedral	Cathedral	1 kilometre	14-minute

Table 2.1 Examples of services, facilities and amenities within the immediate environs of the subject lands, with distances and walk times as approximates

Source: Distances and Walk Times based on Google Maps, Thornton O'Connor Town Planning (2025)

As a result of the site's location to the south-east of the established city centre, it benefits from existing cycle infrastructure, with Greenway Corridors, Primary, Secondary and Feeder Routes all within the vicinity of the subject lands. It is also proposed under *The Active Travel/ Galway City Cycle Network* to enhance the cycle network in Galway City, with a range of cycle infrastructure proposed which will greatly expand coverage and comfort for cyclists. Residents, staff, patrons and visitors will have access to 741 No. cycle parking spaces, distributed across the development, thereby encouraging this mode of active transport.

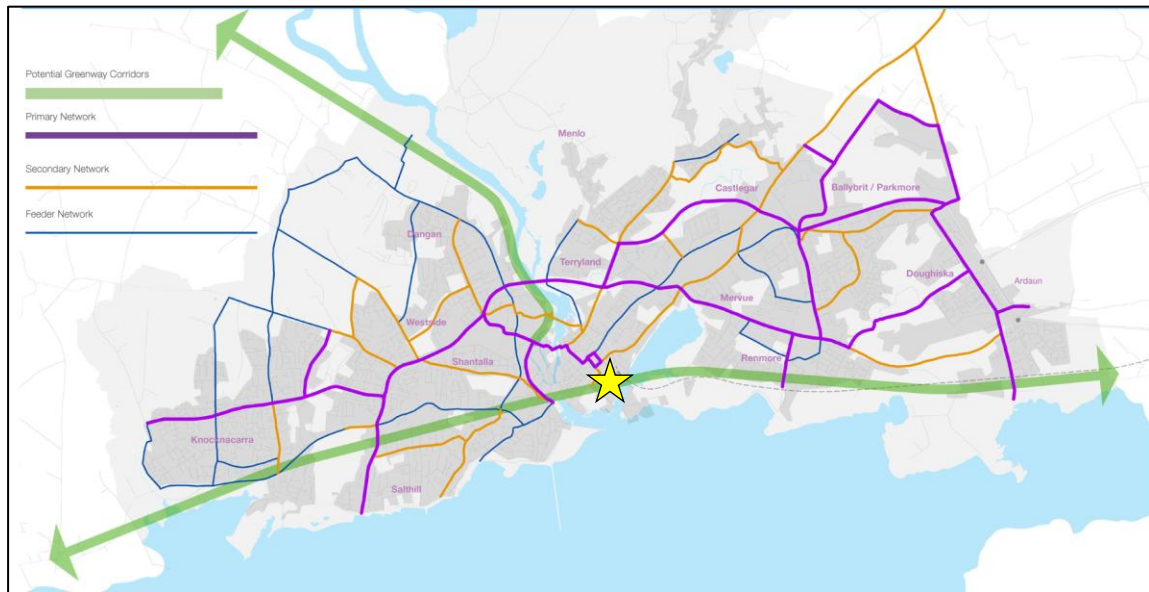


Figure 2.3: Proposed cycle infrastructure surrounding the subject lands (indicative location denoted by yellow star)

Source: The Active Travel/ Galway City Cycle Network, Galway City Council, annotated by Thornton O'Connor Town Planning (2025)

2.2.2 Public Transport

2.2.2.1 Existing Infrastructure

Bus Services

In addition to the site's existing active modes of transport, it is served by 10 No. intracity bus routes, at nearby Eyre Square (approximately 550 metres). These bus routes are detailed below:

Bus Eireann

- **Route No. 405:** from Ragoon – Eyre Square – Ballybane (20-minute frequency at peak).
- **Route No. 407:** from Eyre Square – Bóthar an Chóiste (30-minute frequency at peak).
- **Route No. 409:** from Eyre Square – Parkmore Industrial Estate (10-minute frequency at peak).
- **Route No. 424:** from Eyre Square – Barna (40-minute frequency at peak).

City Direct

- **Route No. 410:** from Eyre Square – Knocknacarra (60-minute frequency at peak).
- **Route No. 411:** from Eyre Square – Cappagh Road (30-minute frequency at peak).

- **Route No. 412:** from Eyre Square – Western Distributor Road (30-minute frequency at peak).

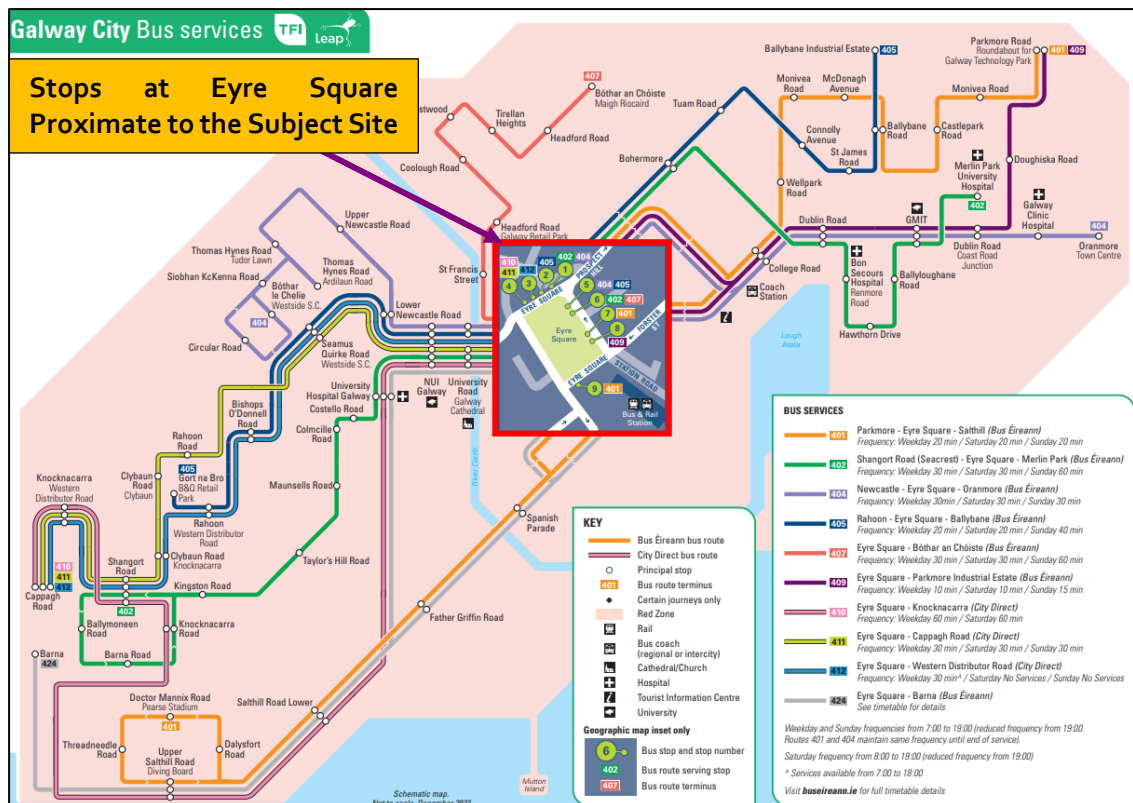


Figure 2.4: Galway City bus services proximate to the site

Source: transportforireland.ie, annotated by Thornton O'Connor Town Planning, (2025)

In addition, 10 No. Bus Éireann routes (and sub-routes) serve the nearby (approximately 600 metres) Galway Bus Station at Station Road (Stop ID 555041):

Bus Éireann

- **Route No. 350:** from Galway to Ennis via Cliffs of Moher (60-minute frequency at peak).
- **Route No. 419:** from Galway to Clifden via Oughterard (30-minute frequency at peak).
- **Route No. 425:** from Galway to Longford via Mountbellew (once daily at 16:25).
- **Route No. 425A:** from Galway to Mountbellew via Monivea (3hr 40-minute frequency at peak).
- **Route No. 65:** from Galway to Cavan via Roscommon (once daily at 15:00).
- **Route No. 417:** from Galway to Ballinastack via Corofin (once daily at 18:15).
- **Route No. 424:** from Galway to Lettermullen via Carraroe (15-minute frequency at peak).
- **Route No. 429:** from Galway to Castlerea via Tuam (once daily at 17:45).
- **Route No. 434:** from Galway to Market Square Gort (once daily at 17:30).
- **Route No. 456:** from Galway to Ballina via Westport (3hr frequency at peak).

Rail Infrastructure

The subject site is located approximately 550 metres (8-minute walking distance) from Ceannt Train Station. This rail line provides relatively frequent and easy access to a series of locations; with those of note being Dublin City, Limerick and Waterford, as illustrated in Figure 2.5 below.



Figure 2.5: Irish Rail Intercity Rail Map, with Ceannt Train Station indicatively labelled

Source: www.irishrail.ie, annotated by Thornton O'Connor Town Planning (2025)

2.2.2.2 Proposed Infrastructure

Bus Services

Under BusConnects, which is a national program for investment in the bus network in cities across Ireland, the bus network will be redesigned, and a more legible and accessible transport network created. A key principle underpinning the network revisions is the concept of 'Abundant Access', which is the idea that through simple connections and transfers between public transport services, more of the city should be accessible to passengers within a reasonable travel time. Under BusConnects, Spine, Orbital and City Bound Routes are proposed to serve Eyre Square (approximately 550 metres from the subject site). The proposed network in the vicinity

of the subject site, which will enhance connectivity with the surrounding area and beyond, is shown on Figure 2.6.

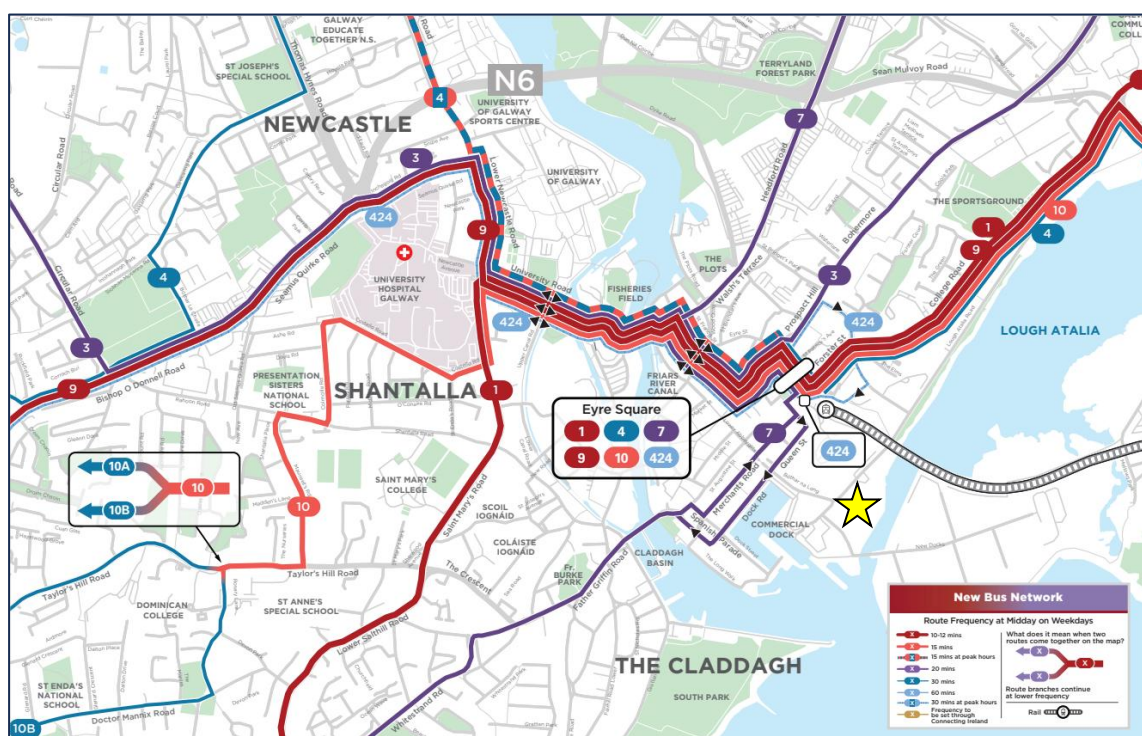


Figure 2.6: Proposed route network in the vicinity of the subject site (indicative location denoted by yellow star)

Source: BusConnects.ie, annotated by Thornton O'Connor Town Planning (2025)

As can be seen in Figure 2.5 above and Table 2.2 below, the following proposed bus routes are particularly relevant to the subject site.

Bus Route	Destination	Weekday Midday Frequency ²⁵
Route No. 1	Gateway towards Parkmore Business Park	15-minutes
Route No. 9	Knocknacarra (W. Distributor Rd) towards Parkmore Business Park	10-minutes
Route No. 10	Taylor's Hill Rd towards Oranmore	15-minutes
Route No. 7	Capagh Road towards Castlegar	20-minutes
Route No. 4	Gateway towards Merlin Park Hospital	30-minutes
Route No. 424	Airport towards Parnell Square	60-minutes

Table 2.2: Proposed bus routes in the vicinity of the subject site

Source: BusConnects.ie

In the context of the existing and proposed rail and bus services set out above, the site is very well served in this regard.

²⁵ Midday frequency shown in table. Services may be more frequent in peak hours. Less frequent at weekends/evenings

Rail Services

Upgrades to local services within the wider Galway area are expected in the coming years, with Planning Permission secured in March 2025 for, amongst other things, a second platform at the Oranmore train station. This will deliver smoother and more frequent services (up to every 30 minutes). This €9.7 million project is targeted for delivery by 2027.

2.2.3 Road Infrastructure

The subject site is strategically positioned at Galway Port, offering excellent access to key transportation routes. To the west, Dock Road connects to the city centre, providing easy access westwards towards Eyre Square and the main commercial areas of Galway City. To the north, Lough Atalia Road links to the N6, which offers routes east towards the M6 motorway, facilitating travel to Dublin and the national motorway network.

Figure 2.7 below illustrates the travelable distance from the subject site by car within 30 minutes.

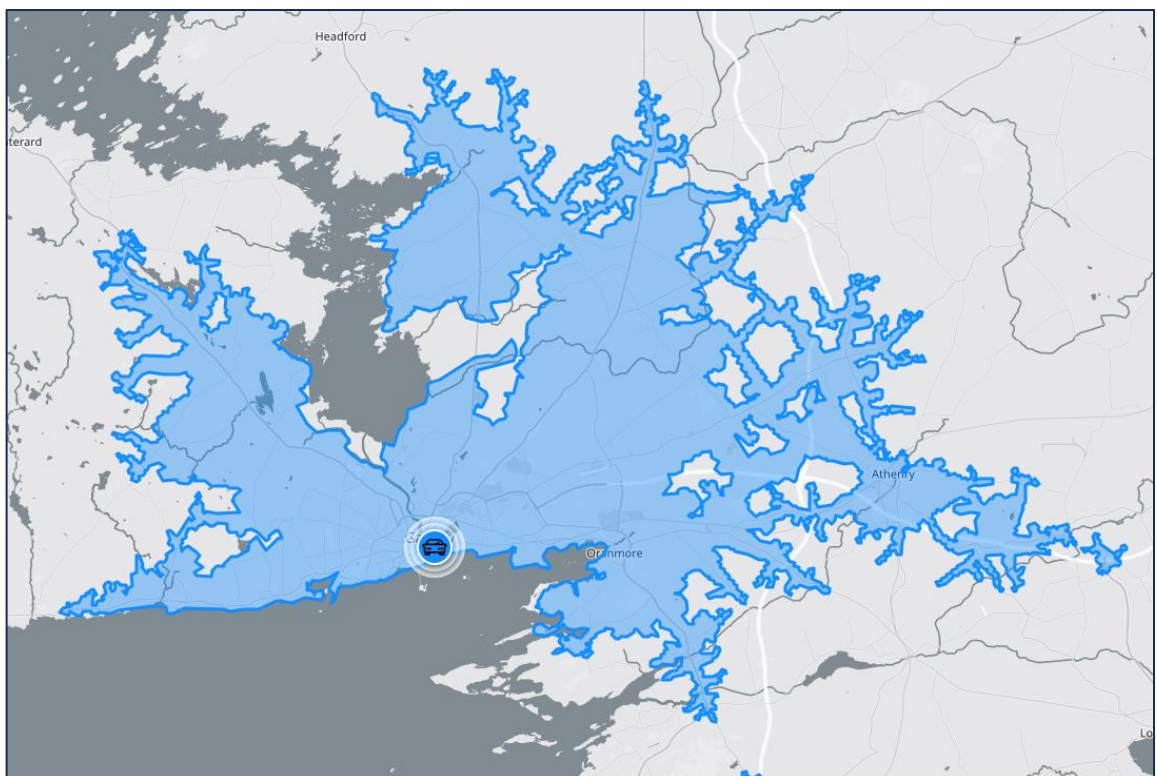


Figure 2.7: Travelable distance by car within 30 minutes of the subject site (denoted by car icon)

Source: [TravelTime.com](https://www.traveltime.com/), annotated by Thornton O'Connor Town Planning (2025)

3.0 PLANNING HISTORY

The following Section provides a brief overview of the subject site's planning history, as well as that of several sites in its environs.

3.1 Subject Site Planning History

According to the Council's online planning application viewer and the National Planning Application Database, there are no recent Planning Applications pertaining to the subject site. However, we note the 3 No. older Applications listed below.

The proposed developments relate to the historic use of the site in terms of port and industrial activity, or ancillary (signage) development. Other than providing a background to the site's history, in our opinion they are not directly applicable to informing the future direction of development at the site.

GCC Reg. Ref.:	97575
Applicant:	Mike & Elanor O'Boyle
Address:	Leeside Oil Terminal, Lough Atalia Road, Galway
Description of Development:	<i>"Permission to extend facilities at existing oil terminal site by construction of five additional bunded storage tanks, a truck loading gantry and site drainage improvement."</i>
Decision Date:	04/02/1998
Decision:	Grant
Final Grant Date:	12/03/1998

GCC Reg. Ref.:	03695
Applicant:	Statoil Ireland Ltd
Address:	Lough Atalia Road, Galway
Description of Development:	<i>"Permission to erect a two-storey permanent prefabricated portacabin to accommodate offices and driver welfare facilities."</i>
Decision Date:	18/12/2003
Decision:	Grant
Final Grant Date:	12/02/2004

GCC Reg. Ref.:	07421
Applicant:	EZ Living
Address:	Galway Harbour Enterprise Park, Renmore, Galway
Description of Development:	<i>"Permission for retention of 3 No. existing signs at the following locations: 1) Entrance to EZ Living at Enterprise Park. 2) Main entrance to Enterprise Park. 3) Eastern elevation of the building."</i>
Decision Date:	16/07/2007
Decision:	Grant
Final Grant Date:	24/08/2007

3.2 Relevant Planning History in the Subject Site's Environs

3.2.1 Bonham Quay Site – GCC Reg. Ref. 17/83 (ABP-300275-17)

GCC Reg. Ref.:	17/83
Location:	Former Topaz Oil Storage Facility, Located at Dock Road, Queen Street, and Bóthar na Long, Galway
Distance from Main Development Area of the Subject Site:	Approximately 230 metres
Applicant:	Bonham Dock Limited
Application Date:	3 rd April 2017
Description of Development:	<p>Permission for a 10 year permission for development at this site (c. 0.93ha). The proposed development consists of a mixed use office development (c. 34,765 sq m GIA excluding basement, external terraces and open roof plant) provided in 4 No. blocks over a single basement level as follows: Block A (c. 9,935 sq m) is an 8 No. storey building, located in the north-west part of the site adjoining Dock Road/Queen Street containing retail/restaurant/café use and ESB sub-station at ground level; office use at ground level to Level 07; plant at Level 07; external terraces at Levels 04 to 06 with a roof garden at Level 07; solar panels on the roof. Block B (c. 4,820 sq m) is a 7 No. storey building with roof plant above, located in the south-west corner of the site adjoining Dock Road and Bóthar Na Long, containing the basement access ramp; retail/restaurant/café use at ground level and mezzanine level; office use at ground level to Level 06; external terraces at Level 01 to 06 with external links with Block C, roof garden at Level 07; solar panels on the roof. A bridge link is provided at Level 04 between Block A and B. Block C (c. 8,165 sq m) is an 8 No. storey building with roof plant above, located in the southern part of the site adjoining Bóthar Na Long containing retail/restaurant/café use at ground floor level; office use at ground level to Level 07; external terraces at Levels 01 to 06 with external links to Block B and D, public accessible roof and event space at Level 07, roof garden at Level 08; solar panels on the roof. Block D (c. 11,845 sq m) is an 8 No. storey building with roof plant above, located along the eastern boundary of the site adjoining Bóthar Na Long to the south, containing office use at ground level to Level 07; external terraces at Level 01 to Level 07 with external links to Block C, roof garden at Level 08; solar panels on the roof. The single basement level (c. 7,030 sq m) contains 138 No. car spaces; 162 No. cycle spaces; a commuter centre, office lobby areas, building facilities and plant. External amenity space is provided at ground level comprising a raised central plaza, basement ventilation areas, 52 No. surface cycle spaces and public realm improvements to the north and west of the site. Vehicle access is from Dock Road; fire tender access is from Dock Road/Queen Street and the proposed public realm to the north; and pedestrian access is from Dock Road, Bóthar Na Long and the proposed public realm to the north.</p>
GCC Decision Date:	27 th September 2017
GCC Decision:	Grant Permission
ABP Ref.:	ABP-300275-17
ABP Decision Date:	31 st August 2018

ABP Decision:	Grant Permission
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A Planning Application for an approximately 34,765 sq m mixed-use office development with restaurant/retail/café use was submitted to Galway City Council on 3rd April 2017. The proposed development included 4 No. blocks, ranging in height from 7–8 No. storeys, with a plot ratio of 3.75:1 and a site coverage of 47%.

The following assessment of the plot ratio and the scale of the development was provided by the Planning Inspector in their Report for the Bonham Quay development:

*"The plot ratio associated with the proposed development is 3.75:1 which is significantly more than the permitted maximum as set out in the development plan of 2.1. Site coverage is 47%. The Development Plan at Section 11.4.2 provides for exceptions where increased plot ratio will be permitted. 'In the CC zone consideration will be given to development proposals more than the normally *permissible plot ratio where such proposals would contribute to urban regeneration or make a significant contribution to urban character, this excess will be interpreted as a proportional increase only'. **I note that plot ratio is a somewhat crude instrument in terms of measuring density and the avoidance of the adverse effects of overdevelopment.** The specific nature and qualitative elements of the proposal need to be considered in terms of the assessment of the appropriateness of the development as proposed to its context. Such wider considerations furthermore inform the issue of whether this proposal contributes to urban regeneration or makes a significant contribution to urban character. In this regard **it is appropriate to rely on qualitative factors defining built form including height, open amenity space provision, and standards of public realm.**"*
[emphasis added]

In relation to the proposed height of the Bonham Quay development, the Inspector noted the following in their Report:

*"In relation to building height, this is addressed at 8.7 Urban Design within the Galway City Development Plan 2017-2023, where it is noted that the scale of development in terms of height and massing can have a considerable impact on other buildings and above prevailing height can usefully mark points of major activity such as business districts, civic functions and transport interchanges. They can also have a considerable impact in the context of historic buildings, conservation areas, areas of natural heritage importance and can detract from the city's skyline and impinge on strategic views. **In the context of the city which is predominantly low rise with its sensitive historic core and unique natural amenity setting, there is little capacity for dramatic increases in height, however it is recognised that modest increases at appropriate locations, can help use land efficiently and provide for sustainable high densities.** The development plan sets out four key principles to be considered when assessing capacity for height as follows:*

- *Protection of existing built and natural heritage and residential amenity.*
- *Creation of landmarks that enhance the city's legibility without eroding its innate character.*
- *Retention of existing benchmark heights to retain strategic views and to protect and enhance the general character of sensitive locations.*
- *Promotion of higher density at centres/ nodes of activity on large scale infill sites and along public transport corridors.*

*The plan notes that 'areas where major change is anticipated to occur such as at Ardaun, Murrough, Ceannt Station and the **Inner Harbour may present opportunities for increased***

***heights. As these are major development areas, there is potential for these areas to establish their own distinctive character."* [emphasis added]**

The principles underpinning a gradual increase in height to 8 No. storeys (38 m to parapet) at Bonham Quay and the potential for further increases in height in the subject redevelopment area has been set by the granting of this permission. The following assessment also concludes that there is scope for further, taller buildings in the vicinity, in our opinion:

***"I consider that having regard to the characteristics of the site, in particular the topography of the area, detachment from established residential properties and landmark location within the inner harbour the opportunity to provide for taller building volumes exists. I have reviewed the Framework Plan in detail and the design statement and I consider that the approach in terms of the building height strategy has been justified."* [emphasis added]**

The Application was Granted Planning Permission on 31st August 2018 by An Bord Pleanála, with 2 No. Applications having since been Granted Permission for amendments to the permitted scheme, primarily relating to modifications of the internal layouts (Reg. Refs. 20/367 and 22/305).

A Extension of Duration of Permission was sought for the Parent Permission on 11th June 2024. An RFI was issued in respect of this, with GCC ultimately making a decision in 11th July 2025 to Refuse Permission for the Extension due to a need to undertake Appropriate Assessment, with the refusal reason stating:

"The Planning Authority consider that the requirements of Section 42(8) of the Planning and Development Act 2000 have not been met as based on the information received with the planning application in conjunction with the further information and clarification of further information received likely significant effects of the proposed development on European Sites namely Galway Bay Complex SAC and Inner Galway Bay SPA in view of their conservation objectives can not be screened out and therefore based on the information provided an Appropriate Assessment is required."

