



Galway Commuter Coalition
Salthill,
Co. Galway

Planning Department,
Galway County Council,
Prospect Hill,
Galway,
H91 H6KX

Date: 16/09/2026

Re: Objection to Planning Application No. 2660292
Atercin Liffey Unlimited
Construction of Drive-Through Hatch to Proposed Starbucks Coffee Shop

Dear Sir/ Madam,

We, the Galway Commuter Coalition, wish to submit an objection to the above planning application on the following grounds:

- Traffic Impact
- Pedestrian Safety
- Non-compliance with the Galway City Development Plan
- Ecological & Flooding Impact
- Detrimental to the Urban Fabric
- A Poor Quality Submission

This submission is on behalf of the Galway Commuter Coalition members, alongside the 2,583 signatories who oppose these plans of a proposed drive-through. Please find all the signatures attached after the appendix.

1. Traffic Impact

The proposed drive thru will open in an area of Galway which is a major choke point for traffic. The adjacent N6 junction leading from the Headford Road to the Quincentennial Bridge often results in tailbacks in all directions. Galway does not need another development which will feed into this car centric environment.

We are of the belief that this drive thru will encourage the phenomenon of induced demand and result in increasing numbers of cars travelling to this area, placing more pressure on the city's already over capacity roads and junctions. Commuters who are already spending hours in traffic every year, losing quality time with their families deserve more than just another car centric development adding to their commute times.

The Starbucks proposal, by its very nature, will create through-traffic within the Galway Shopping Centre site and the wider city centre area. This is clearly not an objective of the GTS or the upcoming GMATS. We note that the applicants have chosen to forgo the preparation of a Traffic & Transport Assessment (TTA) or an Environmental Impact Statement.

This is goes against both the GTS and Galway Development Plan, an objective of which is to:

'Support GTS measures for a reduction of car movements through the city centre.'

We would request that Galway City Council must consider a Traffic & Transport Assessment before further consideration of this proposal.

2. Pedestrian Safety

The proposed drive-thru hatch will eliminate one of the few pathways around the Headford Road Shopping Centre. In this regard it is not compliant with Part M - Access & Use, or Building for Everybody: A Universal Design Approach (National Disability Authority, 2012), and will provide a needless barrier to people with accessibility seeking to access the shopping centre. Both of these standards are explicitly mentioned within the development plan.

No mitigation measure is proposed, there will be no safe path to walk through this area. For example, not even an uncontrolled crossing point is proposed. This will create two clear conflict points between pedestrians accessing the shopping centre and cars utilising the proposed drive-thru.

The proposal is also in conflict with a significant pedestrian route, from the St Finbarrs Terrace access ramp, to the shopping centre entrance.



- | | |
|-----------------|---|
| Shown in Red | - Outline of Proposed Development |
| Shown in Yellow | - Existing Pedestrian Routes |
| Shown in Purple | - Presumed Diversion of Pedestrian Routes |

In contravention to the Galway City Development Plan, no cycle parking is to be provided.

We would request that Galway City Council must consider a Road Safety Audit before further consideration of this proposal.

3. Non-Compliance with the Galway City Development Plan

This area is targeted for regeneration under the upcoming *Headford Road Statutory Area Plan*.

In our appendix, we have attached extracts from the Galway City Development Plan and supporting documents. The council correctly identifies that the area is suffering from car-domination and requires rebalancing towards more sustainable uses.

Should the proposed Starbucks go ahead, the council will set a precedent that their own development plans, strategies and standards are not worth the paper they are written on.

The Galway City Development Plan states that in the Headford Road Regeneration area developments:

'They will be required to demonstrate that good urban design principles are being applied, compact mixed use growth is being encouraged and that economic, social and environmental dividend is being achieved along with a positive contribution to the physical expansion of and liveability of the city. '

Compact Mixed Growth - absolutely cannot be achieved by two drive-thru operating side by-side in the City Centre retail area.

The Development Plan also states that development on the regeneration site:

'have potential to make a transformative difference, creating a better urban form, bringing new life and footfall to the area and increasing housing supply close to the city centre'

This proposal will significantly worsen the urban form, hinder the site's potential redevelopment for housing and decrease footfall. The proposal seeks to remove footpaths, worsen traffic and air quality.

The Galway City Development plan describes the Regeneration area:

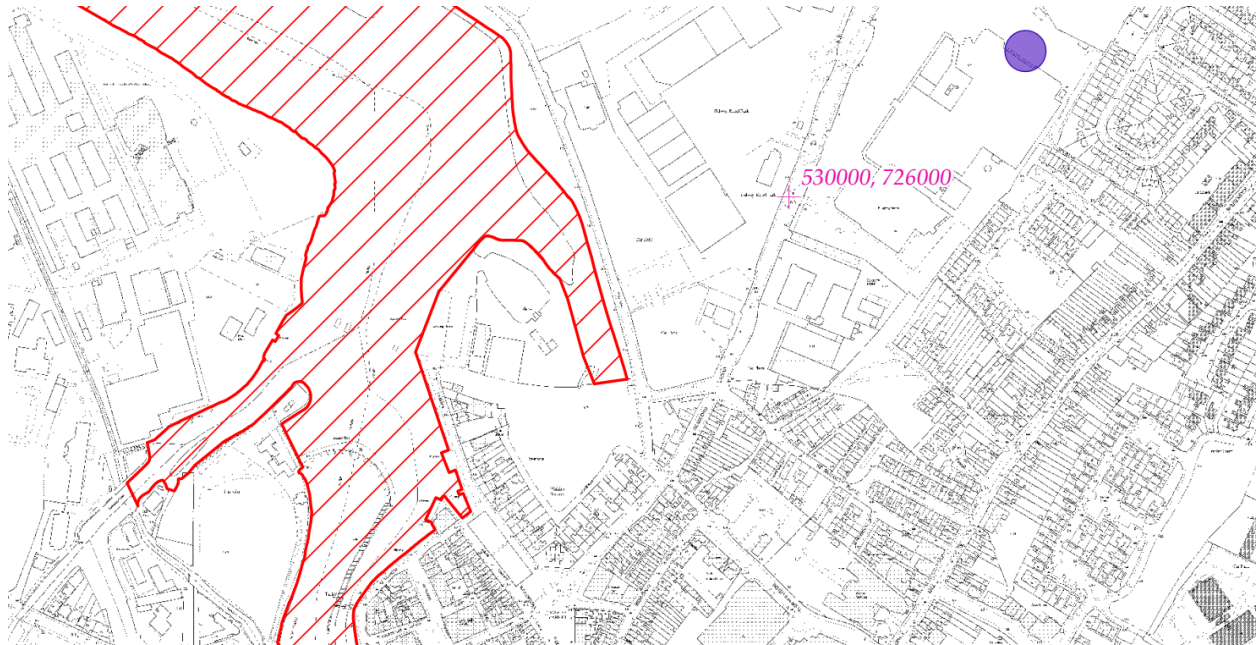
'This area can with re-development and improved urban structure regenerate to provide for a mixed used area suitable for accommodating additional and higher value commercial uses and a critical mass of residential use.'

We fail to see how Starbucks would be considered a higher value commercial use.

4. Ecological & Flooding Impact

In variation 3 of the development plan, it is specifically noted that all development within 1km of a European site are to have '*due consideration for the potential impact of any increase in visitor pressures*'

The proposed Starbucks is located approximately 430 metres from the Lough Corrib SAC. We note, that the proposal fails to prepare the required AA Screening, for a site in such close proximity to a natural area of European importance.



