

Statement of Response to LRD Opinion

Prepared in Respect of a Planning Application for a Large-Scale Residential Development (LRD) at a Site of 1.621 Ha at Galway Port, Galway City

On Behalf of The Land Development Agency



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INTRODUCTION

This Statement of Response to LRD Opinion (Statement of Response) has been prepared by Thornton O'Connor Town Planning¹ (TOC) and the appointed Design Team on behalf of The Land Development Agency² (LDA / Applicant) in respect of a Planning Application for a Large-scale Residential Development (LRD) submitted to Galway City Council (GCC). In summary, and principally, the LRD comprises 356 No. residential units, a crèche, a retail unit and 2 No. café/restaurant units at a site of 1.621 Ha at Galway Port, Galway City.

Full details of the site location and a description of the development are included in TOC's submitted *Planning Report and Statement of Consistency*.

Contributions to this Statement of Response are made by the following members of the Design Team:

- ALTU Architects (ALTU)³,
- DNV⁴,
- John Cronin & Associates (JCA)⁵,
- NRB Consulting Engineers (NRB)⁶, and
- TOBIN Consulting Engineers (TOBIN)7.

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TOPIC	LRD ITEM NO.	LRD REQUEST	RESPONSE
GENERAL	1	Any application under this process shall be accompanied by a detailed report(s)	Please refer to the enclosed <i>Planning Report and Statement of Consistency</i> prepared by TOC.
		demonstrating how the proposal would comply with the requirements of the	
		Galway City Development Plan 2023-2029, Galway Public Realm Strategy	
		2019, Urban Density & Building Heights Strategy, relevant Ministerial	
		Guidelines including Sustainable Residential Development and Compact	
		Settlements Guidelines for Planning Authorities (DHLGH January 2024) and	
		Sustainable Urban Housing Design Standards for New Apartments Guidelines	
		for Planning Authorities (July 2023), and all the points outlined below.	
	2	Any application shall demonstrate compliance with regards to the impacts of	Please refer to the enclosed <i>Climate Change Impact Assessment</i> prepared by JBA Consulting.
		Climate Change for such developments, noting the requirements as set out in	
		the Galway City Development Plan 2023—2029.	
	3	Please ensure the red edge boundary is consistent across all drawings and	All drawings have been reviewed to ensure consistency with respect to the red line Planning Application
		technical reports to be submitted with any subsequent planning application	boundary.
		and that all elements of development proposed are appropriately advertised	
		in the public notices of the application and are contained within the red line	
		boundary of the application site.	
	4	A schedule(s) shall be submitted that details the number and type of	Please refer to the enclosed Housing Quality Assessment prepared by ALTU.
		apartments and associated individual unit floor areas, as required by Section 6	
		Apartments and the Development Management Process of the Sustainable	
		Urban Housing Design Standards for New Apartments Guidelines for Planning	
		Authorities (2023).	



5	The subject site forms part of the Inner Harbour regeneration site as delineated under Figure 10.3 of the Galway City Development Plan 2023-2029 (GCDP). Section 10.6 of the GCDP highlights that this area has the 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. The GCDP explicitly states that in advance of specific proposals for development, a Masterplan will be prepared for the overall site and will be	and collaboration with the Applicant and Design Team of the subject Planning Application) sought to reconsider and revise key aspects of the Masterplan and the proposed development's position and role within the Inner Harbour Regeneration Site. Additional consultation was had with GCC on multiple occasions, including a highly constructive session in the Council Offices on 15 th May 2025. This led to further refinements to the Masterplan, which ultimately went on display for public consultation between 28 th May 2025 and 30 th June 2025.
	required to include a specified list of requirements as set out and detailed under Section 10.6 of the GCDP. The Planning Authority note that a Draft Masterplan and associated environmental reports meeting the requirements set out in Section 10.6 of the GCDP has not been finalised. In the absence of finalised Masterplan, the proposed development may be considered in part to be leading the Masterplan, as opposed to the Masterplan setting out and embedding high level core fundamental principles of good urban design and informing ordered development of the area. In this regard, the development puts forward a very clear proposal that will inform the way the rest of the Inner Harbour Area will be developed and will have a major influence on all future applications within the Masterplan area. In advance of the finalisation of the Masterplan (and associated Environmental	enclosed as part of the Planning Application submission. It should be noted that the development subject to this Planning Application has been designed in accordance with the overarching principles of the Masterplan, with both Design Teams collaborating in a constructive and collegial manner to deliver upon the broader vision for the Inner Harbour Regeneration Site. The proposed development was only finalised on foot of the agreed principles and vision of the Masterplan, yielding a plan-led approach to the Regeneration Site's redevelopment.
	Reports) for the Inner Harbour Area encompassing the specific requirements of Section 10.6 of the Galway City Development Plan, the proposal at this juncture cannot be considered to be in accordance with the Galway City Plan. Therefore, the applicant should ensure that this matter is fully resolved and addressed	
		environmental reports meeting the requirements set out in Section 10.6 of the GCDP has not been finalised. In the absence of finalised Masterplan, the proposed development may be considered in part to be leading the Masterplan, as opposed to the Masterplan setting out and embedding high level core fundamental principles of good urban design and informing ordered development of the area. In this regard, the development puts forward a very clear proposal that will inform the way the rest of the Inner Harbour Area will be developed and will have a major influence on all future applications within the Masterplan area. In advance of the finalisation of the Masterplan (and associated Environmental Reports) for the Inner Harbour Area encompassing the specific requirements of Section 10.6 of the Galway City Development Plan, the proposal at this juncture cannot be considered to be in accordance with the Galway City Plan. Therefore,

 $^{^8\,}Galway\,Harbour\,Company, Scott\,Tallon\,Walker\,Architectis, TOBIN\,Consulting\,Engineers\,and\,MKO\,Planning\,and\,Environmental\,Consultancy.$



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USE MIX	6	The proposal provides a limited quantum of mixed uses in this CC zoned land, which has a zoning objective to provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city. From the details presented, it would appear that the development is c.97.5% residential use and c.2.5% comprising of other uses. The applicant is requested to consider the inclusion of a greater mix of uses on site which shall be in accordance with legislative requirements, preferably providing active ground floor uses, in order to give full effect to the land use zoning objective on site and to create a central focus and to service the future needs of this new area.	In response to this item, we first refer back to the objective of the 'CC – City Centre' lands-use zoning: "To provide for city centre activities and particularly those, which preserve the city centre as the dominant commercial area of the city." The objective does not include an explicit reference to providing a mix of uses or what such a mix should comprise in terms of gross floor area to specific uses. We have further reviewed the Development Plan and cannot find other such policies or objectives.
HEALTH AND SAFETY	7	The subject site is located within in close proximity to a Seveso III site (Circle K Galway Terminal) located in New Docks, Galway Harbour Board Enterprise Park, which is classified as an upper tier establishment. The 'COMAH Land Use Planning Assessment of Future Mixed Use Development of the Inner Harbour Area at Galway Harbour' submitted for the purposes of the LRD meeting, is noted which concludes that the level of individual risk and societal risk at the proposed scheme at the proposed residential led mixed-use development is acceptable. The applicant is advised to note that a consultation zone, of 400m, as referenced in the GCDP, is applied by the Health & Safety Authority in relation to Seveso III establishments and any relevant proposals for development within these zones or any future amended zones will be referred to the HSA for guidance. Technical guidance by the HSA will be taken into account in the overall assessment of development in the vicinity of such establishments, in addition to standard planning criteria.	with relevant guidance, and with the benefit of insights garnered from consultation with the Health & Safety Authority prior to the lodgement of this Planning Application.



