



THORNTON O'CONNOR  
TOWN PLANNING

# Environmental Report

## Planning Application

In respect of a Student Accommodation  
Development at

Cúirt Na Coiribe,  
Headford Road,  
Terryland,  
Galway,  
County Galway

Submitted on Behalf of  
Exeter Property Ireland III Limited

June 2020



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## 1.0 INTRODUCTION

Thornton O’Connor Town Planning in association with TODD Architects, 3D Design Bureau, AECOM, The Big Space Landscape Architects, JBA Consulting, Arborcare, DCON Safety Consultants and AWN Consulting Engineers, have been retained by Exeter Ireland Property III Limited to prepare a planning application in respect of a proposed development at Cúirt Na Coiribe, Dun Na Coiribe Road, off Headford Road, Galway.

### 1.1 Multidisciplinary Team

The following table details the multi-disciplinary team and their specialised inputs, reports and documents:

COMPANY NAME	DOCUMENTS PREPARED
Thornton O’Connor Town Planning	<ul style="list-style-type: none"> <li>→ Planning Report</li> <li>→ Statement of Consistency</li> <li>→ Environmental Report</li> <li>→ Student Demand and Concentration Report</li> <li>→ Response to An Bord Pleanála Opinion</li> </ul>
TODD Architects	<ul style="list-style-type: none"> <li>→ Architectural Drawings</li> <li>→ Architectural Design Statement</li> </ul>
3D Design Bureau	<ul style="list-style-type: none"> <li>→ Daylight and Sunlight Analysis</li> <li>→ Photomontages and CGIs</li> </ul>
AECOM	<ul style="list-style-type: none"> <li>→ Traffic &amp; Transport Assessment</li> <li>→ DMURS Statement of Compliance</li> <li>→ Mobility Management Plan</li> <li>→ Infrastructure Report</li> <li>→ Stage 2 Flood Risk Assessment</li> <li>→ Geotechnical Report</li> <li>→ Energy Statement</li> <li>→ Lighting Study</li> </ul>
The Big Space	<ul style="list-style-type: none"> <li>→ Landscape &amp; Visual Impact Assessment</li> <li>→ Landscape Masterplan</li> <li>→ Landscape Development Report</li> </ul>
JBA Consulting	<ul style="list-style-type: none"> <li>→ Screening for Appropriate Assessment</li> <li>→ Natura Impact Statement</li> </ul>
Arborcare	<ul style="list-style-type: none"> <li>→ Tree Constraints</li> <li>→ Arboricultural Impact Assessment</li> </ul>
DCON Safety Consultants	<ul style="list-style-type: none"> <li>→ Draft Construction Management Plan</li> </ul>

	→ Draft Construction & Demolition Waste Management Plan
AWN	→ Operational Waste Management Plan
O’Herlihy Access Consultancy	→ Disability Access Statement
Exeter Property Ireland III Limited	→ Student Management Plan

The subject lands have recently been purchased by our Client with the intention of developing a high-quality, purpose-built Student Accommodation development. The proposed development comprises the provision of 515 No. new bedspaces in addition to the existing 88 No. apartment Units or 405 No. bedspaces, forming a total purpose built student accommodation complex of 920 No. bedspaces.

This Report is intended to be read in conjunction with the Planning Report, Statement of Consistency and all other plans and reports that accompany this application, which provide a detailed overview of the nature and purpose of the proposed development and detail the relevant environmental considerations of relevant technical disciplines.

The document is intended as a summary review of the outputs of preliminary scoping carried out on the proposed development on possible effects on the environment and detail targeted measures to address any matters potential impacts.

**2.0 SITE DESCRIPTION**

**2.1 Site Location and Description**

The site of Cúirt Na Coiribe is located just north of the junction of the Headford Road, the N6 National Road and the Sean Mulvey Road, in Terryland, Galway City. This is a prominent location above the Terryland River and associated walking path.



**Figure 2.1: Site Location Outlined in Red (Indicative Only). Site in Applicant's Ownership Outlined in Blue (Indicative Only)**

(Source: Myplan.ie, OSI Map, annotated by Thornton O'Connor Town Planning, 2020)

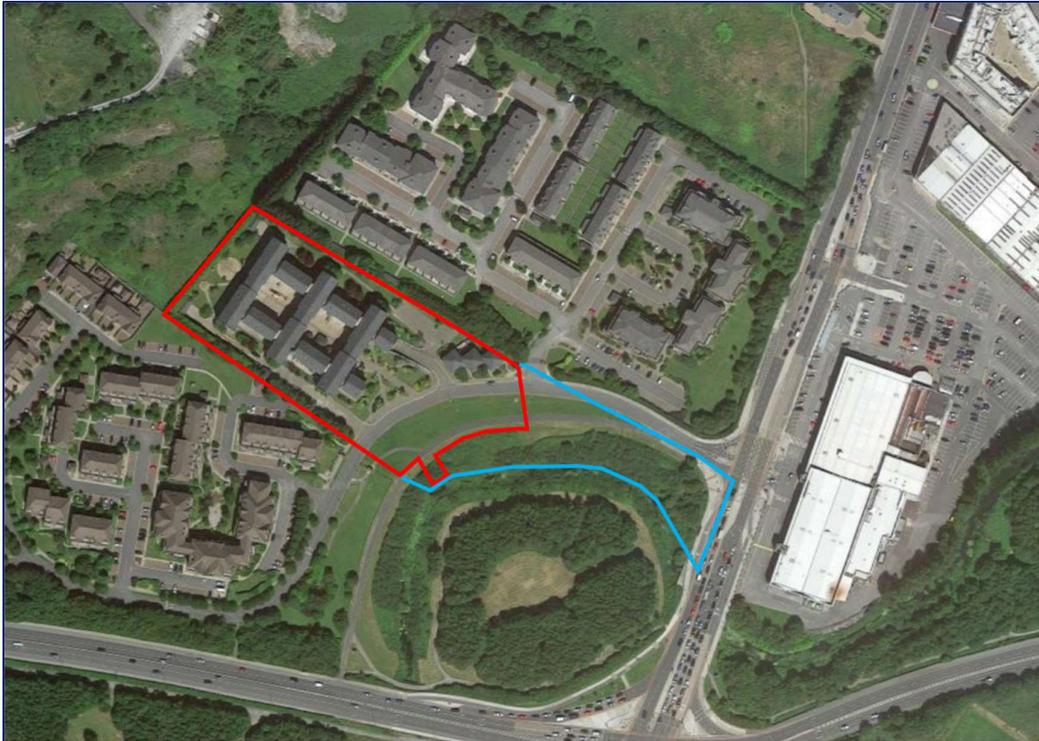


Figure 2.2: Aerial View of Cúirt na Coiribe Complex and the Entrance Roadway

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2020)

The existing Cúirt Na Coiribe complex is 2 No. buildings, a two-storey ancillary service building and the main building. The main building is the largest structure and is orientated around two courtyards and arranged in 3 No. wings running from north east to south west and 2 No. spinal columns running from north west to south east. The 4 No. storey building sits on a plinth made from the underground car park.

## 2.2 Zoning Objective

The subject site is zoned 'Residential' or 'R', which has the following objective in the *Galway City Council 2017-2023 Development Plan*:

*"To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods."*

There is a smaller part of the subject site which is also zoned 'RA' or 'Recreational Amenity', which has the following objective:

*'To provide for and protect recreational uses, open space, amenity uses and natural heritage.'*

This portion of the site will be the location of a 'wetland' attenuation pond as part of the Sustainable Drainage System (SuDS).