3.2.2 Augustine Hill (Ceannt Station) Site – GCC Reg. Ref. 20/47 (ABP-310568-21)

GCC Reg. Ref.:	20/47
Location:	Lands to the rear of Ceannt Train Station, Station Road, Galway City
Distance from Main Development Area of the Subject Site:	Less than 100 metres
Applicant:	Seagullpoint Limited
Application Date:	26 th February 2020
Description of Development:	The proposed development is for a mixed-use urban regeneration project with an overall gross floor area of approximately 128,080 sq. m (approximately 101,327 sq. m, excluding the multi-storey carpark and single level service yard basement with access ramp) on a site of approx. 3.46 Ha. The development is arranged across 10 no. development blocks (B1-B10) with a total of 6 no. residential buildings above Blocks B5, B7, B8 and B9, with building heights ranging from single storey to 21 storeys overall. The mixed use development will consist of: 376 no. apartment units (3 no. studio, 77 no. 1 bedroom, 279 no. 2-bedroom and 25 no. 3-bedroom units) (total of c. 38,365 sq. m), of which 248 no. are 'Build To Rent' units, overall comprising of; Block B5: 43 no. apartment units, accommodated in 1 no. residential tower

	<p>('Pin o6'), with 6 floors above Podium Level o3 (garden level) (10 storeys overall); Block B7: 85 no. apartment units comprising a mix of: 3 no. Studio, 14 no. 1-bedroom, 55 no. 2-bedroom and 13 no. 3-bedroom units, accommodated in 1 no. residential tower ('Pin o1'), with part 10 storey and part 16 storey residential accommodation above Podium Level o4 (up to 21 storeys overall); Block B8: 146 no. 'Build To Rent' apartment units comprising a mix of 33 no. 1-bedroom, 109 no. 2-bedroom and 4 no. 3-bedroom units, accommodated in 2 no. residential towers ('Pin o2' and Pin o3'), with 8 floors and 12 floors above Podium Level o4 (garden level) respectively (17 storeys overall); Block B9: 102 no. 'Build To Rent' apartment units comprising a mix of: 24 no. 1-bedroom and 78 no. 2-bedroom units accommodated in 2 no. residential towers ('Pin o4' and 'Pin o5'), with 8 floors and 11 floors above Podium Level o4 (garden level) respectively (16 storeys overall). Retail use (total GFA of 26,449 sq.m) over 1-3 no. levels comprising 28 no. retail units and 2 no. department stores; a total of 22 no. café/restaurant/bar units (c. 5,179 sq. m) 12 no. (c. 3,037 sq. m) as part of new development and 10 n. (c. 2,142 sq. m) as part of the adaptive re-use and change of use of Protected Structures , with associated conservation works at the Train Shed (RPS No. 10002) and the Stables (RPS No. 8202), both Protected Structures; 1 no. Hotel with 189 no. guestrooms, including ancillary accommodation including bar/restaurant (c. 9,010 sq. m) located in a part 9 storey and part 10 storey building (Block B2); Office use (c. 3,787 sq. m) which includes the re-use and associated adaptive works to No. 16 Eyre Square (RPS No. 3802), a Protected Structure; 1 no. multi-screen cinema complex (c. 2,777 sq. m); 1 no. childcare facility (c. 391 sq. m); a multi-use cultural space (c. 2,203 sq. m); Community facilities (total c. 1,428 sq. m), consisting of a cycle hub/sustainability hub (c. 392 sq. m), childcare facility (c. 391 sq. m) and landscaped open space at rooftop level of Block B6 (c. 645 sq. m); a multi-storey carpark over 8 floors (c. 23,315 sq. m) incorporating 572 no. carparking spaces for residential, commercial and Ceannt Train Station, including 2 no. taxi drop-off points, 60 no. electric vehicle charging points and 18 no. accessible parking spaces; a total of 1,157 no. bicycle parking spaces comprising dedicated and visitor spaces for the commercial and residential uses. Works to Protected Structures, including: No. 16 Eyre Square (RPS No. 3802) (GFA c. 396 sq. m) – conservation of retained existing building fabric including roof, historic interior elements, exterior masonry, and wrought-iron railings; removal of existing rear fire-escape staircase and replacement of existing uPVC windows with timber sliding sash frames; removal of existing masonry fabric to create new openings within No. 16, and between No. 16 and proposed extension; removal of modern lean-to outbuildings from rear yard of No. 16, construction of modern extension of 3 no. storeys adjoining to the side (gable end) and rear of No. 16 Train Shed (RPS No. 10002) (GFA c. 608 sq. m) – conservation of retained existing building fabric; removal of existing infill elements and replacement with modern glazing; removal of existing masonry fabric to create new openings on north elevation, to extend openings on south elevation and to remove remaining section of interior raised platform; removal of existing modern extension to west gable, construction of a single storey structure adjoining to the northern side of the Train Shed. The Stables/Cut Stone Stores (RPS</p>
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	No. 8202) (GFA c. 729 sq. m) – Works to main stable building to include; removal of existing roof structure and chimneys with installation of new roof raised on glazed section; conservation of retained existing building fabric (masonry walls and windows); removal of existing infill and replacement with modern glazing; removal of existing internal floor fabric, stud-wall partitions and simple timber staircase; creation of openings and limited removal of internal masonry partitions. Works to gate lodge to include: conservation of retained existing building fabric (masonry walls) and reinstatement of appropriate replacement windows; creation of large new opening to rear elevation and installation of new roof. Works to stable yard to include: removal of rubble masonry sections from both sides of central entrance gateway between retained higher sections; removal of other historic and modern features from within existing stable yard with salvage of all historic material for re-use on site; removal of historic masonry flanking stable yard entrance gateway and adjoining retaining wall to south-east with salvage of all historic material for re-use on site. the end bay of the stable range will be re-instated, linking it with the stone gateway in to the former stable yard with a modern glazed section. Forthill Cemetery (RPS No. 4401) – New support buttresses will be incorporated into the development to replace the existing underpinning of Forthill Cemetery’s northern boundary walls, the upstanding portions of which will be conserved and consolidated as part of the overall development.
GCC Decision Date:	7 th December 2017
GCC Decision:	Grant Permission
ABP Ref.:	ABP-310568-21
ABP Decision Date:	28 th June 2023
ABP Decision:	Grant Permission

The redevelopment of the lands at Ceannt Station was applied for on 26th February 2020. With 10 No. blocks proposed across the site, the heights within the development ranged from 1 No. storey to 21 No. storeys.



Figure 3.1: CGI of the Augustine Hill development

Source: 'Visualisation 05' by BDP



Figure 3.2: CGI of the Augustine Hill development

Source: 'Visualisation 00' by BDP



Figure 3.3: CGI of the Augustine Hill development

Source: 'Visualisation 10' by BDP

In assessing the Augustine Hill development, Galway City Council issued a Request for Further Information for matters relating to scale, height and massing of the development. In response to the Request for Further Information, the Applicant reduced floor levels and massing of some blocks, with Block No. 10 removed completely. However, the maximum height of the overall development remained at 21 No. storeys at Block No. 1. As a result of the Request for Further Information, the plot ratio was reduced from 3.8:1 to 3.4:1.

Galway City Council issued a Split Decision on 24th May 2021, whereby it was decided to Refuse Planning Permission for the residential towers numbered Pin 04 and Pin 05 of Block No. 9, located to the south of the site in proximity to Forthill Cemetery, and to Grant Planning Permission for the remaining aspects of the development.

The Decision issued by Galway City Council was appealed by First-Party and Third-Party Appellants to An Bord Pleanála.

The *Galway City Development Plan 2017-2023* was the statutory plan at the time of the submission of the Planning Application; however, it was assessed by An Bord Pleanála under the current *Galway City Development Plan 2023-2029*, which requires developments to adhere to the *Urban Density and Building Heights Strategy 2021* prepared by the Council.

The following extracts are taken from the Planning Inspector's Report, which assesses the Augustine Hill development against the current Plan in terms of its height, scale, mass and the positive contribution it would make to Galway City:

*"The redevelopment of this large, underutilised site immediately adjacent to the transport hub, formed by Ceant Station, the Bus Station and the numerous bus-stops at Eyre Square, would help to achieve the twin objectives of regeneration of such a strategic brownfield site and the delivery of compact and sustainable growth in a central location, adjacent to a wide range of amenities and facilities and accessible by a variety of modes of transport. The compact form, together with the varied mix of uses and inclusion of housing in a high quality environment, would create a new community and add to the vitality to the city centre (10.3). **Ceannt Quarter, combined with Bonham Quay and other planned development in the Inner Harbour area, would enable the city centre to expand and re-engage with the seafront and simultaneously integrate with the established commercial centre to facilitate Galway to grow to a city of scale**". [emphasis added]*

"The proposed development complies in principle with Policy 10.5 – Ceannt Quarter Regeneration Site. It represents a large-scale, mixed-use regeneration project, with an aspiration for increased building height and density consistent with the desire to achieve a compact urban form, and which would contribute to the expansion of the city centre with linkage to the city core."

*"The Ceannt Station and Inner Harbour areas are essentially reclaimed lands which are characterised by low density development of mixed usage, primarily related to the port and railway. It is, however, an area in transition and as it is adjacent to the city core, it has the **potential to act as a 'bridge' between the low-rise compact medieval core and the seafront**. Recently permitted development around the docks such as Bonham Quay and the Student Housing Scheme in Queen Street, which are located between the Ceannt Station lands and the city core, have resulted in increased density, height and scale of large blocks with heights of c. 7-8 storeys and plot ratios in excess of 3. **Thus, the area is one that is in transition and where increased heights and densities can be considered**". [emphasis added]*

"In conclusion, it is considered that the site is one which is suited to a development which incorporates buildings of increased scale, density and height given its city centre location and its high level of accessibility to public transport and a range of services and facilities. The policy framework for the area supports the concept of increased height and scale in such locations provided that any such development would make a positive contribution to the character and townscape of the city and would respect the sensitive historic nature of the medieval city of Galway.

*The proposed development would make a **significant and positive contribution to place-making by creating a new and vibrant city district which would extend the city centre and provide permeable links with the seafront**, which are currently unavailable. The project would make a **positive contribution to the mix of uses available within the city**, to the creation of a new residential community and expand the range and extent of commercial and cultural services available in the city. It would also contribute significantly to the improvement of the public realm and to the creation of a much more legible city, as well as to the legibility and permeability of the area by introducing a range of new streets and public spaces which would be linked with the existing network of streets and civic spaces. The **increased height and massing would be achieved without creating monolithic blocks and maintaining views through the site.**" [emphasis added]*

It was concluded by the Planning Inspector that:

*"...the Augustine Hill development, by reason of its design and scale, which incorporates a significant element of height, **would have a profound and enduring impact on the character and visual amenities of Galway city. However, cities have always and will, continue to evolve and change and will need to regenerate areas such as Ceannt Station lands. It is considered that provided that the proposed new urban quarter would enhance and positively contribute to the character and amenities of the city and would not detract from the historical, cultural and architectural essence of the city, it would be acceptable.**" [emphasis added]*

On 28th June 2023, An Bord Pleanála decided to both Grant and Refuse Permission for the proposed Augustine Hill development, similar to the decision of Galway City Council. An Bord Pleanála also decided to Refuse Permission for the residential towers numbered Pin 04 and 05 of Block No. 9. Additionally, Condition 2 required revised drawings to be submitted to the Planning Authority illustrating the removal of 5 No. levels from Pin 03 and 2 No. levels from Pin 02 of Block No. 8 and 2 No. levels from Pin 06 of Block No. 5. The 21 No. storeys at Block No. 1 were permitted by An Bord Pleanála.

3.3.3 Coal Yard Site – GCC Reg. Ref. 20/240 (ABP-310615-21) and New Planning Application

GCC Reg. Ref.:	20/240
Location:	The corner of Lough Atalia Road and Bothar na Long, Galway
Distance from Main Development Area of the Subject Site:	Approximately 100 metres
Applicant:	Summix BNM Developments Ltd.
Application Date:	18 th September 2020
Description of Development:	The development will principally consist of the demolition of (a) the vacant industrial structure (115 sq m) (b) the external canopy structure (170 sq m) and (c) the boundary walls along the southern, western and

	north-western boundaries of the site; and the construction of a part 3 No. to part 11 No. storey Hotel providing 186 No. bedrooms (8,939 sq m), incorporating food and beverage areas and a rooftop bar/function area and terrace. The development will also include: a restaurant; coffee bar; hard and soft landscaping; terraces; the provision of a service lay-by off Bothar na Long; access to the ESB sub-station off Lough Atalia Road; bicycle parking; plant; solar panels; signage; localised repair and rebuilding of the shared boundary wall with Forthill Cemetery to the north; and all other associated site works above and below ground.
GCC Decision Date:	26 th May 2021
GCC Decision:	Refuse Permission
ABP Ref.:	ABP-310615-21
ABP Decision Date:	28 th June 2023
ABP Decision:	Refuse Permission

On 20th September 2020, a Planning Application was submitted to Galway City Council relating to the first hotel development at the Coal Yard Site. The 8,939 sq m hotel proposed a part-3- to part-11-storey building, with a site coverage of 45%, and a total of 186 No. bedrooms in addition to a restaurant and coffee bar. Figure 3.4 provides a CGI of the proposed development along Bóthar na Long.



Figure 3.4: CGI of the hotel development along Bóthar na Long

Source: Model Works

In assessing the proposed development, the Planning Officer noted the following:

“As mentioned above, the western pavilion building is a 3-storey building, which would reach a height of 12.7m, whilst the eastern hotel building, is an 11-storey building, of height 38.3m. The proposed building height would therefore be well above the prevailing building heights in the wider area and would be located in a constrained site bounded by a Protected Structure / Recorded Monument.”

“Whilst the architectural design of the proposed building is considered to be of a good standard, the overall context and scale of the development gives rise to significant concerns

and represents gross overdevelopment of the site. It is considered that the height and massing of the proposed building would have a considerable negative impact on the contextual relationship with the surrounding area.

From an urban design perspective the proposal fails to meet the criteria referenced in section 8.7 of the CDP. It is overwhelming in scale with no site capacity to give it context or streetscape assimilation. It has poor ratio of height to street width, having no relieving features, as previously referenced such as a direct waterfront. It doesn't add to the character of the city, give a good sense of enclosure and creates an overwhelming environment onto the streetscape."

The Planning Officer, having reviewed the documents submitted with the Planning Application, decided that further information was needed to fully assess the Application. A Request for Further Information relating to 20 No. items was issued on 11th November 2020, with Item Nos. 1, 2 and 4 relating to the scale, height and mass of the building.

In response to the Request for Further Information, the Applicant revised the height of the building by omitting a level, bringing the maximum height of the building down to 10 No. storeys (Figure 3.5). As a result of the reduction in height, the plot ratio reduced from 4:1 to 3.77:1. However, despite the revised proposal in response to the Request for Further Information, the Planning Officer considered that the matters were not addressed.



Figure 3.5: CGI of the proposed hotel development along Lough Atalia Road as revised at RFI Stage

Source: Model Works

Galway City Council decided to Refuse Permission on 26th May 2021 due to the following 3 No. reasons:

1. *"It is considered that the proposed development by reason of its excessive density, scale and height on a very constrained site, would represent over development of the site and would be contrary to the maximum permitted plot ratio standard set out under Section 11.4 of the Galway City Council Development Plan 2017-2023 for development on city centre zoned lands and would not be considered as an exception, as provided for in Section 10.2.2, in that it would not make a "significant architectural contribution to the character of the city". The proposed development would, therefore be contrary to the Galway City Development Plan 2017-2023 and to proper planning and sustainable development of the area.*
2. *It is considered that the proposed building by virtue of its excessive height, scale and massing and extreme proximity to Forthill Cemetery, would have a detrimental impact on the character and setting of this heritage asset. It is considered that the building as proposed would therefore contravene the provisions of Chapter 8 of the Galway City Development Plan 2017-2023 which requires protection of Protected Structures and Recorded Monuments and as such the proposed development would be contrary to the proper planning and sustainable development of the area.*
3. *The proposed development does not adhere to the principles of good urban design set out in Section 8.7 and 10.2.2 of Galway City Development Plan 2017-2023 and in this regard is considered to lack the capacity for integration with the existing urban form, to contribute positively to street enclosure and fails to sympathetically assimilate with Galway's townscape. The proposal therefore contravenes the provisions of the Galway City Development Plan 2017-2023 and would be contrary to the proper planning and sustainable development of the area."*

The Applicant decided to Appeal the decision to An Bord Pleanála. The following extracts are from the assessment made by the Planning Inspector in their Report with regard to the visual impact associated with the height and scale of the development:

*"The applicants assert that the proposal provides critical mass of development into a designated gateway / landmark city centre site. I consider that, in terms of the principle of development, **there is significant policy support for this type of development.**" [emphasis added]*

*"The issue of building height is specifically addressed within Section 11.10 of the Galway City Development Plan 2023-2029. This section of the Plan makes specific reference to the Galway Urban Density and Building Height Study, 2021. Section 16.3 of this document sets out that: **There is scope for increased building heights within** the regeneration areas, including **the inner Harbour Area** and the Bonham quay development is specifically referenced. The **National Planning Framework similarly references achieving urban infill and supporting redevelopment on brownfield sites** within Section 4.5. Therefore, **I am satisfied that there is sufficient national and local policy and guidance in place to support the principle of increased building height**, especially when considering the **current proposals relate to redevelopment on a brownfield site within a designated regeneration area.***

*I note that the building height at ten storeys is not too dis-similar to the heights of the buildings within the adjacent Bonham Quay development, which reach up to seven and eight storeys tall and also located within the Inner Harbour Area. **I also note that the Planning Authority have permitted development of between 9 and 21 storeys within the Augustine Hill Development which is located north and north-west of the Forthill cemetery, in the Ceannt Station regeneration area. Therefore, in terms of building***

*height, I do not consider that the proposed ten storey building could be described as being excessive in height. It is clear from the current GCDP 2023 that the Inner Harbour Area is envisaged to be developed as a new urban quarter, and that **these regeneration areas are afforded the flexibility to increase building heights**. It is clear that the **Planning Authority have accepted this argument, given they have already permitted increased building heights within the adjoining Bonham Quay and the Augustine Hill developments.***

*Having regard to the characteristics of the site, in particular, the topography of the area, detachment from residential properties and **location on a brownfield site within the emerging Inner Harbour regeneration Area, the opportunity to provide for taller buildings exists.**" [emphasis added]*

*"On balance, I am satisfied that **the proposal will assimilate satisfactorily within the newly formed townscape within the Inner Harbour Area which provides for increased building heights, density, plot ratio above the Development Management standards that had been historically developed in the city.** The development of the new quarter around the Harbour Area will provide for greater density of development with increased heights particularly on a brownfield site, which benefits from a city centre zoning objective and immediately adjacent to the Ceannt Station rail hub." [emphasis added]*

*"The plot ratio (as revised within the further information response) would be 3.77:1, significantly more than the guidance provided within Section 11.4.2 of the Development Plan, where a maximum plot ratio of 2:1 is envisaged for development on lands within the city centre. **I note that a higher plot ratio is provided for within the Development Plan in certain circumstances. These circumstances include: The appeal site is part of the Inner Harbour Area, part of a new urban quarter within the city where more flexible development standards, including increased plot ratio could be anticipated.** I note that there is ample provision made for on-site set down parking, provision for the servicing of the hotel and, therefore, in this context that **the plot ratio could be considered acceptable.**" [emphasis added]*

*"In conclusion, given the location of the site on city centre zoned lands that are serviced by public infrastructure and within a short walking distance (approximately 360 metres) of the central business district area. I consider **the increased plot ratio to be appropriate within the emerging Inner Harbour Area.** Therefore, on balance, **I would not concur with the Planning Authority that the proposal would constitute overdevelopment of the site.**" [emphasis added]*

*"The townscape, in this new and emerging part of the city is evolving and provides for increased heights, density and plot ratio, as discussed above. Therefore, it is within this policy context of the new and emerging and evolving townscape that the current proposals are considered acceptable and are considered to contribute positively to the local townscape. **The appeal site in its existing form, vacant and underutilised, does not contribute positively to the local townscape or public realm and the current proposal would open up the site to Bothar na Long, provide for a much improved public realm and improved connectivity between Lough Atalia Road to the east and the city centre to the west.**" [emphasis added]*

*"Therefore, I am of the opinion that this would represent a **significant benefit to the streetscape and improve the quality of public realm** and provide opportunities to sit and rest in a landscaped urban environment within the Bothar na Long streetscape **and improve connectivity between the Inner harbour regeneration area and the city centre as***

envisaged within Policy 8.8 of the city Development Plan, regarding the creation of strong links between the city centre and the regeneration areas." [emphasis added]

Despite the Planning Inspector recommending a Grant of Permission, An Bord Pleanála decided to Refuse Permission due to the following reasons and considerations:

"It is considered that, by reason of its proposed height, massing, and volume in conjunction with its extreme proximity to Forthill Cemetery, the development as proposed, would have a detrimental impact upon the character and setting of this heritage asset. It is considered that the development, as proposed, would contravene Policy 8.1 subsection 2 of the Galway City Development Plan 2023-2029, which seeks to ensure that new development enhances the character or setting of a protected structure, and Policy 8.4 subsection 2, which seeks to ensure that proposed development within the designated city centre Zone of Archaeological Notification is not detrimental to the character of an archaeological site or its setting. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

In deciding not to accept the Inspector's recommendation to grant permission, the Board considered that while elements of the proposal such as the palette of materials reflecting the maritime context and the public realm proposed addressing Bothar na Long were acceptable, the specific form of the proposed development in respect of its massing, scale, volume and height as it addresses Forthill cemetery coupled with the extreme proximity to same would be overbearing when viewed from this culturally important site. While the Inspector referenced that increased height had been permitted in the vicinity of the cemetery by reference to Bonham Quay and within the Ceannt station regeneration area, the Board noted that the development permitted on those sites would have greater separation distances from the cemetery, whereas the current site would require further consideration in respect of the most appropriate form of development consistent with its proximity to the cemetery. While the Board agreed that the redevelopment of this underutilised site would be a planning gain, such redevelopment needs to be specifically considered in respect of the impacts arising on the immediate receiving environment, in particular Forthill Cemetery, and it was not considered that the development as proposed in this instance would satisfactorily address this requirement."

The scale, mass and height of the hotel development at the Coal Yard site was deemed to be unacceptable by both Galway City Council and ultimately An Bord Pleanála in their decisions to Refuse Permission but acceptable to the Planning Inspector.

GCC Reg. Ref.:	24/60108
Location:	The corner of Lough Atalia Road and Bothar na Long, Galway
Distance from Main Development Area of the Subject Site:	Approximately 100 metres
Applicant:	Summix BNM Developments Ltd.
Application Date:	16 th April 2024
Description of Development:	The development will principally consist of the demolition of (a) the vacant industrial structure (115 sq m) (b) the external canopy structure (170 sq m) and (c) the boundary walls along the southern, western and north-western boundaries of the site; and the construction of a 15 No. storey Hotel (including part mezzanine at ground floor level) providing 189 No. bedrooms (7,514 sq m), incorporating food and beverage areas.

	The development will also include: the provision of a single storey service building to the northwest of the site, concealed as part of a tiered landscaped proposal comprising tiered steps, public seating and public art; restricted vehicle access off Lough Atalia Road to the ESB sub-station and switch room; service access off Bothar na Long; bicycle parking; outdoor seating; solar panels; lift overrun; green roof; lighting; plant; signage; hard and soft landscaping; localised repair and rebuilding of the shared boundary wall with Forthill Cemetery to the north; and all other associated site works above and below ground.
GCC Decision Date:	6 th June 2024
GCC Decision:	Refuse Permission
ABP Ref.:	320100
ABP Decision Date:	Due 5 th November 2024
ABP Decision:	Pending

Drawing on the previous reasons for refusal, a second Planning Application for a hotel development was lodged (16th April 2024) and its details are summarised below. Whilst this new proposal has increased the height of the hotel to 15 No. storeys, it has narrowed its footprint and stepped its built-form away from Forthill Cemetery to provide the latter with greater 'breathing space'. As previously argued in the initial Planning Application, the development takes cues from local and national policy that support more efficient and progressive use of urban brownfield land. Images of the proposed development are provided as Figures 3.6 and 3.7 below.



Figure 3.6: CGI of the newly proposed hotel development

Source: Model Works



Figure 3.7: CGI of the newly proposed hotel development

Source: Model Works

Galway City Council ultimately made a decision to Refuse Planning Permission on 6th June 2024, citing 7 No. reasons, relating to:

1. Excessive density, scale and height;
2. Overbearance of and detrimental impact on Forthill Cemetery;
3. Does not adhere to principles of good design;
4. Road safety concerns;
5. Contaminated surface water and risks to Natura 2000 sites;
6. Unsatisfactory surface water disposal contrary to SuDS policies; and
7. Bat survey findings.

This decision has been appealed by the Applicant, and although An Coimisiún Pleanála were due to make a decision by November 2024, this has not yet been made at the time of writing.

3.3 Planning History Analysis

The review of the above site planning histories reveals that both Galway City Council and An Bord Pleanála (now known as An Coimisiún Pleanála) have been progressive in their assessment of proposals for development in the City area. They have both permitted development that is of a greater density/intensity and scale than prevailing patterns of development and that is in excess of the 'general' parameters set out in the Development Plan (e.g. plot ratio). **These observations are of vital relevance to the development subject to this Planning Application.**

However, both the Council and the Board have been mindful of local sensitivities in their assessment of schemes; whether that be the City's low-rise townscape or Forthill Cemetery's cultural and heritage importance and context. The benefit of the subject site is that although it

is proximate to these features, it is slightly distant from them, with the above-mentioned developments and future schemes to the north-west likely to provide a level of screening and urban integration.

4.0 DEVELOPMENT DESCRIPTION

This Section provides a summary description of the development, but should be read in conjunction with the full suite of Planning Application documents.

4.1 Key Site and Development Statistics

Key site and development statistics are set out in Table 4.1 below.

Total Site Area	1.621 Ha
Net Site Area (i.e. 'Gross Developable Site Area')	1.469 Ha
Number of Residential Units	356
Total Demolition Floor Area (Approximate)	463.6 sq m
Total Proposed Gross Floor Area	32,096.0 sq m
Plot Ratio (Net Site Area)	2.2
Residential Density (Total Site Area)	219.6 dwellings per hectare (dph)
Residential Density (Net Site Area)	242.3 dwellings per hectare (dph)
Residential Density (Using Compact Growth Guidelines' Methodology for Mixed-Use Developments)	248.9 dwellings per hectare (dph)
Building Height	6–13 No. storeys
Public Open Space	3,802 sq m (25.9% of the net site area 23.5% of the gross site area)
Communal Amenity Space	2,181 sq m
Dual Aspect	134 No. units (37.6%)
Car Parking	37 No. spaces 16 No. of which are for the residential units, equating to a car parking ratio of 0.05 No. spaces per unit
Set Down	1 No. space/bay
Cycle Parking	741 No. spaces (total), of which: <ul style="list-style-type: none"> • 555 No. are long-stay, covered for residents with 281 No. internal within the building Blocks and 274 No. as external, covered spaces; and • 186 No. are short-stay, Sheffield stands with 178 No. for residential visitors and 8 No. for the non-residential uses.

Table 4.1: Key site and development statistics

Source: ALTU (2025)

4.2 Description of Proposed Development

The proposed development principally consists of:

- The demolition of the existing office / bus depot building (370.2 sq m) (Figure 4.1) and ancillary building (26.0 sq m);
- The partial demolition of the existing ESB sub-station and ancillary building (67.4 sq m);
- The demolition of existing boundary walls at the south-west and north-west; and
- The construction of a mixed-use development.



Figure 4.1: The existing office / bus depot building to be demolished

Source: Google Maps (image October, 2022)

The proposed mixed-use development (Figure 4.2) primarily comprises 4 No. Blocks (identified as A–D):

- 356 No. residential apartments (172 No. 1-bed, 169 No. 2-bed and 15 No. 3-bed), distributed across all Blocks
- crèche (255.9 sq m) in Block B with 2 No. outdoor play areas;
- 2 No. café/restaurant units (totalling 428.4 sq m) in Block A; and
- 1 No. retail unit (156.0 sq m) in Block B.



Figure 4.2: CGI of the proposed development from the north-west, with Block D at the closest point

Source: ALTU (2025)

The development has a total floor area of 32,096.0 sq m and generally ranges in height from 6 No. to 13 No. storeys:

- Block A ranges from 6 No. to 9 No. storeys;
- Block B ranges from 6 No. to 11 No. storeys;
- Block C is 6 No. storeys; and
- Block D ranges from 6 No. to 13 No. storeys.

CGIs of the proposed development are presented in Figures 4.2–4.6 to better demonstrate its physical form and massing.