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URBAN	N/A	Introductory text:	N/A
DESIGN/LAYOUT/		,	
ARCHITECTURAL		The applicant is advised to note that the planning authority have a number of	
CONSIDERATIONS		concerns regarding the design as presented in terms of the urban design	
		element, namely in respect of the public realm, placement of services, ground	
		floor uses and landscaping. The following matters should be addressed in any	
		forthcoming planning application:	
	8 (Geometry)	The order of the proposed four blocks is considered to have a fragmented	Response provided by ALTU:
		geometry which does not give rise to a quality street order. In addition, the	
		main street is curved to accommodate the proposed port traffic, while the	
		buildings are positioned in varying angles to each other which fails to create a	
		sense of "street wall" or enclosure. These matters should be addressed in any	, , , , , , , , , , , , , , , , , , , ,
		forthcoming application.	creates a clear primary frontage, framing the internal street as a key pedestrian and cyclist route and defining
			a more legible urban edge.
			While the curved geometry of the street has been retained to accommodate the alignment of the future
			Strategic Infrastructure Road, the building forms and massing have been adjusted to improve street
			definition, public realm quality, and connectivity to future development sites identified in the Inner Harbour
			Masterplan. The design establishes a coherent hierarchy of streets and spaces while balancing long-term
			flexibility with current site constraints.
			Refer to Architectural Design Statement 5.5 Site Layout Strategy
	9 (Primary and	In terms of primary and secondary streets, the proposal will create two new	
	Secondary	streets in Galway and as this project will be the first within the intended	
	Streets)	Masterplan area, it will set the tone for subsequent developments. It is	
		considered that the quality and character of these streets is not clearly defined	Atalia Road to New Docks Road, and a secondary internal street within the masterplan providing connections
		by this project or in the emerging draft Masterplan submitted and the proposed	to open spaces and new public squares. These routes are framed by active frontages, creating a legible,
		buildings do not establish a satisfactory sense of place. A primary street	walkable, and pedestrian-friendly environment, while setting a strong foundation for future phases of the
		(servicing port traffic) and a secondary street are proposed, with both routes	Inner Harbour Masterplan.
		spatially fragmented, lacking spatial order, with the geometry generated from	
		the auto-tracking of the port traffic. Additionally, there is also concern that the	The public realm is supported by a range of high-quality spaces, including a waterfront walkway (Lough Atalia
			Walk), a southwest-facing public square, and a landscaped courtyard. While tree planting along the street is
		whilst there is no sense that a high-quality public realm will be established	limited by access and servicing constraints, green infrastructure has been focused in key public zones in
		aligning with the Galway Public Realm Strategy 2019. Furthermore, it is	, , , , , , , , , , , , , , , , , , , ,
		considered that the proposal represents a lack of clear spatial order. The order	
			Public and semi-private spaces are clearly defined through building orientation, landscape buffers, and
			passive surveillance, ensuring both security and a sense of openness, while supporting a vibrant and liveable
		is poor and relies on abstract fence line. All of these matters should be	urban environment.
		addressed in any forthcoming application.	
			Refer to Architectural Design Statement 5.6 Connectivity & Linkages
	10 (Quality Open		
	Space)	poorly resolved. The open space area appears dominated by carparking,	
		services and utilities and does not contribute positively towards creating active	
		street frontages. Regarding the secondary open space described as a 'Central	
			café/restaurant and retail unit. Its southwest orientation provides good sunlight and supports outdoor
		appears that it would be better suited as 'semi-private' open space for the	
		residents of the buildings. Additionally, the interface between this space and	
		the public promenade is not clearly defined. These matters should therefore be	
		addressed in any forthcoming application.	areas, seating, and soft landscaping to create a safe and sheltered communal environment that complements
			the public realm.



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			The interface between the courtyard and Lough Atalia Walk is clearly marked through building orientation, landscape edges, and level changes, distinguishing public and semi-private areas. Parking and services have been relocated to the site perimeter and significantly reduced within the parking court, minimising their impact and enhancing the pedestrian experience.
			Each open space now has a clear role, appropriate enclosure, and supports active and passive use, aligning with best practice and the Galway Public Realm Strategy 2019.
			Refer to Architectural Design Statement 5.6 Open Space Strategy
	11 (Active Frontage)	the potential to be a strong building with an active ground floor use. However, the current proposal for the corner is a utility building. The appropriate use and design of this building would be instrumental in the creation of a new neighbourhood and a focal point. Likewise, the entrance into the promenade is blocked by a utility/service building which is unedified – this building is poorly located and will result in blocking the walkway and impact on safety with respect to the proposed promenade. In respect to the public realm area, it appears dominated by carparking, services and utilities, with bin storage and bicycle storage areas substantial in scale located in key positions. In this regard, an improved resolution to the urban corners of the proposed development should be provided. New buildings should present a positive aspect to passersby, avoiding unnecessary physical and visual barriers. Please also refer to Item 6 above and address these matters in any future application to be	Response provided by ALTU: The proposal has been revised to enhance active frontages and improve the interface between buildings and the public realm, particularly along the main street and key urban corners. Commercial uses—including a retail unit and two café/restaurant units—are strategically positioned to anchor the southwest public square and activate the primary movement route. The setback and level change along Dock Road, required for flood mitigation, are addressed through a combination of stepped access, ramps, and landscaping, ensuring a more legible, accessible, and welcoming street edge. In line with the Inner Harbour Masterplan, the street level will be raised in future phases, further enhancing public realm quality and pedestrian connectivity. To reduce visual and physical clutter, bin stores, cycle storage, and service areas have been removed from key frontages and relocated within the building blocks. The ESB substation at the corner of the primary and secondary streets, along with the existing pump station, is identified for relocation in a future phase and are currently outside the Applicant's control or the remit of the Planning Application. Their future removal will allow for the expansion of the public square, significantly enhancing the arrival experience and reinforcing the site's placemaking potential at this important junction. Refer to Architectural Design Statement 5.9 Building Design - Block A
	12 (Materiality)	submitted. The concept of the materiality is unclear. In particular, the widespread use of brick material is somewhat alien in Galway City, of which it has no established tradition. Galway City's material palette is of render, stone and slate. This does not indicate that new developments should reflect the materials of the historic core, however, there is potential for the design to integrate itself with the city, and the city's sense of place through the appropriate use/interpretation of established forms, massing and materials. Therefore, a revised approach to the materiality of the building should be under taken in any future application that is to be submitted.	Response provided by ALTU: The Galway Inner Harbour Masterplan outlines the need for consistently high-quality, robust, well-detailed, and low-maintenance finishes that are appropriate for this exposed location and contribute to usable, liveable spaces. The materiality strategy for the proposed development has been carefully developed to balance contextual sensitivity, durability, and long-term performance, with particular consideration for Galway's coastal climate and the character of Lough Atalia Walk, as identified in the masterplan. While Galway's historic core is traditionally characterised by stone, render, and slate, the proposed use of brick offers a contemporary and durable reinterpretation of these materials. Brick has been selected for its resilience in coastal conditions, low maintenance needs, and appropriateness for cost-rental housing, providing a robust solution that addresses both environmental and economic considerations. Furthermore, as the subject site is primarily comprised of reclaimed land, and given the port area is largely without architectural merit at this location, there is an opportunity to define a new city quarter, with materials used as an important part of defining the site.