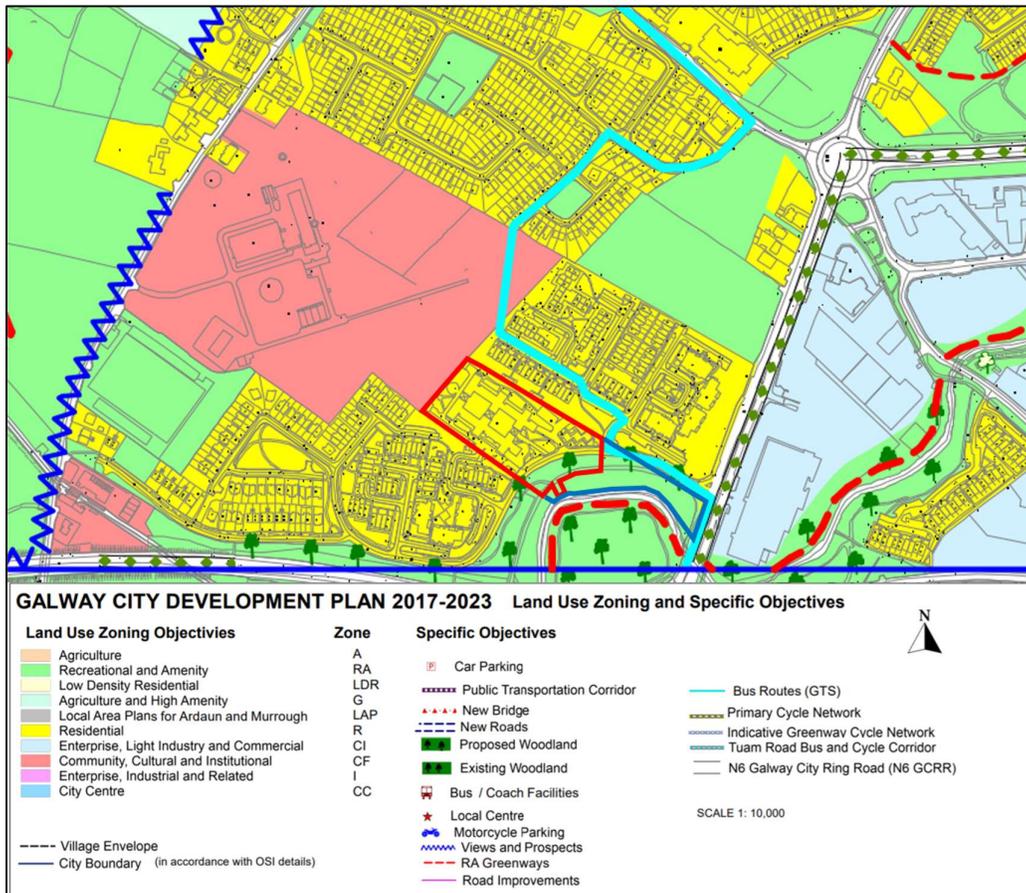


Figure 2.3: Zoning Map with Subject Site Outlined in Red (Indicative Only). Site in Applicant's Ownership Outlined in Blue (Indicative Only)

(Source: Galway City Council 2017-2023 Development Plan, as annotated by Thornton O'Connor Town Planning, 2020)

### 3.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The proposed development will consist of: the demolition of the two storey building (582 sq m) at the entrance to the scheme towards the eastern boundary of the site and the removal of the fifth storey (attic) level (1,123 sq m) of the main building; and the provision of horizontal and vertical additions to and extensions of the main existing building providing 920 No. bedspaces (an additional 515 No. student accommodation bedspaces) in 868 No. bedrooms; ancillary student accommodation spaces at basement and ground floor level measuring 1,688 sq m and including gym/fitness studio, games room, library/study spaces, multi-functional spaces, café/restaurant, and student lounge spaces; all provided in a single building in 9 No. linked blocks ranging in height from 2 No. to 6 No. storeys (gross floor space of 24,693 sq m plus basement car-parking (2,443 sq m)).

The scheme also proposes 59 No. car-parking spaces (43 No. basement and 16 No. surface spaces); 656 No. cycle parking spaces; 5 No. motorcycle parking spaces; external student amenity spaces; hard and soft landscaping; attenuation pond/wetland area; boundary treatments; plant; diversion of services and all associated works above and below ground.

## 4.0 EIA SCREENING METHODOLOGY

An Environmental Impact Assessment (EIA) is a process whereby the potential effects of development projects on the environment are assessed. The particulars of the assessment procedure are adopted through European Directives and correlate to the provisions set out in the *Planning and Development Act 2001* (as amended). An EIA is required to be carried out as part of an application whereby the proposed development exceeds the limitations of Schedule 5 of the *Planning and Development Regulations 2001* (as amended).

A Sub-Threshold EIAR is required where it is considered by the Planning Authority that the development would be likely to have a significant effect on the environment. The criteria for the assessment of sub-threshold impacts is set out in Schedule 7 of the *Planning and Development Regulations 2001* (as amended).

An assessment of the identified *direct, indirect, secondary, cumulative, short, medium, and long-term, permanent and temporary, positive and negative* effects of the proposed development during the construction and operational phases of the development is also required to be carried out in response to Schedule 6 of the *Planning and Development Regulations 2001* (as amended).

### 4.1 Legislation and Guidance

Schedule 5 of the *Planning and Development Regulations, 2001* (as amended) sets out the criteria for the specific development proposals which are required to be accompanied by an EIAR as per Article 93 of those same regulations.

### 4.2 EIA Thresholds

As the proposed development is for residential use, the most relevant assessment category of Schedule 5 is considered to be Part 2, Paragraph 10 (b) – *Infrastructure Projects* which identifies developments requiring EIS as;

- (i) Construction of more than 500 No. dwelling units.
- (ii) Construction of a car-park providing more than 400 No. spaces, other than a car-park provide part of, and incidental to the primary purpose of, a development.
- (iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.
- (iv) Urban development which would involve an area greater than 2 hectares in the case of business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. (In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)

The proposed application is for a part 2 to 6 No. storey Student Accommodation scheme comprising an additional 515 No. student accommodation bedspaces. The development proposes a reduction in car parking from 150 No. car parking spaces to 59 No. carparking spaces and 656 No. bicycle parking spaces.

The main subject site comprises the existing Cúirt Na Coiribe student accommodation and self-catering holiday apartment complex measures 1.135 Ha. When the external attenuation pond/ wetland area is included the subject site measures 1.414 Ha.

If we take a 4 No. bed cluster for example, this would measure c. 70 sq m (4 No. bedrooms x 12 sq m = 48 sq m + 4 sq m per bedspace for living /kitchen space = 16 sq m + corridors etc = 6 sq m). Thus, it would be reasonable to suggest that a 4-bed cluster would be relatively equivalent to a 2 No. bedroom apartment. Thus, 515 No. bedspaces would equate to 137.5 No. 2 bedroom apartments, which would not be near the 500 No. unit threshold.

If we take the cumulative total of 920 No. bedspaces, this would equate to c. 239 No. 2 bedroom apartments, which again is not close to the residential threshold.

It is considered that the proposed development is not required to be accompanied by an EIAR as it has been demonstrated that it does not surpass the limitations as set out in the *Planning and Development Regulations (2001), Schedule 5, Part 2, Paragraph 10 (b)* for Infrastructure projects.

#### 4.3 Sub Threshold Projects Requiring EIA

Part 10 of the *Planning and Development Regulations, 2001* defines sub-threshold developments as 'development of a type set out in Schedule 5 which does not exceed a quantity, area or other limit specified in that Schedule in respect of the relevant class of development.'

As the proposal does not exceed the limitations of Schedule 5 as set out above, the proposed development is required to be assessed against the criteria for sub-threshold developments. The assessment will determine whether the proposal 'would or would not be likely to have a significant effect on the environment'.