Figure 4.3: CGI view of the proposed development looking into the central public open space and communal amenity space, with Block B (left) and Block C (right)

Source: ALTU (2025)



Figure 4.4: CGI view of the proposed development within the central communal amenity space, with Block B (left), Block C (right) and Block D (centre, slightly distant)

Source: ALTU (2025)



Figure 4.5: CGI view of the proposed development within the central communal amenity space, with Block B (left), Block C (right) and Block D (centre, slightly distant)

Source: ALTU (2025)



Figure 4.6: CGI view of the proposed development's Block A in the south-east corner (west side of the Dock Road bridge)

Source: ALTU (2025)

The proposed development also includes:

- New internal street and pedestrian network, including a one-way vehicular route at the north-western side of the site and new junctions with Dock Road at the south-west and with the access road from Lough Atalia at the north-west;
- Upgrades to Lough Atalia Road and the access road from it at the north-west of the site, including the provision of a new toucan pedestrian/cycle crossing at Lough Atalia Road;
- Upgrades to the footpath and road interface with Dock Road to the south-west;
- 37 No. car parking spaces, including 4 No. for the crèche and 4 No. for the retail and café/restaurant uses, 8 No. as EV charging spaces and 5 No. as car share spaces;
- 1 No. set-down/delivery bay adjacent to Block B;
- 741 No. cycle parking spaces, with –
 - 733 No. for the residential uses, as 281 No. for residents in stores internalised within the Blocks and 274 No. in external covered stores within the communal amenity spaces,
 - 178 No. as external Sheffield stands for residential visitors, and
 - 8 No. for the staff and patrons of the crèche, retail unit and café/restaurant units;
- Hard and soft landscaping, including as –
 - Public open spaces (3,802 sq m in 2 No. locations, equating to 23.5% of the gross site area), which include attractive native species planting, children's play space, half/mini basketball court, waterside walking/cycling route, seating, etc., and
 - Communal amenity spaces (2,181 sq m, exceeding the minimum required by 2%), which include considered native species planting, toddler and teenage play areas, seating, etc.;
- Private amenity spaces as balconies and terraces facing all directions, with appropriate defensible space around and defining same where they interface with public areas;
- Boundary treatments;
- Public lighting;
- Bin stores;

- Double sub-station located in Block D;
- Plant rooms in all Blocks;
- Green roofs;
- Rooftop lift overruns and plant at all Blocks;
- Rooftop telecommunications, plant and enclosure at Block C;
- Recladding of the existing sub-station and pumping station; and
- All associated works above and below ground.

5.0 STRATEGIC POLICY CONTEXT AND COMPLIANCE

The following Section provides an overview of strategic national and regional planning policy and the proposed development's compliance with same. However, please note that the more detailed planning assessment is contained in Section 6.0 below.

5.1 *Project Ireland 2040: National Planning Framework*

Project Ireland 2040: National Planning Framework is the Government's high-level, overarching strategic plan that aims to shape the future growth and development of the country. It was published in February 2018 and has recently been revised under the *National Planning Framework First Revision* (2025) (NPF), which was approved by the Houses of the Oireachtas on 30th April 2025 and, accordingly, has now come into effect.

Under the NPF, the Irish Government has set out long term strategic goals for the Republic of Ireland. These goals are geared towards compact growth and the sustainable development of Ireland to accommodate an increased population of one million people by the year 2040.

Section 2.2 of the NPF sets out an overview of the strategy which includes reference to 'Compact Growth' as follows:

- *"Targeting a greater proportion (40%) of future housing development to be **within the existing 'footprint' of built-up areas.**" [emphasis added]*
- *"**Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.**" [emphasis added]*

Section 6.6 of the NPF further calculates that:

*"To meet projected population and economic growth as well as increased household formation, annual **housing output will need to increase to approximately 50,000 homes per annum in the years to 2040** and will be subject to monitoring and review." [emphasis added]*

To assist in the delivery of 50,000 additional homes annually, Section 6.6 of the NPF further states that Ireland's future homes will need to:

- *"**..be located in places that can support sustainable development** - places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change;*
- ***be delivered in our cities and larger towns (where large scale housing demand exists), where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run, and***
- *still be located in our smaller towns, villages and rural areas, including the countryside, but at an appropriate scale that does not detract from the capacity of our larger towns and cities to deliver homes more sustainably." [emphasis added]*

The NPF augments the above, remarking:

“Well designed and located high and medium density housing will assist:

- *Fast-growing urban areas to achieve much needed scale;*
- *Medium-sized urban areas to find a route to quality in a new competitive framework;*
- *All urban areas to increase vibrancy and vitality;*
- *Increased efficiency and sustainability in the use of energy and public infrastructure”.*

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the principles set out throughout this Section as it provides a variety of dwelling sizes and typologies to meet the need for additional housing at a well-connected, well-served, infill site.

The NPF expressly seeks the densification of infill sites close to existing public transport and services and facilities such as at the subject site. National Policy Objective 45 states that it is an objective to:

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

The NPF recognises that building inwards and upwards is important to effectively address the housing crisis in a more environmentally efficient and sustainable way. Therefore, it is contended that there is a significant importance placed in the NPF on developing high-quality accommodation by increasing the density of developments.

Thus, the NPF supports the delivery of the proposed development through increased density and height at the subject site, having regard to the design of the development which considers existing residential amenity, its proximity to public transport and local amenities, retail and commercial services and facilities.

Section 1.3 of the NPF identifies a list of 10 No. National Strategic Outcomes (NSOs), which define its vision. They are as follows:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. High-Quality International Connectivity;
5. Sustainable Mobility;
6. A Strong Economy Supported by Enterprise, Innovation and Skills;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Environmental Resources; and
10. Access to Quality Childcare, Education and Health Services.

A series of key National Policy Objectives (NPOs) are also defined by the NPF and are the more detailed means through which the NSOs will be achieved. NPO 74 sets this:

"Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes."

Table 5.1 below sets out how the proposed development will contribute towards achieving the 10 No. NSOs identified in the NPF.

No.	National Strategic Outcome	How it is addressed by this development	Criteria met?
1	Compact Growth	Residential-led, mixed-use development at a brownfield, infill site, increasing local densities and land-use intensities proximal to existing and proposed public transport, services, facilities and amenities.	Yes
2	Enhanced Regional Accessibility	Proximal to bus stops and Ceannt Station, allowing for prompt onward connectivity to inter-city rail.	Yes
3	Strengthened Rural Economies and Communities	N/A, as this NSO relates to rural areas.	N/A
4	High-Quality International Connectivity	N/A.	N/A
5	Sustainable Mobility	Ties into existing infrastructure, with a range of services, facilities and amenities in the area, thereby promoting active modes. Proximal to bus stops and Ceannt Station, enhancing the mobility of future residents..	Yes
6	A Strong Economy Supported by Enterprise, Innovation and Skills	Employment and economic activity will be generated by the crèche, retail unit and café/restaurant units.	Yes
7	Enhanced Amenity and Heritage	Additional public open space and childcare options are proposed. Protected Structures and heritage features in the area have been respected, noting the need to densify development in the city centre in accordance with planning policy.	Yes
8	Transition to a Low Carbon and Climate Resilient Society	Low car parking and high cycle parking provision will encourage active mode and public transport use. Sustainable renewable energy sources are proposed. A target for an A-rated development (BER) is sought.	Yes
9	Sustainable Management of Environmental Resources	Materials will be carefully selected to minimise resources, and where appropriate (in accordance with the RWMP) demolition waste will be repurposed.	Yes

No.	National Strategic Outcome	How it is addressed by this development	Criteria met?
10	Access to Quality Childcare, Education and Health Services	A crèche is proposed to cater for the childcare demand generated by the proposed development, with the <i>Culture and Social Infrastructure Audit</i> confirming the adequacy of education, healthcare and other services in the wider area.	Yes

Table 5.1: Compliance with the NPF's NSOs

Source: *National Planning Framework First Revision (2025)* and Thornton O'Connor Town Planning (2025)

The above NSOs are supplemented by NPOs, with some of those of relevance to the proposed development outlined below:

NPO 4 – *"A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs."*

NPO 7 – *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth."*

NPO 8 – *"Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth."*

NPO 10 – *"Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth."*

NPO 12 – *"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

NPO 13 – *"Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."*

NPO 14 – *"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals."*

NPO 20 – *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

NPO 22 – *"In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth."*

NPO 37 – *"Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."*

NPO 38 – *"Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services."*

NPO 43 – *"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*

NPO 44 – *"Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time."*

NPO 45 – *"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development."*

The development proposed herein is wholly supported by, and supportive of, the foregoing NPOs. As a higher density development of residential units, crèche, retail unit and café/restaurant units, it seeks to sustainably and efficiently use this brownfield, infill site within the existing envelope of Galway City. It integrates with established and proposed public transport and the existing range of local services, facilities and amenities.

5.2 **Urban Development and Building Heights – Guidelines for Planning Authorities**

The *Urban Development and Building Heights: Guidelines for Planning Authorities* (2018) (Height Guidelines) established a series of national rules in relation to building heights and new developments. The Height Guidelines were prepared to work in concert with the objectives of the NPF and other national Guidelines for the delivery of sustainable development and compact growth.

The Guidelines are intended to set a more proactive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards. The Guidelines note that increasing prevailing building heights has a critical role to play in addressing the delivery of more compact growth in urban areas, particularly cities and large towns by enhancing both the scale and density of development. Accordingly, the planning process must actively address how this objective will be secured.

The Guidelines remark that:

"...it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility."

The Height Guidelines are explicit in their consideration of prevailing heights of development, stressing that such heights should **not** dictate/constrain the scale of new development, but should still be respected.

Under Specific Planning Policy Requirement 1, Planning Authorities are required to avoid the application of blanket height restrictions, but through the plan-making process, identify areas where increases in height can be pursued:

"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."

In accordance with SPPR 1, the Development Plan and its *Urban Density and Building Heights Study* have identified a series of areas within which additional height would be supported and general guidance prescribed. These statutory documents have been prepared in the context of the Height Guidelines. As we contend in Section 6.3 below, the proposed development complies with the Development Plan and the *Urban Density and Building Heights Study*, thus it complies with national policy.

We note for completeness that SPPR 3 states:

"It is a specific planning policy requirement that where;

- (A) *1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and*
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;*

then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme.

(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed."

However, the proposed development does not exceed any height objectives prescribed by the Development Plan, thus there is no need to rely upon the provision of SPPR 3.

As a closing point, we are of the opinion that SPPR 2 and SPPR 4 of these Guidelines do not apply to the proposed development, as the former relates to the role of planning authorities achieving greater heights and mixed-use development and mechanisms to achieve same, and the latter relates to planning at greenfield and edge of settlement locations (the subject site is an infill, brownfield regeneration site).

5.3 Planning Design Standards for Apartments: Guidelines for Planning Authorities

The updated *Planning Design Standards for Apartments: Guidelines for Planning Authorities* (Apartment Design Guidelines) were published in July 2025. The Apartment Design Guidelines

set out the preferred locations for apartment developments to encourage higher densities and consolidated residential development, and the development management standards to which they should be designed.

The Apartment Design Guidelines prescribe a series of Specific Planning Requirements (SPPRs) which apartment developments must comply, although with dispensations in some instances. The SPPRs of relevance to the proposed development are identified and responded to in Table 5.2 below. Note that SPPRs 6, 7 and 8 do not apply to this specific development type.

SPPR No.	Requirement	Response/ Compliance
1	<p>(A) <i>With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.</i></p> <p>(B) <i>Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.</i></p>	Refer to Section 6.4 below for full details.
2	<p><i>The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:</i></p> <ul style="list-style-type: none"> • <i>Studio apartment (1 person) 32sq.m</i> • <i>1-bedroom apartment (2 persons) 45 sq.m</i> • <i>2-bedroom apartment (3 persons) 63 sq.m</i> • <i>2-bedroom apartment (4 persons) 73 sq.m</i> • <i>3-bedroom apartment (4 persons) 76 sq. m</i> • <i>3-bedroom apartment (5 persons) 90 sq.m</i> <p><i>The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.</i></p>	Refer to Section 6.5.1 below for full details.
3	<p><i>In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:</i></p> <p>(i) <i>A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that</i></p>	A total of 134 No. units (37.6%) are dual or triple aspect, thereby complying with this SPPR.

SPPR No.	Requirement	Response/ Compliance
	<p><i>exceed the requirements of this Specific Planning Policy Requirement.</i></p> <p>(ii) <i>For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</i></p>	Refer to Section 6.5.4 below for full details.
4	<i>Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.</i>	<p>Minimum floor to ceiling heights of 2.7 m at ground floor levels are proposed.</p> <p>Refer to Section 6.5.5 below for full details.</p>
5	<i>There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.</i>	<p>We note that the wording ultimately places no restriction on how few units can be proposed per core. Therefore, it places no restriction or limitation on the proposed development.</p> <p>Consequently, the proposed development complies with its content.</p>

Table 5.2: Evidence of compliance with the relevant SPPRs of the Apartment Design Guidelines

Source: *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025) and Thornton O'Connor Town Planning (2025)*

In addition to the above SPPRs, the Apartment Design Guidelines set supplementary guidance and various minimum areas (within units – e.g. storage) and requirements (outside units e.g. communal amenity space). The proposed development complies with these requirements, as relevant and applicable, and this is detailed in the Sections of this Report below and the materials prepared and submitted by the other members of the Design Team.

5.4 Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities

Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (Compact Settlements Guidelines) were adopted in January 2024, replacing *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009). Their purpose is to promote and accommodate more sustainable development (residential in particular); setting density standards and a suite of design requirements, such as those relating to parking and public open space.

As with the Apartment Design Guidelines, the Compact Settlements Guidelines define a suite of SPPRs, as well as a series of 'Policies and Objectives'. The rest of this Sub-Section lists these and provides brief responses to demonstrate the proposed development's compliance with same (Tables 5.3 and 5.4). Note that SPPR 2 does not apply to this scheme as it relates to private amenity space requirements for house unit types, none of which are proposed as part of this development.

Specific Planning Policy Requirements

SPPR No.	Requirement	Response/ Compliance
1	<p>Separation Distances</p> <p><i>It is a specific planning policy requirement of these Guidelines that statutory development plans* shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms** at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</i></p> <p><i>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</i></p> <p><i>In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.</i></p>	<p>The following minimum separation distances have been achieved:</p> <ul style="list-style-type: none"> • Blocks A and B do not contain directly opposing habitable façades; therefore, they are not subject to the minimum separation requirement. • Blocks A and C are 29.7 m apart at their closest point. • Blocks B and C and 17.5 m apart at their closest point, with their angles relative to each such that this separation increases to 23.4 m. • Blocks B and D are 29 m apart at their closest point. • Blocks B and C are 23.1 m apart, but are entirely offset from each other, such that they do not

SPPR No.	Requirement	Response/ Compliance
	<p><i>This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."</i></p> <p><i>* "Any reference to a statutory development plan(s) in these Guidelines refers to all development plans made under the Planning and Development Act 2000 (as amended) or under any replacement Planning and Development Act, including local area plans and strategic development zones planning schemes.</i></p> <p><i>** "Refer to definition in Appendix A: Glossary of Terms."</i></p> <p><i>The Appendix defines this as "Primary living spaces such as living rooms, dining rooms, studies and bedrooms.</i></p>	<p>have opposing elevations.</p> <ul style="list-style-type: none"> Blocks A and D do not interface with each other. <p>Therefore, the proposed development complies with SPPR 1.</p> <p>Refer to Section 6.6 below for full details.</p>
3	<p>Car Parking</p> <p><i>It is a specific planning policy requirement of these Guidelines that:</i></p> <p>(i) <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.</i></p> <p>(ii) <i>In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.</i></p> <p>(iii) <i>In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.</i></p> <p><i>Applicants should 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.</i></p>	<p>Refer to Section 6.7 below for full details.</p>

SPPR No.	Requirement	Response/ Compliance
	<i>This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.</i>	
4	<p>Cycle Parking and Storage</p> <p><i>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.</i></p> <p><i>The following requirements for cycle parking and storage are recommended:</i></p> <ul style="list-style-type: none"> (i) <i>Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.</i> (ii) <i>Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.</i> 	<p>A total of 741 No. cycle parking spaces are proposed for the residential units. Of these, 555 No. are for residents (1 No. per bedroom) in enclosed cycle storage, whilst a further 178 No. are for visitors (0.5 No. per dwelling).</p> <p>Refer to Section 6.7.2 below for full details.</p>

Table 5.3: SPPRs and compliance with same

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024) and Thornton O'Connor Town Plannign (2025)*

Policies and Objectives

P&O No.	Requirement	Response/ Compliance
3.1	<p>Densities</p> <p><i>It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the</i></p>	<p>Based on the guidance and methodology contained in the Guidelines, a</p>

P&O No.	Requirement	Response/ Compliance
	<p><i>consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."</i></p> <p>We contend that the site falls within the category of 'City Centre, per the definition in its Table 3.2:</p> <p><i>"The city centres of Limerick, Galway and Waterford, comprising the city centre and immediately surrounding neighbourhoods, are the most central and accessible urban locations in their regions with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 250 dph (net) shall generally be applied in the centres of Limerick, Galway and Waterford."</i></p>	<p>density of 248.9 dph is proposed. This falls within the range for this location.</p> <p>Refer to Section 6.3.2 below for full details.</p>
4.1	<p>DMURS</p> <p><i>It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.</i></p>	<p>Please refer to the <i>DMURS Statement of Compliance</i> prepared by TOBIN in respect of this Policy and Objective.</p>
4.2	<p>Quality Urban Design and Placemaking</p> <p><i>"It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications."</i></p> <p>The "key indicators of quality urban design and placemaking" set out in Section 4.4 of the Guidelines fall under the headings of:</p> <p>"Sustainable and Efficient Movement"</p> <p><i>"Ensuring places are well connected and accessible by sustainable modes. Also acknowledging that quality of journey is equally important and that places are perceived as safe and are not dominated cars."</i></p> <p>"Mix and Distribution of Uses"</p> <p><i>"Promoting the integration of land uses and transportation and a diverse and innovative mix of housing that can facilitate compact housing and provide greater housing choice."</i></p> <p>"Green and Blue Infrastructure"</p>	<p>Please refer to the <i>Architectural Design Statement</i> prepared by ALTU in respect of this Policy and Objective.</p>

P&O No.	Requirement	Response/ Compliance
	<p><i>"Placing and [sic] emphasis on the protection of natural assets and biodiversity, whilst also taking a more strategic view as to how open space networks are formed to balance the needs of communities."</i></p> <p>"Responsive Built Form"</p> <p><i>"Placing an emphasis on the creation of a coherent urban structure and design approach that responds to local character and is attractive."</i></p>	
5.1	<p>Public Open Space</p> <p><i>It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.</i></p> <p><i>In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.</i></p> <p><i>In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.</i></p> <p><i>In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the</i></p>	<p>Public open space of 3,802 sq m, equivalent to 25.9% of the net site area (1.469 Ha) and 23.5% of the gross site area (1.621 Ha), is proposed. This is in accordance with the Development Plan and this SPPR.</p> <p>Refer to Section 6.8.1 below for full details.</p>

P&O No.	Requirement	Response/ Compliance
	<i>Planning and Development Act 2000 (as amended) in lieu of provision within an application site.</i>	

Table 5.4: Policies and objectives and compliance with same

Source: *Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024)* and Thornton O'Connor Town Planning (2025)

5.5 *The Planning System and Flood Risk Management: Guidelines for Planning Authorities*

The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009) provide detailed guidance for Planning Authorities when preparing their statutory plans and competent authorities when assessing Planning Applications. Their objectives are stated as being to:

- "Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management."

The *Flood Risk Assessment* prepared by TOBIN is included in this Planning Application pack. Whilst it is available for review under separate cover, we provide its key conclusion in the assessment of flood risk in Section 6.10 below.

5.6 *Design Manual for Urban Roads and Streets*

The proposed development has been designed in accordance with the principles of the *Design Manual for Urban Roads and Streets* (2019) (DMURS), which prioritises active and public modes of transport over the use of the private car, seeks to create safer and more accessible environments, and supports the integration of transport infrastructure and land-uses.

For details of the proposed development's compliance with DMURS, please refer to the enclosed drawings and reports prepared by TOBIN, in particular the content of the submitted *DMURS Statement of Compliance*.

5.7 *Childcare Facilities: Guidelines for Planning Authorities*

National guidance with respect to Childcare Facilities is principally contained in the *Childcare Facilities: Guidelines for Planning Authorities* (2001) (Childcare Facilities Guidelines). They were drafted to provide Planning Authorities and Developers with guidance in relation to the provision of Childcare Facilities, in terms of their location, scale and design.

We note that these Guidelines are now dated, and have been supplemented by guidance contained in the Apartment Design Guidelines and the *Child Care Act 1991 (Early Years Services) Regulations 2016*.

In relation to the extent of provision, the Childcare Facilities Guidelines state that 1 No. Childcare Facility should be provided for larger residential developments unless there are genuine reasons to the contrary:

*"Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments. For new housing areas, an average of one childcare facility for each 75 dwellings would be appropriate. **The threshold for provision should be established having regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas.** Authorities could consider requiring the provision of larger units catering for up to 30/40 children in areas of major residential development on the basis that such a large facility might be able to offer a variety of services – sessional/drop in/after-school, etc."*

The provision of childcare facilities is further elaborated in Section 3.3.1 of the Guidelines, which states that "a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate" for residential developments. The Guidelines additionally provide information on, *inter alia*: (i) minimum clear floor area and (ii) operational / management requirements.

Based on the guidance above and that provided in the more contemporary Apartment Design Guidelines, it is necessary to determine if, and to what extent, childcare requirements exist on a case-by-case, project-by-project basis. For this project, the childcare requirement of 49 No. places was calculated using the 20:75 rate of provision and based on 184 No. units²⁶.

However, in the analysis undertaken in the *Culture and Social Infrastructure Audit* prepared by Thornton O'Connor Town Planning (enclosed under separate cover), it was determined that estimated demand for childcare places would be limited to approximately 9 No. We note that the proposed crèche, based on its floor area of 255.1 sq m will have capacity for approximately 51 No. children.

For further insights, please refer to the *Culture and Social Infrastructure Audit*.

5.8 ***Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities***

The undertaking of Appropriate Assessment is to ensure the protection and integrity of statutorily protected environments/sites. These sites are protected by the Birds Directive (2009/147/EC (as amended)) and the Habitats Directive (1992/43/EEC (as amended)), and by Natura 2000. In Ireland, such areas are identified the Natura 2000 network. Appropriate Assessment, as set out in the *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009), is "an impact assessment process that fits within the decision-making framework", albeit "the requirement [to undertake Appropriate Assessment] is not to prove

²⁶ This excludes/omits all 1-bed units as allowed for by the Apartment Design Guidelines. These are considered to be units that will not or are unlikely to generate a childcare requirement on the basis that they are not likely to be occupied by young children due to their size.

what the impacts and effects will be[if any], but rather to establish beyond reasonable scientific doubt that adverse effects on site integrity will not result”.

As shown in Figure 5.2, there are 4 No. principal stages to Appropriate Assessment. For the development proposed on the subject site, DNV’s enclosed *Appropriate Assessment Screening Report* concluded “...that the possibility of significant effects on... European sites cannot be excluded...” Thus, a *Natura Impact Statement* was prepared by DNV to identify the possible significant and to prescribe necessary mitigation measures to avoid them. Please refer to these separate report for further details or the key conclusion in Section 6.14.1 below.

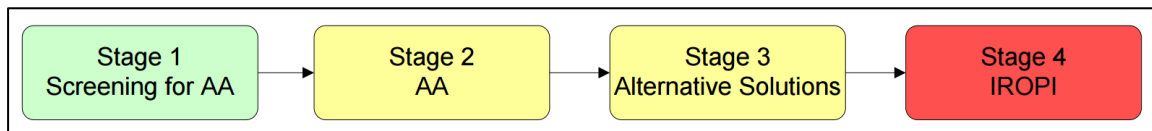


Figure 5.2: The 4 No. Stages of the Appropriate Assessment Process

(Source: *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009))

5.9 Regional Spatial and Economic Strategy for the Northern & Western Region

The *Regional Spatial and Economic Strategy for the Northern & Western Region 2020–2032* (RSES) is the key regional planning document that applies to the subject site and development. Although the intention in legislation is for this and the other 2 No. regions’ RSESs to guide County and City Councils in the preparation of their Development Plans, we identify a series of Regional Policy Objectives (RPOs) within the RSES that the proposed development aligns with and will support.

These are as follows:

RPO 3.1 – “Develop urban places of regional-scale through:

- Delivering on the population targets for the Metropolitan and Regional Growth Centres through compact growth:
- Delivering significant compact growth in Key Towns; and
- Developing derelict and underutilised sites, with an initial focus within town cores.”

RPO 3.2 – “(a) Deliver at least 50% of all new city homes targeted in the Galway MASP, within the existing built-up footprint of Galway City and suburbs.

(b) Deliver at least 40% of all new housing targeted in the Regional Growth Centres, within the existing built-up footprint.

(c) Deliver at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 (other than the Galway MASP and the Regional Growth Centres), within the existing built-up footprints³.”

RPO 3.5 – “Identify and develop quality green infrastructure, within and adjacent to City, Regional Growth Centres and Key Towns.”

RPO 3.8 – “Support the design of new/replacement/ refurbished dwellings to high energy efficiency standards that fully avail of renewable technologies, maximise solar gain, utilising modern materials and design practices.”

RPO 3.9 – *"Identify suitable development opportunities for regeneration and development that are supported by a quality site selection process that also addresses environmental constraints and opportunities."*

RPO 3.10 – *"Ensure flood risk management informs development by avoiding inappropriate development in areas at risk of flooding and integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places. Development plans should assess flood risk by implementing the recommendations of the Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PLo2/2014 (August 2014)."*

RPO 3.6.2 – *"The Assembly supports the proposition that 50% of new homes for the population targets will be constructed within the existing city development envelope, 40% of these shall be located on infill and/or brownfield sites."*

RPO 3.6.4 – *"The Assembly support the regeneration and development of city centre sites at Galway Harbour, Ceannt Station and Headford Road (S/M)."*

RPO 7.18 – *"Support the development of housing to meet the population targets in this strategy using as wide a variety of funding mechanisms as possible including regeneration funds, Part V, direct public funding and Public/Private Partnerships."*

RPO 7.19 – *"Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time."*

RPO 7.20 – *"Increase population living within settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, in-fill development schemes, area or site-based regeneration, service site provision and increased building heights appropriate to the settlement, together with infrastructure provision."*

The development of the subject underutilised site will ensure that an appropriately dense and designed development is delivered in close proximity to high-quality public transport. The provision of a range of housing tenures and sizes, which include a mix of 1-, 2- and 3-bed apartments, will provide a choice of housing options and cater for the needs of a variety of different individuals and households. These will be complemented by the ground floor level crèche, retail unit and 2 No. café/restaurant units, aligning with the principles of the '15-minute city' concept.

6.0 LOCAL PLANNING POLICY AND PLANNING ASSESSMENT

The purpose of Section 6.0 is to provide an assessment of key aspects of the proposed development in the context of the *Galway City Development Plan 2023–2029* (Development Plan) and relevant Section 28 Ministerial Guidelines.

6.1 Land-Use Zoning

The subject site is principally zoned by the Development Plan as ‘CC – City Centre’ (see extract from *City Centre Map* zoning map in Figure 6.1), with the following objective assigned:

“To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city.”

A small area of the site at Lough Atalia Road is technically unzoned due to its road/transportation ‘use’. Development proposed thereat is limited to roads and water infrastructure works.