We believe that under the development plan a full Environmental Impact Assessments (EIA), Appropriate Assessment (AA) and/or Ecological Impact Assessment (EcIA) and/or Natura Impact Statement (NIS) would need to be prepared for this proposal. We believe the detrimental effects of this development to the environment is one of many reasons why this planning application should be refused.

We also note that the site is located within the most at-risk flood zone - Flood Zone A. No mitigation measures or even a SUDS system is mentioned in this plan, the proposal clearly fails the justification tests outlined in GCC's own SFRA, attached in our appendix. We believe a Flood Risk Assessment (FRA) will also be required. The current proposal will increase the amount of impermeable paving, run-off pollutants from increased traffic and proposes not a single mitigation measure.

5. Detrimental to the Urban Fabric

Galway City's retail strategy defines this area as City Centre.

We believe that a Retail Impact Assessment (RIA) will need to take place, given the proposed significant deterioration of the public realm of the Headford Road Opportunity Site under this plan. We strongly believe that this proposal will undermine '*the potential for Regeneration and Opportunity Sites*' namely Headford Road. This would be through the substantial increase in through-traffic, worsening of access for those with accessibility needs and the potential to undermine any future development of this strategically important brownfield site.

The proposal seeks to develop a drive-thru next to the existing established Supermac's drive-thru. We believe that this will constitute an over-proliferation of uses and does not contribute positively to the Regeneration Area.

The Development Plan states that:

'It is considered that the success of expansion of retail services will be strengthened where it is delivered in tandem with, a diversity of uses, new neighbourhoods and an expansion of public spaces arranged in a consolidated and compact format and framed in high quality design.'

Two drive-thrus operating side-by-side, does not constitute a diversity of uses. We also note that applicant's previous permission 25/60202, in condition number 2, stated that the

'(ii) The use shall be restricted to a café use and shall not be used as a takeaway for consumption of hot food off the premises'

To allow this development would undermine the authority and planning process of Galway City Council.

The Headford Road Regeneration site is a key priority of the Galway City Development Plan. It states that the area will support developments with:

'own character with high quality architecture and can become exemplars of good urban design and placemaking'

This proposal is not developed by architects, does not comply with national best practice guidelines and is detrimental to the Government's National Planning Framework and National Policy on Architecture.

We further note that the proposal does not comply with the '*Galway Shop Front & Signage Design Guidelines 2012*'

We would request that Galway City Council carry out a RIA before further assessment of this application.

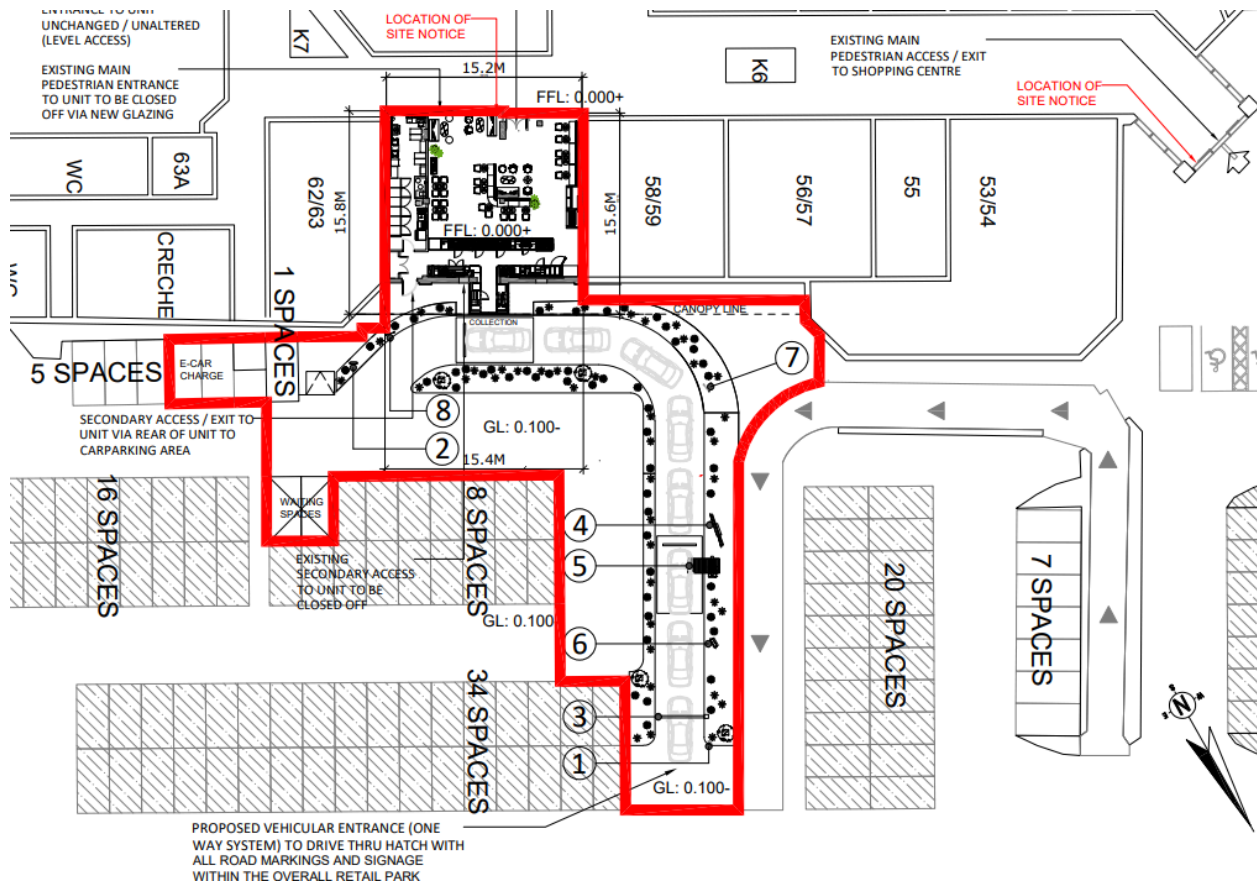
6. A Poor Quality Submission

The application fails to meet the required criteria for a valid submission. Namely:

- Site layout plan to show levels or contours.
- Site / layout plans to show distances of structures to boundaries of site.

Additionally the proposed drive-thru road is shown at an insufficient level of detail for the purposes of a valid submission. 1-500 purposely obscures the level of significant intervention to the public realm. The existing footpath will be rendered inaccessible, with over 100 car-park spaces now having no safe route to walk to the shop centre.

The proposal also fails to show the existing pedestrian crossing of the Supermac's drive-thru line. We would hope that this is an error and not a further proposed erosion of the public realm.



Is there any safe route to walk in this proposal?

Appendixes

The Galway City Urban Density & Building Heights study

The study identifies this area as City Centre (Fig 13). The same study notes a very low floor-area ratio and population density. This is unsurprising given the car-dominated development of the shopping centre that this proposal only seeks to exacerbate.

In the Suitability Analysis for higher density development, 10 overlapping layers for suitability are noted for the Headford Road site.

The core strategy of the current plan supports an integrated sustainable land use and transportation strategy. It has a focus on the growth of designated regeneration areas at – Ceannt Station, Inner Harbour and lands in the Headford Road area.