Furthermore, in assessing whether the proposed development requires an EIA, regard must also be given to European Directive 2014/52/EU. The EIA Directive 2014/52/EU came into effect on the 15<sup>th</sup> of May 2014, asserting the rules for assessing the potential effects of development projects. As of the 16<sup>th</sup> May 2017, it is compulsory for member states to have due regard of the Directive in assessing whether a development proposal requires an accompanying EIA.

#### 4.4 EIA Screening Exercise

The proposed development will be assessed against the following criteria;

- A. Characteristics of proposed development
- B. Location of proposed development
- C. Characteristics of potential impacts

##### 4.4.1 Characteristics of Proposed Development

The characteristics of the proposed development have been assessed with regard to the following criteria as set out in Annex III of Directive 2014/52/EU and Schedule 7 of the *Planning and Development Regulations, 2001 (as amended)*;

###### (a) The size and design of the whole project;

This Environmental Report is submitted in conjunction with a Planning Report prepared by Thornton O'Connor Town Planning and a Design Statement prepared by TODD Architects.

The proposed development comprises an extension to an existing Student Accommodation development comprising an additional 515 No. bedspaces. The existing 4 No. storey building is arranged in a lattice pattern of building blocks surrounding 2 No. courtyards with a separate 2 No. storey over basement ancillary services building to the south-east. The proposed development will demolish the ancillary service building and provide for a series of new extension blocks and an increase in height of the existing building to tie into the new extension blocks.

There will be a rearrangement of internal spaces and a partition of space within the car park to create new amenity spaces and facilities for the students.

As the building represents vertical and horizontal extension to an existing brownfield site, it is not considered that the design of the extensions raises any environmental issues.

It is anticipated that the proposed development *would not be likely to have a significant effect on the environment.*

###### (b) Cumulation with other existing and/or approved projects;

The proposed Student Accommodation use of the site is consistent with the zoning as per the adopted *Galway City Council 2017-2023 Development Plan*. The application site is located within 'R' zoned land which aims 'to protect and/or improve residential amenity'.

There is a smaller part of the subject site which is also zoned 'RA' or 'Recreational Amenity', which has the following objective:

*'To provide for and protect recreational uses, open space, amenity uses and natural heritage.'*

This portion of the site will be the location of a 'wetland' attenuation pond as part of the Sustainable Drainage System (SuDS).

A search of Galway City Council's online planning application directory for current and determined applications as of 10<sup>th</sup> June 2020 found that there are no significant developments in proximity that would impact negatively on the immediate area.

It is anticipated that the cumulative impact of the proposed development *would not be likely to have a significant effect on the environment* in congress with other existing and/or approved projects.

**(c) The Use of Natural Resources, in Particular Land, Soil, Water and Biodiversity;**

The development proposes the more intensive use of a brownfield site that largely comprises hard-standing and thus, it has minimal additional land-take. An additional area of green space close to the Terryland River will also be utilised as part of the Sustainable Drainage System (SuDS), this wetland/ attenuation area will have a hydrological link to 3 No. Natura 2000 areas in the vicinity. Through the implementation of the proposed mitigation measures as outlined by the *Appropriate Assessment* and *Natura Impact Statement*, the following conclusion is provided by JBA Consulting:

*'It is concluded that **provided that the mitigation measures outlined are strictly adhered to, adverse effects are not likely to occur** from the works involved with the proposed the extension of Cúirt na Coiribe Student Accommodation, Galway, Co. Galway; in-combination with other projects and plans on the following Natura 2000 sites:*

- *Lough Corrib SAC;*
- *Galway Bay Complex SAC; and*
- *Inner Galway Bay SPA.'*

[Existing Emphasis]

The demolition and construction phases of proposed development on a brownfield site will involve the consumption of natural energy sources, the movement of soil and the use of water and other various raw materials. However, it is anticipated that throughout the demolition, construction and operation of the scheme the development would not result in the use of large amounts of natural resources greater than that associated with comparable developments or to the extent that would have a significant impact on the environment.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment.

**(d) The production of waste;**

It is acknowledged that waste will be generated during the demolition, construction and operation of the development as detailed in the accompanying *Draft Construction and Waste Demolition Management Plan*<sup>1</sup> prepared by DCON Safety Consulting.

Volumes of waste materials will be generated during the construction of the proposed development. However careful management of these, including segregation at source, will help to ensure maximum recycling, reuse and recovery is achieved, in accordance with current local national waste targets. It is expected however that a certain amount of waste will still need to be disposed of to landfill. Assuming appropriate facilities are provided, environmental impacts (e.g. litter, contamination of soil or water etc.) arising from waste storage are expected to be minimal. Particular attention must be given to the appropriate management of excavation waste containing contaminated or hazardous materials by the contractor. The use of suitably licensed waste contractors will seek to ensure compliance.

The following waste management practices will be implemented during construction and demolition works on site:

*'Waste materials generated will be segregated on site, where it is practical. Where the on-site segregation of certain types is not practical, off-site segregation will be carried out at licensed waste facilities. There will be skips and receptacles provided to facilitate segregation at source. All waste receptacles leaving site will be covered or enclosed. The appointed waste contractor will collect and transfer the wastes as receptacles are filled. There are numerous waste contractors in the Galway region that provide this service.*

*All waste arising's will be handled by an approved waste contractor holding a current waste collection permit. All waste arising's requiring disposal off-site will be reused, recycled, recovered or disposed of at a facility(s) holding the appropriate registration, permit or license, as required. Written records will be maintained by the contractor detailing the waste arising throughout the construction phase, the classification of each waste type, waste collection permits for all waste contractors who collect waste from the site and the COR, permit or licence for the receiving waste facility for waste removed and recovered/ disposed off-site.*

*Dedicated bunded storage containers will be provided for hazardous wastes which may arise such as batteries, paints, oils, chemicals etc., if required.'*

To accompany this application an *Operational Waste Management Plan* has been prepared by AWN Consulting to outline how operational waste management and collection will be managed within the development.

It is not considered that the development will have significant impacts.

<sup>1</sup> A final *Construction and Demolition Waste Management Plan* will be submitted upon the appointment of a contractor for the construction of an approved development.

**(e) Pollution and nuisances;**

As with all planning applications, there will be potential for dust and noise produced during the construction period. However, as the proposed application seeks to develop an expanded Purpose Built Student Accommodation complex, the immediate pollution and nuisance generated will be from the demolition of the ancillary services building, the demolition of the pitched roof and the creation of the vertical expansion to 5 and 6 No. storeys in certain locations and the construction of the extension blocks.

The accompanying *Draft Construction and Demolition Waste Management Plan* details the measures that will be put in place for dust suppression and noise mitigation during construction and appropriate working hours to ensure there will be no material nuisances from the site.

It is not considered that the development will have significant impacts.

**(f) The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;**

Throughout the demolition and construction phases of the development, applicable building and fire regulations and appropriate environmental controls will be put in place.

Further, there are no technologies, materials or substances proposed which may cause concern.

The development is neither a Seveso site nor near any Seveso sites.

The lands have been zoned under the *Galway City Council Development Plan 2017-2023* and therefore have been subject to both a Strategic Environmental Assessment and a Strategic Flood Risk Assessment.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment through risk of major accidents or disasters.

**(g) The risks to human health (for example due to water contamination or air pollution);**

There are no foreseen risks to human health, as noted appropriate noise and pollution (including water) mitigation measures are to be put in place during the demolition and construction phases of the development. The proposed development is to be connected to public foul and storm water systems. There are no foreseen risks to human health during the operation of the development.

It is anticipated that the proposed development would not be likely to have a significant effect on the environment in respect of risk to human health.

#### 4.4.2 Location of Proposed Development

Schedule 7 of the *Planning and Development Regulations 2001 (as amended)* require an assessment of the environmental sensitivity of the geographical areas likely to be affected by proposed development, having regard to;

**(a) The existing and approved land use;**

The proposed development is located on suitably zoned lands within a residential area which also features similar holiday/ home, self-catering apartment and student accommodation mixed facilities.