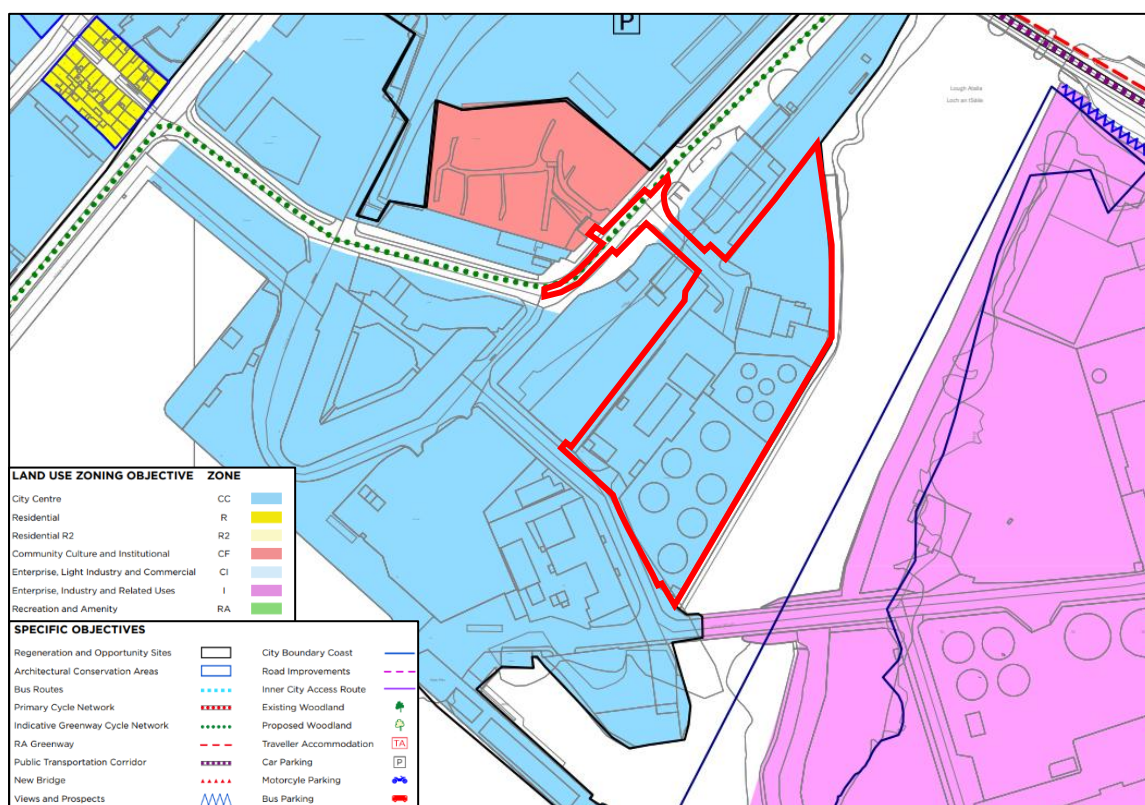


Figure 5.1: Land-use zoning of the subject site (indicatively outlined in red)

Source: *Galway City Development Plan 2023–2029* (2023), annotated by Thornton O'Connor Town Planning (2025)

The CC zoning facilitates the land-uses identified in Table 6.1 below. However, we note that the Development Plan provides flexibility in relation to permissible/acceptable uses, emphasising that its priority is the attainment of the zoning’s objective. The Plan states:

“The land use zoning objectives in the chapters of the Development Plan give an indication of the acceptability of new uses in each zone. They are intended as a guideline and are not exhaustive. Under each land use zoning, examples of uses which are compatible with

and contribute to the zoning objective are specified. Examples of uses shown as "Uses which may contribute to the zoning objectives, dependent on the location and scale and the proposed development", are uses which may not be considered acceptable in principle in all parts of the relevant land use zoning objective and will only be accepted where the Council is satisfied that the use would not have an undesirable consequence for prevailing use or amenity. **A use that is not compatible or does not contribute to the specific land use zoning objective will not be permitted in that land use zone. Uses not cited as examples of uses but which fulfil the land use objective shall be considered in relation to general policy and to the zoning objectives for the area in question.** Uses, which are temporary in nature, may be considered by the Council as uses that are compatible and contribute to the zoning objective." **[emphasis added]**

Consequently, whilst the uses in Table 6.1 below are a useful guide, they are not definitive. Uses beyond these may be accommodated by the Council where it can be demonstrated that they, amongst other things, "fulfil the land use objective" of the site.

Uses which are compatible with and contribute to the zoning objective, for example:	<ul style="list-style-type: none"> • Retail • Residential • Offices, banks and professional services • Tourist related uses • Cultural and community uses • Buildings for education • Recreation • Childcare facilities • Places of worship
Uses which may contribute to the zoning objectives, dependent on the CC location and scale of development, for example:	<ul style="list-style-type: none"> • Light industry • Public utilities

Table 6.1: Uses listed as being (1) compatible with and (2) which may contribute to the city centre zoning

Source: **Galway City Development Plan 2023–2029 (2023)**

The proposed uses are detailed in Table 6.2 below alongside a brief justification for their appropriateness at the CC-zoned subject site. **Evidently, we contend that the proposed use-mix is wholly appropriate at the subject site and will support the achievement of the zoning designation's overarching objective.** It also aligns with Policy 10.1 (City Centre) Point 4, which seeks some form of mixed-use development:

"Encourage a living city centre by requiring a residential content in new developments and promoting a high quality urban environment in the design and layout of new schemes."

The crèche use is notable in the context of Development Plan Policy 7.1's following points:

"1. Support and facilitate the sustainable development of community, social and cultural infrastructure in collaboration with all stakeholders that affords inclusive opportunities for everyone to shape their own lives, enables communities to realise their full potential and that contributes to a high quality of life and wellbeing for all who live work and visit the city."

2. *Support and facilitate key infrastructure and actions that encourages expanded development of the city's culture, arts and creative industries and strengthens the linguistic heritage.*
3. *Facilitate a balanced and equitable provision of community social and culture services and facilities in collaboration with key stakeholders in alignment with the core/settlement strategy through policies, zoning objectives and specific designations.*
4. *Work in partnership with the Local Community Development Committee (LCDC) to achieve the aims of Local Economic and Community Plan (LECP) to ensure that Galway City is an equal and inclusive city.*
5. *Promote and facilitate in conjunction with key stakeholders the co-location of community services and infrastructure to allow for shared use for a variety of purposes including health, education, social and local enterprise and community activities.*
6. *Encourage design flexibility in buildings of culture, arts and community use, so that the buildings can be adapted in ways, which allow for a diversity of different uses and include for accessibility for all, including people with disabilities."*

Furthermore, the crèche delivery will align with the following from Policy 7.5 (Community Facilities) of the Development Plan:

- "2. *Support the location and concentration of local community facilities and services in accordance with the aim to build sustainable, compact neighbourhoods in line with the '15-minute city' concept so that these can be easily accessible by walking and cycling. Where larger scaled facilities and services are provided these should be aligned with existing /proposed public transport links...*
4. *Encourage and facilitate the provision of community facilities and local services of a nature and scale appropriate to serve the needs of the local community in tandem with the development of residential areas."*

Policy 7.7's delivery will also be secured with the crèche designed to comply with both points:

- "1. *Facilitate the development of childcare facilities, including afterschool services, at a number of suitable locations, such as, within residential areas, places of employment, city centre, neighbourhood and district centres, schools, in the vicinity of educational and community establishments and adjacent to public transport nodes in consultation with the Galway Childcare Committee.*
2. *Contribute to the provision of childcare facilities by requiring that such facilities be provided in conjunction with residential developments over 75 dwelling units. An exception can only be considered where it can be clearly established and professionally supported that adequate childcare facilities already exist to service the area and where acceptable alternative arrangements to support childcare, play and or other child specific facilities are deemed acceptable."*

Proposed Use	Alignment with the Uses and Objective
Residential	<p><u>Stated as being a use that is compatible with the zoning and will contribute to the zoning objective.</u></p> <p>Will deliver much-needed housing at a city centre location, thereby generating critical mass to support and sustain new and existing businesses and services. This accords with the principles of the '15-minute' city²⁷, where residential and non-residential are proximate to each other.</p>
Crèche	<p><u>Falls under 'childcare facilities', which is stated as being a use that is compatible with the zoning and will contribute to the zoning objective.</u></p> <p>Will support community development and will vitally meet the needs of existing and future residents of the area, as well as persons working locally. A key requirement of making city centres attractive places in which to live for families.</p>
Café	<p><u>Not explicitly stated amongst the uses listed above. However, could be considered as falling into the general categories of 'tourist related uses' and 'recreation'.</u></p> <p>Notwithstanding this, the use is compatible with zoning and makes a contribution to its attainment. It will activate and enliven the proposed development, whilst creating economic and employment opportunities and meeting the dining and socialising needs of new and existing residents.</p>
Retail	<p><u>Stated as being a use that is compatible with the zoning and will contribute to the zoning objective.</u></p> <p>Will actively contribute to the commercial role of the City Centre and meet the basic needs of residents, visitors and workers on-site and in the local area.</p>

Table 6.2: Proposed uses and compliance with the subject site's CC-zoning designation

Source: Prepared by Thornton O'Connor Town Planning (2025)

6.1.1 Inner Harbour Regeneration Site and Masterplan Requirement

The Development Plan includes the site within the defined 'Inner Harbour Regeneration Site'. This is one of a series of 'regeneration and opportunity sites' in the Council area. The Plan says:

*"It has **potential for significant redevelopment** providing an opportunity to **re-establish links between the city centre and the sea**, to create a **high quality waterfront setting**, a new city centre **mixed use neighbourhood** and include for **water-related leisure uses**. This area is already **under transition** with the current development of Bonham Quay contributing to the transformation of this part of the city centre and **indicating a scale and density that could be achieved in the wider Inner Harbour.**" [emphasis added]*

²⁷ ²⁷ Policy 4.2 (Land Use and Transportation) point 6: "Aim to achieve the concept of a '15 minute city' where land use policies facilitate residents to access their daily needs within a 15 minute walk or bike ride and thereby reduce the dependence on car transport." Policy 3.3 (Sustainable Neighbourhood Concept) point 8: "Support through policy and design standards the concept of a '15 minute city' where the daily needs of communities can be accessed within a 15 minute walk, cycle or by public transport."

We note that the Council recognises the capacity of these lands to deliver significant, much-needed housing, although balancing this against the need to maintain port-related activity and to deliver a range of non-residential uses.

Ultimately, the Development Plan requires the preparation of a Masterplan for the 'Inner Harbour Regeneration Site' – i.e. including the subject site²⁸. The guidance in relation to the content of the Masterplan is prescriptive; it covers a range of matters including overall vision, use-mix, plot ratio, sustainability, permeability, height and its distribution, etc.

The guidance in the Development Plan adds to the above:

***"The preparation of this Plan shall be the responsibility of the Galway Harbour Company in consultation with the local authority, adjoining landowners and stakeholders. This will build on the acknowledged co-operation existing between the Port of Galway landowners and Ceannt Station landowners, which includes for a common objective to have a co-ordinated and integrated approach embedded into future proposals."* [emphasis added]**

The Masterplan has been commissioned by Galway Harbour Company (GHC) and prepared by Scott Tallon Walker Architects, with appendices prepared by TOBIN and MKO.

The Planning Authority is directed to the Masterplan for consideration. However, we make the following key observations in relation to the proposed development's integration with it:

- The Masterplan is a highly permeable proposition that integrates the Regeneration Site with the subject development's site, the waterfront and the city centre's core. Enhanced connectivity and the disaggregation of site areas makes movement through the spaces easier and less onerous.
- Height is proposed in a responsive and considered manner, with taller structures supporting wayfinding and relating to each other, both within the Masterplan area and on neighbouring sites (e.g. Augustine Hill / Ceannt Station proposal). This varies the built-form and generates interest on the skyline.
- Built-form is varied and modulated (albeit pragmatically) to avoid excessively repetitive massing and to deliver architectural interest. However, future developments within the Masterplan area will need to undergo detailed design and will require Planning Permission.
- Density, measured as both plot ratio / floor area ratio and dwellings per hectare, are progressive and justified in the context of the parameters established by the Development Plan and the Compact Settlements Guidelines.
- The mix of uses at the subject development's site and across the proposed Masterplan area will complement each other. They will bring variety, vibrancy and activation to the area that is currently lacking. They will combine to create an attractive and desirable mixed-use node, proximate to the core of the city centre.
- Ecology and flood risk, as key environmental considerations, feature heavily in the Masterplan. Cognisance has been given to efforts to increase green infrastructure and connectivity, including shifting the current context from 'grey space' to 'green space'.

The development of the site in accordance with the Masterplan aligns with Policy 10.1 (City Centre) Point 14, which seeks a coherent form of development:

²⁸ As affirmed by '10.26 Specific Objectives – City Centre Area' ("2. Require the preparation of a masterplan for the Inner Harbour.") and by 10.26 Specific Objectives – Regeneration and Opportunity Areas ("5. Require the preparation of masterplans and spatial frameworks to inform development proposals.")

"Ensure the development of significant city centre sites is carried out to high standards and in the context of an overall masterplan."

6.2 Core Strategy

The Core Strategy for Galway City is set out in Chapter 1: 'Introduction, Strategic Context & Core Strategy' of the Development Plan. This chapter details the proposed total "unit yield" or "housing target" and estimated population capacity for the city as a whole, as well as its sub-city areas. We have outlined these in Figure 6.2 below, which is an extract of the Plan's Table 1.9.

Location	Proposed Total Residential Unit Yield Y Est. pop capacity* P	Proportion of total residential unit yield attributed to Regeneration/ Opportunity Sites	Area (Ha) of which is specifically Zoned R residential
Outer Suburbs (West)	2322 (Y) 5573 (P)	150 (Y) infill	54
Outer Suburbs (East)	2100 (Y) 5250 (P)	100 (Y) Opportunity /Infill	50
Established Suburbs (West)	120 (Y) 300(P)	0	3
Established Suburbs (East)	1,355 (Y) 3,387(P)	795 (Regeneration)	14
Inner Residential Area	250(Y) 625(P)	250 (Regeneration)	0
City Centre	295(Y) 737 (P)	295 (Regeneration)	0
Ardaun	500(Y) 1,250 (P)	N/A	Portion of R zoned lands in LAP
Galway City Total Housing Capacity Yield			6942
		Less estimated completions from Q.3 2021 – Q.4 2022**	300
		GCC Housing Targets Q.1 2023 to Q4 2028	6642

* Using an estimate of 2.5 per households noting that this not equivalent to population increase solely but also new household formations

** Estimated

Figure 6.2: Extract of Table 1.9 from the *Galway City Development Plan 2023–2029* setting out the proposed residential unit yield and estimated population capacity

Source: *Galway City Development Plan 2023–2029*

Evidently, the Core Strategy sets a total "unit yield" or "housing target" for Galway City of 6,642 No. units for the approximate life of the Development Plan. For development within the 'City Centre' area – within which the subject site is located – just 295 No. units are assigned. All of these units are deemed to be in regeneration/opportunity areas, such as the 'Inner Harbour Regeneration Site' (within which the subject site is located). None are assigned, for example, to locations outside regeneration/opportunity areas.

Before proceeding further, we consider it prudent to indicate that we have reviewed the content, and specifically the policies and objectives, of the Development Plan and cannot find reference to the Core Strategy figures being considered as 'caps' or 'limits'. In fact, we note that following a decision by Wicklow County Council to Refuse Planning Permission for a 98-unit development in Greystones, Co. Wicklow²⁹, The Irish Times published an article in which they contacted the Office of the Planning Regulator (OPR) for a response. Whilst the OPR spokesperson stated that they could not comment on the Local Authority's decision, they remarked that:

*"...taking into account relevant national planning guidance, in a practical sense, **figures [contained in development plans] are generally regarded as broad targets rather than fixed ceilings** taking into account the extent of other uncommenced planning permissions and the likely rate of build out". [emphasis added]*

Additionally, on 17th September 2024, (then) Tánaiste Micheál Martin remarked on RTÉ's 'Morning Ireland' radio show that housing *"targets are not a ceiling."*

We have also delved into the content of the *National Planning Framework* (2017 and 2025), the *Development Plans – Guidelines for Planning Authorities* (2022)³⁰ and the *Housing Supply Target Methodology for Development Planning – Guidelines for Planning Authorities* (2020)³¹. We cannot identify a reference in any of these documents to "housing targets" being caps or limits, or that exceeding or surpassing them should not be accommodated by a Planning Authority or An Coimisiún Pleanála. In fact, we assert that at a time of long-known shortages of housing and substantial pent-up housing demand, establishing something as a "target"³² does not explicitly or implicitly define it as a limit or threshold. Doing so, when infrastructure exists to facilitate the target being surpassed, actually runs contrary to sustainable planning and development (not to mention the benefits to society and the economy) as it restricts the overall delivery of housing when requirements in the near and medium terms are acutely known.

Further to the above, we contend that there are strong policy bases within the Development Plan that support the development and densification of brownfield, vacant and infill sites within the existing 'built-up' envelope of the city. For example, we note the Council's commitment to sustainable, compact growth in accordance with regional and national policy in its 'Core Strategy Statement' (Section 1.5.3 of the Development Plan):

"To deliver on the compact growth approach, the strategy seeks to concentrate a significant amount of development that is, more than half of all new homes within the built footprint of the city and thereby accord with sustainable principles and the NPF/RSES objectives. This will allow for efficient use of existing services, public transport and facilities and in some areas can lead to transformational change bringing additional footfall, new life and facilitate shorter, more sustainable journeys to employment, and recreation opportunities..."

*The Core Strategy also recognises, in line with the NPF and RSES/MASP direction, the significant potential for a number of brownfield sites in the city to contribute to the delivery of housing. **Major potential exists in particular on the priority regeneration sites at Ceannt Quarter, the Inner Harbour, Headford Road, Sandy Road and Crown Quarter. The***

²⁹ WCC Reg. Ref. 23342 / ABP Ref. 317445.

³⁰ The Section 28 Ministerial Guidelines that provide guidance in respect of the preparation of City and County Development Plans (as well as Local Area Plans to an extent).

³¹ The Section 28 Ministerial Guidelines used to ensure "...consistent and coherent approach to be taken by planning authorities in incorporating national and regional population and housing projections into their statutory functions."

³² Defined by the Cambridge Dictionary as "a level or situation that you intend to achieve". See: <https://dictionary.cambridge.org/dictionary/english/target>

development of housing at these locations in conjunction with other mix of uses can improve the general environment and revitalise and transform these to vibrant, living locations.”
[emphasis added]

Of course, core strategy “*housing targets*” must be considered in the context of ‘soft’ and ‘hard’ infrastructure’s capacity to accommodate the additional dwellings. In relation to ‘soft’ infrastructure, the proposed non-residential uses will play an important role in economic, social and community development. However, as presented in the *Culture and Social Infrastructure Audit*, the subject site and proposed development will benefit from ample pre-existing cultural, social and community infrastructure.

In relation to ‘hard’ infrastructure and to further advance the insights presented above, we note the Development Plan’s own ‘Settlement Capacity Audit’, which seeks to determine the capacity of the Plan’s zoned land to deliver housing. Table 1.8 of the Plan (see Figure 6.3 below) notes that they can deliver 1,590 No. units on “*Regeneration/ Opportunity/Infill*” sites, which aligns with the total for regeneration/opportunity/infill sites throughout the City, as shown in the Table 1.9 above (i.e. this Report’s Figure 6.2). The above-mentioned 295 No. units for the City Centre regeneration sites are included in these 1,590 No. units.

Zoning	Potential Development Yield Cumulative	Tier 1 / Yield	Tier 2 / Yield	Strategic Reserve
R – Residential Zoned lands	5381	4421	440	520
Regeneration /Opportunity/infill	1590	1390	200	1,820
Ardaun Phase 1	500		500	1480
Ardaun Phase 2	2660			2660
R2 – Residential 2 zoned lands low density	60	60		

Figure 6.3: Extract of Table 1.8 from the *Galway City Development Plan 2023–2029* setting out the residential capacity of land within Galway City

Source: *Galway City Development Plan 2023–2029*

However, the ‘Settlement Capacity Audit’ also includes capacity for a further 1,820 No. units on “*Regeneration/Opportunity/Infill*” sites that are designated as ‘strategic reserve’ (Figure 6.4). The Development Plan describes ‘strategic reserve’ as “...lands that have potential to be developed over a timescale greater than the single six year cycle of the plan”, adding in Appendix 4 that:

*“These lands are **not scheduled to be fully supported by infrastructure before 2029**, but it is important that there is some context given to the lands to provide for a strategic settlement portion of NPF/RSES/MASP 2040 population delivery and to coordinate with a longer term infrastructure investment guide.”* **[emphasis added]**

The Development Plan does not appear to explain where the 1,820 No. units in ‘strategic reserve’ would or could be delivered (i.e. on which Regeneration/Opportunity sites), and infers that these sites are all unserved by not defining them as Tier 1 (or even Tier 2). However, we contend that this cannot strictly be the case. For example, the 295 No. units assigned to the City Centre regeneration sites could easily be delivered entirely on just 1 No. of the larger of these sites (e.g. Inner Harbour), yet the 5 No. remaining regeneration/opportunity sites would remain serviced (given their centrality within the city) and capable of delivering housing (Figure 5.4). Therefore, we contend that there is ample scope to support residential-led development at the subject site within the Inner Harbour Regeneration Site (as well as at the other regeneration/opportunity sites within Galway City Centre).

6.3 Height and Density of Development

Development management standards relating to plot ratio and building height work in conjunction with each other to define the bulk and scale of a development. This is then articulated and defined to distribute the massing as an appropriate and attractive built-form.

Generally, when particular site coverage and plot ratio standards are set, they inform the height of a development. By consequence, height (in conjunction with the mix of uses and dwelling mix) defines density.

Guidance in relation to height and density as they pertain to the subject site is detailed in the Development Plan, the Council's *Urban Density and Building Heights Study* (2021) and the Compact Settlements Guidelines.

6.3.1 Plot Ratio

Plot ratio (or floor area ratio (FAR)) is effectively a ratio of proposed floor area relative to site area. It is used as a measure of the overall physical scale of a development, or the density/intensity of development on a site.

The Development Plan generally defers to the *Urban Density and Building Heights Study* in relation to height and density. However, the Development Plan's Section 11.4.2, relating to plot ratio in the city centre area, states:

- *"The plot ratio density standard is designed so as to help prevent the adverse effects of over-development on the amenities of the area."*
- *In general for new development, the maximum plot ratio permitted will be 2:1.*
- *In the CC zone on larger Regeneration Sites consideration will be given to development proposals in excess of the normally permissible plot ratio where such proposals would contribute to sustainability, architectural quality, urban design, public realm, delivery of housing and make a significant contribution to urban character. This excess will be interpreted as a proportional increase only and will be assessed on performance based outcomes and general standards."*

Evidently, the above states a "general" maximum plot ratio of 2:1 but that dispensations are available for development on CC-zoned lands in regeneration sites subject to meeting a series of criteria. The subject site is zoned CC and is located within the Inner Harbour Regeneration Area, thereby allowing for the consideration of a higher plot ratio. In relation to the criteria mentioned above, we provide the following responses:

- **Sustainability** – The proposed development will bring an underutilised city centre site into a more sustainable and efficient use, with a density of 248.9 dph. Delivering housing and a range of complementary non-residential uses (including childcare) is vital to sustaining the city and enhancing its attractiveness as a place in which to live and work.
- **Architectural quality, urban design and public realm** – The proposed design of the development is carefully considered, delivering appropriately massed and modulated built-form that respects and responds to its immediate context. In doing so, it delivers 4 No. blocks that respond to each other, the internal street network and Lough Atalia. This creates cityscape and seascape 'openings'. Importantly, the development includes a new public walk along the site's eastern edge, creating a high-quality public recreational amenity.

- **Delivery of housing** – The development will provide 356 No. much-needed dwellings in the centre of Galway City, where large-scale housing delivery has been limited in recent years. It will play a notable role in addressing the ongoing demand for, and shortfalls of, housing in the city.
- **Contribution to urban character** – The project will markedly improve the urban character of the subject site and its immediate environs. The site's current configuration will transform from an underutilised port-related / industrial character to a new urban environment, presented as an attractive series of buildings with dwellings and a range of ground floor uses to activate existing and new streetscapes.

Therefore, there is a robust and legitimate case to warrant an exceedance of the 2:1 plot ratio referenced in the Development Plan. This is further bolstered by insights in the *Urban Density and Building Heights Study*, which states the following in relation to densities:

Prevailing densities – *"This is a mixed use area and FAR is a more appropriate measure of urban density. FAR is typically around 3.0 revealing tight streets, solid building lines and small plots with little amenity space."*

Densities open to consideration – *"Already high density, the Long Walk area would be sensitive to dramatic increases in density. The harbour area is less sensitive, characterised by large buildings and surface car parks. It would be appropriate for densities here to be higher than those of the historic core if townscape impacts of new development are careful considered."*

Therefore, the Study indicates a prevailing plot ratio of 3:1, which is greater than the Development Plan's 2:1. We contend that having to adhere to the lower plot ratio of 2:1 would be regressive in terms of achieving sustainable and efficient use of the city centre sites, including the subject site; especially as the Study explicitly refers to the harbour area as being "less sensitive". It would also be inappropriate given the site's size, its capacity to define an appropriate scale and density of development, and its place in a wider regeneration area within the centre of the city.

Further to the above, we are aware of the successful delivery and precedent for permitting developments with higher plot ratios on CC-zoned lands in regeneration areas, as presented in Section 3.0. Both Bonham Quay (Reg. Ref. 17/83) with its plot ratio of 3.75:1 and Augustine Hill (Reg. Ref. 20/47) with its 3.4:1 plot ratio are well in excess of the Development Plan's 2:1 ratio and the *Urban Density and Building Heights Study's* 3:1 ratio.

Informed by the above, the proposed development's plot ratio is presented as 2.2:1 (based on a net site area of 1.469 Ha (14,690 sq m) and a gross floor area of 32,096 sq m) and is considered to be wholly appropriate at the subject site. With respect to how this is successfully delivered in terms of height and massing, we direct the Council the following sections and the enclosed *Architectural Design Statement* prepared by ALTU.

6.3.2 Building Height and Residential Density

For the following Sub-Section, the assessment of building height and residential density are combined due to their intrinsic relationship and the content of the *Urban Density and Building Heights Study*.

6.3.2.1 Height and Density Policy Context

Local Policy Context (Height and Density)

We note that the Development Plan contains no prescriptive or definitive permissible building heights or densities (as dwelling/units per hectare) for development at the subject site. In fact, in relation to 'urban development and building height', it states in Section 11.10 that:

"...developments shall specifically have regard to the Galway Urban Density and Building Height Study (2021) which sets out the framework for density and building height in the city. Part D Spatial Strategy outlines the potential for appropriate building densities and heights for new development in each geographic zone and sub zone of the city."

Section 8.8 add weights to the Study being the primary guidance document and means of assessing height within the City, remarking:

"In general, the capacity for height will be assessed in conjunction with the development guidance set out in the Galway Urban Density and Building Height Study (2021) Section D Spatial strategy."

Within Part D of the *Urban Density and Building Heights Study*, the "development guidance" in relation to density and heights in the Inner Harbour is per the following:

Prevailing densities – *"This is a mixed use area and FAR [floor area ratio] is a more appropriate measure of urban density. FAR is typically around 3.0 revealing tight streets, solid building lines and small plots with little amenity space."*

Densities open to consideration – *"Already high density, the Long Walk area would be sensitive to dramatic increases in density. The harbour area is less sensitive, characterised by large buildings and surface car parks. It would be appropriate for densities here to be higher than those of the historic core if townscape impacts of new development are careful [sic] considered."*

Prevailing heights – *"Typically building heights are between 3 and 5 storeys, with the modern larger developments tending to be the taller."*

Heights open to consideration – *"Heights should respect prevailing heights in the historic core. Within Ceannt Station and the Inner Harbour regeneration areas where large sites are capable of generating their own character, there is scope for greater height if designed carefully as demonstrated in emerging developments."*

In respect of density in the Inner Harbour, the Study uses plot ratio / FAR as the "appropriate measure", rather than units/dwellings per hectare (which is used by the Study as a measure of density elsewhere in the City).