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		The development incorporates three complementary brick tones:
		 Dark grey brick at ground level, grounding the buildings and referencing the industrial character of the adjacent docks and railway infrastructure Primary brick tone 1: Light grey brick on upper levels, evoking the tone and grain of local limestone typical of Galway's civic architecture Primary brick tone 2: Buff brick, used in combination with the light grey to introduce warmth and variation, referencing traditional rendered buildings and boundary walls in the surrounding urban fabric.
		This palette brings material richness and variation while maintaining a cohesive architectural language across all four blocks. Additional detailing—such as brick banding, ribbed textures, and pressed metal elements—adds articulation and rhythm to the façades, contributing to a contemporary Galway identity that draws inspiration from, but does not replicate, the city's historic material tradition.
		The overall approach responds to the site's transitional location between the historic city centre and industrial docklands, offering a design that is modern, robust, and rooted in place.
		We welcome a planning condition requiring the submission of detailed material palettes, colour samples, and finish specifications, and will work closely with the Council to ensure that all materials selected are high quality, weather-resistant, and appropriate to Galway's evolving urban context.
		Refer to Architectural Design Statement 5.13 Materiality Strategy & 5.14 Materiality Palette
13 (Materiality)	Details and colour photographs/brochures of the materials, colours, textures of all the external finishes to the proposed development, including pavement, hard landscaping finishes and boundary treatment shall be submitted. Material choices shall take account of weathering, owing to this exposed, coastal location.	See Item 12, noting that the materials can be agreed with GCC by way of condition if the Planning Authority is minded to Grant Planning Permission.
14 (Balconies)	The design of balconies which provide private amenity area is an important consideration particularly in a development of this scale. The extensive use of	
	may be unsightly and detract from the public realm and aesthetics of a building. There are also concerns that the balcony type proposed may limit the	
	opportunity to provide for quality open spaces in such an exposed location. Therefore, the balcony design and type should be reconsidered to address	
	these matters.	Enclosed balconies with glazed balustrades, offering protection from wind and rain while maximising natural light and outward views;
		2. Vertical bar railings, used selectively on less exposed elevations to maintain openness and reduce visual bulk;
		3. Metal 'box frames', introduced at more exposed corners to provide additional shelter and to create a strong architectural expression, reinforcing the visual identity of the scheme.
		To address concerns regarding unsightly balcony storage, rental covenants and management by-laws will be implemented and enforced by the on-site management company, ensuring that balcony use remains appropriate and does not detract from the overall appearance of the buildings or public realm.
		Refer to Architectural Design Statement 5.15 Balcony Strategy
15 (Residentia Amenity)	It is noted that the separation distances as per SPPR 1 of Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DHLGH January 2024) is not achieved between Blocks A sand B	Following the LRD Meeting and receipt of the <i>LRD Opinion</i> , revisions were made to the design and layout of the proposed development. These have resulted in the following separations distances in the development that is now the subject off this Planning Application:



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		and Blocks C and D. This matter should be addressed in any forthcoming application.	 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 have opposing elevations. Blocks A and D do not interface with each other. Therefore, the proposed development complies with SPPR 1.
	16 (Residential Amenity)	Drawings/visuals, photomontages and streetscape elevations of key viewpoints of the site from the surrounding area displaying its contextual setting, public realm attributes, layout, boundary treatment, and amenity impact are required.	Additional CGIs and visualisations have been prepared by ALTU and Model Works to illustrate the proposal's contextual setting, streetscape character, and public realm impact. These include key viewpoints from the junction of the primary and secondary streets on Dock Road and from the Lough Atalia Road junction, providing a clear understanding of the development's urban interface and architectural form. These images have been used in the preparation of the 'Landscape and Visual Assessment' Chapter of the EIAR.
	17 (Residential	Any proposed application shall be accompanied by an	Details of boundary treatments, surface materials, and public realm features are addressed in the accompanying landscape design drawings and reports, which form part of the overall planning submission. A comprehensive Daylight and Sunlight Analysis has been prepared by Model Works to accompany the
	17 (Residential Amenity)	overshadowing/daylight/sunlight analysis for the proposed residential development and shall demonstrate compliance with quantitative performance and recommendations under relevant best practice guidelines and the development requirements of Section 11.3.(e) Daylight of the City Development Plan 2023-2029. Any analysis shall take account of and address the impact of the proposed development on the vacant lands surrounding the site which are also zoned CC and may facilitate future residential/mixed use development.	Planning Application. This is enclosed under separate cover. The report assesses the performance of the proposed development and its impact on surrounding properties. As requested, it also considers the potential impact of the development on surrounding lands identified for redevelopment in the Masterplan. This is a bespoke assessment as the detailed design of the buildings proposed by the Masterplan thereat have not yet been advanced. Model Works' findings should only be considered as indicative, as a future development at the adjacent sites will need to respond to the new and emerging context.
ARCHITECTURAL CONSERVATION & ARCHAEOLOGY	18 (Archaeology)	Works within the Zone of Archaeological Notification (Figure 8.12 – Galway City Development Plan 2023) will require licensed archaeological monitoring. In addition, there is some archaeological potential associated with the main body of the site due to the previous material from the city centre core being deposited as fill. Therefore, appropriate archaeological monitoring should also be proposed within this area as part of any Archaeological Impact Assessment recommendations submitted in any forthcoming planning application.	Response provided by JCA: Please refer to Chapter 14 of the EIAR which presents an archaeological and cultural heritage impact assessment. Mitigation measures outlined in said chapter commits the developer of the scheme to appointing an archaeologist to undertake a programme of archaeological monitoring of site development works; the appointed archaeologist shall work under licence from the National Monuments Service of the Department of Housing, Local Government and Heritage [NMS]. In the event any archaeological sites or features are identified during monitoring, ground works will halt at that location, and they will be recorded and will be left to remain securely in situ within a cordoned off area. The NMS and GCC will be notified of the discovery and consulted to determine further appropriate mitigation measures, which may entail preservation in situ by avoidance or preservation by record through a licensed archaeological excavation.
	19 (Architectural Conservation)	It is considered that the proposed development as presented in the documents submitted for the LRD Meeting will have a significant impact on views out of the Forthill Cemetery, a protected structure. The massing of the blocks is considered jarring, due to the widespread use of flat roofs, and significant areas of blank facades. As such, the proposed form is not considered to relate to the character of Galway City, or its docklands location; noting that other adjacent developments have addressed their setting in a more successful manner. A revision of the massing, and treatment of roofscape in particular	Response provided by JCA: The likely impact of the proposed development on views out of (and on the setting of) Forthill Cemetery have been assessed in both Chapters 11 and 14 of the EIAR. No significant negative impacts have been identified. The design team have taken account of the observations made by Galway City Council during the LRD consultation process. The massing and treatment of the roofscape has been altered to lessen the impact on