The original parent permission for Cúirt Na Coiribe was for 88 No. Residential Apartments for use as student accommodation and short stay rental (GCC Reg. Ref. 00/249).

The facility has matured in the time since to become an important part of the city's supply of student accommodation during term time and self-catering apartments during the summer months.

Under the 'R' Zoning of the subject lands the Residential use of Student Accommodation is still permitted. The subject proposal seeks to expand and improve upon the facilities and bedspace capacity of Cúirt Na Coiribe, creating a purpose built student accommodation development.

The subject site is also partially zoned 'RA' or Recreational Amenity. At this location the attenuation pond/ wetland area will be developed to provide an overflow area for the Sustainable Drainage System (SuDS).

*'To store run-off in excess of this flow rate, it is proposed to provide a wetland in the green area to the east of the development site as set out within the CIRA C753 document. Wetlands are features with a permanent pool of water that provide both attenuation and treatment of surface water runoff. They can support emergent and submerged aquatic vegetation which helps enhance treatment processes and has amenity and biodiversity benefits. The proposed wetland is to be enclosed with a fence to prevent any threat to locals or animals falling into the wetland. Mature hawthorn bushes are specified on either side of a post and rail fence. There will be a gated entry provided to allow for maintenance of the wetland. Water signage and a lifebuoy will also be required.*

*Attenuation storage is provided above the permanent pool and wetland areas. A hydro-brake installed at the outflow controls the rates of discharge from the pool which is limited to the greenfield runoff rate (QBar). The storage area has been sized based on the volume required (135.2 m<sup>3</sup>) to run-off from the development site during a 1 in 30-year return period rainfall event. A 20% increase in rainfall intensities as a result of impacts of climate changes has also been incorporated in this design.'* – Infrastructure Report prepared by AECOM

Thus, there is no change in the land-use with the subject application densifying an existing brownfield site.

**(b) The relative abundance, quality and regenerative capacity of natural resources in the area;**

The absorption capacity of the natural environment, paying particular attention to the following areas:

**(i) Wetlands, Riparian Areas and River Mouths;**

The application site is located uphill from the Terryland River (70 Metres). This is a small local river which meanders through the northern suburbs of Galway before joining the River Corrib to the south-west of the subject site. While not an SAC itself the Terryland River also has influence on the River Corrib and Lough Corrib SAC.

A Flood Risk Assessment has also been conducted by AECOM in conjunction with the AA Screening, and the Natura Impact Assessment by JBA consulting.

The subject site as described by the *Stage 2 Flood Risk Assessment* is located in the following flood zone areas:

*'Parts of the existing site (external) are located within Flood Zone B and the existing accommodation and service building are located within Flood Zone C.'*

The Lough Corrib SAC (610 Metres) is part of a large body of water and is connected to a large collection of tributaries which all flow through the lake and on to the sea. The NIS describes the Lough Corrib SAC as follows:

*'Lough Corrib is situated north of Galway city and is the second largest lake in Ireland. The lake supports extensive Chara beds, many wooded islands and large areas of swamp and fen in the shallow south-east section which lies on limestone. The north-west part is deeper, wider and more oligotrophic. Shore is mainly karst, bog and small areas of callow. Most of the main rivers and tributaries which flow into the lake are included within the site, including the Abbert, Clare, Cong, Cornamona, Dalgan, Drimeen, Grange, Owenwee, Owenriff and Sinking rivers. The River Corrib flows from the southern point of the lough into the sea at Galway City (NPWS, 2017a).'*

The River Corrib runs from the Lough through Galway city and into the Galway Bay (in turn the Galway Bay Complex SAC).

Due to the nature and extent of the works to the Cúirt Na Coiribe site as well as the proposed mitigation works, there is no anticipated impact of the Natura 2000 sites.

There is a separate portion of the development across the access road and under the clients ownership where the wetland/ attenuation pond will be located. According to the *Infrastructure Report* prepared by AECOM the following volume is required for his attenuation area:

*'The storage area has been sized based on the volume required (137.2 m<sup>3</sup>) to store run-off from the development site during a 1 in 30-year return period rainfall event.'*

This portion of the site is closer to areas within Flood Zone B and is designed to be part of the development's Sustainable Drainage System (SuDS).

The following summary details the mitigation measures proposed within the *Natura Impact Statement* prepared by JBA Consulting:

- A '*Construction and Environmental Management Plan*' is to be submitted to the Planning Authority during the course of construction works. A *Draft Construction and Demolition Waste Management Plan* has been prepared by DCON Safety Consultants and has been submitted as part of this application.
- '*The development of site construction compound with strict guidance that all 'potential sources of pollution (chemical storage and machinery) are kept at minimum of 50 m away from the Terryland River.'*
- '*Water quality controls, including the surface water plan including appropriate erosion and silt controls, including step-wise removal of sediment when digging trenches for attenuation wetland outlet pipe.'*
- '*Works on the outlet pipe trench close to the Terryland River should include pre-checking of dense vegetation or undergrowth for the presence of Otter's.'*
- '*Pollution control and spill prevention methods, detailing suitable spill kit equipment and management on site.'*
- '*Where applicable depending on the species or extent of growth it is best practice for vegetation clearance to be 'conducted outside of the bird breeding season (i.e avoiding March to September inclusive).'*

Noting the nearby Lough Corrib SAC, the combined habitats would be considered a supporting environment for OI species, such as the Eurasian Otter, and works within this area may negatively impact this species through physical disturbance. Thus, there are a range of mitigation measures outlined in the NIS which have been set out to address potential impacts.

It is considered that the development will not be likely to lead to any significant effects on the absorption capacity of wetlands, riparian areas and river mouths.

## **(ii) Coastal Zones and The Marine Environment;**

The *Appropriate Assessment* and *Natura Impact Assessment* identified that there is a potential risk of impacts on coastal and marine environments, stating the following:

*The AA Screening determined that pathway of impact existed between the proposed site and the relevant Natura 2000 sites. This section further examines the source > pathway > receptor chains that could potentially result in adverse impacts arising within Lough Corrib SAC. Galway Bay SAC and Inner Galway Bay SPA.*

The NIS stated the following are potential impacts:

*'Impacts on water quality from pollutant discharges may temporarily affect total habitat area through direct impact, during the project's construction phase.'*

The proposed mitigation measures for on-site construction and for the attenuation tank/ wetland area as well as the outflow pipe into the Terryland River are applicable in this instance in order to prevent potential impacts during the construction phase of the development. The potential impacts relating to this are further outlined in Section 4.4.3 (e).

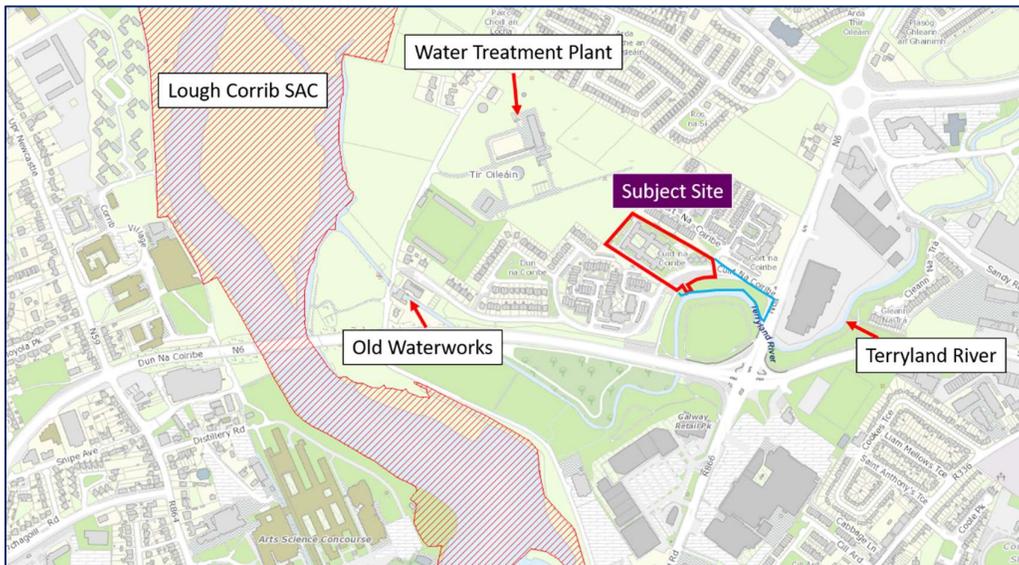


Figure 4.1: Immediate Context Surrounding the Subject Site (Highlighted in Red, with land in Ownership in Blue)