17.3 East: Bohermore, Headford Road, College Road, Lough Atalia

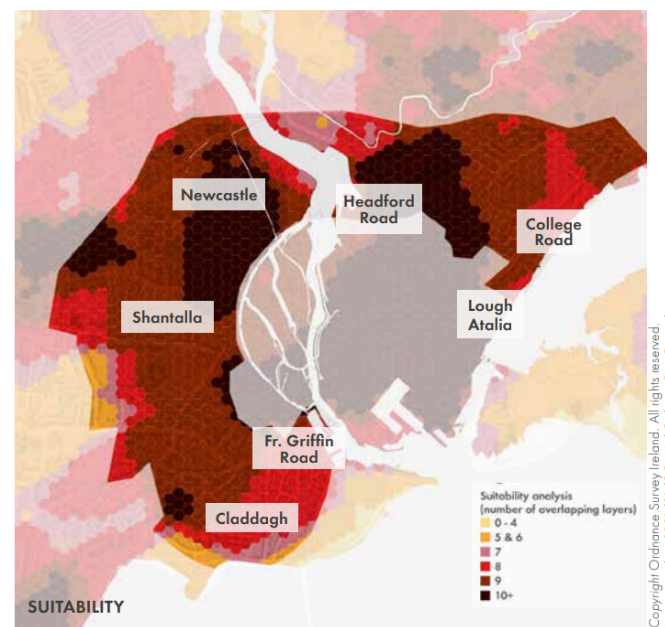
The major opportunity for growth would be the regeneration of the Headford Road area, which has the benefit of permission for development rising to 7 storeys in height.

If redeveloped, this area has huge potential to provide good access to shops, services and jobs in the city centre, while also being directly connected to the wider road network via the N6. The Headford Road area is also in proximity to the Terryland Forest Park and River Corrib with opportunities for strong frontage.

Densities could be significantly increased to create a high density new northern neighbourhood for the city centre, with the Headford Road axis as its High Street.

Densities open to consideration:

Redevelopment of the Headford Road area provides significant opportunities. There is scope for greater density with a mixed use development capacity to deliver 50+ dph.



The Galway City Development Plan

3 HOUSING & SUSTAINABLE NEIGHBOURHOODS

3.7 Sustainable Neighbourhoods Inner Residential Areas

Significant regeneration opportunities for mixed use development exist in the Headford Road area. These regeneration sites in view of their scale and location, have capacity to create their own character with high quality architecture and can become exemplars of good urban design and placemaking. They have potential to make a transformative difference, creating a better urban form, bringing new life and footfall to the area and increasing housing supply close to the city centre. They can also support GTS measures providing easy access to the proposed public transport and active travel networks, including the proposed bridge link to University of Galway and greater connectivity to the green network.

Policy 3.6 3. Prioritise the provision of new homes on designated Regeneration and Opportunity Sites in the Inner Residential Areas at appropriate scales to enable the development of new sustainable communities.

6 SUSTAINABLE MOBILITY & TRANSPORTATION

- The Strategy for the city supports NPF policy and promotes the three key regeneration sites - Ceannt Station, Inner Harbour, the Headford Road Regeneration area and other opportunity sites. The Ceannt Station and the Inner Harbour offer a sequential solution to the expansion of the city centre, linked with a transportation hub, reinforcing the prime role of the city centre in both the city and the Metropolitan Area and the wider region. The consolidation of existing residential areas and development of Ardaun to the east of the city utilising this approach will help to create future sustainable residential neighbourhoods, where the reliance on private transport is reduced and where services are provided locally, allowing access by walking and cycling. The alignment of land use and transportation is also supported in the Retail Strategy where a hierarchy of centres encourages easily accessible shopping and essential services.
- At a local level, the preparation of plans including Local Area Plans and Masterplans provide a framework for mixed-use development in conjunction with a transport strategy and use of sustainable densities at locations adjacent to public transport routes. These plans will ensure that sustainable patterns of travel integrated with land use will be achieved.
- Policy 4.4 Sustainable Mobility - Walk and Cycle
 8. Promote, facilitate and maintain maximum connectivity and permeability for pedestrians and cyclists in the design and management of new public and private projects and in upgrading and retrofitting existing developments in accordance with the Design Manual for Urban Roads and Streets (2019) and Permeability a BestPractice Guide, NTA (2015).

- Policy 4.5 Transport Demand Management Measures
 1. Support GTS measures for a reduction of car movements through the city centre, to be achieved by specific traffic management arrangements including the implementation of a City Centre Access Network.

- Policy 4.8 Modal Change - Public Transport
 18. Prioritise improvements to pedestrian movements and safety between the City Centre, Woodquay and Bóthar na mBan to the Headford Road Regeneration area.
 21. Re-organise car parking in the city in particular to reduce on-street provision in the city centre and along key sustainable transport routes as provided for in the Galway Transport Strategy (GTS).

6 ECONOMY, ENTERPRISE & RETAIL

6.3.1 Commercial Sector

- Commercial lands at the edge of the city centre on the Headford Road (covering approximately 13 ha in total), currently support a mix of uses including bulky goods, surface car parking and a single storey, internal mall shopping centre that would benefit from refurbishment. This area can with re-development and improved urban structure regenerate to provide for a mixed used area suitable for accommodating additional and higher value commercial uses and a critical mass of residential use.
- Policy 6.2 Commercial Sector
 3. Encourage and facilitate the development of other designated regeneration sites in the city for mixed use development appropriate to the scale and context of each site.

Retail Strategy

- The retail strategy for this plan is to direct major expansion in retail development into the city centre, in particular that of a high order comparison nature and to reinforce the function of the city centre as the hub of public life in Galway. It is considered that the success of expansion of retail services will be strengthened where it is delivered in tandem with, a diversity of uses, new neighbourhoods and an expansion of public spaces arranged in a consolidated and compact format and framed in high quality design.