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		should be addressed in order to lessen the impact on Forthill Cemetery and views of the City in general. Updated visual imagery should also be provided to support any application.	Forthill Cemetery and views of the city in general. Updated visual imagery has been prepared by the Model Works and is available for detailed review under separate, enclosed cover.
			Given the site's sensitive location adjacent to Forthill Cemetery, a protected structure, the design has evolved with a strong emphasis on contextual sensitivity, visual impact, and architectural refinement. As the first development within the Galway Harbour Regeneration Area, the scheme plays a key role in shaping future phases, including new streets, public spaces, and the waterfront edge.
			With 360-degree visibility, the buildings are designed to perform well in both close-up and distant views. The architecture carefully balances the cost-rental brief with a refined massing strategy, aiming to reduce visual impact while contributing meaningfully to the public realm.
			Key design measures include:
			Chamfered upper levels and an articulated roofline that help break down the perceived bulk of the blocks—particularly from elevated viewpoints such as Forthill Cemetery—while contributing to a more dynamic and varied skyline. A diverse and carefully detailed façade treatment, incorporating ribbed and protruding brickwork, button bricks, horizontal stack bonding, and stone banding, adds depth, rhythm, and texture to each elevation,
			enhancing the architectural expression across the scheme. Lower parapets with metal cappings, combined with recessed and screened rooftop plant, minimise the visual impact of roof-level services and reduce the dominance of flat roof profiles.
			Together, these strategies create a layered, well-articulated, and visually responsive development that respects its context, contributes positively to the evolving Galway cityscape, and responds sensitively to views from protected structures such as Forthill Cemetery.
ACTIVE TRAVEL	20	The applicant is advised to note that Lough Atalia Road/Dock Road is part of the Orbital route for the Cross City Link Orbital Route. The Active Travel Unit have highlighted that a final Masterplan for the Inner Harbour Area is necessary to provide a complete overview of active travel requirements and permeability and that the Final Masterplan should also consider and consult with the ARUP (Consultants for Cross City Link) for comment regarding the Orbital Route of the Cross City Link and proposed works on Lough Atalia/Dock Road.	"the proposed development at the Docklands does not directly engage with the Cross-City Link Scheme. Any reference to the Orbital Route relates to the "City Centre Access Network" as identified in the Galway Transport Strategy. Where your proposed development interfaces with the CCAN, this does not form part of the Cross-City Link and Arup have no comment to make in relation to your proposed development".
	21	The Active Travel Unit also highlight that requirement for a footpath and cycle path connecting the whole project. The proposals submitted appear to indicate a footpath/cycle path for the northern section of the development on one side only, however, the vacant site currently fronting the subject site and abutting Lough Atalia Road is required to be included and part of such a design. Clarity is also required on the design for the "proposed new road" indicated with regards to cyclists/pedestrians. Similarly, details have not been provided for the road south of the development or linkage to the proposed greenway, south of the site. Any forthcoming application should address these Active Travel items.	A footpath is proposed both to the north and the south of the new one-way vehicular route. Cyclists are intended to use the new road carriageway, as it is designed to be a low-speed, lightly-trafficked street, in line with the principles outlined in the Cycle Design Manual. A 4.om minimum pedestrian/cycle way adjacent to Lough Atalia (i.e. 'Lough Atalia Walk'), on the eastern side of the site is proposed.



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ROADS AND	22	The Roads and Transport Department express concerns that further	Response provided by NRB:
TRANSPORTATION		consideration of this development must be within the context of a finalised Masterplan. It is considered that the proposed road layout is ambiguous as to the status of the main access route serving the Harbour and particularly Active Travel measures and permeability. The Roads & Transport Department also have concerns in relation to the proposed access road serving as a "resilient access" to the Harbour. Any application shall provide clarification with regard to same and shall be with supported with Road Safety Audits, as necessary.	The proposed access road is consistent with the Galway Inner Harbour 2025 Masterplan's objectives. The new internal street, which is a one-way vehicular route (south to north flows from Dock Road to the development and Lough Atalia Road) at the north-western side of the site, has a new junction with Dock Road at the south-west connecting with the upgraded access road from Lough Atalia at the north-west. The main access road to the overall Galway Harbour will continue to be Dock Road, and this is unaffected by the proposed development. The proposed new internal street is proposed only to serve the proposed development and not a main access route to the Harbour. An independent Stage 1 Road Safety Audit has been submitted with the application to address safety considerations and ensure compliance with relevant standards.
	23	The development proposal must demonstrate consistency with a finalised masterplan and the masterplan and this proposal each must demonstrate integration and consistency with the GTS (and GMATS under development by the NTA) with clear recognition of active travel schemes and permeability requirements.	Response provided by NRB: The proposed access road is consistent with the Galway Inner Harbour 2025 Masterplan's objectives, and integration and consistency with the GTS, with a greenway proposed on the southern boundary of the site. Please note that we engaged with GCC Active Travel regarding any current active travel proposals on Lough Atalia Road, and discussions with GCC noted that:- • There are currently no formal GCC proposals or drawings for Lough Atalia Road in the vicinity of our site. • While there are preliminary discussions regarding a future active travel route, the proposed Toucan
			Crossing will not
	24	This location is a significant traffic route through the city centre, and as such a Construction Management Plan including a Traffic Management Plan must be submitted for consideration. These plans should recognise standard requirements with respect to Road Opening Licences, Hoarding Licences and special deliveries to the development.	A Construction Environmental Management Plan (CEMP) has been provided by DNV as part of this Planning Application, and is enclosed separately. A Construction Traffic Management Plan (CTMP) has been prepared by NRB and is enclosed under separate cover as part of the submitted Planning Application.
LANDSCAPE, RECREATION AND AMENITY	N/A	Introductory text: The Parks, Recreation & Amenity Department note and require the following: The general concern is that the Masterplan for the Inner Harbour area, which is still at draft stage and has not been finalised. Therefore, the timing of the proposed scheme is out of sync with the plan for the overall area. As a result, the proposed LRD scheme falls short in several areas, namely the layout, amenity provision and ecological connectivity. In relation to these elements, the proposed scheme does not refer to the wider Lough Atalia area to the northeast or the city core to the northwest. Given the prominent location and the impact the scale of the built forms will have on the city, it is considered that the ambition for the site needs to be much higher. In this regard, the scheme needs to centre ecological concerns and should be nature-focused at its core to achieve sustainable urbanisation. The Masterplan, and eventually the scheme for this site, should be visionary and demonstrate how to address urban challenges, such as climate change mitigation and adaptation, biodiversity loss, urban densification as well as associated societal aspects (e.g. social cohesion, culture and health).	Responses to the various matters are set out below. However, with respect to the Masterplan's preparation and this development's synchronisation with same, we refer the Reader back to the response to LRD Item No. 5.
	25	It is unclear how the proposed scheme implements the key elements of the Public Realm Strategy. Any forthcoming application shall clearly set out the design context for the proposed scheme and define the network of spaces and routes in which the proposed spaces relate back to the existing city core area.	Please refer to the suite of detailed materials prepared by Stephen Diamond Associates Consultant Landscape Architects (SDACLA). In response to this LRD Item, SDACLA has created a series of distinct, but integrated landscaped areas; both public open space and communal amenity space. They all have purpose and are usable, incorporating seating and congregation areas, play spaces, attractive planting (with native and pollinator-friendly species), high-quality and robust hard surfaces, etc.