(Source: Myplan.ie, Annotated by Thornton O'Connor Town Planning, 2020)

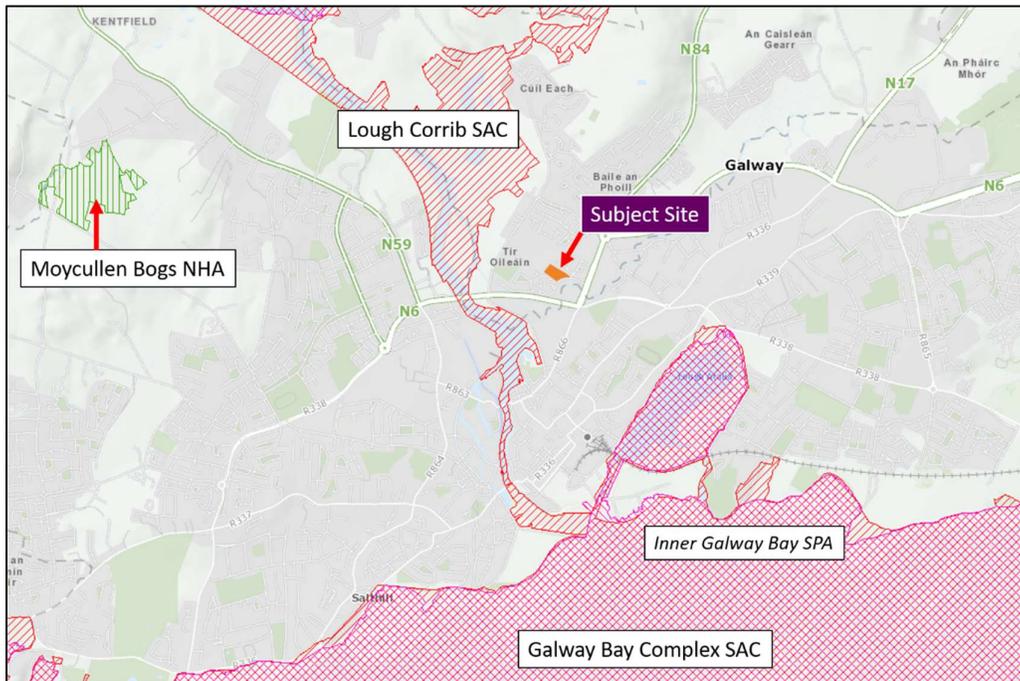


Figure 4.2: Site location in relation to coastal zones and SPAs/ SACs/Other Protected Habitats. Wider view.

(Source: Myplan.ie, Annotated by Thornton O'Connor Town Planning, 2020)

(iii) Mountain and Forest Areas;

The application site is not located in close proximity to any mountainous or forest areas.

The nearest woodlands/ forest are that of the Terryland River trail which are mature in nature and form part of a linear park and indicative greenway/ trail along the course of the Terryland River.

The nearest mountainous or raised landscape area of environmental importance is the Moycullen Bogs NHA to the north west, at over 5.27 Kilometres from the subject site.

It is considered that the development will not be likely to lead to significant effects on the absorption capacity of any mountain and forest areas.

**(iv) Nature Reserve and Parks;**

An online search of the National Parks and Wildlife Service database found that there are no nature reserves in close proximity to the application site.

It is considered that the development will not be likely to lead to significant environmental effects on any nature reserves or parks and therefore will not impact on the absorption capacity of the natural environment.

**(v) Natura 2000 Areas Designated Pursuant To 79/409/EEC and 92/43/EEC;**

Accompanying this application are an Appropriate Assessment Screening Report and Natura Impact Assessment prepared by JBA Consulting. A range of mitigation measures are proposed in connection with all proposed works in order to mitigate against potential impacts on the nearby Lough Corrib SAC, Galway Bay Complex SAC and Inner Galway Bay SPA from surface water/ground water during construction.

Noting the nearby Lough Corrib SAC, the combined habitats would be considered a supporting environment for QI species, such as the Eurasian Otter, and works within this area may negatively impact this species through physical disturbance. Thus, there are a range of mitigation measures outlined in the NIS which have been set out to address potential impacts.

**(vi) Areas in which there has already been a failure to meet the environmental quality standards, laid down in European Union legislation and relevant to the project, or in which it is considered that there is such a failure;**

There are no records of the application site being located in an area as described above.

It is considered that the development will not be likely to lead to significant effects on the environment.

**(vii) Densely Populated Areas;**

As per the *Galway City Council Development Plan 2017-2023*, the application site is principally located in area zoned 'R' where the objective is '*To provide for residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods.*'

Residential use is permitted in principle under this zoning objective and the principle of providing a residential scheme on part of the subject lands has been established previously having regard to the extant permission. It is therefore concluded that the proposed development would not have a significant likely impact on the absorption capacity of the natural environment.

Part of the subject lands within the redline boundary are also zoned 'RA' Recreational Amenity where the objective is as follows:

*'To provide for and protect recreational uses, open space, amenity uses and natural heritage.'*

It is proposed that an attenuation pond/ wetland area and an outflow pipe are provided at this location in order to provide an improved Sustainable Drainage System (SuDS) for the expansion of Cúirt Na Coiribe.

It is concluded that the proposed development would not have a significant likely impact on the absorption capacity of the natural environment as it has been designated to provide a denser development having regard to its city centre location.

**(viii) Landscapes and Sites of Historical, Cultural/Archaeological Significance;**

This area does not have any known surviving archaeology or architectural heritage, which predominantly comprises of late 20<sup>th</sup> century and early 21<sup>st</sup> century construction.

An online search of the National Monuments Service database found that there are no recorded national monuments within the subject site, and there is one known site in close proximity to the subject site.

'*Terryland Castle*' - Record Number: GA082-080002 / RPS. No.: 3503

This site adjacent to the N6 Quincentennial bridge over the River Corrib is the ruins of a 17<sup>th</sup> century house. This recorded monument is just under c. 600 metres from the subject site.

An online search of the National Inventory of Architectural Heritage database also returned no record of any buildings of architectural heritage importance within or close to the subject site. To the south-west of the subject site (390 metres) is the Galway Waterworks at the mouth of the Terryland River (NIAH No. 30,408,209 /

RPS 3501). This building is no longer in use and has been replaced by the nearby Terryland Waterworks.

It is considered that the proposed development would not have a significant likely impact on the absorption of the natural environment in regard to landscapes and sites of historical, cultural and archaeological significance.

#### 4.4.3 Type and Characteristics of Potential Impacts

The primary impacts of the development identified at Sections 4.4.1 and 4.4.2 of this report (characteristics of the development and the location of the site) refer to the potential temporary disruption, increase in noise and dust and production of waste as result of the demolition, construction and operational phases. The use of the land and the risk of accidents have been recognised as not being potential impacts during the operation of the development. Although there are no likely significant impacts envisaged, in accordance with the Annex III of Directive 2014/52/EU, the impacts identified have been assessed further in regard to the type and characteristics of potential impacts.