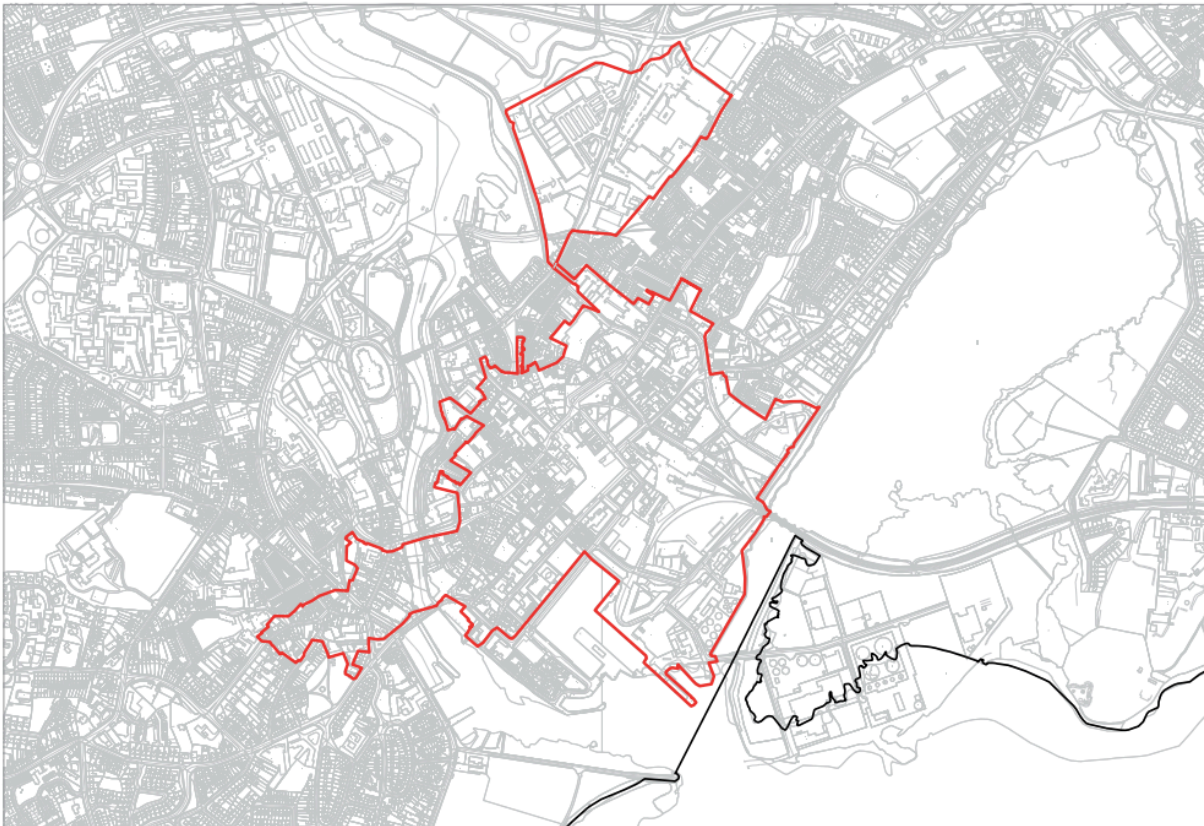


Figure 6.4 Core Shopping Area

- The Headford Road LAP area is an additional designated regeneration site which is located in the defined core shopping area. It currently includes a significant level of comparison and convenience retail floor space, set in expanses of surface car parking. These are mainly accommodated in a 1970's shopping centre and an adjoining retail park. In form and layout this area lacks cohesion, a sense of place, good linkages and failure to take advantage of the adjacent natural heritage assets, which include the River Corrib and Terryland Forest Park. These areas could benefit greatly from an improved urban structure, modernisation, quality design, a greater mix of uses, better linkage and integration with the finer grained street network in the historic core and a significant upgrade to the public realm.
- There has been a number of historical and extant grants of permission for retail floor space which include for elements of this rejuvenation and also include for residential uses in the mix.
- The Galway Transport Strategy (GTS) includes for a number of projects that will improve accessibility and the quality of the city centre environment by reducing car traffic, improving walkability, cycle access, and deliver improved journey times for buses. The implementation of the Galway City Public Realm Strategy in conjunction with the GTS projects is supported by commitments under the Urban Regeneration & Development Fund (URDF) and the NDP and will be transformative for the city. These projects will improve the streets and public spaces, create new spaces, redress the balance in favour of pedestrians and cyclists over vehicular traffic and create a high quality accessible public realm.
- The regeneration areas are considered the priority areas for development in the city for retail, service retail and suitable types of commercial offices. This mix of development in conjunction with the development plan requirements to deliver residential floor space concurrent with commercial floor space will consolidate, affirm and protect the prime role of retailing in the city centre.

6.8 Retail Impact Assessments

- Retail Impact Assessments (RIA) should be submitted to support major proposals in order to demonstrate compliance with the City Development Plan and to show that there will not be an adverse effect on the existing retail centres, an undermining of the potential for the Regeneration and Opportunity Sites and that the development will contribute to achieving compact growth. In general the requirement to submit a RIA will be determined in the context of the development plan policies and objectives for retailing or as may be conveyed by the City Council at pre-planning stage or in the course of assessing an application. RIAs should be carried out in accordance with the requirements set out in the Retail Planning Guidelines (2012).

6.9 Design Quality

- A high level of design quality can make an important contribution to the vitality and vibrancy of the city centre and generally all retail centres. The Retail Design Manual (DAHG 2012) (a companion document to the Retail Planning Guidelines 2012) highlights 10 key principles that should be applied when guiding retailing in order to deliver quality urban design outcomes. These provide a framework for development of the retail sector in a way which meets the needs of modern shopping formats while contributing to protecting, supporting and promoting the attractiveness and competitiveness of city and town centres as places to live, work, shop and visit. The application of this approach is supported in Chapter 8 which encourages good urban design and treatment of public realm areas.
- The quality of shop fronts too plays an important role in determining the character and the perception of the shopping street. The City Council specifically promotes an awareness of good shop front design in the Galway Shop Front & Signage Design Guidelines 2012.

Policy 6.11 Retail Strategy

1. Adopt the retail hierarchy for the city as identified in the strategy and restrict retail development at each level on the hierarchy to a scale and nature commensurate with catchment demands.
2. Provide for an appropriate range and scale of retail services throughout the city at locations accessible by walking, cycling and public transport, in accordance with the settlement strategy and population target for the city.
3. Review the strategies and policies for retailing and vary the plan if necessary following the preparation of a Joint Retail Strategy for the Galway Metropolitan Area with Galway County Council, to ensure sufficient policy support to create a positive framework for continued vitality and investment in the main retail areas especially the Galway MASP and to ensure an informed and consistent approach to policies relating to shared retailing activities in line with national policy. The preparation of the Joint Retail Strategy for the Galway Metropolitan Area will be completed within one year of the adoption of the City Development Plan and will be initiated and managed by a joint local authority working group.
4. Enhance the city centre as the primary retail service centre in the MASP area, through promotion of appropriate uses, regeneration, an increased mix in complementary uses including residential, leisure, cultural uses and through investment in public realm, amenities and sustainable transport infrastructure.
5. Improve access and permeability in the city centre and other designated centres with particular emphasis on improving the public realm with a focus on an increase in pedestrianisation and enhanced access by public transportation, cycling and walking.

6. Support a diversity of uses in the public realm including markets, outdoor seating and dining, arts and culture events to add to the vitality and vibrancy of the city and the retail experience.
7. Encourage a high quality retail environment through implementation of the Galway Transport Strategy and Public Realm Strategy and other initiatives that combined, contribute to creating places that are attractive, vibrant, sustainable and safe.
8. Have regard to the Galway City Shopfront Design Guidelines and support Irish language and bilingual signage.
9. Have regard to the Retail Design Manual (2012), a companion document to the Retail Planning Guidelines for Planning Authorities (2012) to ensure that retail developments provide a high quality of architecture and urban design.
10. Require that major proposals for retail development should be supported by a Retail Impact Assessment (RIA), prepared in line with the Retail Planning Guidelines for Planning Authorities (2012) and that demonstrates compliance with the strategies in the Development Plan in particular the objective to not adversely impact on the vitality and vibrancy of an existing retail centre in particular the city centre.
11. Encourage retail development to include for measures that can contribute positively to climate action and to increased investment in the circular economy in alignment with the national strategy to significantly reduce Ireland's circularity gap.

Policy 6.12 Retail Hierarchy

1. Protect and enhance the city centre, designated as the most important shopping area in the Galway MASP and county area and as a major centre in the Northern and Western Region and facilitate a mixed expansion of services including high order comparison retailing in conjunction with service retailing, an enhanced shopping experience and cultural and entertainment facilities through appropriate and sensitive re-development, infill and development on designated regeneration in conjunction with implementation of key public realm and sustainable transport projects.
2. Direct strategic investment in commercial, civic, cultural and retail, particularly high order comparison goods and specialist retailing into the city centre where they can enhance vitality and viability through a mix of uses, reuse of vacant sites and revitalisation to contribute to regeneration and the maintenance of a compact core area.
3. Strengthen the vitality of the city centre and its resilience to changing retail trends and consider measures to support a sustainable retail environment taking into account flexibility of uses and retail formats, complementary uses and a quality retail experience.