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			west between the open space	Blocks A and between Blo ial to link in w	B which act as a welco ocks B, C and D, which with the pedestrian/cycl	me point for ties into ped	les and routes: (1) the new plaza area to the rethed the the development at Dock Road; and (2) at destrian network south-east of Forthill and litted in the Ceannt Station development at
	26	The proposed scheme has a combination of private communal open space areas enclosed around the residential blocks with a central open space plaza leading to the waterfront promenade. The layout and use of the open space amenity areas is determined by the form of the residential blocks and does not consider the impact of available sunlight on the use of the spaces. The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2023, Section 4.11, states: Designers must ensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year. The results of the Daylight & Sunlight Analysis, prepared by Model Works, states 2 hours of direct sunlight reaches 82% of amenity areas. However, the detail of the study reveals that the main amenity areas at the base of the residential blocks, the playgrounds and passive recreation provision in the communal private open space areas, are in shadow at the most important times of the day, in the evening when families are returned from work/school at the end of the day. No evening sun reaching these areas at any time of the year. With parts of the	Having reviewed lighting and moderate At the outset, is receive daylight reach Therein, an asshown below pure the recomment practice (3rd ecological past 50% of its second moderate).	ed this LRD It icro-climate of the needs to be nt throughouting these are sessment of ser those in the nded requirement of the needs on 21st I low from Application, 2022) is area on 21st I low from Application, 2022	em, it is our understand of the proposed common of the proposed common of the proposed common of the year, contrary to eas, we direct the Coupening the end of the proposed common of t	he commundetail/under uncil to Modamenity spanyout Planning to achieve a withat this is ht and Sunli	the concerns principally relate to the natural by spaces. al amenity spaces (and public open spaces) restanding of the LRD Item. With respect to del Works' Daylight and Sunlight Analysis. Access has been undertaken. The results are any for Daylight and Sunlight: A guide to good at least 2 hours of direct sunlight across at a sachieved across all amenity spaces (Table light Analysis). Therefore, they are wholly
		communal private open space to block D & C in total darkness (oo-60 minutes).			of Sunlight - Proposed %	Criteria	
		The Parks, Recreation & Amenity Department advise that the degree of	COS 01	470	99%	Yes	
		human comfort in open space is impacted by access to sunlight, natural shade	COS 02	271	52%	Yes	
		as needed, and exposure to wind. Too much or too little of any of these	COS 03	1,053	63%	Yes	
		elements determines how people use outdoor space, especially for passive	COS 04	388	100%	Yes	
		recreation. These atmospheric features contribute to how long people linger	Creche	74	65%	Yes	
		or choose to stay/leave in any given place. In addition, the same factors	POS 01	3,335	100%	Yes	
		contribute to what planting will grow, given that all plants need access to direct	POS 02	468	89%	Yes	
		sunlight (even for only the shortest time) to photosynthesize and survive.	Total Areas N	leeting Criteria	Yes No	7	
		The orientation of the open spaces, particularly the private communal open		T.	tal Amenity Areas Tested	7	
		space, to available sunlight would suggest that spaces will not be conducive to		10	tar Amemity Areas rested		•
		people using the recreation facilities in the way that is intended at design					
		stage. The layout of these areas shall be reconsidered to maximise use and					
		successful animation of the public realm which shall be addressed in any					
		forthcoming application.					



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		Cirche Cos 01 Cos 02 Public Open Space 02 Cos 03 Approximate locations of the proposed play areas
		As we have annotated on the above drawing, which is an extract from the <i>Daylight and Sunlight Analysis</i> , 2 No. of the main play areas are entirely within parts of the site that will achieve more than two hours of direct sunlight on 21 st March, whilst 1 No. play area is partly within and partly outwith such an area. We are firmly of the opinion that this is an acceptable approach to the landscape design and siting of the place spaces:
		 Firstly, the assessment of amenity spaces must be taken as a whole, thus if COS 3 is compliant, then so is the play area therein.
		 Secondly, the play area in COS 3 will still benefit from natural <u>daylight</u> even if it does not achieve 100% sunlight across its area. Therefore, it will still be lit and will <u>not</u> be "in total darkness".
		 Thirdly, shifting the play area south-west would displace other aspects of the communal amenity space into parts of the space that achieve less than the 2 hour of direct light. As a result, there would not be any net improvement to the overall communal amenity space.
		Notwithstanding the above points, which demonstrate that the proposed communal amenity space is compliant from a sunlighting perspective, we direct the Council to the additional study undertaken by



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			marked increase in the central play ar (implied 2 months of sunlight; these	n its area achiev ea falling within either side of th are the spring a	ing at least 2 hours of direct n part of the space. This imp ne summer solstice on 21 st Ju nd summer months when ch	aces on 21 st April. It shows that COS 3 had a t sunlight, jumping from 63% to 91%, with olies that for a period of at least 4 months one), the play area would achieve this level hildren are off school and more likely to be dix E of the <i>Daylight and Sunlight Analysis</i> .
			Amenity Area	Area m²	Area Receiving 2 Hrs of Sunlight - Proposed %	
			COS 01	470	99%	
			COS 02	271	69%	
			COS 03	1,053	91%	
			COS 04	388	100%	
			Creche	74	65%	
			POS 01	3,335	100%	
			POS 02	468	93%	
			Public Open Space 02	eche	COS 02	e locations of the my areas



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			With respect to micro-climate, we direct the Council to B-Fluid's <i>Wind Microclimate Analysis</i> . The analysis contained in the report is technical, detailed and lengthy. It considers both the performance and impacts of the proposed development, and looks at a cumulative scenario in which the Masterplan buildings are inserted. However, due to the indicative massing and form of these structures, this latter analysis should be reviewed as preliminary in nature and extent. However, for the purposes of assessing the central community amenity space (COS 3 for consistency with the lighting analyses discussed above), we direct the Council to Figure 8.28 of B-Fluid's report, which we have extracted below. Based on the 'Lawson Comfort / Distress Scale', it is evident that the central space is intended for its casual, relaxed use, as well as more active recreational uses, with the space falling within the categories of 'sitting', 'standing' and 'strolling'. Thus, it performs well and has been designed appropriately.
			Lawson 2001 Unsafe all Unsafe frail Uncomfortable Business walking Strolling Standing Stitting
	27	The GCDP states that open spaces should be designed to complement Galway as a Child Friendly City through provision of appropriate recreation facilities and these measures will need to be incorporated into the open space design proposals. 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. Enhance the provision of facilities for older children and teenagers within the city. Regarding the provision of recreational facilities table 11.2 of the CDP states:	 This LRD Item is noted and has been considered by the Design Team. Firstly, with respect to the need to provide a 'recreational facility' in accordance, the development incorporates: A new 'Lough Atalia Walk' along the entire east side of the site. This will be publicly accessible open space, usable by walkers/pedestrians and cyclists. It has been designed to directly interface with the Lough Atalia inlet/outlet, connecting the public with the water and nature. However, the amenity is not just a walking/cycling route. It has been designed by SDACLA to incorporate seating areas, congregation spaces, a raised 'Harbour Point Terrace', a viewing terrace and more. Attractive and considered planting includes wildflower meadows and native trees such as Birch, Strawberry Trees, Scots Pine and Mountain Ash. A mini/half basketball court in the public open space south-east of Block D, available for use by residents, the local community and passers-by. An additional nature-based play area for multiple age groups between the court and 'Lough Atalia Walk'.
			Individually, and combined, these features meet the requirement for a recreational facility at a site of this size which is located in a very centrally positioned and constrained urban area.