The Study acknowledges that densities are already high, and that the harbour area is ultimately "less sensitive", thereby making it "...appropriate for densities here to be higher than those of the historic core if townscape impacts of new development are careful [sic] considered."

In relation to heights, the Study highlights the prevailing range of 3–5 No. storeys. However, we note that this context is changing, with Bonham Quay up to 8 No. storeys, Ceannt Station up to 21 No. storeys and Coal Yard (hotel development) up to 15 No. storeys (if Granted).

In relation to heights that are open to consideration, the Study is not prescriptive. Whilst they "should respect prevailing heights in the historic core", the Study remarks that the Inner Harbour

regeneration area is capable of generating its own character and that there is scope for "...greater height if designed carefully as demonstrated in emerging developments."

Informed by the above, it is our opinion and understanding that no prescriptive quantitative caps are placed on density or height set by the Development Plan. Evidently, appropriate heights and densities will be defined by the overall design of a proposal, the potential impacts on the historic core, townscape impacts, etc. However, we also contend that residential density, which is simply a reflection of a site's overall housing yield, is dependent on the capacity and quality of 'hard' and 'soft' infrastructure to accommodate the development. The enclosed documentation demonstrate that the existing infrastructure is adequate to facilitate the proposed development (see documents prepared by TOBIN, NRB and the *Culture and Social Infrastructure Audit*).

National Policy Context (Height)

National policy with respect to height is principally defined by the Height Guidelines. As stated above, and repeated here for robustness, under SPPR 1 of the Guidelines, Planning Authorities are required to avoid the application of blanket height restrictions, but through the plan-making process, identify areas where increases in height can be pursued:

"In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."

As stated at the outset of Section 5.3.2.1, the Development Plan and its *Urban Density and Building Heights Study* have identified a series of areas within which additional height would be supported and general guidance is accordingly prescribed. These statutory documents have been prepared in the context of the Height Guidelines. **As we contend herein, the proposed development complies with the Development Plan and the Urban Density and Building Heights Study, thus it complies with national policy.**

National Policy Context (Residential Density)

Specifically in relation to densities as defined by dwellings/units per hectare, we are mindful of the guidance set out in the Compact Settlements Guidelines. Table 3.2 of Section 3.3 in the Guidelines remarks:

*"The city centres of Limerick, Galway and Waterford, comprising the city centre and immediately surrounding neighbourhoods, are the most central and accessible urban locations in their regions with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. **It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 250 dph (net) shall generally be applied in the centres of Limerick, Galway and Waterford.**"* [emphasis added]

On this particular piece of guidance, we note that its basis for application is in 'Policy and Objective' 3.1:

"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."

As a 'Policy and Objective' and not a 'Specific Planning Policy Requirement', the Planning Authority needs only to have regard to the above. Furthermore, it is referenced as being a range that will "generally" be applied. **Consequently, we are of the opinion that the Planning Authority is only obliged to have regard to same and is not compelled to rigidly comply with it**³³.

The Guidelines provide further instruction relating to 'Refining Density' to take account of specific characteristics and constraints of individual sites. This additional requirement is intended to incorporate the nuances of individual sites, pushing their densities up and down within the ranges set by the Guidelines. 'Refining Density' is comprised of 2 No. steps, which principally require consideration of: (1) accessibility; and (2) character, amenity and natural environment.

6.3.2.2 Proposed Height and Density

Proposed Height

The development proposes a series of different heights for its 4 No. mixed-use blocks, ranging from 6 No. to 13 No. storeys (Figure 6.5). The taller elements of 11 No. and 13 No. storeys act as nodes of height within the development, but create respectful relationships with surrounding development. These wayfinding elements cascade downwards to 6 No. storeys at the waterfront. The blocks and their heights are distributed as follows:

- Block A – Ranges from 6 No. to 9 No. storeys,
- Block B – Ranges from 6 No. to 11 No. storeys,
- Block C – 6 No. storeys, and
- Block D – Ranges from 6 No. to 13 No. storeys.

³³ See Sections 28(1) and 28(1C) of the *Planning and Development Act 2000* (as amended).

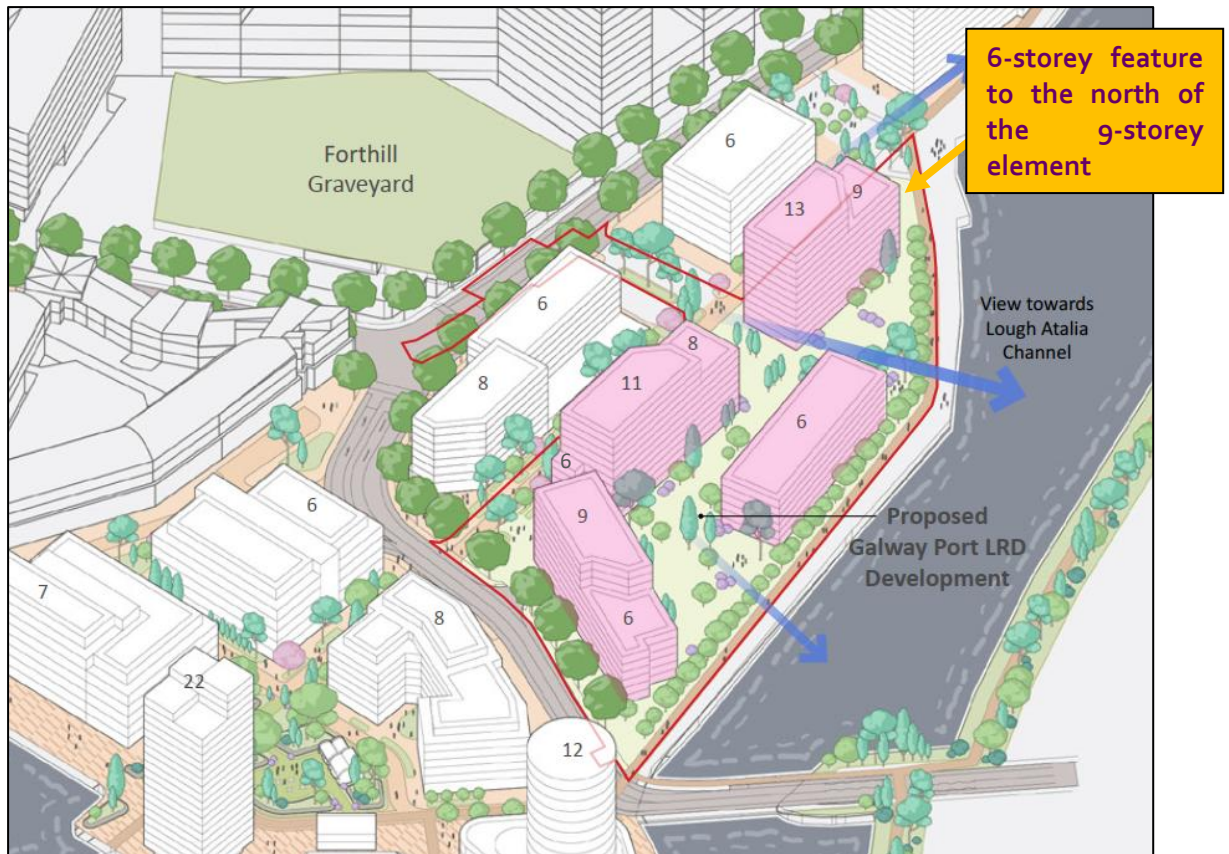


Figure 6.5: Heights of the proposed development, ranging from 6 No. to 13 No. storeys, set within the context of the envisaged development of the Masterplan and permitted developments

Source: ALTU (2025)

The proposed heights and the built-form, massing and modulation are set out in a considered manner to avoid excessive repetition and monotony. This is aided by the angularity of each block, with a more defined and assertive geometry and presence now placed onto the internal street network proposed as part of this Planning Application and envisaged by the Masterplan (and encouraged by the Council's *LRD Opinion*). This is not at the expense of the site's frontage onto the water, with Block C retaining its emphasis there, aided by treatment and activation of the southern and eastern parts of Block A (Figure 6.6).



Figure 6.6: CGIs of the proposed development from its south-east, on the west of the Dock Road bridge

Source: ALTU (2025)

The transitions in height are considered. They are lowest at the waterfront to the east, respecting this natural feature, rising up towards the city centre and other areas of permitted (Ceannt Station / Augustine Hill mixed-use), proposed (Coal Yard hotel) and envisaged (Masterplan mixed-use) development. These gradations in height also mean that the development is not 'competing with itself' in terms of height and presence; as noted above, there are key nodes of greater height (11 No. and 13 No. storeys) that deliver respectfully vertical projections.

The height, massing and modulation have undergone careful reconsideration since the LRD Meeting. This is evident in how the proposed development presents itself. As shown in Figures 6.6 (above) and 6.7–6.9 (below), the overall scheme has been 'broken up' and its 'rigidity' disaggregated. This is evident in the stepped heights and chamfered form of the more publicly visible Blocks A, B and D. This modulates the structures, countering their perception as being overly bulky/blocky and "*jarring*" by creating a perception of depth and individuality. These 'bigger' design moves are complemented by more subtle interventions, such as: (1) the 'box frame' features at the south-eastern elevation of Block A, the south-western elevation of Block B and the north-eastern elevation of Block D (Figures 6.6 and 6.9); and (2) the setback metal 'capping' atop the Blocks (Figures 6.6 and 6.9).

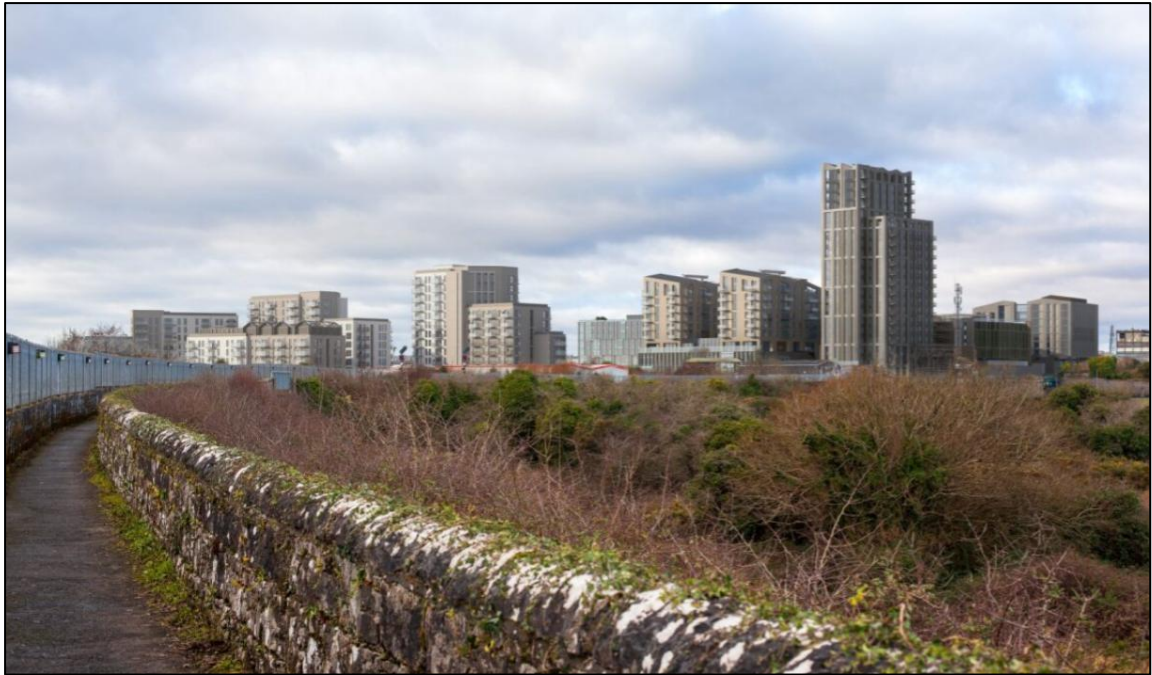


Figure 6.7: Verified View No. 3 (proposed) from across the railway bridge to the site's north-east

Source: Model Works (2025)



Figure 6.8: Verified View No. 4 (proposed) from Lough Atalia Road to the north of the site

Source: Model Works (2025)



Figure 6.9: Verified View No. 5 (proposed) from Lough Atalia Road to the north of the site

Source: Model Works (2025)

Height: Materiality and Finishes

On the point of materiality and finishes, as stated in ALTU's *Architectural Design Statement*, brick is the favoured material due to its robust, hard-wearing qualities and attractive appearance. Dark grey is proposed at ground floor levels, which yields a strong, assertive 'base' or 'plinth' to the development. Atop this, light grey and buff brick options are proposed, which are perceived as softer or lighter. As ALTU state, these have been:

"...carefully selected to evoke the tonality of local limestone, prevalent in Galway's civic and historic architecture..."

A buff-toned brick is introduced to add warmth and depth to the elevations. It enhances verticality, creates subtle variation across the upper levels, and contributes to a more human-scaled and inviting character. The tonal interplay between the light grey and buff bricks has been designed to read as unified from a distance, while revealing finer detailing and richness up close."

The means of delivering the brick has also been carefully considered with subtle details such as horizontal banding in stacked bonds integrated into the design, thereby tying/stitching blocks together where the primary emphasis has otherwise primarily been 'on the vertical' to avoid monolithic, blocky forms. Other strategies to be employed in respect of brick use are protruding it in select locations to add variety and balance across the elevations.

Given the number of Blocks and the variation in forms and treatments, we respectfully direct the Council to ALTU's *Architectural Design Statement* for a full explanation of the proposed materials and their delivery.

Height: Relationship to Forthill and Galway's Skyline

In regard to the proposed heights and built-form, and their relationship with the protected Forthill Cemetery (associated features), we wish to highlight that a notable separation distance of approximately 60 metres (measured using Google Maps) exists between the 2 No. sites.

Additionally, there is an intervening underutilised site between Forthill and the subject site that will act as a buffer or screening when developed, as envisaged by the Masterplan and the Development Plan's own zoning (Figure 6.10). Given this other site neighbours Forthill, the onus will be placed on the quality of the design of the future proposal thereat to provide an attractive and sympathetic backdrop and to avoid negative, impactful overbearance.



Figure 6.10: Verified View No. 6 (cumulative), with indicative block massing demonstrating the built form that may be proposed in the interstice between the Application site and Forthill, thus screening the proposed development

Source: Model Works (2025)

Ultimately, however, we assert that sites such as Forthill should not, in and of themselves, blanketly dictate permissible heights or sterilise skylines in urban contexts. A pragmatic, but respectful approach to planning and development is necessary given policy's drive for compact growth and the sustainability of developing and densifying the country's cities and towns. Therefore, we contend that facilitating taller structures surrounding features such as Forthill frames and defines them, and brings them back into the fold of the city. This places greater emphasis on their intrinsic value; be that heritage, cultural, ecological, visual, recreational, etc.

By restricting heights and development adjacent to historic features such as Forthill, it reduces the opportunity for the public to engage with them; leaving them as underappreciated and undervalued assets in our urban settlements. There are now multiple positive precedents of taller developments being permitted and developed around historic cemeteries and church ruins, giving them greater renewed purpose in their ever evolving contexts without jeopardising their very basis of existence. For example:

- St Michan's Cemetery, Dublin;
- Huguenot Cemetery, Dublin;
- Franciscan Abbey Graveyard, Galway;
- Christchurch, Greyfriars, London;
- St Dunstan's Church, London.

The heights of 6 No. to 13 No. storeys are appropriate, both in terms of the site's character and context and the intent of planning and development policy. In response to development in the Inner Harbour regeneration area being capable of generating its own character, subject to being

"designed carefully as demonstrated in emerging developments", we are of the opinion that this is indeed the case.

Proposed Density (Plot Ratio / Floor Area Ratio)

With respect to the density (which is an extension of the overall built-form) and height of a development, we have previously indicated in Section 5.3.1 that **the Development Plan principally considers/measures this in relation to the overall scale of buildings as plot ratio / floor area ratio.**

As presented above, the proposed development's plot ratio is 2.2:1. This is marginally above the 2.0:1 ratio set by the Development Plan, but less than the indicated prevailing plot ratio of 3.0:1 for the Inner Harbour, as highlighted in the Council's *Urban Density and Building Heights Study*.

A justification has already been articulated above in support of the proposed plot ratio density (Section 6.3.1) and this is further bolstered by the findings of the supplementary analyses and assessments included in this Section (6.3.2).

Proposed Density (Dwellings per Hectare)

In relation to density as measured by dwellings per hectare, we have calculated this using the methodology set out in the Compact Growth Guidelines (Table 6.3) as the scheme is mixed-use in nature. The proposed development achieves a net density of 248.9 dph.

Stage	Metric	Calculation	Total Site
A	Net Site Area		14,690.0
B	Total GFA	C+D	32,096.0
C	Residential GFA		31,256.0
D	Non-Residential GFA		840.0
E	Residential GFA as Proportion of Total GFA	C/B	97.4%
F	Pro Rata Site Area	AxE	14,305.5
G	Number of Dwellings		356
H	Net Residential Density (dph)	G/F/10000	248.9

Table 6.3: Density of the proposed development, calculated in accordance with the methodology in the Compact Growth Guidelines

As indicated above, the general 'dph' density range for Galway City Centre set by the Guidelines is 100–250 dph (net) but with the 2 No. 'Refining Density' steps considering proximity and accessibility to services and public transport and character, amenity and natural environment pushing appropriate densities up and down within that range.

In respect of proximity and accessibility to services and public transport (Step 1), the Guidelines state:

"While densities within the ranges set out will be acceptable, planning authorities should encourage densities at or above the mid-density range at the most central and accessible locations in each area, densities closer to the mid-range at intermediate locations and densities below the mid-density range at peripheral locations."

The various locations referenced in the quote above generally feature in Table 3.8 of the Guidelines³⁴. For conciseness, we will not summarise these location criteria here, but we note that the site is in a defined 'high capacity public transport node or interchange' as it is within a 1 km walk of the Ceannt Station / Galway Bus Station transport node/interchange, which is adjacent to the serviced terminating and operating via Eyre Square.

KEY POINT:

However, Table 3.8 of the Guidelines takes a very narrow view with respect to the broader concept of 'accessibility', focusing only on proximity to (and frequency of) public transport services. Table 3.8 and its location criteria do not consider other modes of sustainable transport, nor do they consider a site's proximity to other key services, facilities and amenities which would mean that residents may not even need public transport. Such a narrow focus is contrary to the Development Plan's own stated goal of the 15-minute city.

On this very point, we note for the Council that despite the Guidelines' guidance, its Section 3.4.1 states: "The characteristics detailed in Table 3.8 are not exhaustive and a local assessment will be required." [emphasis added] This statement is crucial to understanding the appropriateness of residential densities and the justification for that proposed in the subject development.

The site is centrally located within Galway City Centre, with a range of services, facilities and amenities within short walking and cycling distances (see Section 2.0 above, and the enclosed *Culture and Social Infrastructure Audit* and *Traffic and Transport Assessment* (including its appendices)). Multiple public transport options are available, as highlighted in Section 2.2 above. Additionally, the site is located within a key regeneration and opportunity area, with significant potential to markedly transform this part of the city centre.

Thus, as a site that is...

- 1) Well served,
- 2) Well connected,
- 3) Brownfield,
- 4) Infill,
- 5) Regeneration,
- 6) City centre located and zoned,

...there is an incredibly strong justification to propose and permit a residential development at the very upper end of the Guidelines' range.

In relation to character, amenity and natural environment (Step 2), we understand that there are no notable constraints at the main subject site (known ecology, protected structures, archaeology, etc.) that would result in a density at the lower end of the range. Notwithstanding this, we are mindful that the site is shown as falling within the Galway Bay Complex proposed Natural Heritage Area and it is adjacent to the Galway Bay Complex Special Area of Conservation and the Inner Galway Bay Special Protection Area (both Natura 2000 sites). The site is also relatively proximate to protected structures and archaeological features, such as Forthill Cemetery and its associated elements. **However, we contend that the quality of the proposed development, with the inclusion of mitigation (where appropriate), will ensure that the development does not result in significant or inappropriate negative impacts/effects on these protected features.**

³⁴ 'High Capacity Public Transport Node or Interchange', 'Accessible Location', 'Intermediate Location' and 'Peripheral'.

Therefore, there is a strong rationale for a density in the upper range of 100–250 dph. This will also ensure compliance with other Development Plan policies, such as Policy 4.2 (Land Use and Transportation) point 4: *"Promote effective sustainable residential densities in the city particularly along and close to the existing and planned public and sustainable transport route network."*

6.3.2.3 Concluding Remarks on Height and Density

Ultimately, as in most urban and suburban contexts, the receiving built environment often has the capacity to absorb taller and higher-density developments. Additionally, as the Design Team has presented in the enclosed Planning Application documentation, there is adequate existing and proposed physical and social infrastructure to accommodate this particular development.

Therefore, as density (for example) is just a ratio of the number of residential units relative to a site area, it is the built-form (height, bulk, massing and modulation), design and materiality within which a higher-density development is proposed that are of greatest importance given the impacts that they can have on visual/physical setting, daylight and sunlight, residential amenity, privacy, overbearance, telecommunications infrastructure, etc.

Accordingly, we direct the Council to consider height and density in the context of the overall quality of the scheme, as presented in this Planning Application, rather than as arbitrary numbers on a site.

6.4 Dwelling Mix

As the residential element of the proposed development comprises apartment units, we draw from SPPR 1 of the *Planning Design Standards for Apartments – Guidelines for Planning Authorities* (2025), which states:

"(A) With the exception of social housing developments, social/affordable housing provided for under Part V [of] the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above."

Evidently, generally, no prescriptive dwelling mix applies. This varies for some housing tenures and typologies per the SPPR, although the Guidelines do not state what the mix must be and relies upon HNDAs. **However, as a cost rental residential development³⁵, this tenure is excluded; thus there is no explicit restriction on the dwelling mix.**

³⁵ For the Part V social housing units, we have reviewed the Housing Strategy and HNDA and cannot find an explicit reference to a required or needed dwelling mix.

Informed by the above, the approach has been to propose the dwelling mix presented in Table 6.4 below.

Unit Type	No. Units	Mix of Units
1-bed	175	49.2%
2-bed (3-person)	33	9.3%
2-bed (4-person)	133	37.4%
3-bed	15	4.2%
Total	356	100.0%

Table 6.4: Unit mix (including 2-bed, 3-person breakdown) of the proposed development

Source: ALTU and TOC, 2025

Notwithstanding the foregoing, we have reviewed the Development Plan and its *Galway City Housing Strategy and Housing Need & Demand Assessment 2023-2029* (Housing Strategy and HNDA) to identify any dwelling mix policies or objectives. We did not identify any. However, we note a series of policies and objectives in both documents relating to dwelling mix:

DEVELOPMENT PLAN

Item 20 under Policy 3.1 Housing Strategy – *"Planning applications for multiple housing units will be required to include a Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient range in unit sizes and types to satisfy community mix including the demographic trend of reduction in average household sizes. The needs of special groups such as older persons and persons with disabilities will be required to be considered as part of this process."*

General under Section 3.4 (Sustainable Neighbourhood Concept): *"The creation of successful residential neighbourhoods is about the provision of opportunities for homes which respond to the housing needs of people at all stages of life and where communities can become established and grow. Providing a mix of house types and sizes supports 'lifetime communities' where people can access accommodation suitable to their needs over their lifetime within their neighbourhood. It allows for sustainable use of community services and increased social inclusion. It can also provide a more attractive residential development due to diversity of form. Proposed residential developments will need to provide sufficient housing mix to meet the requirements of different households and demographics and in particular to reflect emerging household trends. The provision of live-work homes to accommodate small enterprise and home working can add to housing diversity and will be considered having regard to impact on residential amenity, traffic generation and car parking."*

HOUSING STRATEGY AND HNDA

Policy Objective PO2 – *"To aim for housing choice to be available to meet all needs and incomes in Galway City, with an appropriate mix of housing sizes, types, and tenures at suitable locations."*

Policy Objective PO2 – *"To provide social housing to meet forecasted housing need over the plan period as identified in the HNDA. The Council will endeavour to deliver a further 1,575 social housing units over the plan period 2023-2029 to meet forecasted need as resources allow and subject to updated national social housing targets."*

New social housing units shall be delivered having regard to the wider aims and policies of the Galway City Development Plan and in line with regional policy and government objectives and targets, including the need to deliver sustainable and compact growth and a diverse mix of housing types and tenures. Social housing shall be delivered through a range of mechanisms including provision directly by the Council, by Approved Housing Bodies, and through short- and long-term tenancies arranged by the Council with private landlords."

Policy Objective PO14 – *"Planning applications for multiple housing units will be required to submit a Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient minimum in house sizes and types to satisfy the demands of the evolving reduction in household sizes. The needs of special groups such as older persons and persons with disabilities will be required to be considered as part of this process."*

The proposed development and its dwelling mix will actively support the Council in delivering much-needed housing, and at an appropriate location in the City Centre. The principally cost rental tenure type will broaden the range of options available in the area, varying on existing, more established trends for the betterment of the wider housing market.

In relation to the preparation of a "Statement of Housing Mix detailing the proposed mix and demonstrating that it provides a sufficient range in unit sizes and types to satisfy community mix including the demographic trend of reduction in average household sizes", we have carried out a review of Galway City's existing housing stock. Census 2022 data indicates that the City's housing supply is generally comprised of a greater proportion of larger units (i.e. 3 No. bedrooms or more). We set the proposed development's dwelling mix alongside that of the City's existing stock in Table 6.5.

Unit Site (No. Bedrooms)	Proposed Dwelling Mix	Existing Stock Mix in Galway City	Variance
1-bed	48.3%	6.4%	95.8% v 27.9%
2-bed	47.5%	21.5%	
3-bed	4.2%	35.5%	4.2% v 72.1%
4-bed or larger	0.0%	36.6%	

Table 6.5: Proposed dwelling mix and existing stock mix in Galway City (excluding 6' number of bedrooms not stated')

Source: Central Statistics Office (2022) and Thornton O'Connor Town Planning (2025)

As shown in Table 6.5, there is a considerable proportion of existing larger dwellings (3-bed and larger); they account for 72.1% of the total. This contrasts markedly with the dwelling mix of the proposed development, which includes just 4.2% of units as 3-beds. The smaller units (1-bed and 2-bed) account for 27.9% of existing dwellings, but 95.8% of the proposed dwellings. **Therefore, the proposal will support a balancing and broadening of the City's housing stock; shifting away from the dominance of larger units to smaller alternatives.** Importantly, this will increase the range of options open to existing and future residents:

- Supporting rightsizing in later stages of life;
- Providing smaller dwellings for young adults and young families who do not require larger, multi-bedroom homes; and
- Providing smaller units to match the personal preferences and affordability of prospective residents of all ages, socio-economic backgrounds and lifecycle stages.

Further to the above, the increase in smaller units is reflective of the reduction in household sizes that have been occurring nationally³⁶ and are envisaged for the future³⁷, thereby warranting their inclusion.

6.5 Dwelling Design and Amenity

The following Sub-Sections detail and assess several of the key dwelling design considerations, notably in relation to internal areas, private amenity space, aspect and floor-to-ceiling heights.

6.5.1 Internal Floor Areas

The internal floor area (IFA) standards for apartments are set by Apartment Design Guidelines. These are summarised by each unit type/size in Table 6.6 below alongside the areas of the proposed apartments.