4. Support the development of a vibrant, inclusive, evening and night-time culture and economy through sustainable measures and promote the need for associated transport supports, measures to secure a safe environment, and for diversity in entertainment and creative offerings. This may include extended opening hours, proposals for outdoor living and event space, and proposals for the greater utilisation of existing heritage assets.
5. Ensure that the design of city centre retail developments, including extensions and modifications, respond positively to the unique setting, distinctive character and quality of the built and natural environment of Galway.

8 BUILT HERITAGE, PLACEMAKING & URBAN DESIGN

8.1 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. Where opportunities exist in the city for such development and where the design resolution interprets the historic setting, without harming its values and character-defining elements, it can derive value and benefit that attracts investment, new uses and creates new, vibrant, distinctive neighbourhoods building on the historical layers of the city.

8.8 Architecture, Urban Design & Placemaking Policy

Regeneration & Opportunity Areas

- In regeneration areas including key areas at Ceannt Station, Inner Harbour and at the Headford Road area there will be a need to develop a new local distinctiveness. These areas will require development to be supported by a strategic framework and spatial plan which includes for a long term vision for the area with functional divisible stages of development where relevant. They will be required to demonstrate that good urban design principles are being applied, compact mixed use growth is being encouraged and that economic, social and environmental dividend is being achieved along with a positive contribution to the physical expansion of and liveability of the city.

Local Area Plans and Masterplans/Framework Plans

- Within the framework of the City Development Plan, an Area Plan can provide more detailed planning policies for areas where significant development and change is anticipated.
- Area Plans are proposed for Murrough, Headford Road, Castlegar and Doughiska. They will include for an urban design framework which will have a key role in translating at the local level, the policies included in Section 8.8 relating to urban design and provide guidance in relation to layout, density, diversity of uses, access and infrastructural

provision, and the integration of green spaces/parks which will contribute significantly to achieving a high-quality place.

- Major regeneration schemes in and around the city will have a significant impact on Galway's growth, evolution and future character and success. In light of the significant planned growth for Galway, the Urban Density and Building Height Study provides design principles and guidance to promote high standards of design, both in buildings, streets and public spaces. Where an area of land requires a masterplan/spatial framework, it will also include a specific contextual urban design strategy. Such masterplans/spatial frameworks will be required to demonstrate how redevelopment will incorporate a good standard of architecture in conjunction with a high quality of urban design standard, in accordance with City Development Plan policies and objectives. This approach will encourage developments that can contribute to making successful places, contribute to distinctive place making and enable new urban extensions to link well and efficiently into the existing built form. For those in the city centre area this can mean growing and expanding the vibrancy of the core area, creating new quarters, new streets and new spaces and by design ensuring that they are safe, accessible, pleasant to use and human in scale. (See Chapter 10 for further guidance).
- Policy 8.7 Architecture, Urban Design and Placemaking
 2. Encourage high quality urban design in all developments.
 4. Ensure that development delivers high quality urban design, placemaking and public realm that contributes to urban regeneration in the city and that is resilient to potential impacts of climate change.
 7. Promote sustainable and inclusive urban design, urban form and architecture that positively contributes to the city's existing character and distinctiveness.
 8. Adhere to the Galway City Urban Density and Building Height Study (2021) and promote development which incorporates high quality sustainable and inclusive urban design, urban form and architecture that positively contributes to the city's character, heritage and neighbourhood areas.
- Policy 8.8 Public Realm
 4. Prioritise the safe movement of people on streets and create a high quality environment through design promoting connectivity, accessibility and the principles of universal design.
 5. Promote nature based SUDS solutions in the public realm where possible to enhance biodiversity and resilience to climate change.
 9. Prioritise the creation of public spaces in the development of regeneration areas and opportunity sites and deliver high quality public realm.

9 ENVIRONMENT & INFRASTRUCTURE

9.2 Flood Risk Assessment

- Climate change impacts which include more intense storms, storm surges, sea level rise and increased occurrences of long high-intensity rainfall events, contribute to an increased likelihood of flooding. The city is particularly vulnerable to flooding by virtue of its location on the Atlantic coast and River Corrib and this requires a comprehensive approach to flood management.
- The Development Plan can play an important role in flood management through policy and land use zoning and to date large sections of the natural flood plains of the coast and River Corrib have been protected from compromising development. Other policies in relation to control of drainage and surface water management also support flood management. In the preparation of the Plan, in accordance with The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009), a Strategic Flood Risk Assessment (SFRA) has been carried out to assess the implications for planning policy of flood risk. The SFRA adopts a largely precautionary approach to land use zoning to avoid directing development towards areas at risk of flooding. Areas subject to development and identified as being at risk of flooding, are assessed through a justification test, to determine their suitability and requirements for site-specific flood risk assessment and detailed mitigation are considered on a site by site basis.
- The Office of Public Works (OPW) is the lead agency for flood risk management. In 2011 the OPW completed a national Preliminary Flood Risk Assessment (PFRA), carried out under the EU Floods Directive, which identified areas of potentially significant flood risk. Subsequent to this, the OPW undertook the Catchment Flood Risk Assessment and Management study (CFRAMs) which established a long term strategy and measures for the management of flood risk in the city and wider Corrib catchment. It concluded that a flood relief scheme would be a viable and effective option to protect the city against fluvial and tidal flood risk, to provide for future resilience, and to enable the city to develop in a sustainable way
- Where development is required it must complement the character, sensitive environment, cultural legacy and built form of the city in any design. The design of the flood relief measures will be required to include for creative landscape architectural solutions, which can, in addition to addressing flood risk management, bring value to the urban context and public realm and integrate with other advancing projects.
- Policy 9.1 Flood Risk
 1. Support, in co-operation with the OPW, the implementation of EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No, 122 of 2010) and the DECLG and OPW Guidelines for Planning Authorities, the Planning System and Flood Risk Assessment Management (2009), updated/superseding legislation or departmental guidelines and have regard to the findings and relevant identified actions of the Corrib Catchment Flood Risk Management (CFRAM) Study.

2. Support and facilitate the implementation of the Coirib go Cósta Galway City Flood Relief Scheme in conjunction with the OPW to support a climate resilient city, protect against flooding and minimise the impact of future climate events. Support in general the associated mitigation and adaptation measures in order to prevent flooding and coastal erosion, subject to appropriate environmental, visual, built heritage and other relevant considerations.
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).
4. Protect and promote sustainable management and uses of water bodies and watercourses from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains.
5. Ensure flood risk is incorporated into the preparation of any future local area plans, framework plans and masterplans in the city.

9.5 Sustainable Urban Drainage Systems (SuDS)

- The urban environment with its associated impermeable surfaces, such as roofs, roads and car parks, prevents the natural percolation of rainfall into the ground which can result in excessive volumes and flows of surface water runoff. Sustainable Urban Drainage Systems (SuDS) aims to minimise surface water run-off associated with development, using a series of water management measures designed to drain surface water in a more sustainable manner, reflecting natural drainage processes.
- The use of SuDS reduces the amount and rate of surface water flow by a combination of measures including infiltration into the ground and attenuation of surface water in storage areas to slow down the movement of water. While to date there has been a heavy reliance on underground storage tanks to provide attenuation, there is a move towards nature based SuDS such as ponds and basins, wetlands, planted filter strips and swales, permeable surfaces, green facades and green roofs. Nature based SuDS are designed to deal with rainfall in urban areas in a manner as close as possible to that pertaining in the natural environment. The benefits are wide ranging, including a reduction in pollution from urban run-off, reduced flooding and reduced loading of combined sewer systems. They can be positive landscape features within the urban environment, providing amenity benefits and contributing to biodiversity.