##### (a) The magnitude and spatial extent of the impact;

As noted throughout this report, the proposed development is consistent with the designated land use as per the *Galway City Council 2017-2023 Development Plan* and the scheme previously permitted by *Galway City Council* (Reg. Ref. 00/249)

A *Landscape and Visual Analysis (LVIA)* has been conducted by The Big Space Landscape Architects and is provided with this application.

The development works are not considered to be to an extent which would have a likely significant effect on the environment.

##### (b) The nature of the impact;

The proposed scheme will result in short term impacts during the demolition and construction phases of the development, such as temporary noise and dust pollution. The impacts of the development are not considered to be any greater than that associated with typical developments.

The NIS has detailed appropriate mitigation measures to ensure no impact on nearby Natura 2000 sites. Further measures as proposed in the *Draft Construction and Demolition Waste Plan* and the *Draft Construction Management Plan* prepared by DCON Safety Consulting will also be implemented and submitted as part of a *Construction and Environmental Management Plan* to be submitted to the Planning Authority prior to the commencement of permitted works.

With these mitigation measures in place, there are no significant negative impacts anticipated to occur.

**(c) The transboundary nature of the impact;**

Accompanying this application are an *Appropriate Assessment Screening Report* and *Natura Impact Assessment* prepared by JBA Consulting. A range of mitigation measures are proposed in connection with all proposed works in order to mitigate against potential impacts on the nearby Lough Corrib SAC, Galway Bay Complex SAC and Inner Galway Bay SPA from surface water/ground water during construction.

The Terryland River is the main downstream connection between the subject site and the nearby areas of environmental interest. The mitigation measures proposed as well as the proposed attenuation pond/ wetland area will provide a range of infrastructure designed to slow and control the release of any overflow drainage or dangerous spills. This is further detailed between the *Natura Impact Statement* and the *Infrastructure Report* prepared by AECOM.

There are no anticipated significant likely negative impacts on the environment once these mitigation measures are provided.

**(d) The intensity and complexity of the impact;**

The potential impacts identified are not considered to result in an intensity or complexity that would have a long term impact on the environment.

There are no anticipated significant likely negative impacts on the environment once appropriate mitigation measures are implemented.

**(e) The expected onset, duration, frequency and reversibility of the impact;**

The potential impacts of the demolition and construction phases of the development which are identified at Section 5.0 are considered to be short term. It is acknowledged that the extent of these impacts will vary throughout the development process, however it is not anticipated these impacts on the environment would be significant. There are no significant negative impacts which are likely to occur during the operational phases of the proposed residential development, given that the proposed development represents the sustainable adaptation and expansion of a permitted use.

The following are the direct impacts associated with the construction phase of the development as stated in the *Natura Impact Assessment* prepared by JBA Consulting:

**'6.2.1 Construction Phase – Direct Impacts**

*Spill or leakage may lead to pollutant materials entering the Lough Corrib SAC, Galway Bay Complex SAC and Inner Galway Bay SPA. There is potential for impact on the water-dependent qualifying interests to occur during the construction phase of the proposed project.*

*The construction phase of the project will entail the demolition of the two-storey building at the entrance to the scheme and the removal of the fifth storey (attic) level of the main building; the provision of horizontal and vertical additions to and extensions of the main existing building; and the implementation of hard and soft landscaping. Excavation of topsoil and sub-soil (total =3,550 m<sup>3</sup>) will be necessary to create the foundations of these new extensions and the basement slab; as well as the placement of the wastewater storage tank, attenuation and petrol interceptor within the surface water and foul water drainage systems. The generation of dust during these excavations is not considered to be significant; and does not pose a threat to the QI species of the Natura 2000 sites as outlined in the Screening for Appropriate Assessment report (JBA, 2019).*

*The construction phase will involve the temporary clearance of immature riparian woodland and its scrub undergrowth and fringe in order to install the outflow pipe from the attenuation wetland. This temporary loss of habitat via vegetation removal by machinery may potentially disturb QI species, such as Grey Heron, which has recorded utilising the area in close vicinity to proposed outfall pipe area.*

*The possible entry of pollutants, such as diesel, oil, paint, solvents, cleaners; leaking into the surface water network and/or groundwater table on-site have the potential to degrade the surface water and groundwater quality. This degradation of surface water and groundwater can in turn impact the Natura 2000 sites' QIs via surface run-off and groundwater contributions to the Terryland River (up to 80-90% contribution (EPA, 2006) given that site and the river are present within a regionally important, productive karstfield aquifer). These pollutants may cause effects such as increased turbidity; changes in pH level; and introduction or increase in toxic chemicals. These potential effects may impact on the floral communities of Annex 1 habitats present within the Natura 2000 sites, potentially resulting in decreased distribution of these communities, and ultimately resulting in a percentage loss of the designated habitats. Additionally, these pollutants could directly impact the mammal, bird and fish QI species of the SACs and SPA through contact with the fur, feathers and gills respectively, which will ultimately degrade the physical condition of these biological features. Furthermore, these pollutants may be ingested through the grooming/ preening the affected fur/ feathers, or while feeding within the aquatic environment.'*

Any potential impacts during the construction phase will be managed as recommend in the *Appropriate Assessment* and *Natura Impact Statement* as well as subsequent best practice documentation and construction management submissions.

**(f) The cumulation of the impact with the impact of other existing and/or approved projects;**

The development site is located on land zoned for residential use and Recreational Amenity. The majority of the site area comprises existing buildings and uses.

We note the planning history of the adjacent Terryland Water Treatment Plant (GCC 19/107). This application was lodged on the 11<sup>th</sup> of April 2019.

This will see the transfer of water intake/ abstraction point from the mouth of the Terryland River to a new abstraction source on the banks of the River Corrib. The following extract from the Appropriate Assessment for the above mentioned Planning Application details the rationale for selecting the new abstraction location:

*'The Terryland River has issues with supply security (i.e raw water shortages during dry weather flow), raw water quality and in stream vegetation growth. To facilitate this proposal and to mitigate limitations on the current abstraction, it is proposed that the raw water intake works be established. Detailed assessments were undertaken to determine the optimum location for the new intake works. The preferred site, which is proposed to be relocated on the east bank of the River Corrib at Terryland downstream of Quincentenary Bridge, was found to be the most favourable location based on an 'Analytical Hierarchical Process' comprising a review of a selection of criteria including Archaeology, Visual Impact, Cost, Water Quality, Hydraulics, Navigation and Ecology. The site selection report was presented to Galway City Council in October 2013 and further recommended following a detailed Hydraulic Assessment for Irish Water and Galway City Council in June 2015.'*

Following the receipt of Significant Further Information in late 2019 the above development was granted planning permission on 24<sup>th</sup> January 2020.

The relocation of the abstraction point will be of benefit to the security of water supply in the city. It is not anticipated that the subject Development or that outlined above will in culmination result in any adverse impacts on the environment and the nearby Natura 2000 sites.

**(g) The possibility of effectively reducing the impact;**

The proposed development will undertake all necessary and appropriate mitigation measures to avoid or limit any likely significant effects on the environment that may arise as described within the *Natura Impact Assessment* and other accompanying documentation of this application.

In the interests of best practice, a *Construction and Environmental Management Plan* will be submitted to the Planning Authority prior to the commencement of any works on site relating to this application.

Appropriate mitigation measures will be taken to avoid any likely significant effects on the environment that may arise, thus effectively reducing the impact.

## 5.0 POSSIBLE EFFECTS ON THE ENVIRONMENT

The following section briefly assess the proposed development in the context of environmental topics referred to in Article 3 of Directive 2014/52/EU.

### 5.1 Population and Human Health

The proposed development is located within an inner-suburban area dominated by mixed-tenure terraced duplex units and semi-detached houses, as well as existing student accommodation/ short term let apartments at Gort Na Coiribe and Cúirt Na Coiribe.