Unit Type	Unit Size	No. Units	IFA Standard per Unit	IFA Proposed	Exceeds Minimum by at Least 10%
2A (and 2B UD unit)	1-bed	172	45 sq m	49.9 sq m	Yes
3A (and 3B UD unit)	2-bed (3-person)	34	63 sq m	69.8 sq m	Yes
4A	2-bed (4-person)	48	73 sq m	73.5 sq m	No
4B	2-bed (4-person)	87	73 sq m	73.9 sq m	No
5A (and 5B UD unit)	3-bed (5-person)	15	90 sq m	99.6 sq m	Yes

Table 6.6: Minimum floor area standards for apartment units

Source: *Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025)*, ALTU (2025) and Thornton O'Connor Town Planning (2025)

In addition to these minimum internal floor areas, the Guidelines also stipulate that:

"...at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes in more suburban locations, social housing developments, social and affordable housing delivered under Part V10 and schemes to provide housing for older persons and/or persons with disabilities."

As demonstrated in the Table 6.6 above, a total of 221 No. units exceed the minimum standards by at least 10%, equating to 62.1% of the 356 No. total units.

Therefore, the proposed units are in compliance with the minimum floor area standards applicable to apartments.

³⁶ Despite declines having stalled in recent years due to the covid pandemic, strong population growth and limited housing delivery.

³⁷ The NPF expects this to decline to 2.5 No. persons per household by 2040.

Greater detail in respect of the size and design of the units is provided in ALTU's *Apartment Typologies* and *Universal Design Apartment Typology* drawings and *Architectural Design Statement*.

6.5.2 Universal Design

We note that the Development Plan does not prescribe requirements for minimum numbers of universally designed units. However, it does note that the Council will have regard to *Buildings for Everyone: A Universal Design Approach* (2012), amongst other guidelines, in their assessment of residential Planning Applications. The Development Plan does include Policy 3.4 (Sustainable Neighbourhoods: Outer Suburbs) Point No. 8: "Encourage the promotion of universal design principles and lifetime adaptability in the design and layout of residential developments." Although this relates to the outer suburbs, its principle applies to the subject site and development in the City Centre.

In light of this, the Applicant has proactively and progressively proposed 73 No. units (21.1% of the total) designed in accordance with universal design principles. These units are distributed across the 4 No. blocks per Table 6.7 below. Their inclusion will make the development a more equitable, integrated scheme.

Unit	Block A	Block B	Block C	Block D	No. UD Units	Mix of UD Units
1-bed	8	17	10	8	43	57.3%
2-bed (3-person)	8	0	6	13	27	36.0%
2-bed (4-person)	0	0	0	0	0	0.0%
3-bed	0	5	0	0	5	6.7%
No. UD Units	16	22	16	21	75	100.0%
Mix of UD Units	21.3%	29.3%	21.3%	28.0%	100.0%	-
Total No. Units	81	105	66	104	356	-
UD Units at Mix of Total	19.8%	21.0%	24.2%	20.2%	21.1%	-

Table 6.7: Universal design units per block

Source: ALTU (2025)

6.5.3 Private Amenity Space

In relation to the provision of private amenity space for units, the guidance set out in the Apartment Design Guidelines applies to the proposed development. For each of the unit types proposed, we have set out the related private amenity space standard to be met, as well as the private amenity space area proposed in Table 6.8. As is clear, the proposed spaces all meet the minimum standards. This is confirmed by way of a review of the *Architectural Design Statement*, the *Housing Quality Assessment* and the various drawing prepared by ALTU.

Unit Type	Unit Size	PAS Standard per Unit	PAS Proposed
2A (and 2B UD unit)	1-bed	5 sq m	5.04 sq m
3A (and 3B UD unit)	2-bed (3-person)	6 sq m	6.12 sq m
4A	2-bed (4-person)	7 sq m	7.02 sq m
4B	2-bed (4-person)	7 sq m	7.02 sq m
5A (and 5B UD unit)	3-bed (5-person)	9 sq m	9.00 sq m

Table 6.8: Private amenity space requirements for apartment dwellings

Source: *Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025)*

In accordance with the Guidelines, the private amenity spaces are proposed as terraces at ground floor and balconies at upper floor levels with minimum depths of at least 1.5 m, ensuring they are appropriately sized and functional. Ground floor level private amenity spaces are provided with ample defensible space, augmented by landscape treatment designed by SDACLA (see an example in Figure 6.11 below), and we direct the Council to review the landscape drawings for a clear understanding of these design considerations.



Figure 6.11: Defensible space at ground floor levels balconies/terraces, achieved by way of physical separation and landscape interventions

Source: SDACLA (2025)

6.5.4 Aspect

In relation to the aspect and orientation of units, direction is taken from SPPR 3 of the Apartment Design Guidelines:

"In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A **minimum of 25% of units within a development shall be required to be dual aspect**. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.*
- (ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."* **[emphasis added]**

Additional text – not an SPPR – in the Guidelines notes that single aspect units should preferably face east, south or west, and that north-orientated units must face an attractive amenity feature.

According with the guidance, 134 No. of the 356 No. units are dual aspect, equivalent to 37.2%³⁸ of the total, thereby exceeding the requirement of SPPR 3. In isolation, each Block exceeds the 33% requirement:

- **Block A** – 35.8%
- **Block B** – 35.2%
- **Block C** – 33.3%
- **Block D** – 43.3%

There are no directly north-facing, single aspect units.

6.5.5 Floor-to-Ceiling Heights

In relation to floor-to-ceiling heights of units, the Apartment Design Guidelines' SPPR 4 sets the standard to be met:

"Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.."

Building Regulations Technical Document F addresses ventilation and provides guidance on ceiling heights in habitable rooms. The suggested minimum floor-to-ceiling height, consistent with good room design, the use of standard materials and good building practices, is generally 2.4 m.

As detailed in the drawings prepared by ALTU, all ground floor level floor-to-ceiling heights exceed 2.7 m. In fact, they have particularly generous floor-to-ceiling heights of 3.6 m. This will give flexibility to the spaces, and for ground floor level dwellings specifically, it will maximise light ingress and make their living environments especially spacious and attractive.

6.5.6 Storage

In relation to the provision of internal storage provided in units, instruction is again taken from the Apartment Design Guidelines. Its minimum requirements for the proposed unit types and sizes are shown in Table 6.9 below, with the following additional guidance provided:

³⁸ An increase on 36.2% presented in the LRD Meeting design.

"Storage should be additional to kitchen presses or cupboards and loose bedroom furniture, but may be partly provided in these rooms. In such cases this must be in addition to aggregate living/dining/kitchen or bedroom floor areas. A store off a hallway or landing will facilitate access, but hot presses or boiler space/heat pump will not count as general storage. As a rule, no individual storage room within an apartment should exceed 3.5 square metres."

The proposed storage areas for each of the units are presented in the *Housing Quality Assessment* (contained in ALTU's *Architectural Design Statement*) and on the various unit drawings. As is evident, the minimum requirements of the Guidelines are matched or exceeded in all cases.

Unit Type	Unit Size	Storage Standard per Unit	Storage Proposed
2A (and 2B UD unit)	1-bed	3 sq m	4.53 sq m (3.21 sq m)
3A (and 3B UD unit)	2-bed (3-person)	5 sq m	5.74 sq m (5.35 sq m)
4A	2-bed (4-person)	6 sq m	7.15 sq m
4B	2-bed (4-person)	6 sq m	6.07 sq m
5A (and 5B UD unit)	3-bed (5-person)	9 sq m	9.06 sq m (10.11 sq m)

Table 6.9: Internal storage spaces within proposed units

Source: ALTU and TOC (2025)

6.5.7 Daylight and Sunlight

The natural lighting of proposed units is important to create bright, enjoyable and energy efficient environments for residents. The Development Plan remarks that *"...development shall be guided by the quantitative performance approaches and recommendations under the 'Site Layout Planning for Daylight and Sunlight' (2nd edition): A Guideline to Good Practice (BRE 2011) and BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting' or any updated guidance."*

As part of Model Works' *Daylight and Sunlight Analysis*, focus was placed on the performance of the proposed development. This Report is included under separate cover and principally used The Building Research Establishment's (BRE) *Site Layout Planning for Daylight and Sunlight: A guide to good practice* (BRE 209 – 3rd edition / 2022 edition) for its assessments and analyses as the 2nd edition / 2011 edition has been superseded.

Daylight of Unit Rooms

In relation to daylight, the assessment focused on the 908 No. main habitable rooms of the 356 No. units. The performance targets for Spatial Daylight Autonomy (SDA) are based on BRE 209, as follows:

- >50% of kitchens achieving at least 200 lux;
- >50% of living rooms achieving at least 150 lux; and
- >50% of bedroom areas achieving at least 100 lux over at least half of the daylight hours³⁹.

The 908 No. rooms perform well given the development's urban context and the need to achieve a higher-density, mixed-use proposal with the incorporation of an attractive tree planting regimen:

³⁹ Where rooms serve more than one function, the higher SDA target value is taken.

- 88% of assessed rooms are compliant in a scenario without trees.
- 87% of assessed rooms are compliant in a scenario with trees.

Sunlight of Units

In relation to sunlight, the performance is based on 'Sunlight Exposure' (SE) for units, rather than their individual rooms. The results in Model Works' report are as follows:

- 100% of assessed units are compliant in a scenario without trees.
- 99% of assessed units are compliant in a scenario with trees.

Lighting of Open Spaces

Please refer to Sections 6.8.1 and 6.8.2 below.

Concluding Remarks on the Daylight and Sunlight Performance of the Proposed Development

Evidently, the proposed development performs well in terms of daylight and sunlight. This is especially the case given the site's city centre location, and the need to achieve a high-density, mixed-use proposal. This results in taller structures and more enclosed spaces due to the constrained urban location.

Notwithstanding these results, it is prudent to highlight that the BRE209 Guide itself states that its content and targets are simply guidance and that:

"...The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design..." [emphasis added]

Therefore, there should not be an expectation that all assessments need to rigidly or slavishly secure 100% compliance.

6.6 Separation Distances

Standards with respect to minimum separation distances between windows in opposing residential elevations apply to secure and protect residential amenity and privacy. These minimum distances also influence building design and site planning as they play a role in avoiding overbearance, overlooking and impacts on daylight and sunlight.

The Development Plan does not prescribe guidance in respect of minimum separation distances. These are set as SPPR 1 in the Compact Growth Guidelines, which states:

"It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below

16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.”

The approach to the design of the proposed development has been to secure residential amenity and achieve adequate privacy for future residents. Throughout the development, the minimum separation of 16 m has been applied and this is evident on the *Site Layout Plan with Ground Floor* and *Site Layout Plan with Roof Plan* drawings, and the various block floor plans (all prepared by ALTU).

There is only 1 No. instance in the development where the separation distance between blocks is less than 16 m; between Blocks A and B, where the separation ranges from 6 m to approximately 20 m (Figure 6.12).

However, in respect of this, we make the following important observations:

- The elevations/façades are at angles relative to each other. Therefore, they are not directly opposing, with their outward views offset or staggered relative to each other.
- For dwellings in the closest units in both sets of blocks, the windows that are closest to each other are 'secondary' for the rooms they serve – i.e. they are not the main windows/views, with other larger, 'primary' windows serving the rooms (see orange arrows on Figure 6.12).

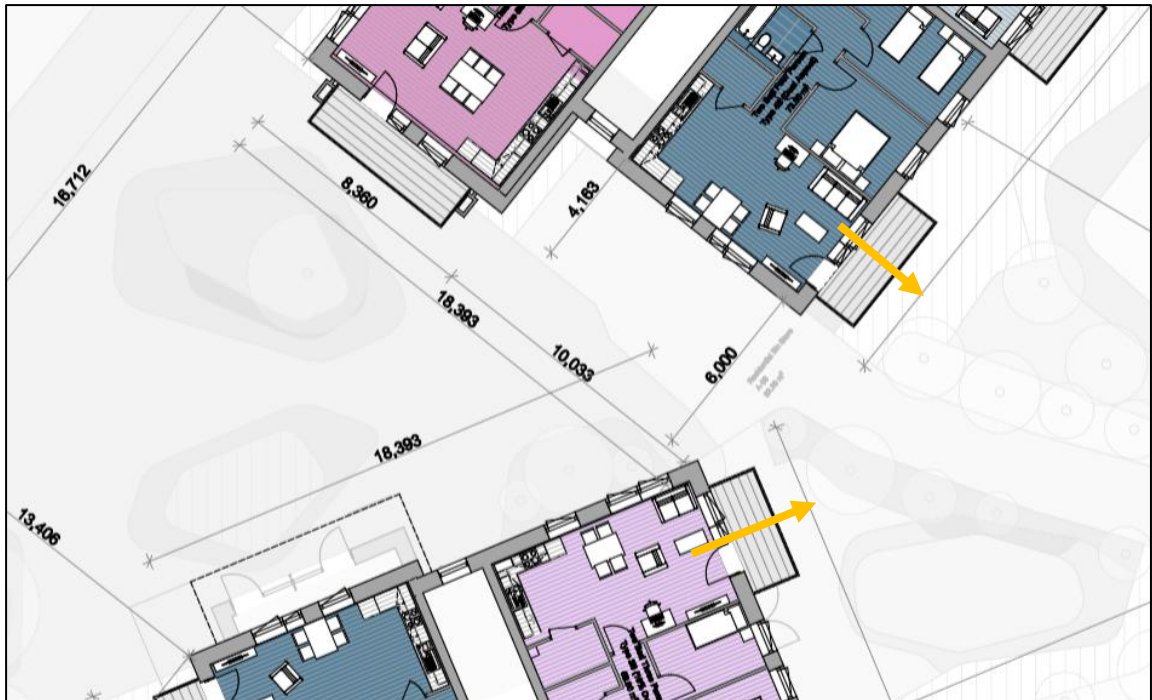


Figure 6.12: The relationship between the 2 No. blocks that are closest to each other at the proposed development – Blocks A and B – with yellow arrows indicating that the primary windows for the closest windows are pointed away from each other

Source: ALTU (2025), annotated by Thornton O'Connor Town Planning (2025)

In light of the above, we firmly contend that the proposed development accords with SPPR 1 of the Compact Settlements Guidelines and ensures that attractive and pleasant living environments are provided for future residents, with ample privacy secured.

No residential developments are currently present in the immediate environs of the subject site; therefore, 'impacts' on same have not been directly considered herein. Notwithstanding this, the development's design has been mindful of the future (re)development potential of adjacent lands, with the footprint and orientation of proposed structures set out to lessen risks of potential future overlooking, overbearance and overshadowing.

6.7 Parking

Parking for cars and cycles is an important design consideration for development as a means to support the mobility of future residents and to do so in healthy and sustainable ways. The following Sub-Sections outline the standards and proposals relating to car and cycle parking.

6.7.1 Car Parking

6.7.1.1 Residential Car Parking

The standards for residential car parking provision are now principally set by the Compact Settlements Guidelines' SPPR 3:

"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.*
- (ii) *In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) *In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.*

Applicants should 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.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail. **[emphasis added]**

We are of the opinion that the subject site is a sustainable location to reduce car parking, drawing on its key assets, in particular its centrality within the city and its proximity to a range of key services, facilities and amenities (which encourage the use of active modes) and its servicing by existing public transport (as detailed in Section 2.2 above).

Additionally, we note that the dwelling mix's greater relative inclusion of 1-bed and 2-bed units will result in a lower car parking demand than in a scheme of the same number of units comprised wholly of 3-bed and larger dwellings.

In fact, we draw directly from Section 11.11.1 of the Development Plan which reads:

"There will be a presumption against a car parking requirement for new development in the city centre unless a justifiable case for minimum requirements is acceptable to the City Council."

Thus, whilst no car parking provision is evidently acceptable in principle to the Council, a case can be made to provide a certain number of spaces (implied to be relatively small).

Accordingly, the development proposes an overall car parking provision of 37 No. spaces. Of these, 16 No. are specifically dedicated to the residential units, whilst the remaining spaces are for the non-residential uses (8 No.), EV charging (8 No.) and car share (5 No.). However, the 8 No. EV charging spaces can be assigned to the proposed dwellings, which would increase their allocation to 24 No. spaces.

The 16 No. spaces for residents equate to a parking ratio of 0.05 No. spaces per dwelling, although including the EV spaces would increase this to 24 No. or 0.75 No. spaces per dwelling. Yet, the 5 No. car share spaces will increase the 'effective' parking ratio. As stated in NRB's *Traffic*

and *Transport Assessment Report*, these spaces have a 'replacement rate' of 18 No. spaces for 1 No. space; thus, increasing the effective residential car parking ratio to 0.3/0.32 No. spaces per dwelling.

The allocation and distribution of car parking across the development has been carefully considered as perimeter parallel and perpendicular parking, and as a cluster to the north between Blocks B and D. This avoids an overconcentration of parking in a single location and provides users with a variety of options.

Car demand management solutions are provided in NRB's *Travel Plan*, which will be expanded upon prior to and upon occupation of the development.

6.7.1.2 Non-Residential Car Parking

Car parking standards for non-residential uses are set in Table 11.6 of the Development Plan. Based on these standards and the detail of the proposed development, the maximum rate of car parking come to 25.9 No. spaces (see Table 6.10 below).

Use	Standard	Proposed Development	Maximum Car Parking
Crèche	1 per 40 sq m of operational space	255.9 sq m	6.4
Café/restaurant	1 per 30 sq m GFA	428.4 sq m	14.3
Retail	1 per 30 sq m GFA	156 sq m	5.2
Total			25.9

Table 6.10: Calculation for the maximum car parking provision for the proposed non-residential uses

Source: *Galway City Development Plan 2023–2028* and Thornton O'Connor Town Planning (2025)

For the non-residential uses, the following rates of provision are proposed:

- Crèche – 4 No. spaces.
- 3 No. retail and café/restaurant units – 4 No. spaces.

As with the residential parking, the provision is low and is intended to encourage and respond to lower rates of car use and ownership. Much of the patronage of the crèche, retail and café/restaurant units is expected to be generated by the future residents of the development, and by persons living and working in the local area; they are not explicitly 'destination uses' that would create their own high levels of car parking requirement. Thus, we are of the opinion that these rates of car parking provision are both appropriate and sufficient

6.7.1.3 Additional Car Parking Considerations

Electric vehicle charging spaces will total 8 No., which is equivalent to over 20% of proposed spaces. This rate of provision equates to 20% of total spaces, thereby complying with the standard set by Section 11.11.2 of the Development Plan.

Mobility impaired / accessible spaces total 3 No., which is equivalent to over 8% of proposed spaces.

Further to the above, a total of 5 No. car share spaces are proposed. With the benefit of their substantial replacement rate for standard cars/spaces, the mobility needs of future residents will be markedly enhanced.

6.7.1.4 Set Down Space

In addition to car parking, the proposed development includes 1 No. set-down space. The set down space will be unallocated and indicated for short-stay use only, thereby allowing for drop-offs and collections for the crèche, retail/café units, food deliveries, post/shopping deliveries, taxi collections, etc. Its inclusion is considered to be practical given the lower car parking provision and changing life practices. Providing the space also means that vehicles will not block roads, need to park on footpaths, if unable to find a free parking space.

6.7.2 Cycle Parking

6.7.2.1 Residential Cycle Parking

The standards for residential cycle parking provision are set by the Compact Settlements Guidelines' SPPR 4:

"It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:

- (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided."*

Based on the above SPPR, the resident cycle parking requirement for the proposed residential uses is calculated as 555 No. spaces (Table 6.11). No quantitative standard is set by the SPPR for visitor parking; however, a general cue of 0.5 No. spaces per dwelling (or 1 No. space per 2 No. units) as espoused by the 2023 version of the Apartment Design Guidelines has been taken. Therefore, the residential visitor parking requirement is 178 No. spaces.

Block			A	B	C	D	No. Units
Dwelling Mix (No. Units)	1-bed		39	51	32	50	172
	2-bed (3-person)		8	0	6	20	34
	2-bed (4-person)		29	49	28	29	135
	3-bed		5	5	0	5	15
	No. Units		81	105	66	104	356
Parking Requirement (No. Spaces)	Resident	1/Bedroom	128	164	100	163	555
	Visitor	0.5/Unit	41	53	33	52	178
	Total		169	217	133	215	733

Table 6.11: Resident cycle parking requirement for each block that comprises the overall subject site

Source: Thornton O'Connor Town Planning (2025)

Total proposed residential use cycle parking is per Table 6.19 below and meets the requirements calculated above. We note for the Council's awareness that whilst it appears that some Blocks are 'underprovided' when comparing Tables 6.11 and 6.12, this is not strictly the case as: (1) for ease of reference and counting, cycle spaces were 'assigned' to their nearest immediate Blocks where they are located in communal or public spaces; and (2) the cycle spaces are distributed widely across the site making them accessible across multiple locations for residents and visitors.

Cycle Parking Type and Location	A	B	C	D	Total
Resident (Internal Within Blocks)	63	85	48	85	281
Resident (External, Covered Within CAS)	70	86	44	74	274
Visitor	78	76	0	24	178
Total	211	247	92	183	733

Table 6.12: Proposed quantum of cycle parking for the residential uses

Source: Thornton O'Connor Town Planning (2025)

As demonstrated in ALTU and SDACLA's documents, resident cycle parking is dispersed across the site in a series of enclosed stores within the Blocks (281 No. spaces) and as separate covered stores within the communal amenity spaces (274 No. spaces). The latter will have green roofs to give them additional SuDS, ecological and aesthetic functions/benefits. Access to the residents' spaces will be limited to residents only (via key, fob or code).

Of the 281 No. spaces within the Blocks, 15 No. are proposed as cargo spaces, equating to 5.3%. These spaces will cater for larger and adapted cycles, broadening the range of options available to residents.

The 178 No. visitor parking spaces are dispersed across the site in a manner that gives arriving cyclists plenty of options, thus making this mode easier and more attractive. Both visitor parking and the entrances to resident parking alike benefit from passive surveillance.

6.7.2.2 Non-Residential Cycle Parking

Guidance with respect to cycle parking for the proposed non-residential uses is set by the Development Plan as follows:

"For commercial developments, the number of cycle stands shall be equivalent to 25% of the number of car parking spaces, the amount of spaces at a minimum shall meet the cycle parking space requirements in accordance with Section 5.5.7 of the National Cycle Manual 2011, or any forthcoming replacement to these standards, unless otherwise agreed in writing with the Planning Authority and shall be located close to entrance points."

As the *National Cycle Manual* has been superseded by the *Cycle Design Manual* (2023), which does not contain cycle parking space standard (quanta), we have relied upon the Development Plan's standard of 1 No. space for the equivalent of every 4 No. car parking spaces. On a *pro rata* basis of a maximum of 25.9 No. car parking spaces being allowed for the non-residential uses, this would set a requirement for 6.5 No. cycle parking spaces. Rounding-up the requirement for each use equates to 8 No. spaces. It is proposed to meet this requirement, with 8 No. cycle parking spaces as Sheffield stands distributed across the development⁴⁰. As with the residential visitor spaces, these spaces will benefit from passive surveillance from the proposed dwellings, the non-residential units and from passers-by using the various open spaces.

Use	Standard	Proposed Development	Maximum Car Parking	Cycle Parking Standard (25% of Car Parking)	Cycle Parking Requirement	Cycle Parking Requirement (Rounded-up)
Crèche	1 per 40 sq m of operational space	255.9	6.4	25%	1.6	2
Café/ restaurant	1 per 30 sq m GFA	428.4	14.3	25%	3.6	4
Retail	1 per 30 sq m GFA	156	5.2	25%	1.3	2

Table 6.13: Required and proposed quanta of cycle parking for the non-residential uses

Source: Thornton O'Connor Town Planning (2025)

6.8 Landscaping, Open Space and Children's Play

Open space in a general sense is categorised as public open space, communal amenity space and private amenity space. Public open space is publicly accessible land that future residents, as well as the existing local community or passers-by, can use freely. Communal amenity space is semi-private in its intention and proposed for use by specific future residents of a proposed development, thereby allowing for relaxation, socialising and integration. Private amenity space is provided on a dwelling-by-dwelling basis, with individual spaces designed solely for private use by the residents of the related unit.

Before going into the detail of the various open spaces, we provide Figure 6.13 below which demonstrates the location and extent of the proposed public open spaces and communal amenity spaces.

⁴⁰ The Development Plan does not state if these spaces need to be short-term or long-term, enclosed/covered. Given the nature of the uses, we consider that providing them as Sheffield stands for the former is a more appropriate design solution at this development.

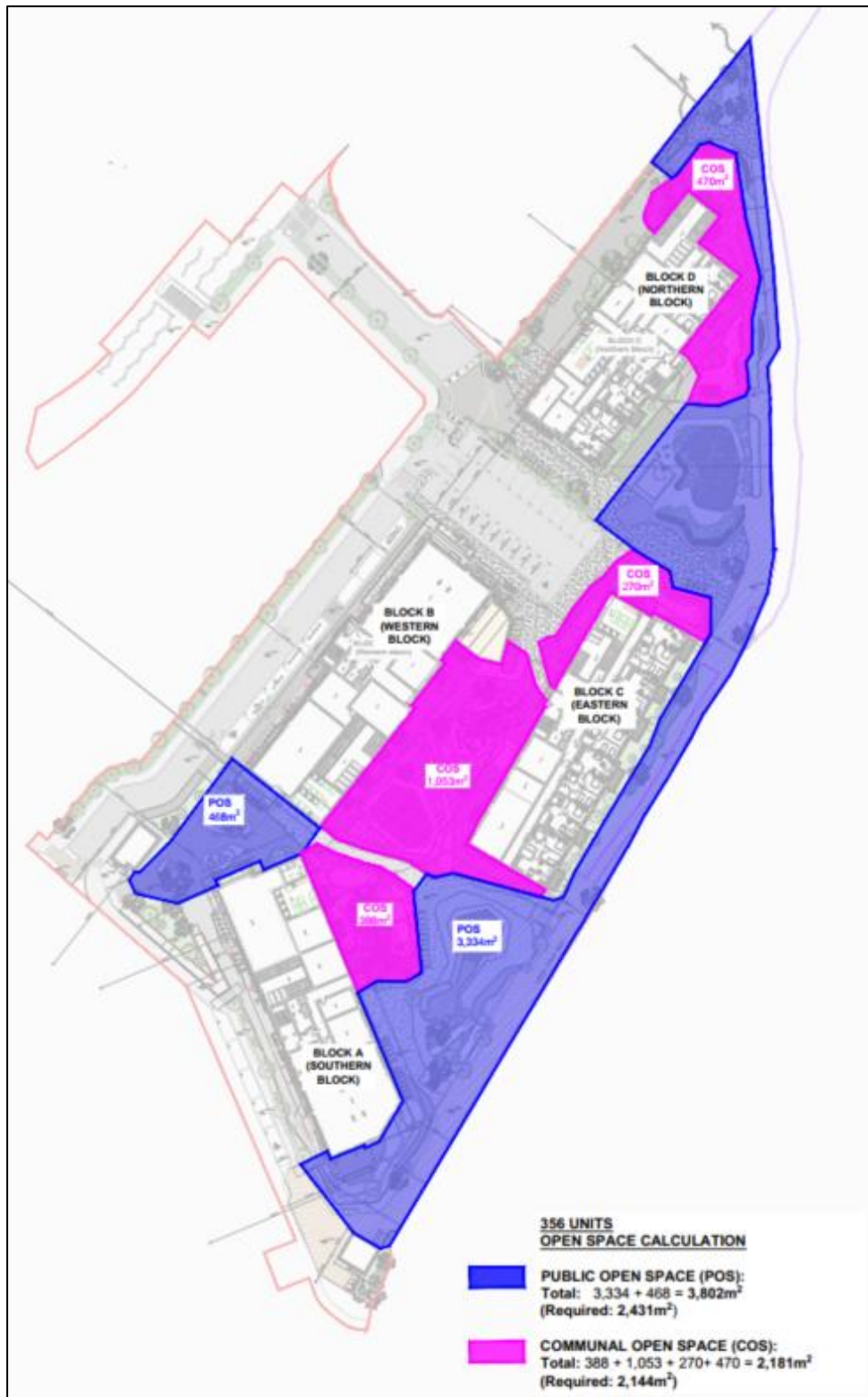


Figure 6.13: Location and extent of public open spaces and communal amenity spaces

Source: SDACLA (2025)

6.8.1 Public Open Space

In relation to public open space provision in residential developments, the Development Plan refers to this as 'communal amenity'. It sets a standard in its Section 11.3.1 (c), which states that

"communal recreation and amenity space is required at a rate of 15% of the gross site area." To avoid confusion with 'communal amenity space' associated with apartment units (discussed below and required by the Apartment Design Guidelines), we will use the description of 'public open space' rather than 'community amenity' from hereon.