- LAWPRO in conjunction with the DHLGH are developing an implementation strategy for the development of Water Sensitive Urban Design, which includes nature based SuDS and when completed will provide useful guidance in an urban context. The draft River Basin Management Plan also recognises the benefits of using nature based surface water management and the need to move away from engineering solutions. In this regard, 'Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document' (DHLG) (November 2021), has been prepared in order to provide guidance on measures to be implemented to support the delivery of a greater focus on nature based solutions. The council will have regard to this interim guidance in advance of a national implementation strategy.
- 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.

10 COMPACT GROWTH & REGENERATION

10.7 Headford Road Regeneration Sites

Currently the overall area has a weak urban structure and lacks cohesion. The existing commercial area comprises low grade buildings and the existing floorspace is well below sustainable density standards. The existing parks lack adequate passive surveillance and could be better utilised for public benefit. The upgrade of the Bodkin junction to a signalised junction and the revision of access and traffic circulation measures have made improvements to traffic flow and pedestrian and cycle linkage. Despite this the area still suffers traffic congestion, particularly at peak times and would benefit from improved linkages and connections. The area extends to approximately 30 hectares and its redevelopment is best realised within the structure of a LAP. This approach will result in a sustainable integrated development framework for the area supporting the creation of a vibrant mixed-use area including for a commercial and residential district with cultural, civic and amenity facilities.

The preparation of the LAP will build on a previous draft framework for these lands which considered the principal aspects of placemaking, planning, sustainable transportation, architecture, engineering, landscape design, ecology, access, passive surveillance and development economics. It is intended that the LAP will encourage a diversity of uses to sustain an animated and vibrant public realm of streets and urban spaces promoting sustainable transportation options. It will seek to maximise the opportunities that exist to integrate and protect the natural heritage assets of the area, create improvements to the existing parks and provide high quality linkages to the city centre, University of Galway and outer residential areas. The Plan will reflect the unique character and culture of Galway and acknowledge the dynamism of this urban area. This is an area identified at risk of flooding by virtue of its location along the River Corrib and defended by the Dyke road embankment and specific flood risk assessment of the lands was undertaken in 2012. The LAP will be required to review this assessment and comply with any requirements of the Coirib go Cósta Galway City Flood Relief Scheme. The LAP will also include for extensive public consultation.

Headford Road Regeneration Site - Galway Shopping Centre

This Headford Road shopping centre occupies a site of 6.8 hectares. The shopping centre dates to 1972 and is occupied by a range of retail uses and experiences significant footfall. It is reflective of its era developed as a single storey introverted mall linked to car borne patronage. It represents a development form which requires modernisation with the layout and organisation of uses on the site representing an inefficient use of urban land.

Similar to the retail park, the site has significant potential for intensification, a better urban mix, an improved pedestrian environment and permeability. Subject to a LAP, the redevelopment of this site to a significant scale has potential to create a new vibrant urban quarter with increased retail floorspace, commercial space and cultural and civic uses and a new residential community with a minimum 30% residential content required.

Key to the success of these regeneration areas will be the enhancement of links to the city core, in particular along Headford Road, Bóthar na mBan and Woodquay. These streets require investment to improve public realm and rebalance the priority for pedestrian and cyclist movement to make them attractive, safe and convenient.

Natural Heritage, Recreation & Amenity

It is critical that there is continued protection and sensitive management of these sites, so that the sites' intrinsic high ecological and biodiversity value is safeguarded and in some cases restored. The policies and objectives of the City Development Plan have been drafted taking cognisance of Article 6 of the Habitats Directive. This includes requiring any development located within 1km of a European Site, any sensitive area found to have local importance for SCI species, or highly sensitive coastal habitat vulnerable to visitor pressures to have due consideration for the potential impact of any increase in visitor pressure. All plans including lower tier plans and projects identified as having potential to impact on European Sites are required to adhere to the requirements of the Habitats Directive, to ensure no adverse impact on the integrity of European Sites.

Area Plans are also proposed for the Murrough, and Headford Road, Area Castlegar and Doughiska. They will include for an urban design framework which will have a key role in translating at the local level, the policies included in Section 8.8 relating to architecture and urban design and provide guidance in relation to layout, density, diversity of uses, access and infrastructural provision, and the integration of green spaces/parks which will contribute significantly to achieving a high-quality place

11.2.6 Commercial/Industrial CI Land Use Zoning Objective

Zoning Objective CI	
To provide for enterprise, light industry and commercial uses other than those reserved to the CC zone	
Uses which are compatible with and contribute to the zoning objective, for example:	- Warehousing/Storage - Retail of a type and of a scale appropriate to the function and character of the area - Specialist offices - Offices of a type and of a scale appropriate to the function and character of the area - Light Industry - Accommodation for the Traveller Community - Childcare facilities - Community and cultural facilities - Allow for development of Regeneration and Opportunity Sites in accordance with the provisions of Chapter 10 and Policy 10.2 Strategic Regeneration and Opportunity Sites, particularly where it is identified to provide for mixed use development which includes for residential.
Uses which may contribute to the zoning objectives, dependent on the CI location and scale of development, for example:	- General industry (small scale) - Service retailing - Residential content of a scale that would not unduly interfere with the primary use of the land for CI purposes and would accord with the principles of sustainable neighbourhoods outlined in Chapter 3. Exceptions can be accommodated on publically owned lands on the Regeneration Sites at Headford Road and Sandy Road which can provide predominantly for residential uses in accordance with national housing policy. - Offices - Car parks (including heavy vehicle parks) - Waste management facility - Public transportation facility - Public utilities - Outdoor recreation - Commercial leisure/indoor recreation - Places of worship

- Retail development of a nature appropriate to the city centre will be considered on the Headford Road (south of the Bodkin junction). An arts/cultural facility shall be delivered in conjunction with any major re/development of these lands. It is intended to carry out a Local Area Plan as specified in Chapter 10 for these lands termed the Headford Road LAP.
- CI zoned lands on the Headford Road (south of the Bodkin junction), Sean Mulvoy Road, Tuam Road (south of Bóthar na dTreabh), Moneenageisha Road and lands abutting Seamus Quirke Road. Offices appropriate to the CC zoning will be open for consideration on these lands

11.9 Commerical & Industry

- CI zoned sites, with an objective for regeneration, namely Headford Road LAP area (including Dyke Road), Corrib Great Southern Site, Sandy road, Nuns Island and Knocknacarra District Centre, shall accord with the vision as provided for in Chapter 10.
- CI and I zoned lands, that are identified as Opportunity sites, namely at Shantalla Road (0.62ha), former Connaught Laundry site and Royal Tara site shall accord with the vision as provided for in chapter 10, which includes for consideration of residential development on the full extent of these zoned sites.
- Developments shall be required to provide an element of open space which would include a landscaping scheme for the site having regard to screening of boundaries and vehicle parking areas and to the visual appearance of the site, in particular the area between the front building line and the front boundaries.
- Open space shall be provided in a manner in which it can function as an effective amenity area taking into account its location on the site, physical size, aspect to avail of sunlight and accessibility. In this regard open space inappropriately sited or sized or open space incidental to roads, boundaries or pathways, shall not be accepted by the Council, as fulfilling this requirement. Such landscaping schemes shall encourage habitat biodiversity and incorporate SuDS where feasible
- Adequate space must be available for on-site storage of materials and refuse, loading and unloading, on site circulation of vehicles and parking for motor vehicles and bicycles. In this regard adequate on site waste management/recycling facilities must be provided.
- Advertising structures, where required, shall be sized and placed in a manner, which is unobtrusive. Advertising structures and signage shall be minimised, of a high standard, co-ordinated in design and appropriately scaled and located.
- Buildings or structures intended for use by the general public shall be designed to allow access and internal circulation for people with disabilities.