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		Table 11. 2 Indicative E Developments.	examples of Recreational Facilities for	or Different Sizes of Residential	Secondly, play areas within the communal amenity spaces have been proposed in accordance with the
		Number of Residential Units	xamples of Recreational Facilities		Apartment Design Guidelines. In the central space between Block B and C (COS 3 referenced above), a play area of 85 sq m for toddlers and small children is proposed. In the space to the north-east of Block A,
		0-10 In	oformal play areas with seat and natur of amenity and recreational facility and	ral features at appropriate scale d to include green infrastructure	200 sq m of play area is proposed for older children.
		11-20 N	atural play equipment/natural play ar		As these play areas are required to be within communal amenity spaces, they must be "closed off behind
		21-50 Si	mall playground, kick about area, land	dscaped garden/small park	fencing and hedging" or the semi-private nature of the communal amenity space is undermined. Notwithstanding this, as noted above, play areas are also proposed within the public open space parts of
			IUGA, outdoor gym, self-directed play ther equipment)	y (may include skateboard or	the development, making them accessible to all.
		100+ La	arge playgrounds for all ages, playing	pitch, landscape park	The development includes a carefully considered and designed play space strategy and we encourage the
		proposal complie Sustainable Urban for Planning Author needs around the within the within sm needs of t equipmen within pla teenagers or more book It is noted that p across the site ar	s with the above standards in Housing: Design Standards orities 2023, Section 4.13, what apartment building should be private open space associated play spaces (about 85 – coddlers and children up to st., seating for any areas (200–400 sq. metres, in a scheme that includes 1 dedrooms. Ilaygrounds do not appear and are closed off behind for e open space. Any develop	clearly demonstrate how the rds and have reference to the sets and have reference to the sets for New Apartments Guideline. Thick sets out how children's play be catered for: ted with individual apartments; 100 sq. metres) for the specific the age of six, with suitable play es) for older children and young to be openly accessible for use to be openly accessible for use to be openly accessible for use the set of the specific that are the set of th	
	28	findings include t NEAP within appr distance refers to	he need for Galway to pro opriate walking distances. T the age of the child, their pl	ovide additional LAP, LEAP and the type of play space vs walking ay requirements and the level to	repetition, we direct the Council to the response provided above.
		will need to clear reference the nea	rly demonstrate that they	earest playground. The applican comply with this standard and on to the proposed developmen ertain age cohort.	with the <i>Draft Green Spaces Strategy</i> once the latter is formally adopted, noting it remains Draft.
		Type of space	Walking distance (metres)	Straight line distance (metres)	
		Local areas for play or `door-s spaces – for play and informa tion (LAPs)		60	
		Local equipped, or local lands areas for play – for play and ir recreation (LEAPs)		240	
		Neighbourhood equipped are play – for play and informal re and provision for children and people (NEAPs)	ecreation,	600	
	29	The lack of play pr Spaces Strategy.	The draft Strategy describe	s a key finding of the draft Greer s where there are opportunitie	s
		to meet this pro	vision through new reside	ntial developments which may	A mini/half basketball court; and



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		provide Active Teen Spaces. These are spaces designed for teens which include	A nature-based play area.
		self-directed play and passive recreation elements and are intended to support	
		opportunities for peer-to-peer social interaction, in a safe, well-lit space with	Whilst the latter is designed for multiple age cohorts, key features can be incorporated for the interest of
		passive surveillance. The space must be specifically designed for teenagers	
		with appropriate and novel elements and must be clearly designated for teens.	
		It is not clear from the design of the proposed scheme that the location of the	
		teen area and the elements provided meet these standards. The applicant will	'Lough Atalia Walk'.
		therefore need to demonstrate they have achieved this	
	30	Policy 5.10 Specific Objectives Specific Objectives Blue Spaces in the GCDP	From the southern corner of the site along its eastern side to the northernmost corner, the proposed
		describes the future of the Lough Atalia and Renmore Lagoon area as being	development includes a new 'Lough Atalia Walk'. This will be publicly accessible open space, usable by
		developed for water-based recreation [subject to ecological considerations],	walkers/pedestrian and cyclists. It has been designed to directly interface with the Lough Atalia
		forming part of a wider coastal path network. It is not clear from the proposed	inlet/outlet, connecting the public with the water and nature.
		scheme how it will achieve access to future amenities of Lough Atalia or if this	
		is the intention.	However, the amenity is not just a walking/cycling route. It has been designed by SDACLA to incorporate
			seating areas, congregation spaces, a raised 'Harbour Point Terrace', a viewing terrace and more.
		The draft Green Spaces Strategy also identifies Lough Atalia as having	Attractive and considered planting includes wildflower meadows and native trees such as Birch,
		opportunities to enhance the experiential quality of the space by providing;	Strawberry Trees, Scots Pine and Mountain Ash.
		amenities for events, recreation trails, various access points that seamlessly	
		integrate into the locally surrounding streets, a 'gateway' or arrival point to the	
		promenade. The lack of connectivity of the site to the northeast is a missed opportunity and this connectivity should be clearly integrated into any future	by all ages and a rubber safety matting grass reinforcement.
			With respect to farther connectivity, we note that this is beyond the scope of the subject project.
		proposed development.	However, as demonstrated in the Masterplan, it is envisaged that Lough Atalia Walk will indeed connect
			into abutting sites and deliver a potential looped network. We direct the Council to the Masterplan for
			details of this proposition and its phasing.
			Luctails of this proposition and its phasing.



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ENVIRONMENTAL CONSIDERATIONS	31 (Appropriate Assessment)	Assessment) Assessment) Assessment) Assessment) Assessment) Assessment) Assessment) The p		Response provided by DNV: As the proposed development site is situated adjacent to both Galway Bay and Lough Atalia—areas designated as part of the Galway Bay Complex Special Area of Conservation (SAC) and the Inner Galway Bay Special Protection Area (SPA)—a comprehensive and robust ecological assessment has been undertaken. This assessment is detailed in the accompanying Natura Impact Statement (NIS), which evaluates the potential for any significant effects on the integrity of these designated European sites. The NIS concludes that, with the implementation of a carefully considered suite of mitigation measures, the		
		This area supports marine, coastal, and terrestrial environments that are of significant ecological value, designated to protect species and habitats under the EU Habitats Directive. Galway Bay Complex SAC includes fifteen Annex I habitat types and two Annex II species. The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of	proposed development will not result in any deterioration of water quality, nor will it adversely affect the conservation objectives of the Galway Bay Complex SAC or the Inner Galway Bay SPA. Key mitigation measures proposed include:			
		habitats and species of community interest. The applicants are advised to note that the annexed habitats and species which are found in close proximity to the proposed development, which have been assigned a conservation objective to restore their favourable conservation condition includes; Coastal lagoons [1150], Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)	Integration of Sustainable Urban Drainage Systems (SuDS): These systems are embedded into the design of the development to manage surface water runoff effectively, thereby reducing the risk of pollution and hydrological impacts on adjacent sensitive habitats. Water Quality Protection Measures: A range of best-practice and site-specific measures will be strictly			
		[1330], Mediterranean salt meadows (<i>Juncetalia maritimi</i>) [1410] and Otter (<i>Lutra lutra</i>) [1355]. For example, the conservation status assessment of Lough Atalia is outlined in the Galway Bay Complex SAC [000268] Conservation Objectives Supporting Document Lagoon Habitats, V1 (NPWS 2013)1, and is stated as Unfavourablebad. The Irish Lagoons publication assessment of Lough Atalia reference IL052-Lough Atalia, states the following: The lagoon (Lough Atalia) appears to be heavily impacted by industrial and domestic effluents from the city and large areas consist of bare anoxic mud It is also highly polluted, so that even on hard surfaces very few algal plants were found. Priorities for Lough Atalia are improvements to water quality and habitat restoration, therefore there can be no further deterioration of water quality.	enforced during both the construction and operational phases of the development. These include sediment and erosion control, spill prevention protocols, and regular water quality monitoring (weekly checks are proposed.			
			Construction Environmental Management Plan (CEMP): All mitigation measures will be incorporated into a detailed CEMP, which will govern the environmental management of the site throughout the lifecycle of the project. The CEMP will be a live document, subject to regular review and updates, ensuring compliance with environmental standards and regulatory requirements.			
			Air Quality Measures: Measures: In addition to the embedded design measures referenced above in order to protect the surrounding waters and habitats/species therein from dust deposition during earthworks, a suite of mitigation measures are proposed shall be included the accompanying CEMP.			
						Article 6(2) and Article 6(3) of the EU Habitats Directive (92/43/EEC) are the key provisions related to the protection of habitats and species in the European Union. Any NIS to be submitted shall satisfactorily and robustly demonstrate that the development will result in no further deterioration of water quality.
	32	Galway City Council has significant concerns regarding proposals as presented. The size and scale of this development in such close proximity to an area of ecological sensitivity and the design proposals provided to date are not considered to provide sufficient reassurance or detail to avoid deterioration (i.e., harm or destruction) and disturbance of natural habitats and the habitats of species that are protected under the Habitats Directive. Additionally, it is considered that sufficient consideration has not been given to the potential for contaminated lands on site and the disturbance/disposal of same or to the provision of specific construction methodologies required for the site in the	Response provided by DNV: We acknowledge Galway City Council's concerns regarding the proposed development, particularly in relation to its proximity to ecologically sensitive areas and the potential for environmental impacts. We wish to provide the following clarifications and reassurances:			