Notwithstanding the above requirement, we are cognisant of the provisions of the Compact Growth Guidelines. In relation to public open space, the Guidelines include 'Policy and Objective 5.1':

*"It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). **The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.** Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.*

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

***In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site."* [emphasis added]**

As this is not an SPPR, the Council is not yet compelled to strictly comply with its provisions, but only to have regard for same. **Consequently, at the current time, we are of the opinion that the 15% of gross site area required for public open space established by the Development Plan is of relevance.** Thus, public open space has been provided to accord with the Development Plan's minimum requirements for same of 15% of gross site area, which equates to at least 0.2432 Ha or 2,432 sq m. By consequence, the Guidelines' standard is exceeded.

As shown in the *Landscape Design Proposal* report and *Open Space & Bike Parking* drawing prepared by SDACLA (enclosed), **a total of 3,802 sq m of public open space is proposed, exceeding the minimum quantity by 56.3% or 1,370 sq m.**

The public open space is designated in 2 No. locations:

(1) At the site's western side as an 'entrance plaza' (i.e. between Blocks A and B) – referred to as 'Public Open Space West' in Table 6.14 below.

This is a focal point of both the proposed development and the wider Masterplan vision that will have a major placemaking and wayfinding role. The position of the retail and one of the café/restaurant units opening out onto it gives it greater purpose and activation.

(2) At the site's southern corner, east side and northern corner (i.e. east of Blocks, A, C and D) – referred to as 'Public Open Space East' in Table 6.14 below.

The latter area of public open space runs from the proposed raised 'Harbour Point Terrace' at the south to north along the eastern side of the side fronting the Lough Atalia inlet. Featuring in this public open space is 'Lough Atalia Walk' – a new landscaped pedestrian and cyclist amenity that has the potential to be extended to the north, south and east in the future, as envisaged by the Masterplan. This route is an attractive recreational amenity that will enhance local pedestrian and cyclist connectivity, and unlock the waterfront for the public. It has the potential to become part of a looped walking route around the Lough Atalia inlet to the east.

It should be noted that the 'Walk' is not just pedestrian and cyclist route, but part of a grander vision for recreation in the City, and enhanced by carefully design and sited seating nodes, activity and play spaces, attractive planting and congregation spaces.

Of note in the public open space are a mini/half basketball court and a large nature-based play area. These will be open to all members of the public and community, encouraging socialising and physical activity.

The provision of the 'Walk', the basketball court and the play area address the Development Plan's requirement (Section 11.3.1 (c) therein) for a 'recreational facility' in larger residential developments. These aspects of the development are appropriate and have the potential to become important local community assets. The 'Lough Atalia Walk' will support the achievement of Development Plan Policy 5.5 (Community Spaces: Greenways, Boreens and Public Rights of Way) points 1, 2, 3 and 6.

The detail of the proposed public open space is provided in Table 6.14 below.

Detail	Public Open Space West	Public Open Space East
Location	Western 'corner' of the development between Blocks A and B.	From the southern 'corner' of the site to the northern 'corner' of the site along its eastern edge overlooking the Lough Atalia inlet.
Area	468 sq m	3,334 sq m
Key Design Features	<ul style="list-style-type: none"> Central or focal point location within the development and as part of the wider Masterplan Seating Attractive planting Congregation space Interface with the proposed retail unit and one of the café/restaurant units Visitor cycle parking 	<ul style="list-style-type: none"> Overlooking / running parallel to the Lough Atalia inlet/outlet Lough Atalia Walk Raised 'Harbour Point Terrace', with views out over Galway Bay 'Central Gathering Plaza' Viewing terrace Urban square Seating Attractive planting

Detail	Public Open Space West	Public Open Space East
		<ul style="list-style-type: none"> • Congregation space • Visitor cycle parking • Play features (see below) • Potential future connection to the north
Play Detail	<ul style="list-style-type: none"> • No play space proposed 	<ul style="list-style-type: none"> • Mini/half basketball court. • Nature-based play area, with features usable by all ages and a rubber safety matting grass reinforcement.
Planting Regimen	<ul style="list-style-type: none"> • Wildflower meadow • Shrubs, perennials, groundcover • Native trees, for example: Hazel, Birch, Mountain Ash and Scots Pine. 	<ul style="list-style-type: none"> • Wildflower meadow • Shrubs, perennials, groundcover • Native trees, for example: Birch, Strawberry Tree, Scots Pine and Mountain Ash.
Passive Surveillance	Yes, from the proposed dwellings and non-residential units.	Yes, from the proposed dwellings and non-residential units.
Sunlight	89% of the space receives at least 2 hours of direct sunlight on 21 st March. 50% recommended minimum exceeded.	100% of the space receives at least 2 hours of direct sunlight on 21 st March. 50% recommended minimum exceeded.
Buffer Around Private Amenity Spaces	Not applicable as there are no ground floor level private amenity space located at this part of the development.	Yes, defensible space provided as both physical separation and landscaping to achieve privacy and security for ground floor level units.

Table 6.14: Details of the proposed public open space

Source: Collated by Thornton O'Connor Town Planning (2025)

6.8.2 Communal Amenity Space

Communal amenity space standards are set for apartment dwellings by the Apartment Design Guidelines. These standards are set alongside the resulting quantitative requirement for the proposed development in Table 6.15 below.

Unit Size	CAS Standard per Unit (sq m)	No. Units	CAS Requirement (sq m)
1-bed	5	172	860
2-bed (3-person)	6	34	204
2-bed (4-person)	7	135	945
3-bed	9	15	135
Total		356	2,144

Table 6.15: Communal amenity space standards and requirements for apartment dwellings

Source: *Planning Design Standards for Apartments: Guidelines for Planning Authorities* (2025) and Thornton O'Connor Town Planning (2025)

The communal amenity space is provided in 4 No. areas, totalling 2,181 sq m, thereby exceeding the minimum quantitative requirement for same by 37 sq m or 2%.

These areas are proposed at ground floor level, principally within the centre/core of the development, giving them a sense of enclosure and privacy. The spaces are designed with a variety of purposes and functionality, incorporating seating, play and congregation spaces. The children's play is in 2 No. locations, introducing variety and catering for different age groups (85 sq m for toddlers and younger children and 200 sqm for older children).

Planting is robust, given the city and sea influences on micro-climate. However, emphasis has been placed on native, pollinator friendly species where possible and appropriate. As in the public open space, semi-mature tree species are proposed to secure an early sense of establishment to the spaces. Proposed trees species include:

- Scots Pine,
- Alder,
- Strawberry Tree,
- Hawthorn, and
- Blackthorn.

The detail of the proposed communal amenity spaces is summarised in Table 6.16 below. Evidently, and as is confirmed upon review of the materials prepared by SDACLA (separate cover), the spaces will be of a high-quality: attractive, functional, ecologically beneficial and supportive of placemaking.

The spaces are all compliant with recommended levels of direct sunlight (see Model Works' *Daylight and Sunlight Analysis*). With respect to micro-climate (wind) analysis, B-Fluid's *Wind Microclimate Analysis* indicates that they fall within the 'sitting', 'standing' and 'strolling' categories defined by the 'Lawson Comfort / Distress Scale', indicating that they are designed and will perform for their purpose.

Detail	CAS 1	CAS 2	CAS 3	CAS 4
Location	North-east of Block A, interfacing with public open space.	Between Blocks B and C, interfacing with public open space.	North and north-west of Block C.	North-east of Block D
Area	388 sq m	1,053 sq m	270 sq m	470 sq m
Key Design Features	<ul style="list-style-type: none"> • Play space • Seating • Congregation space • Grassed lawn • Attractive planting • Notable/specimen trees: Scots Pine • Cycle parking 	<ul style="list-style-type: none"> • Play space • Seating • Congregation space • Grassed lawn • Attractive planting • Notable/specimen trees: Scots Pine • Cycle parking 	<ul style="list-style-type: none"> • Seating • Congregation space • Grassed lawn • Attractive planting • Cycle parking 	<ul style="list-style-type: none"> • Seating • Congregation space • Grassed lawn • Attractive planting • Notable/specimen trees: Scots Pine • Cycle parking
Play Detail	<ul style="list-style-type: none"> • Area: 200 sq m • Nature-based • Older children 	<ul style="list-style-type: none"> • Area: 85 sq m • Nature-based • Toddlers and younger children 	N/A	N/A
Planting Regimen	<ul style="list-style-type: none"> • Tree planting to include: Blackthorn, Downey Birch, Scots Pine • Grassed lawn • Shrubs/perennials/groundcover 	<ul style="list-style-type: none"> • Tree planting to include: Wild Privet, Aspen, Hawthorn, Mountain Ash, Guelder Rose • Grassed lawn • Shrubs/perennials/groundcover 	<ul style="list-style-type: none"> • Tree planting to include: Downey Birch, Hawthorn, Blackthorn • Grassed lawn • Shrubs/perennials/groundcover 	<ul style="list-style-type: none"> • Tree planting to include: Downey Birch, Alder, Guelder Rose • Grassed lawn • Shrubs/perennials/groundcover
Passive Surveillance	Yes, from dwellings.	Yes, from dwellings.	Yes, from dwellings.	Yes, from dwellings.
Buffer Strips Around Adjacent PAS	No ground floor level units are proposed at this CAS.	No ground floor level units are proposed at this CAS.	No ground floor level units are proposed at this CAS.	Yes, providing privacy and creating a sense of defensible space.
Sunlight	COS4 in the <i>Daylight and Sunlight Analysis</i> . 100% of the space receives at least 2 hours of direct sunlight on 21 st March. 50% recommended minimum exceeded.	COS3 in the <i>Daylight and Sunlight Analysis</i> . 63% of the space receives at least 2 hours of direct sunlight on 21 st March. 50% recommended minimum exceeded.	COS2 in the <i>Daylight and Sunlight Analysis</i> . 52% of the space receives at least 2 hours of direct sunlight on 21 st March. 50% recommended minimum exceeded.	COS1 in the <i>Daylight and Sunlight Analysis</i> . 99% of the space receives at least 2 hours of direct sunlight on 21 st March. 50% recommended minimum exceeded.

Table 6.16: Details of the proposed communal amenity spaces

Source: Collated by Thornton O'Connor Town Planning (2025)

6.8.3 Private Amenity Space

Private amenity is addressed in Section 6.5.3 given its association with dwelling design and quality.

6.8.4 Incidental Landscaping and Open Spaces

The proposed landscaping extends beyond just the above open/amenity spaces discussed above. This ensures the delivery of an integrated development, thereby supporting progressive placemaking and the creation of attractive living, working and visiting environments. Incidental planting features throughout the development, as shown on SDACLA's drawings.

It includes: various planting beds, such as shrubs and perennials; and tree planting, which incorporates Downey Birch and Hazel species, amongst others. These additions are important for ecology and biodiversity as they create new habitats and foraging opportunities, and act as green refuges and stepping, thus supporting the delivery of green infrastructure in an established urban setting.

6.8.5 Children's Play Compliance

As discussed above in relation to the public open space (Section 5.8.1) and communal amenity space (Section 5.8.2) provision, the proposed development incorporates a range of different children's play areas. This accords with the requirements of both the Apartment Design Guidelines and the Development Plan. In respect of the latter, we contend that these play spaces comply with the requirements and expectations of Policy 5.6 (Community Spaces: Child Friendly City):

"1. Enhance and promote Galway as a 'Child Friendly City' which will help children understand and feel secure in their environment and will encourage them to experience and respect the natural heritage of the city."

"2. Support the right of the child to play by ensuring the creation and maintenance of inclusive natural and built play areas within every community."

"3. Maintain and enhance existing play areas and provide new, accessible and safe play areas for all in accordance with the Council's commitment to the Barcelona Declaration, policies in relation to Social Inclusion, the Recreation and Amenity Needs Study, and any subsequent strategies including the future Green Space Strategy."

"4. Continue the improvement and development of playground facilities as outlined in the Council's Recreation and Amenity Needs Study."

"5. Enhance the provision of facilities for older children and teenagers within the city, including skateboarding areas, teenage shelters, ball walls and Multi Use Games Areas (MUGAs)."

6.9 SuDS and Surface Water Management

Safe and sustainable surface water management is acknowledged as an important design and development criterion. It has been carefully considered and integrated into the proposed development. Listed below are key policies against which the proposal has been designed.

Policy 9.4 (Sustainable Urban Drainage Systems (SuDS)):

"1. Ensure the use of Sustainable Urban Drainage Systems (SuDS) and sustainable surface water drainage management, wherever practical in the design of development to enable surface water run-off to be managed as near to its source as possible and achieve wider benefits such as sustainable development, water quality, biodiversity local amenity and climate adaptation."

"2. Promote the use of green infrastructure e.g. green roofs, green walls, bioswales, planting and green spaces for surface water retention purposes as an integrated part of SUDS and to deliver all the ancillary benefits."

Policy 5.1 (Green Network and Biodiversity):

"5. Support climate action through implementation of nature based solutions that enhance biodiversity in the green network, including measures such as tree planting, SuDS, and the use of green infrastructure. Such measures will be informed by the Green Space Strategy."

"6. Promote the integration of nature based solutions and green/blue infrastructure in all new developments as appropriate to contribute to the city's climate resilience and require large scale development proposals to include a green infrastructure and biodiversity plan."

In compliance with the foregoing policies, the proposed development includes a range of SuDS measures to carefully and considerably manage surface water. These include:

- Tree Pits;
- Rain Gardens;
- Permeable Surface; and
- Green Roofs.

According to the *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document* (2022), all of the above SuDS measures are 'nature-based'. Therefore, the proposed development demonstrates strong compliance with the expectations of the Development Plan.

Noting potential contaminants on-site, TOBIN's design has sought to avoid surface water infiltration on-site in order to prevent contaminated run-off with an impermeable liner. We contend that this will ensure compliance with Policy 9.2 (Water Quality) points 1, 3, 5 and 6:

"1. Support the actions of the River Basin Management Plan 2018-2021 and future River Basin Management Plan in order to promote and achieve a restoration of good status, reduce chemical pollution and prevent deterioration of surface, coastal and groundwater quality, where appropriate."

"3. Ensure development adheres to prevailing environmental standards and guidelines and accords with emerging legislation and strategy on the marine environment."

"5. Protect the city's groundwater resource in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010 (SI No. 9 of 2010) or any updated legislation and limit any development which has potential to impact the objectives for protection, enhancement and/or restoration."

"6. Minimise and control discharges to inland surface water bodies, in particular Terryland/Sandy River, groundwater and coastal waters to prevent water pollution and protect the environment."

Further technical insights in respect of the design and detailed of the proposed SuDS are provided in TOBIN's *Civil Works Design Report, Flood Risk Assessment* and full suite of drainage drawings.

6.10 Flood Risk

With respect to flood risk within the City Centre, we note that the Development Plan includes the following policies, which require the preparation of a *Flood Risk Assessment* and the incorporation of appropriate design measures on sites with a potential risk of flooding:

Policy 9.1 (Flood Risk) No. 3 – *"Ensure the recommendations of the Strategic Flood Risk Assessment (SFRA) for the Galway City Development Plan 2023-2029 are taken into consideration in the assessment of developments in identified areas of flood risk and require site specific Flood Risk Assessment (FRA) and associated design and construction measures appropriate to the scale and nature of the development and the risks arising, in all areas of identified flood risk including on sites where a only small proportion of the site is at risk of flooding and adopt a sequential approach in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)."*

Policy 9.1 (Flood Risk) No. 5 – *"Ensure flood risk is incorporated into the preparation of any future local area plans, framework plans and masterplans in the city."*

In light of these, a detailed standalone *Flood Risk Assessment* has been prepared by TOBIN and is included as part of this Planning Application. This was prepared in accordance with *Planning System and Flood Risk Management: Guidelines for Planning Authorities* (2009), and led to the setting of the minimum finished floor levels of 5.35 mOD.

Whilst the Council is recommended to review this separate report, we note the following key conclusions:

"With reference to the PSFRM guidelines, the proposed development is comprised of "highly vulnerable" (residential properties and childcare facilities) and "less vulnerable" (commercial properties).

Fluvial Flooding

The river Corrib, which is located approximately 500m west of the subject site was studied as part of the Western CFRAM Study. The mapping shows that in a 1 in 1000-year (0.1% AEP) MRFS event, the fluvial flood extents are at minimum 120m southwest of the subject site.

*Therefore, **the risk of fluvial flooding to the subject site is minimal.***

Coastal Flooding

NCFHM mapping indicates that in a current scenario approximately 25% of the subject site is inundated in a 1 in 1000-year (0.1% AEP) event, with a small area liable to coastal flooding in a 1 in 200-year (0.5% AEP) event. The NCFHM mapping indicates that in a

current scenario approximately. The area prone to flooding is the southwestern portion of the subject site. In the MRFS approximately half of the subject site is inundated in a 1 in 200-year (0.5% AEP) event, with approximately 60% of the subject site inundated in a 1 in 1000-year (0.1% AEP) event. Again, the southwestern portion of the subject site is the area which is at risk of coastal flooding. There are two small areas of the subject site which are liable to flooding in the 1 in 10-year (10% AEP) event; along the southeastern and southwestern borders. The ICWWS water levels in a 1 in 200- and 1 in 1000-year (0.5% and 0.1% AEP) MRFS event area 4.51mOD and 4.76mOD respectively. The CFRAM mapping showed lesser extents but uses the superseded ICPSS coastal water levels.

In order to defend the subject site against a 1 in 1000-year (0.1% AEP) MRFS flood event, which is required for critical infrastructure, the FFL at the subject site is required to be at minimum 5.05mOD to account for climate change and a freeboard of 300mm.

Therefore, it is estimated that risk of coastal flooding associated with the proposed development is minimal.

Pluvial Flooding

The PFRA indicative mapping indicates that there are no areas of pluvial flooding within the subject site.

Surface water arising on the proposed mixed-use development will be managed by a dedicated stormwater drainage system in accordance with Sustainable Drainage Systems (SuDS) principles, limiting discharge from the site to greenfield runoff rates.

The landscaping and topography of the developed site will provide safe exceedance flow paths and prevent surface water ponding to minimise residual risks associated with an extreme flood event or a scenario where the stormwater drainage system becomes blocked.

Therefore, it is estimated that risk of pluvial flooding associated with the proposed development is minimal.

Groundwater Flooding

There is no evidence to suggest groundwater as a potential source of flood risk to the proposed subject site.

Justification Test

The proposed development was subject to the Justification Test as the southwestern corner of the subject site was shown as flooding in the 1 in 1000-year coastal flood event by the NCFHM Study, with an even smaller area liable to flooding in the 1 in 200-year event. ***The proposed development satisfied all criteria of the Justification Test in Section 4.5.***

Based on the results of this flood risk assessment, it is estimated that the risk of flooding to the proposed development will be minimal, and that the development will not increase the risk of flooding elsewhere. There is an evident coastal risk at the southwestern portion of the subject site. We propose to mitigate the flood risk to "Highly vulnerable"

infrastructure by raising the minimum FFL to 5.05mOD, this allows for a 300mm freeboard above the 1 in 1000-year (0.1% AEP) MRFS event.” **[emphasis added]**

6.11 Architectural Heritage and Archaeology

With respect to architectural heritage and archaeology, the Development Plan’s Chapter 8 (Built Heritage, Placemaking and Urban Design) opens with the following statement:

“Galway has exceptionally strong links with its past. This is evident in the built form, architecture and archaeology of the city...”

Managing growth and redevelopment in a way that respects and draws on Galway’s heritage is vital for the success of the city. As the Plan includes policies to support infill, redevelopment and regeneration in the city core it is anticipated that overtures for large scale development will advance in the currency of this Plan. It is necessary for such developments to include for high quality architectural design, reflect good urban design principles and contribute to the public realm while integrating the new architecture respectfully and successfully into the valued historic context. Application of a quality architectural response, particularly on the Regeneration and Opportunity Sites, that is inspired by the unique historical built heritage and good urban design can meet the challenge of a historical context and can, with use of sensitive design, complement the city’s character and distinctiveness and maintain and contribute to its strong sense of place.”

Relevant policies in relation to Protected Structures feature under Policy 8.1 (Record of Protected Structures), with those of note being:

“2. Ensure new development enhances the character or setting of a protected structure...”

“4. Have regard to the National Inventory of Architectural Heritage in the assessment of development.”

Relevant policies in relation to Architectural Conservation Areas (ACAs) feature under Policy 8.2 (Architectural Conservation Areas), with the only one of note being:

“1. Protect and enhance the character and special interest of designated Architectural Conservation Areas, in accordance with legislation and DEHLG Architectural Heritage Protection Guidelines 2011.”

Relevant policies in relation to archaeology feature under Policy 8.4 (Archaeology), with those of note being:

“1. Protect, preserve and promote the archaeological heritage of the city including underwater archaeology in rivers, lakes, intertidal and subtidal environments.

“2. Ensure that proposed development within the designated city centre Zone of Archaeological Notification is not detrimental to the character of an archaeological site or its setting.”

“3. Have regard to the archaeological recommendations of the DHLGH on any planning applications.”

"7. Ensure that any development proposal with potential to impact on archaeological heritage, including the setting and amenity of sites and monuments, includes for an archaeological assessment. This includes within terrestrial, riverine, inter-tidal and sub-tidal environments."

The 'Archaeology and Cultural Heritage' Chapter of the EIAR identified a total of 33 No. "cultural heritage sites" within the subject site and its defined study area of 300 m from the site. These include archaeological features, buildings/structures listed on the National Inventory of Architectural Heritage (NIAH), Protected Structures and ACAs. Amongst these are:

- Galway City: Rivers and Waterways (Quay/Wharf – Old Dock) (RPS No. 8501),
- Forthill (including Graveyard/Cemetery, Fort and Religious House) (RPS No. 4401, NIAH No. 30319007 and Monument Nos. GA094-099001-, GA094-099002- and GA094-099003-),
- Lough Atalia Railway Viaduct (as part of the 'Railway & Ancillary Buildings - Including Stone Sheds, Stone Stables, Turntable, Bridges & Tracks' record) (RPS No. 10002, NIAH No. 30319007),
- St Nicholas Street ACA,
- City Core ACA,
- Eyre Square ACA,
- Long Walk ACA,
- Monument No. GA094-100----: Historic town, and
- Monument No. GA094-100001-: Town defences.

The Chapter of the EIAR provides a detailed history of Galway City and the subject site, including the built/culture heritage features present. It remarks that, during the construction phase:

"Should archaeological material be uncovered during the archaeological monitoring programme, the NMS [National Monuments Service] will be informed and consulted to establish suitable measures to record and recover the archaeological material. This may include the preservation of archaeological deposits in situ, where possible, archaeological excavation (preservation by record) of archaeological deposits and/or the retrieval of artefacts of archaeological consequence, whether found in and archaeological context or out of context within modern fill materials. The discovery of archaeological material will lead to a post-excavation phase of works, involving analysis and further reporting for dissemination to the relevant authorities. The level of the post-excavation analysis and reporting will be commensurate with the level of archaeology discovered."

On the basis of the successful implementation of the above, the Chapter proceeds to state that:

"...no operational phase archaeological mitigation measures will be necessary."

"There are no appropriate measures available to mitigate the operational phase effects on architectural/built heritage sites/features located in close proximity to the Proposed Development."

In closing out the Chapter, its 'Residual Effects' Section (14.7) concludes:

"While the operational phase of the Proposed Development will have the potential to result in permanent, indirect, residual negative effects of a visual nature on Forthill Cemetery, these effects are predicted to be low in magnitude and slight in significance. No residual operational"

phase effects on other archaeological and cultural heritage constraints within the study area are predicted from the Proposed Development."

The proposed development is ultimately a new insertion into the site and cityscape at a location historically in use for port-related/industrial activity. However, it is also a site within the centre of Galway City and in a context that is currently evolving and expected to change in response to the Inner Harbour's designation as a 'Regeneration Site'. Therefore, change must be expected and accepted.

The proposed development's design has sought to respond in a respectful manner relative to the City's existing built and archaeological heritage. Careful design, articulation, fenestration, height and massing, along with pleasant and robust materials, all combine to yield an attractive development that will complement the existing and emerging built-form of the City, whilst remaining sympathetic to its built and archaeological heritage.

6.12 Part V

The proposal to comply with Part V obligations is detailed in Section 5.21 of ALTU's *Architectural Design Statement*. It is proposed to provide in excess of 20% of units, with 72 No. to be put forward; equivalent to 20.2% of the 356 No. totals units (Table 6.17). The units proposed are at ground to seventh floor levels of Block D, which is the development's northernmost block, with strong views over Lough Atalia..

The Applicant proposes that half of the units will be made available to the Council as social housing and the remaining half will be affordable.

1-bed	2-bed (3-person)	2-bed (4-person)	3-bed	Total
22	8	35	7	72

Table 6.17: Proposed Part V provision

Source: Collated by Thornton O'Connor Town Planning (2025)

Costings associated with the Part V proposal have been prepared and are submitted under separate cover.