11.11 Transportation

- In the case of any use not specified, the Council will determine the parking requirement, having regard to the traffic levels likely to be generated as a result of the development.

In the case of developments with significant car trip generation potential, a Traffic and Transport Assessment (TTA) shall be carried out in accordance with the Traffic and Transport Assessment Guidelines (TII 2014). The requirements for a TTA should be ascertained at the pre-planning stage. TTA's shall project forward 5 years and 15 years after the opening date in accordance with TII Traffic and Transport Assessment Guidelines and the UK's Institution of Highways and Transportation Guidelines, and shall, in their analysis, consider all major road and traffic schemes and existing and proposed developments in an area.

11.20 Green Design & Surface Water/SuDS

- New development shall consider the use of innovative design features in buildings including Green roofs, walls and roof gardens. These are important measures in the control of surface water runoff, providing thermal insulation, enhancing biodiversity and promoting a varied cityscape. Development proposals which include any of the above elements shall be accompanied by details of construction techniques, long-term viability, maintenance and management, prepared by a suitably qualified landscape designer. Development proposals will be required to be accompanied by a comprehensive SuDS assessment that addresses run-off quantity, run-off quality and its impact on the existing habitat and water quality and will have regard to guidance set out in Planning for Watercourses in the Urban Environment (IFI 2020) and Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document' (DHLG) (November 2021).

11.22 Street Furniture, Signs and Structures

- Application for licenses for street furniture, signs and structures shall be considered under Section 254 of the Planning and Development Act, 2000 (as amended) and Part 17, of the Planning and Development Regulations 2001-21. Further guidance is available in the Councils Licensing of Street Furniture, Signs & Structures Policy Document 2011 and Galway Shop Front and Signage Design Guidelines 2012. It is important to ensure that certain uses in the public realm, including elements of street furniture do not obstruct public footpaths for pedestrians, in particular for people with disabilities and mobility issues.

11.25 Access for All

- Part M of the Building Regulations 2010, and Building for Everybody: A Universal Design Approach (National Disability Authority, 2012) sets out standards and best practice to ensure that buildings and the built environment are accessible and usable by everyone, including the elderly, people with disabilities and people with children.

Further information available on the website of the National Disability Authority at www.nda.ie.

11.32 Environmental Impact Assessment

- The Planning and Development Regulations specify mandatory thresholds above which Environmental Impact Statements (EIS) are required, setting out the types and scale of Development proposals that require EIS. Where it appears to the Planning Authority that a development proposal that falls below the thresholds set out in the Planning and Development Regulations 2001-2015 would be likely to have a significant environmental effect, a 'sub-threshold/discretionary EIS' can be requested by the Council. Galway City Council (or An Bord Pleanála) may require EIA to be carried out on below-threshold development if it is considered that, or uncertain if, the development proposal would be likely to have significant effects on the environment.

11.28 Flood Risk Management & Assessment

- Where development is proposed in identified flood risk areas, the type or nature of the development needs to be carefully considered and the potential risks mitigated and managed through on-site location, layout and design of the development to reduce flood risk to an acceptable level.
- Development shall have regard to the flood resilient design guidance and flood mitigation measures in the City Council's Strategic Flood Risk Assessment for Galway City Development Plan 2023-2029, the recommendations and best practice guidelines of Appendix B – addressing flood risk management in design of development of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (or any superseding document) and the Strategic Flood Risk Assessment for Three Local Area Plan Areas 2012.
- Dependant on the type and nature of development proposed within identified flood risk areas, Flood Zone A or B, it will be necessary to carry out a Site Specific Flood Risk Assessment (FRA), appropriate to the scale and nature of the development and the risks arising. Proposals shall demonstrate appropriate mitigation and management measures in the layout and design of development.
- All proposed development must consider the impact of surface water flood risk in drainage design. Consideration should be given in the design of new development to the incorporation of SuDS. The drainage design should ensure no increase flood risk to the site or downstream catchment.
- Development proposals in identified flood risk areas shall consider and incorporate the potential impacts of climate change and residual risk into development layout and design.
- In areas of identified flood risk all developments including minor works and changes of use should include an appropriate level of FRA. This assessment must demonstrate that the development would not increase flood risk in the context of use, emergency access and infrastructure. Development should demonstrate principles of flood resilient design.

- Proposed developments shall have regard to the the Coirib go Cósta Galway City Flood Relief Scheme.

11.33 Appropriate Assessment / Natura Impact Statement

- Under Article 6 of the Habitats Directive there is a requirement to establish whether, in relation to plans and projects, appropriate assessment (AA) is required. If, following screening, it is considered that AA is required then the proponent of the plan or project must prepare a Natura Impact Report/Natura Impact Statement. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, screening for Appropriate Assessment, and a Stage 2 Appropriate Assessment where necessary, that:
 - The plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or
 - The plan or project will have significant adverse effects 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
 - The plan or project will have a significant 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 of 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.

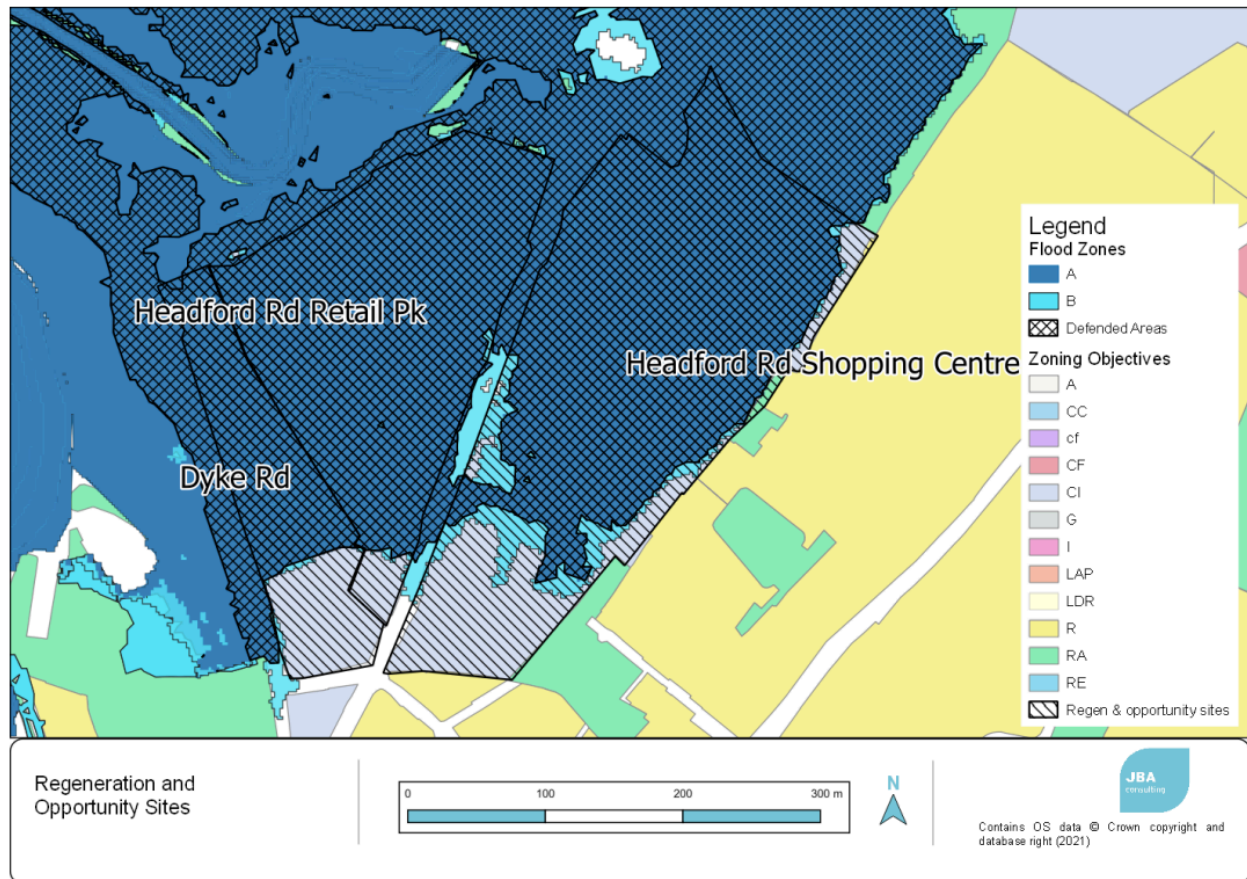
11.35 Ecological Impact Assessment (EclA)