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	context of potential impacts on European sites arising from these activities,	1. Ecological Sensitivity and the Habitats Directive
	which should be satisfactorily detailed and assessed.	A comprehensive Appropriate Assessment (AA) Screening and Natura Impact Statement (NIS) were
		undertaken to assess the potential for significant effects on European sites. These assessments concluded
		that, with the implementation of the proposed mitigation measures, the development will not result in
		deterioration or disturbance of natural habitats or species protected under the Habitats Directive.
		The Biodiversity Chapter of the Environmental Impact Assessment Report (EIAR) further supports this conclusion, detailing:
		Baseline ecological surveys,
		Identification of sensitive receptors,
		Mitigation measures to avoid or reduce impacts during both construction and operational phases.
		These include water quality safety measures, timing restrictions, dust, noise, and lighting control measures,
		all of which are designed to protect nearby designated sites and species.
		2. Contaminated Land and Waste Management
		The Material Assets: Waste and Utilities chapter of the EIAR considers the potential for encountering
		contaminated material during the construction phase. In such cases, both the Construction Environmental
		Management Plan (CEMP) prepared by DNV (2025) and the EIAR (DNV, 2025) outline robust procedures for:
		 Identification, classification, and segregation of contaminated materials; Environmental site assessment in accordance with BS 10175:2011+A2:2017 and EPA (2018)
		guidance;
		 Temporary stockpiling on impermeable surfaces, with protective sheeting and buffer zones from watercourses; and
		 Supervised removal and disposal at licensed facilities, including provisions for Transfrontier Shipment of Wastes (TFS) where required.
		These measures are designed not only to ensure compliance with waste legislation but also to prevent any
		adverse effects on nearby designated ecological sites. The potential for ecological impacts arising from the
		handling or disposal of contaminated material has been assessed in the Biodiversity Chapter and the Natura Impact Statement (NIS), which confirm that, with mitigation, no significant effects will occur.
		3. Construction Methodologies and European Sites
		The NIS and EIAR both include detailed descriptions of the construction methodologies to be employed, with
		specific reference to:
		Surface water management, Duet and a size control.
		Dust and noise control,
		Use of oil interceptors,
		Timing of works to avoid sensitive periods for wildlife.



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			These methodologies have been designed to ensure that there will be no adverse effects on the integrity of
			any European site, either alone or in combination with other plans or projects.
			We trust that the information provided in the AA Screening, NIS, and EIAR demonstrates a robust and
			precautionary approach to environmental protection. We remain committed to engaging with Galway City
			Council and relevant stakeholders to ensure that all environmental considerations are fully addressed.
	33	The planning authority wish to highlight that construction, demolition and operational noise and lighting can have significant negative effects on wildlife behaviour, particularly birds, otter and seal that have been recorded in the area. The Appropriate Assessment Screening Report (Enviroguide, January 2025) states that the site does not provide suitable habitat for terrestrial mammals, including otter. Otter are a qualifying interest species of the SAC and are frequently recorded in Lough Atalia, the River Corrib and the coastline of Galway Bay. The proposed development could result in loss of habitat area, habitat degradation, fragmentation, disturbance and indirect effects. Therefore, potential for adverse effects on the integrity of the SAC needs to be thoroughly assessed and supported by robust ecological surveys and assessment and this shall be addressed in any future application.	Response provided by DNV: We acknowledge the planning authority's concerns regarding the potential for construction, demolition, and operational activities—particularly noise and artificial lighting—to negatively affect local wildlife, including bird species, otters (Lutra lutra), and seals, all of which have been recorded in the vicinity of the proposed development site. A detailed ecological assessment has been undertaken as part of the Natura Impact Statement (NIS), which includes a thorough evaluation of potential direct and indirect impacts on these species and their habitats.
			ensure that mitigation measures are effective. This will include:



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			 An Ecological Clerk of Works (ECoW) will be present to check light spill and acoustic barrier functionality during the winter period. Noise and light level monitoring Adaptive management protocols to respond to any unforeseen impacts (e.g. emergency spills) Compliance with Conservation Objectives All proposed measures are aligned with the conservation objectives of the Galway Bay Complex SAC and Inner Galway Bay SPA. The NIS concludes that, with these measures in place, the development will not result in significant adverse effects on the integrity of these designated sites or their qualifying interests, which includes, but is not limited to, Harbour Seal and Otter. Please refer to the NIS and biodiversity chapter of the EIAR for complete assessment.
	34	Details provided indicate wintering bird surveys are being undertaken on the site and SCI species of Inner Galway Bay SPA have been recorded in proximity or flying over the site. Again, potential for adverse effects on the integrity of the SPA needs to be thoroughly assessed and supported by robust ecological surveys and assessment.	Response provided by DNV: Please refer to the Biodiversity Chapter (No. 5) of the enclosed EIAR wherein details of the undertaken surveys
			 A robust Natura Impact Statement (NIS) assessing potential direct, indirect, and cumulative impacts on the SPA and its qualifying interests; Consideration of disturbance pathways, including noise, lighting, and visual disturbance during construction and operation; The incorporation of mitigation measures to avoid or reduce any potential for significant effects, such as timing restrictions on works, acoustic barriers, visual screening, construction and operation phase lighting regimes and design to minimise impacts on wildlife, and best practice construction management.
	35	The planning authority note that a Natura Impact Statement (NIS) and wintering birds survey(s) are being prepared/underway and shall be submitted as part of the future planning application. It is recommended up to date assessments are submitted with the final application and demonstrate compliance with Section 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance and Section 11.33 Appropriate Assessment of the Galway City Council Development Plan 2023-2029.	inclusive. Please refer to Section 5.2.3.3.3 of the EIAR's Chapter 5 (Biodiversity). Please also refer to the response above and the content of the standalone <i>Natura Impact Statement</i> for its full details, which are not replicated here in order to avoid excessive repetition.
	36 (EIAR)	The planning authority note the proposal to submit a subthreshold EIAR which shall be required to be submitted in accordance with the relevant legislative provisions.	
	37 (Ecology)	The proposed application shall be accompanied by reports assessing potential impacts to bat species and any measures to mitigate potential impacts to same in accordance with best practice bat survey and mitigation guidelines, including but not limited to the National Parks and Wildlife Service Bat Mitigation Guidelines for Ireland v2. Irish Wildlife Manuals No.134 (DHLGH, 2022). Please note, should any derogation licences be required in respect of protected wildlife, evidence of such licences shall be provided as part of any future planning application.	Please refer to the Biodiversity Chapter (No. 5) of the enclosed EIAR wherein details of the undertaken bay surveys are presented. In summary:



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	38 (Ecology)	A detailed lighting plan for all areas shall be submitted with any application	A bat transect survey was carried out in full accordance with best practice and the NPWS Bat Mitigation Guidelines for Ireland v2 (2022). The survey confirmed that the site does not currently support suitable habitat for commuting or roosting bats, and no bat activity was recorded. Nonetheless, a precautionary approach was adopted throughout the ecological assessment, and the development has been proactively designed to safeguard bats in the wider area and enhance the site's long-term ecological value. The proposed planting regime, once established, will significantly improve habitat availability for commuting, foraging, and sheltering bats. Additional measures, including bat-sensitive lighting and the integration of bat boxes, which will further support future bat use of the site and contribute to local biodiversity enhancement. As not bats were identified on-site, there is no need to seek a Derogation Licence. Please refer to the enclosed Site Lighting drawing and External Lighting Report prepared by Axiseng. This
	30 (Ecology)	identifying proposed lamp columns and luminance levels, light spillage both free standing and on buildings in accordance with proposed mitigation measures and best practice Bats & Lighting Guidance Notes for: Planners, engineers, architects and developers (or any subsequent guidance).	lighting design has been reviewed and co-ordinated with DNV (Project Ecologist) and SDACLA (Project Landscape Architect).
	39 (Ecology)	Any forthcoming application shall address any invasive species on site in accordance with Section 11.34 of the Galway City Development Plan 2023-2023	Please refer to Biodiversity Chapter (No. 5) of the EIAR which details how invasive species are to be addressed, which is in accordance with Section 11.34 of the Galway City Development Plan 2023–2029. The Chapter confirms that "no invasive alien plant species were identified on the Site, with the sole exception of a single stand of sycamore (Acer pseudoplatanus) located in the northeast section (outside of the red line boundary). While sycamore is not listed as a high-risk invasive species in Ireland, its presence is consistent with disturbed or unmanaged urban environments." No invasive animal species were identified.
	40 (Noise)	A Noise Impact Assessment and noise amelioration measures associated with the construction and operation phases of the proposed development, including associated plant and equipment shall be submitted.	Mitigation is proposed from a precautionary perspective in order to derisk their introduction/spread. Please refer to the enclosed <i>Acoustic Design Statement</i> prepared by Wave Dynamics and the Noise and Vibration Chapter (No. 10) of the EIAR.
	41 (Flood Risk)	The planning authority note the SSFRA submitted for the purposes of the LRD Meeting and the conclusions made regarding the flood levels for the 1/1000y MRFS event associated with the site, with the proposed finished floor level of 5.05m OD designed to protect the site from this event. It is however, advised that the risk of below ground seepage into the site and the risk of flooding that may result from same is investigated by the project team with the results reported in any future application. Given the proximity of the site to the tidal water course and the fact that the ground in this area is of made ground it is imperative to investigate same. The risk is most likely during construction; however, the project team will be able to establish this during the ground investigations required to be carried out. Please address this matter accordingly.	
SERVICES	42	The applicant shall acquire a Statement of Design Acceptance from Irish Water in respect of a potable water supply and foul water services.	A Statement of Design Acceptance (SoDA) has been applied for from Uisce Eireann. However, at the time of lodging this Planning Application, a response had not yet been received. We note that a SoDA is not a statutory requirement for LRD Planning Applications in either the Planning and Development Act 2000 (as amended) or the Planning and Development Regulations 2001 (as amended). A Confirmation of Feasibility from Uisce Eireann is a statutory requirement per the Regulations, and this is enclosed as part of TOBIN's reporting.
SURFACE WATER	43	In respect to the SUDS design, it is noted that the ground has a high infiltration rate and as the ground conditions may be contaminated on this site, it is requested that the Design Team consider this when finalising the surface water drainage design	The high infiltration rate of the ground is acknowledged and the Design Team is aware of the potential for contamination on-site. The drainage strategy is to avoid infiltration on-site and full details are established in TOBIN's Civil Works Design Report.
	44	In relation to the proposed scheme specifically, although some sustainable urban drainage systems elements are included in the proposed development, the variety of nature-based SUDS measures and the quantum delivered across	As part of the current SuDS strategy, we have incorporated a range of nature-based solutions including tree pits, rain gardens, permeable paving, infiltration trenches, etc. These features are designed to



TOPIC	LRD ITEM NO.	LRD REQUEST	RESPONSE
		the site is very limited. This is considered a missed opportunity to integrate urban greenery, active and passive amenity, and meaningful biodiversity interventions such as native planting into the streetscape and open spaces.	manage surface water sustainably while contributing to the visual and ecological quality of the development.
		Any forthcoming application shall provide for a significant increase in the number and variety of nature-based solutions which combine the drainage, amenity and biodiversity measures for the scheme.	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.
			The proposed development has sought to strike a careful design balance to achieve greening (seeking to maximise it) within an evolving urban context. A strong SuDS strategy and highly detailed landscape design to maximise green infrastructure have been prepared, per the materials prepared by TOBIN and SDACLA respectively. They combine to address surface water on-site, with aesthetic, recreational, amenity and biodiversity benefits.
	45	The GCDP, states in Policy 2.2 Climate Action the requirement to support the implementation of water management measures through mechanisms such as SUDS, rainwater harvesting, use of grey water, water storage and nature-based solutions (NbS) to adapt to the impacts of climate change.	See response to Item No. 44 above.
		Policy 2.3 Green and Blue Infrastructure (Adaption and Mitigation) also states that NbS have an important role in tackling the biodiversity crisis, sequestration of carbon, absorbing filtering and attenuating water, preventing erosion and filtering pollutants from the air and water.	
		Any forthcoming application will need to demonstrate how it achieves these policies and shall reference and consider the design guidance Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas - Water Sensitive Urban Design: Interim Guidance Document, Department of Housing, Local Government and Heritage, 2021 and Biodiversity and the	
CRÈCHE	46	Built-Environment IGBC-1. The applicant shall demonstrate that the proposed creche complies with the specific development standards of Section 11.4 Childcare Facilities of the City Development Plan 2023-2029 and relevant Childcare (Preschool Services) Regulations 2006 (as amended).	Please refer to Section 4.2 of the enclosed <i>Culture and Social Infrastructure Audit</i> prepared by TOC.
PART V	47	The applicant is required to provide a Part V Compliance methodology, drawings as well as a provisional letter of agreement from Galway City Council Housing section with any subsequent planning application. It is incumbent on the applicant to demonstrate compliance with the provisions within the Act.	Please see enclosed: proposal in Section 5.21 of ALTU's Architectural Design Statement, suite of architectural drawings, costings and letter from Galway City Council.
MANAGEMENT	48	Any forthcoming application shall submit details pertaining to the management/taking in charge of the scheme.	Please refer to the enclosed <i>Proposed Taking in Charge Plan</i> (Drawing No. P107) prepared by ALTU.