The expansion of the existing student accommodation scheme of 405 No. bedspaces will provide for an additional 515 No. comprising 920 No. bedspaces. The proposal responds directly to the housing need for student accommodation in Galway.

The proposed development is considered to be consistent with national, regional and local planning policy and guidance, as set out within the accompanying Planning Report and Statement of Consistency prepared by Thornton O'Connor Town Planning. The proposal will result in direct and positive effects in terms of facilitating population growth and providing accommodation for students during term time.

In order to mitigate and prevent any impact on the residential amenity of the surrounding developments and those resident within Cúirt Na Coiribe there is a Student Management Plan which has been prepared for this application. The following extracts detail how the proposed development will be managed:

#### **Antisocial Behaviour**

*'The Management Team have primary responsibility for handling potential antisocial behaviour. This involves managing any behaviour that intrudes on others' enjoyment, in most cases involving excessive noise. One-to-one discussion is the preferred option and in most cases it goes no further than that, although in the case of significant damage or offence, financial penalties can be invoked. In extreme cases the Management Team are mandated to involve the Gardai.*

*Residents are made aware of their behavioural responsibilities from the time of their arrival. There is a clear statement of the rules governing acceptable behaviour on the website, including in the License to Reside. The Code of Conduct is a central feature of the Welcome Events.*

*The Management Team requires that noise levels at night, between 11 pm and 7 am, do not exceed 45dB, and social gatherings will be shut down immediately if they are in breach of this to the extent of causing annoyance to other residents or neighbours. A 24 hour telephone service is available to our neighbours to inform the Management Team of antisocial behaviour.*

*Antisocial behaviour interventions are logged in order to monitor repeated breaches.'*

As well as active on-site management of daily operations, maintenance/ upkeep and facilitating residents needs the Management Team will also be available to liaise with local residents and to act as a medium for engagement with the local communities.

### **Operation**

*'A central pillar of our Good Neighbour Policy is respect for the right of the local community to a quiet life. To that end, residents will be required to sign a License to Reside agreement which sets out a code of behaviour for the duration of the license period. Particular consideration is given to the prevention of any activity that might cause nuisance to adjoining local residents. Short Stay residents, as part of this booking terms and conditions, are informed of their obligations to abide by the same rules.'*

### **Lines of communication**

*'There is a 24-hour telephone service available for local residents to make the Cúirt na Coiribe Management Team aware of any antisocial activity that might be taking place. Full contact details will be circulated to local residents and businesses. At the beginning of each year representatives of local residents groups will be invited to meet the residents with the intention of building positive relationships in the context of sharing local advice. In the case of official student events held at Cúirt na Coiribe, advance notice will be given to local residents by the Management Team.'*

The proposed development has also been assessed by 3D Design Bureau in the report *Daylight and Sunlight Analysis* for the potential impacts on residential amenity and the amenity of adjacent semi-private open space. The following is a summary of the results of this analysis:

### **VSC to Adjacent Properties**

*'Of the 182 windows assessed for impact to VSC, 178 have met the BRE guidelines on impact to VSC. The impact to these windows would be considered imperceptible. All 4 windows that did not meet the BRE guidelines on impacts to VSC would encounter a slight level of impact.'*

### **Impact on Amenity Areas**

*'This study assessed the impact the proposed development would have on the levels of sunlight received in the amenity areas behind 1-36 Gort Na Coiribe. To calculate this, the percentage of the green space which can receive two hours or more of direct sunlight on March 21st has been calculated in both the baseline and proposed states. A comparison between these values will determine the level of impact.'*

*As the amenity areas to the rear of 1-36 Gort na Coiribe, capable of receiving 2 hours sunlight on March 21st are considerably above the recommended level as per the BRE guidelines in the baseline state. The impact to this figure caused by the proposed development would be marginal and these areas would remain adequately sunlit throughout the year. The impact caused by the proposed development should be considered imperceptible.'*

It is therefore believed that through effective management and engagement with residents and the surrounding communities the proposed development can successfully continue the relationship the existing Cúirt Na Coiribe has provided since opening in 2004.

As identified throughout Section 4.4 of this report, it is established that there will be short term impacts at varying levels during the demolition and construction phases of the development. Mitigation measures such as routing all construction traffic via the Headford Road will be put in place. Mitigation measures to control noise and vibration during the construction phase of the development site will be undertaken by the contractor as detailed in the *Draft Construction and Demolition Waste Management Plan*. All best practice measures from BS 5228 *Code of practice for noise and vibration control on construction and open sites* (2009 +A1 2014) will be adhered to and implemented. There are no projected long term negative impacts of the development. It is noted that the development comprises 656 No. bicycle parking spaces, therefore encouraging sustainable modes of transport.

The proposed development has had due regard for water and waste infrastructure throughout the concept and design process.

## 5.2 Biodiversity (Flora and Fauna)

The subject site comprises a brownfield site dominated by existing buildings and hard-standing. The subject site is not located within any Special Protection Areas (SPA) or National Heritage Areas. There are no site specific designations in regard to flora and fauna and there is no vegetation of value located on site.

An Arboricultural Impact Assessment prepared by Arborcare notes that there is no Category A or B trees are on the site, and provides the following conclusion:

### **'Conclusion**

*The arboricultural impact on the site will be high as the majority of the trees surveyed on the site are to be removed to accommodate the proposed development. (However it must be emphasised that the majority of trees that are being removed are all category C trees, that due to their small size they can be replaced with similar sized trees that are more site appropriate.) Bs 5837 states, Category C signifies those trees/hedgerows of "a low quality and value that are currently in an adequate condition to remain until new planting could be established (a minimum life expectancy of 10 years is suggested..." Category U. This category signifies those trees that are in such a condition that any existing value would be lost within 10 years and which should, in the current context, be removed for reasons of sound arboricultural management.*

*A comprehensive landscape plan which will involve planting additional trees within the site that will enhance the arboreal footprint of the site and compensate for any tree loss (please refer to landscape plan).*

*I consider subject to implementing the above Arboricultural Method Statement /Tree Protection Strategy as well as implementing the landscape proposals that there is unlikely to be significant long term detrimental impact as a consequence of the development proposal. As all replacement trees will in a short few years reach the size of those removed.'*

As noted previously with regard to Lough Corrib SAC's boundary, this riparian habitat would be considered supporting habitat for QI species, such as the Eurasian Otter, and works within

this may negatively impact this QI through physical disturbance. Thus, mitigation measures are further outlined in the NIS in this regard.

### 5.3 Environmental Geography (Soil, Water, Air, Climatic Factors and the Landscape)

#### 5.3.1 Soil

The subject development proposes a number of additional areas of excavation including the creation of new basement areas (and foundations), a wetland/ attenuation tank and the associated outflow pipe. The *Natura Impact Statement* provides the following description of the potential impacts of these works:

*'Excavation of topsoil and sub-soil (total =3,550 m<sup>3</sup>) will be necessary to create the foundations of these new extensions and the basement slab; as well as the placement of the wastewater storage tank, attenuation and petrol interceptor within the surface water and foul water drainage systems. The generation of dust during these excavations is not considered to be significant; and does not pose a threat to the QI species of the Nature 2000 sites as outlined in the Screening for Appropriate Assessment report (JBA,2019).'*

It is not anticipated that the proposal is likely to impact on the environment in regard to soil and/or geology following the implementation of appropriate construction practices and mitigation measures as set out in the *Natura Impact Statement*.

#### 5.3.2 Water

The application site is located within range of the emerging Water Framework Directive area for Lough Corrib, but this has yet to be implemented as a combined watershed management plan. Therefore, the relevant documentation for water management for the subject site is contained within the Strategic Flood Risk Assessment conducted for the *Galway City Council Development Plan 2017-2023*.