- An Ecological Impact Assessment (EclA) will be required to be undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals where the requirements of section 11.32 do not apply.

Strategic Flood Risk Assessment

7.8 Headford Road Shopping Centre - Part of Headford Road and Dyke Road Regeneration Site

The Headford Road and Dyke Road Regeneration Site comprises an existing shopping centre and surface car park. Planning permission for significant redevelopment had been previously granted on site. The site is identified in the core strategy of the Development Plan as a significant brownfield regeneration site. A Plan for the Headford Road and Dyke Road regeneration area will guide its comprehensive redevelopment. It lies within Flood Zone A which is based on the undefended runs with no Dyke embankment in place. The site comprises a mix of highly and less vulnerable, and water compatible, zoning objectives, and is in Flood Zones A, B and C. As required by the Planning Circular PL02/2014, the Justification Test is required for highly and less vulnerable development in this area.



Justification Test Parts 1 and 2

Criteria		Response
1	The urban settlement is targeted for growth under the NPF, RSES statutory plans or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.	Project Ireland 2040 National Planning Framework (NPF) and the Northern and Western Assembly's Regional Spatial and Economic Strategy 2020-2032 (RSES) includes objectives to develop Galway City as a regional city targeted for significant growth, supporting a compact form of development. This is reflected in the core strategy of the Development Plan. These sites are identified in the core strategy as strategic regeneration sites adjacent to the city centre.
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
2(i)	Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement:	The sites are significant regeneration sites earmarked for comprehensive redevelopment, essential for the sustainable development of the city and consolidation of a physically compact city centre. The sustainable development of these serviced sites will ensure the continued viability and vitality of the city centre and enhance its role as a regional retail centre.
2(ii)	Comprises significant previously developed and/or under-utilised lands:	The sites are already developed with commercial/retail uses and car parking. Site 7.7 comprises relatively underutilised serviced lands with surface car parking and a low density retail park. Site 7.8 comprises a major shopping centre in need of modernisation.
2(iii)	Is within or adjoining the core of an established or	These sites are designated regeneration sites and
	designated urban settlement:	are directly adjacent to the city centre.
2(iv)	Will be essential in achieving compact and sustainable urban growth; and,	The redevelopment of these serviced sites is essential in the sustainable development of the city. Their location adjacent to the city centre conforms to the sequential approach to retail development and will be an essential element in creating a compact and sustainable city.
2(v)	There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These serviced sites are ideally suited for comprehensive redevelopment given their proximity to the city centre and their significant accessibility. There are no available appropriate sites which could accommodate the uses envisaged or which could complement the offer of the city centre which functions as a regional retail centre. These sites already have considerable commercial/retail development, planning permission has been previously granted in the Headford Road Shopping Centre area for significant shopping centre redevelopment. As such, there are no suitable alternatives within the city.

Flood Risk Assessment and Justification Test Part 3

Benefitting from Defences (flood relief scheme works)	The site benefits greatly from the Dyke Road defence in Galway City. This embankment will be subject to assessment, and possible remediation, under the Coirib go Cósta FRS.
Sensitivity to Climate Change	Low – moderate. The extent will increase slightly with climate change. The depths however will be the greatest increase as climate change progresses. The frequency of the Dyke Road embankment overtopping is likely to increase also.
Residual Risk	Dyke road overtopping or breach.
Historical Flooding	The land is marked 'liable to floods' on the 1829-41 6" historic OS maps. This is before the construction of the Dyke embankment and no record of flooding is known since.
Surface Water	Should the site be developed, the FRA would be required to consider surface water management and discharge, whether this is to the Terryland River directly or into the surface water system, particularly during (but not limited to) flood events.

Commentary on Flood Risk:

The Terryland River is a tributary of the River Corrib and discharges its flow into a sinkhole to the northeast of the subject site. Flow into the Terryland River is controlled by the old Waterworks Weir. If a groundwater event or blockage occurs in the sinkhole, water will back and pond in the floodplain. This type of flooding will be very slow and the inflow at Waterworks Weir can be limited so the risk of this occurring is quite low. Due to the slow nature of the event, it likely that the cause can be remediated before damage can occur. The River Corrib is prevented from expanding water into the Terryland area by the Dyke Road defence. The Dyke Road embankment is shown to prevent the River Corrib entering the area in the defended 1% AEP fluvial event, but is overtopped in a 0.1% AEP event. This does not include sufficient freeboard and does not meet the standard of protection required for a formal defence. The embankment is critical to preventing flood risk to the subject site.

Development Considerations:

The site is located adjacent to the city centre and is earmarked for significant future redevelopment. It is an important objective for the council to develop here, and as such meets Part 2 of the Justification Test (see Appendix B). The site conforms to level 1 in the

retail hierarchy and complements the retail/commercial offer of the City Centre. It contributes to the function of the City Centre as a Regional Retail Centre.

"The CFRAM study has identified that defences along the Dyke Road are critical and should be raised and strengthened in order to support intensification of land use behind it." The Coirib go Costa FRS reflects the outcomes of the CFRAM and should include for works to remediate the Dyke Road defences.

Part 3 of the Justification Test has been carried out and included a detailed flood risk assessment and model runs.

Planning permission was granted for significant redevelopment of the shopping centre and did include flood risk consideration. Should future applications for the site be submitted they will need to take account of recommendations contained in this SFRA, the development specific plans, the CFRAM Study and the Coirib go Cósta FRS.

As with the Dyke Road Car Park site and Headford Road Retail Park, development proposals for the site will need to consider appropriate finished floor levels and mechanism for managing residual flood risks. However, the Stage 3 FRA undertaken in this assessment has demonstrated that the principle of land raising is acceptable.

Development of the regeneration site will require site specific assessment and plans for the area should include the following additional flood management measures:

- Highly vulnerable development should be located above the 0.1% AEP level, with an appropriate freeboard. This may be achieved through setting the ground floor at a suitable height or by located highly vulnerable uses (and particularly sleeping accommodation) at first floor level.
- An emergency plan and evacuation procedure in the event of an embankment failure should be prepared along with any planning proposal for the site.