Additionally, a letter from Galway City Council (dated 15th August 2025) confirming that the Applicant is engaging with them in respect of Part V requirements is enclosed. It states that the Council is *"....agreeable in principle to [the proposed] units on-site."*

6.13 Control of Major Accidents and Hazards

The subject site is within the 'consultation distance' of a Control of Major Accidents and Hazards (COMAH) / Seveso establishment; specifically, the 'Circle K Galway Terminal'. Consequently, AWN has been appointed to prepare a *COMAH Land Use Planning Assessment*. Their analysis, prepared using the Health and Safety Authority's own guidance, has drawn the following conclusions, which we are of the opinion do not preclude the delivery of the proposed development:

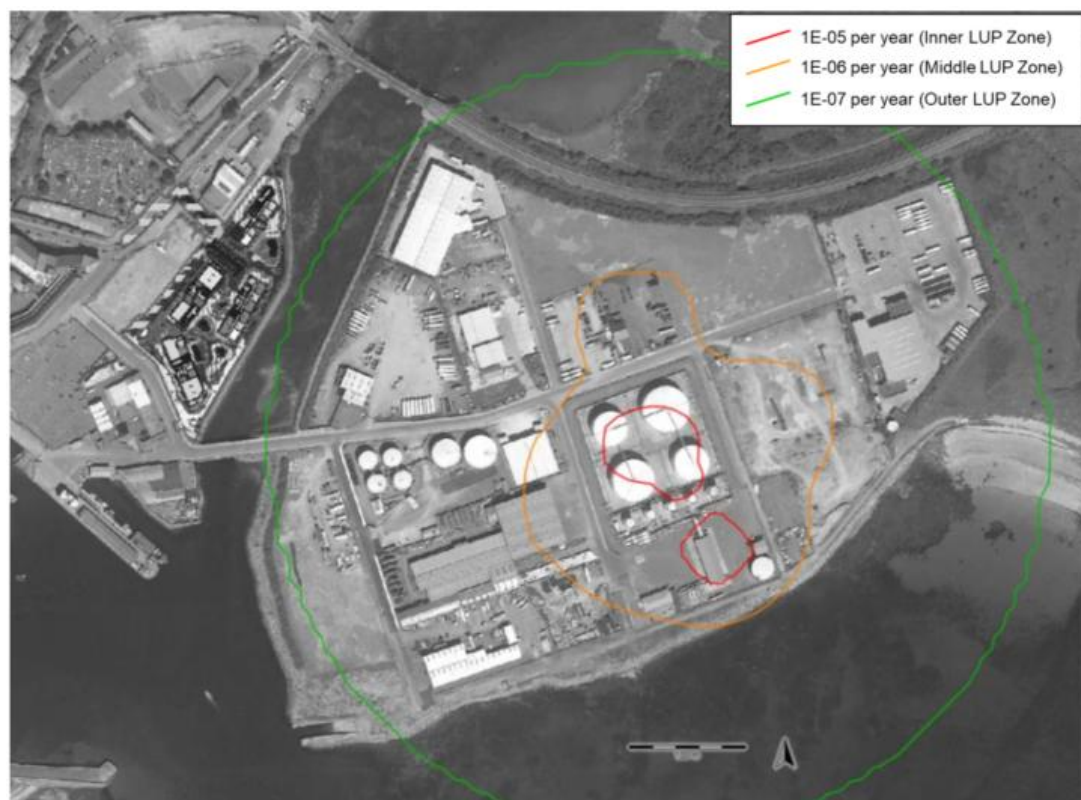
"The assessment is completed following the Health and Safety Authority's Guidance on technical land-use planning advice (TLUP) For planning authorities and COMAH

establishment operators (HSA, 2023) and the Land Use Planning Policy and Approach Document (HSA, 2010).

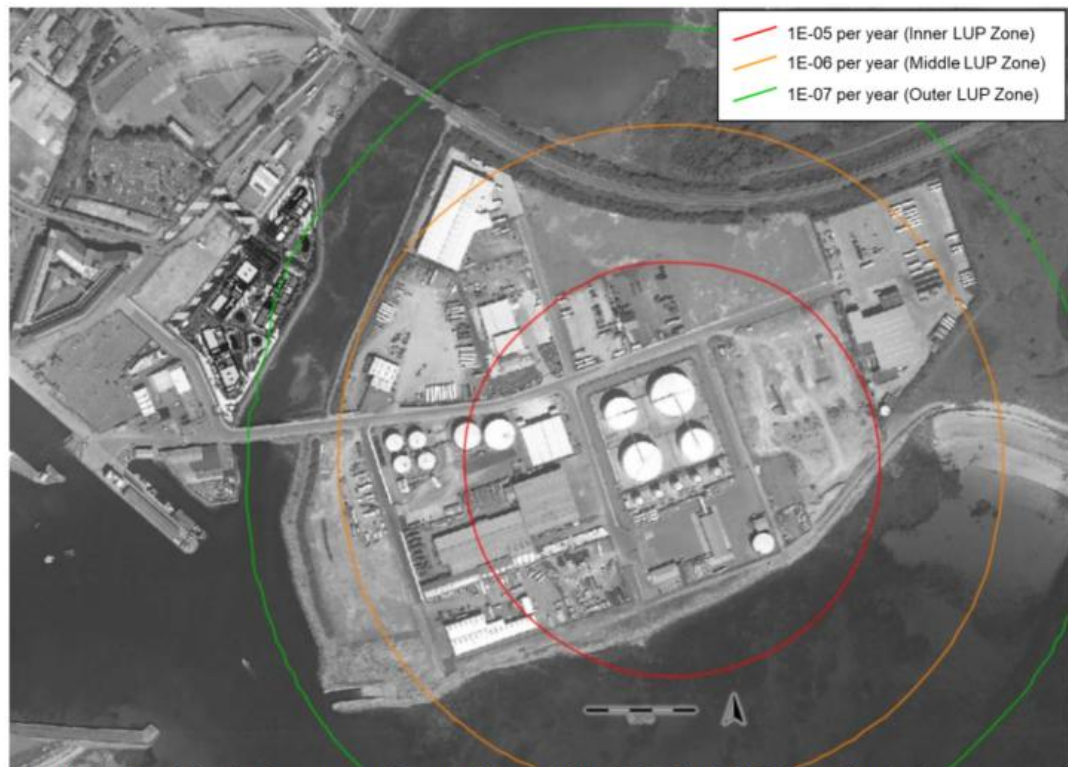
The Circle K Galway Upper Tier COMAH facility handles the import and storage of ultra-low sulphur diesel (ULSD), kerosene (kero), and gasoline delivered by ship, as well as ethanol received via road tankers. This document assesses major accident scenarios identified in the TLUP (HSA, 2023), including pool fires, vapour cloud explosions, and flash fires.

During consultation with the HSA, prior to the lodgement of this planning application, explicit reference was made by the HSA to include the assessment of a Buncefield-type explosion scenario. At the HSA's request, this assessment is included in this report. Modelling methodology for a Buncefield-type explosion does not feature in the most recently published guidance issued by the HSA; therefore, we have utilised the previous iteration of the Land Use Planning guidance (HSA, 2010) to undertake this assessment, as the most recently available, relevant guidance for same.

The individual risk contours, to persons outdoors and persons indoors (CIA 2), for the Circle K upper tier COMAH establishment corresponding to the boundaries of the Inner, Middle and Outer risk-based land use planning zones are illustrated as follows:



Individual Risk of Fatality Contours, to Persons Outdoors, for Circle K Galway Terminal



Individual Risk of Fatality Contours, to Persons Indoors (CIA 2), for Circle K Galway Terminal

The proposed scheme is a Sensitivity Level 3 type development as it is a 'Larger housing developments for more than 30 dwelling units' (HSA, 2023). Therefore, the proposed scheme is permitted within the Outer Zone.

It is concluded that the level of individual risk at the proposed scheme is acceptable.

The proposed scheme is within the consequence zone of major accidents at the Circle K facility. Therefore, a Societal Risk assessment is required to take account of group risk to the receptors at the proposed scheme.

*Societal risk calculations aggregate the risks presented to all populations at the proposed development arising from all major accidents at the Circle K facility. A Societal Risk assessment for the proposed scheme was completed and the Expectation Value (EV) at the proposed scheme is calculated to be **667**.*

Section 1.7 of the TLUP (HSA, 2023) states:

'for new developments near an establishment, where the calculated off-site EV at the development greater than 2,000, further assessment of societal risk will be required.'

*The total Expectation Value (EV) at the proposed scheme is **667**. This is <2,000; therefore, no further risk calculation is required.*

*It is concluded that the level of individual risk and societal risk, at the proposed residential led mixed-use scheme, is in accordance with the HSA's criteria and is acceptable. **[emphasis original]***

As stated above, the approach taken by AWN in the preparation of their submitted assessment varied by comparison with that presented to the HSA after the consultation held with them.

Specifically, although not prescribed by the latest HSA guidance and despite the Circle K facility having been designed to avert the same type of incident, AWN modelled and assessed a 'Buncefield-type' scenario (as sought by the HSA).

As evidenced above and in AWN's report, whilst the outer zone extends to include part of the development site and only 'touches' Block C, this is acceptable as the use proposed there is a "Larger housing developments for more than 30 dwelling units".

In light of the detailed analysis undertaken by AWN, it is clear that the proposed development is appropriately designed and sited relative to the Circle K facility, with the analyses undertaken to draw this conclusion informed by publicly available and verifiable information and methodologies.

6.14 Ecology and Environment

6.14.1 Natura 2000 Sites

Policy 5.2 (Protected Spaces: Sites of European, National and Local Ecological Importance) of the Development Plan prescribes the local level affirmation of protections associated with Natura 2000 sites in the City Council area. Relevant policy points are as follows:

"1. Protect European sites that form part of the Natura 2000 network (including Special Protection Areas and Special Areas of Conservation) in accordance with the requirements in the EU Habitats Directive (92/43/EEC), EU Birds Directive (2009/147/EC) and associated national legislation."

"2. Ensure that all plans or projects within the Plan area will only be authorised and / or supported after the competent authority has ascertained based on scientific evidence, screening for appropriate assessment and /or a Habitats Directive Assessment that:

i. The plan or project will not give rise to an adverse direct, indirect or secondary effect on the integrity of any European site (either individually or in combination with other plans or projects); or

ii. The plan or project will have an adverse effect on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or

iii. The plan or project will have an adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000."

"4. Protect, conserve and support the development of an ecological network throughout the city which will improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive."

"10. Protect and conserve rare and threatened habitats and their key habitats, (wherever they occur) listed on Annex I and Annex IV of the EU Habitats Directive (92/43/EEC) and listed for protection under the Wildlife Acts 1976-2000 and plant species listed in the Flora Protection Order 2015."

"11. Ensure that plans and projects with the potential to have a significant impact on European sites (SAC or SPA) whether directly, indirectly or in combination with other plans or projects are subject to Appropriate Assessment, under Article 6 of the Habitats Directive (92/43/EEC) and associated legislation and guidelines, to inform decision making."

"14. Support and implement measures to control and manage alien/invasive species, where appropriate in accordance with the EU (Birds and Natural Habitats) Regulations 2011."

As referenced in Section 5.8 above, a review of the National Parks and Wildlife Service's *Designations Viewer* reveals that the subject site is adjacent to the Galway Bay Complex SAC and the Inner Galway Bay SPA, and proximal with potential pathways to others; most notably the Lough Corrib SAC and the Lough Corrib SPA. In light of same, DNV prepared an *Appropriate Assessment Screening Report*, which concluded *"...that the possibility of significant effects on... European sites cannot be excluded..."* The specific sites of interest were the 4 No. listed here. Thus, a *Natura Impact Statement (NIS)* was prepared.

This thorough assessment considered the possibility of both direct and indirect significant impacts of the development on these Natura sites and incorporated a range of construction and operation mitigation measures. With these in place, the NIS proceeded to conclude:

"The above sites were identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The Appropriate Assessment investigated the potential direct and indirect effects of the proposed works, both during construction/infill and operation, on the integrity and qualifying interests of the above European Site, alone and in combination with other plans and projects, taking into account the site's structure, function and conservation objectives."

*Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. **This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Development will not have an adverse effect on the integrity of the above European site(s), individually or in combination with other plans and projects.** Where applicable, a suite of monitoring surveys have been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.*

*As a result of the complete, precise and definitive findings in of this NIS, **it has been concluded, beyond reasonable scientific doubt, that upon implementation of the mitigation measures as outlined in the preceding section, the Proposed Development will have no significant adverse effects on the QIs, SCIs and on the integrity and extent of the aforementioned European sites. Accordingly, the Proposed Development will not adversely affect the integrity of any relevant European site.*** [emphasis added]

6.14.2 Environmental Impact

With respect to impacts on the environment, whilst the proposed development is markedly below the thresholds for mandatory *Environmental Impact Assessment Report* (EIAR) as set by Categories 10(b)(i)⁴¹ and (ii)⁴² in Schedule 5 of the *Planning and Development Regulations 2001* (as amended), the decision was made by the Applicant and Design Team following consultation with GCC to proceed with the preparation of an EIAR.

DNV has acted as the lead in the collation and preparation of the EIAR, which is enclosed under separate cover. Given the voluminous and technical nature of this document, its content is not repeated here. However, we direct the Council to this standalone document for full details of environmental impacts and the mitigation to be employed.

For the Council's awareness, the EIA Portal Notification was made to the Department of Housing, Local Government and Heritage on 8th September 2025. We received a response on 9th September 2025 confirming that the submitted information was uploaded to the EIA Portal under EIA Portal ID No. 2025164. Evidence of the confirmation is enclosed.

6.15 Climate Change

Climate change is an increasingly important consideration in the design, siting, delivery and operation of new (and existing developments). In this context, the Applicant and Design Team are mindful of the policies contained within Chapter 2 (Climate Action) of the Development Plan. Having reviewed Policies 2.1 (Circular Economy), 2.2 (Climate Action), 2.3 (Renewable Energy), 2.4 (Sustainable Building Design and Construction) and 6.1 (General Policy), we are firmly of the opinion that the proposed development will directly and indirectly aid their attainment.

Example aspects of the design, construction and operation of the development that demonstrate this include:

- Waste minimisation and material reuse during demolition and construction;
- Target BER of A;
- Incorporation of renewable energy infrastructure;
- Incorporation of a significant planting regimen with a substantial number of native trees;
- Minimum finished floor level of 5.35 mOD (including 300mm freeboard) to protect against flood risk;
- Incorporation of nature-based SuDS;
- Waste minimisation and recycling during operation;
- Low car parking provision;
- Car share options and EV charging spaces;
- Substantial cycle parking provision;
- Redevelopment/regeneration of an underutilised brownfield sites, rather than development of an outer city greenfield site;
- Location of the subject site within the City Centre, making it easy to access a host of services, facilities and amenities via active modes; and
- Inclusion of non-residential uses on-site (i.e. mixed-use development).

⁴¹ 500 No. residential units.

⁴² Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. "*Business district*" means a district within a city or town in which the predominant land use is retail or commercial use.

In addition to the above, the Applicant appointed JBA to prepared a *Climate Action Energy Statement*, incorporating a *Scheme Sustainability Statement* as required by Section 11.31 of the Development Plan. This report has been submitted as part of the Planning Application pack and is available for review, addressing the 7 No. requirements set by the Development Plan:

1. *"How the location, siting, layout, design and drainage proposals maximise climate adaptation opportunities.*
2. *How the SuDS strategy integrates the four pillars of SuDS Design – water quantity, water quality, amenity and biodiversity.*
3. *The use of green roofs other green infrastructure as a means of contributing towards sustainable urban drainage, improving biodiversity and influencing heat loss/gain from the building.*
4. *Energy efficiency through thermal insulation, passive ventilation and cooling, passive solar design and any technologies used to help occupants better manage energy usage.*
5. *The use of district, renewable and/or low-carbon energy supply opportunities.*
6. *How the proposals at all stages embrace the Circular Economy approach in relation to waste management from construction through to the operation of the building(s).*
7. *How noise and air pollution will be managed across all stages of development from construction through to operation of the building(s)."*

7.0 PLANNING ADMINISTRATION

This Planning Application is being lodged to Galway City Council via the online system provided at: planning.localgov.ie/en/ Should hard copies of the submitted pack be required, please do not hesitate to contact us as Planning Agent.

Please find the plans and particular listed below enclosed.

7.1 Planning Administration

Application Form

- The *Planning Application Form* is auto-generated by the online system.
- *Application Form (Form 19)*

Planning Fee

- The Planning Application Fee has been calculated in accordance with the *Planning and Development (Large-scale Residential Development Fees) Regulations 2021*:
 - 356 No. units x €130 per unit = €46,280.00
 - 841 sq of non-residential floorspace (rounded-up from 840.3 sq m) = €6,055.20
 - EIAR included = €10,000.00
 - NIS included = €10,000.00
 - **Total = €72,335.20**
- This was paid to GCC via Electronic Fund Transfer on 4th September 2025 (see Appendix A below).

Letter of Authorisation to Lodge

- Letter of authorisation from The Land Development Agency allowing Thornton O'Connor Town Planning to lodge this Planning Application on their behalf.

Letter of Consent

- Letter of consent from GCC permitting The Land Development Agency to lodge this Planning Application which includes lands in its ownership/charge.
- Letter of consent from GCC permitting The Land Development Agency to lodge this Planning Application which includes lands in their ownership/charge.

Site Notice

- A copy of the Site Notice, dated and erected at 7 No. locations at the site on Wednesday, 17th September 2025.

Newspaper Notice

- A copy of the Newspaper Notice, published in the Galway Advertiser on Thursday, 18th September 2025.

Part V

- *Part V Cost Proposal.*
- Letter from GCC in respect of Part V provision.
- (Please also refer to Section 5.21 of ALTU's *Architectural Design Statement* for details of the proposed units and their locations.)

7.2 Planning

- This *Planning Report and Statement of Consistency*, prepared by Thornton O'Connor Town Planning.
- A copy of the *Statement of Response to LRD Opinion*, prepared by Thornton O'Connor Town Planning.

7.3 Architecture

- A copy of the *Architectural Design Statement* prepared by ALTU Architects.
- The following Drawings prepared by ALTU Architects.

Drawing No.	Drawing Title	Scale	Size
P101.1	Site Location Map	1:1000	A1
P101.2	Existing Site Plan	1:500	A1
P101.3	Demolition Plan	1:200, 1:500	A0
P101.4	Proposed Site Layout Plan	1:500	A1
P101.5	Site Layout Plan Ground Floor	1:500	A1
P101.6	Site Layout Plan – First & Second Floors	1:500	A1
P101.7	Site Layout Plan – Third & Fourth Floors	1:500	A1
P101.8	Site Layout Plan – Fifth & Sixth Floors	1:500	A1
P101.9	Site Layout Plan – Seventh & Eighth Floors	1:500	A1
P101.10	Site Layout Plan – Ninth & Tenth Floors	1:500	A1
P101.11	Site Layout Plan – Eleventh & Twelfth Floors	1:500	A1
P101.12	Site Layout Plan – Thirteenth Floor – Roof	1:500	A1
P101.13	Ground Floor Plan – Part 1 of 2	1:200, 1:2000	A0
P101.14	Ground Floor Plan – Part 2 of 2	1:200, 1:2000	A0
P102.1	Block A – Plans 1 of 2	As Indicated	A1
P102.2	Block A – Plans 2 of 2	As Indicated	A1
P102.3	Block A – Elevations / Sections	As Indicated	A1
P103.1	Block B – Plans 1 of 2	As Indicated	A1
P103.2	Block B – Plans 2 of 2	As Indicated	A1
P103.3	Block B – Elevations	As Indicated	A1
P103.4	Block B – Sections	As Indicated	A1
P104.1	Block C – Plans 1 of 2	As Indicated	A1
P104.2	Block C – Plans 2 of 2	As Indicated	A1
P104.3	Block C – Elevations / Sections	As Indicated	A1
P105.1	Block D – Plans 1 of 3	As Indicated	A1

Drawing No.	Drawing Title	Scale	Size
P105.2	Block D – Plans 2 of 3	As Indicated	A1
P105.3	Block D – Plans 3 of 3	As Indicated	A1
P105.4	Block D – Elevations	As Indicated	A1
P105.5	Block D – Sections	As Indicated	A1
P106.1	Site Elevations Sections 1 of 5	1:200	A0
P106.2	Site Elevations Sections 2 of 5	1:200	A0
P106.3	Site Elevations Sections 3 of 5	1:200	A0
P106.4	Site Elevations Sections 4 of 5	1:200	A0
P106.5	Site Elevations Sections 5 of 5	1:200	A0
P107.1	Standard Apartment Typology	1:50	A1
P107.2	Universal Design Apartment Typology	1:50	A1
P107.3	Proposed Taking In Charge Plan	1:500	A1
P107.4	Proposed Phasing Plan	1:500	A1
P107.5	Substation and Pump Station	1:100, 1:2000	A1

7.4 Engineering

- A copy of the *Civil Works Design Report* prepared by Tobin.
- A copy of the *DMURS Statement of Compliance* prepared by Tobin.
- A copy of the *Flood Risk Assessment* prepared by Tobin.
- The following Drawings prepared by Tobin.

Drawing No.	Drawing Title	Scale	Size
11910-2000	Site Location Map	1:2500/1:5000	A3
11910-2001	Proposed Watermain Layout	1:500/1:1000	A3
11910-2002	Proposed Foul Layout	1:500/1:1000	A3
11910-2003	Proposed Road Layout	1:500/1:1000	A3
11910-2004	Proposed SuDS and Surface Water Drainage Layout	1:500/1:1000	A3
11910-2005	Proposed Manhole & Drainage Schedule	As Shown	A1
11910-2006	Autotrack Analysis Large Car	1:500/1:1000	A3
11910-2007	Autotrack Analysis Refuse Truck	1:500/1:1000	A3
11910-2008	Autotrack Analysis Fire Tender	1:500/1:1000	A3
11910-2009	Standard Watermain Details	As Shown	A3
11910-2010	Standard Manhole Details Sheet 1 of 2	As Shown	A3
11910-2011	Standard Manhole Details Sheet 2 of 2	As Shown	A3
11910-2012	Standard Pipe Bedding Details	As Shown	A3
11910-2013	Typical Site Works Details	As Shown	A3
11910-2014	Typical SuDS Details	As Shown	A3
11910-2015	Proposed Remedial Earthworks Heatmap	1:500/1:1000	A3
11910-2016	Post Remedial Bulk Earthworks Heatmap	1:500/1:1000	A3

7.5 Traffic and Transportation

- A copy of the *Traffic and Transport Assessment Report* (and its appendices, including *Travel Plan*, *Quality / Stage 1 Road Safety Audit*, *Public Transport Capacity Assessment* and *Construction Management Plan*) prepared by NRB Consulting Engineers.

7.6 Public Lighting

- A copy of the *External Lighting Report* prepared by Axiseng Consulting Engineers.
- A copy of the *Climate Action Energy Statement* prepared by Axiseng Consulting Engineers.
- A copy of the *Thermal Comfort Study – TM59 Analysis* prepared by Axiseng Consulting Engineers.
- The following Drawing prepared by Axiseng Consulting Engineers.

Drawing No.	Drawing Title	Scale	Size
GALP-X-X-DR-AXE-EE-60102	Site Lighting	1:500	A1

7.7 Landscape Architecture

- A copy of the *Landscape Design Proposal Report* prepared by Stephen Diamond Associates Chartered Landscape Architects.
- The following Drawings prepared by Stephen Diamond Associates Chartered Landscape Architects.

Drawing No.	Drawing Title	Scale	Size
24-612-SDA-PD-DR-GF-001	Landscape Master Plan	1:500	A1
24-612-SDA-PD-DR-GF-002	Landscape Plan – Block A	1:200	A1
24-612-SDA-PD-DR-GF-003	Landscape Plan – Block B & C	1:200	A1
24-612-SDA-PD-DR-GF-004	Landscape Plan – Block D	1:200	A1
24-612-SDA-PD-DR-GF-005	Open Space & Bike Parking	1:1000	A3
24-612-SDA-PD-DR-GF-006	Green Infrastructure and Biodiversity Plan	1:1000	A3
24-612-SDA-PD-DR-GF-201	Landscape Sections 01	1:500/1:50	A1
24-612-SDA-PD-DR-GF-202	Landscape Sections 02	1:500/1:50	A1
24-612-SDA-PD-DR-GF-203	Landscape Sections 03	1:500/1:50	A1
24-612-SDA-PD-DR-GF-204	Landscape Sections 04	1:500/1:50	A1
24-612-SDA-PD-DR-GF-205	Landscape Sections 05	1:500/1:50	A1

7.8 Ecology & Environment

- A copy of the *Appropriate Assessment Screening Report* prepared by DNV.
- A copy of the *Natura Impact Statement* prepared by DNV.

- A copy of the *Water Framework Directive Assessment* prepared by DNV.
- A copy of the *Construction Environmental Management Plan* prepared by DNV.
- A copy of the *Climate Change Impact Assessment* prepared by JBA Consulting.

7.9 Arboriculture

- A copy of the *Arboricultural Impact Assessment* prepared by Arbor-Care Ltd.
- The following Drawings prepared by Arbor-Care Ltd.

Drawing No.	Drawing Title	Scale	Size
GPG-TS-001	Tree Survey Plan	1:500	A1
GPG-TS-001	Tree Protection Plan	1:500	A1

7.10 Daylight and Sunlight

- A copy of the *Daylight and Sunlight Analysis* prepared by Model Works Ltd.

7.11 Visuals

- A copy of the *CGIs* prepared by Model Works Ltd.
- A copy of the *Verified Photomontages* prepared by Model Works Ltd.

7.12 Waste Management and Servicing

- A copy of the *Resource & Waste Management Plan* prepared by AWN Consulting.
- A copy of the *Operational Waste Management Plan* prepared by AWN Consulting.

7.13 Microclimate

- A copy of the *Wind Microclimate Analysis* prepared by Buildings Fluid Dynamics.

7.14 Culture and Social Infrastructure

- A copy of the *Culture and Social Infrastructure Audit* prepared by Thornton O'Connor Town Planning.

7.15 COMAH

- A copy of the *COMAH Land Use Planning Assessment* prepared by AWN Consulting.

7.16 Telecommunications

- A copy of the *Telecommunications Report* prepared by ISM – Independent Site Management.

7.17 Noise Impact

- A copy of the *Acoustic Design Statement* prepared by Wave Dynamics Acoustic Consultants.

7.18 Property Management

- A copy of the *Building Lifecycle Report* prepared by Aramark Property.
- A copy of the *Property Management Strategy Report* prepared by Aramark Property.

7.19 EIAR

- A copy of the *EIAR (Volumes 1–3)*, principally prepared by DNV.
- *Confirmation of EIAR from Department.*

7.20 Masterplan

- A copy of the *Galway Inner Harbour Masterplan 2025*, prepared by Scott Tallon Walker Architects, including its following Appendices:
 - A copy of the *Galway Inner Harbour Planning Framework 2021* prepared by Scott Tallon Walker Architects.
 - A copy of the *Biodiversity Action Plan* prepared by MKO.
 - A copy of the *Article 6(3) Appropriate Assessment Screening Report* prepared by MKO.
 - A copy of the *SEA Screening of the Galway Inner Harbour Masterplan* prepared by MKO.
 - A copy of the *Galway Inner Harbour Masterplan Public Consultation Report* prepared by MKO.
 - A copy of the *Statement of Consistency with Planning Policy* prepared by MKO.

8.0 CONCLUSION

This is an excellent opportunity to bring the centrally located, underutilised subject site into a more sustainable and efficient use. Its development for residential, childcare, café and retail uses will deliver much-needed housing and other vibrant uses to this part of the city centre.

The height, scale and density of the development have been informed by the Development Plan, the Council's *Urban Density and Building Heights Study* and Section 28 Guidelines as appropriate, resulting in an attractive, efficient and respectful built-form and intensity of land-use. The choice of materiality is intentional and informed by the vision of the *Galway Inner Harbour Masterplan 2025*; robust, hard-wearing brick variations are the primary selection, delivered in alternating forms. Form, fenestration and modulation are proposed in a way to disaggregate the scale and to vary the scheme's presentation, avoiding monotony and bulkiness.

As the first phase of development envisaged by the Masterplan, it has an important catalyst role and has been designed to set the tone as a carefully design and considered development given the sensitivities of the area.

We trust that the above and enclosed allow for a thorough assessment of the proposed development and the making of a decision to Grant Planning Permission. However, should you require further insights, please do not hesitate to contact the undersigned.

Yours faithfully,



Daniel Moody
Associate
Thornton O'Connor Town Planning

APPENDIX A – PROOF OF PLANNING FEE PAYMENT

The Land Development Agency
4th Floor, Ashford House
Tara Street
Dublin
D02 VX67

Telephone:
Email:
VAT Reg No IE



Galway City Council
College Road , Galway
Galway
H91 X4K8
Ireland

Remittance Advice

Date	04/09/2025
Account Ref	GAL004

NOTE: All values are shown in Euro

Date	Ref	Details	Debit	Credit
27/08/2025	Planning Application	Galway Port LRD	72,335.20	0.00

Discount Taken 0.00

Amount Paid	
€	72,335.20