As noted at Section 4.4.1 (c), it is not anticipated that the use of natural resources such as water at the site would be greater than that of ordinary use or have a significant impact on the environment. In conjunction with Irish Water consultation this is further discussed in the *Infrastructure Report* prepared by AECOM.

During the construction phase the foundations of the new building areas will be supported by piled foundations. The excavation of new basement areas will also require the dewatering of the surrounding soil. The *Stage 2 Flood Risk Report* prepared by AECOM states the following:

*'The building extensions and local increase in existing basement areas will all be supported on piled foundations. This type of foundation scheme does not require surcharging or vertical drainage to consolidate the existing ground strata so there will be no impact on the ground water regime.'*

In all other instances where the use of water during construction, or potential contaminants/ pollutants which may impact upon the nearby Terryland River, are detailed and discussed in relation to the necessary mitigation measures in the following reports:

- *Draft Construction Management Plan* prepared by DCON Safety Consultants
- *Draft Construction & Demolition Waste Management Plan* prepared by DCON Safety Consultants; and
- *Natura Impact Assessment* prepared by JBA Consulting.

The application site is located within a Flood Zone as per the *Stage 2 Flood Risk Report* prepared by AECOM. The site is predominantly within Flood Zone C, with the area to the front of the development within Flood Zone B.

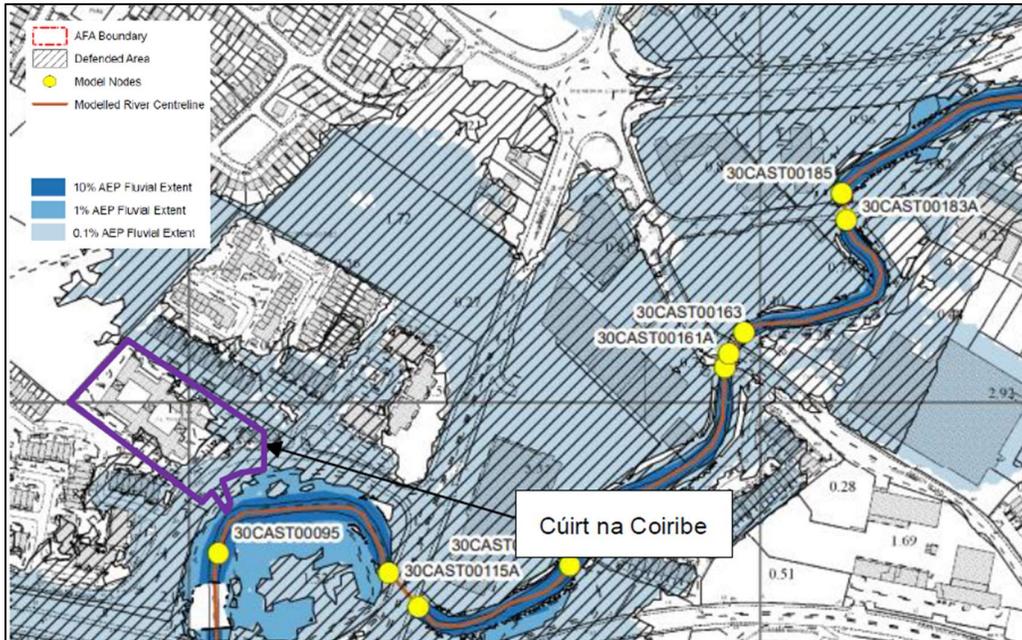


Figure 5.1: Flood Zone Map with Application Site Outlined in Purple (Indicative Only)

(Source: Floodinfo.ie, Annotated by Thornton O'Connor Town Planning, 2020)

The subject site is elevated above the Terryland River which is 50 metres away. There is a buffer of green space and a pedestrian path between Cúirt Na Coiribe and the river course. Along the riverbank is a series of connected habitats as identified by the *Natura Impact Assessment* including the following:

- *Reed and Large Sedge Swamps (FS1);*
- *Reed and Large Sedge Swamps / Amenity Grassland (improved) (FS1/ GA2);*
- *Amenity Grassland (improved) (GA2);*
- *Amenity Grassland (improved)/ Scrub (GA2 / WS1);*
- *Depositing/ lowland rivers (FW2);*
- *Dry calcareous and neutral grassland (GS1);*
- *Wet Grassland (GS4);*
- *Hedgerows (WL1);*

- Riparian woodland/ Immature woodland (WN5 / WS2); and
- Scrub (WS1).

Following topographical survey's the following levels were established for the existing and proposed development:

- 'The existing site levels range from approximately 5.5 m to 6.8 m OD Malin,
- The existing Finished Ground Floor Level of the main accommodation building is between 6.79 m OD Malin and 6.83 m OD Malin.
- The existing Finished Ground Floor Level of the reception/ services building is between 6.02 m OD Malin and 6.13 OD Malin.
- The existing basement floor level is 3.25 m OD Malin.'

The following is the established flood risk for Fluvial flooding for Flood Zone A and Flood Zone B in the vicinity:

Type of Flood Risk	Flood Zone	Return Period	Water Level
Fluvial Flood Risk	Flood Zone A	1 in 100 year	4.04 m OD Malin
	Flood Zone B	1 in 1,000 year	6.01 m OD Malin

Due to portions of the subject site being subject to a potential flood risk in Flood Zone B, the following solution is proposed for the protection of the basement car park in the even of a 1 in 1,000 year flood event:

*'The road elevation at ground floor level at the entrance to the basement level is currently 3.25 m OD Malin. It is proposed to increase the elevation at the entrance to the basement (at ground floor level) to 6.1 m OD Malin. Therefore, in the event of a 1 in 1,000-year return period fluvial flood event occurring, the basement entrance will not provide a direct flow path for flood waters to enter the basement.'*

The *Stage 2 Flood Risk Assessment* also assessed the potential risk of an increase flow rate in the Terryland River as a result of the proposed attenuation storage (see also *Infrastructure Report* prepared by AECOM):

*'The existing development does not include attenuation storage for surface water run-off generated within the site. The proposed development will result in an increase in building footprint within the development site. However, the majority of the existing site is currently hardstanding in the form of paved roads and paths, therefore the resulting increase in areas generating run-off is negligible.'*

*'The redevelopment works include for the provision of an attenuation area sized to cater for the entire site for a 1 in 30 year return period rainfall event with HydroBrake to restrict the run-off to predevelopment rates. Therefore, there will be a net overall reduction in the rate of run-off discharged to the Terryland Stream when compared with the existing development.'*

*'As there will be no hydrological impacts, mitigation is not proposed.'*

The proposed attenuation storage is therefore not considered part of any additional mitigation measures in regard to potential for flood risk to the subject site.

In the event of a flood event the following recommendation is provided by the *Stage 2 Flood Risk Assessment*:

*'While conditions required to generate a flood risk to the proposed development will not occur frequently, there is still a risk to the development site. The Finished Floor Level of the existing and proposed buildings is above the 0.1% AEP water level. It is proposed to increase the existing ground elevation at the entrance to the basement to 6.1 m OD Malin.*

*It is recommended that an emergency plan is prepared for the accommodation complex and that residents/ tenants are aware of the procedures. While the details of this plan will be the responsibility of the proprietor, it is recommended that access to basements is prevented and guidance is given on what actions residents are required to take prior to the onset of flood event and during a flood event.'*

The *Stage 2 Flood Risk Assessment* provides the following conclusion:

*'The potential flood risk at the site of the proposed development has been assessed. There are no historic reports of flooding of the development site. Based on the predictive flood risk mapping available, it is concluded that there is a fluvial flood risk to the eastern end of the development site and the access road from the Headford Road. However, the Finished Floor Levels of the existing and proposed accommodation buildings (6.83 m OD Malin) place the buildings within Flood Zone C. In addition, when the presence of the existing OPW flood defences are considered, the risk of fluvial flooding is reduced to a residual risk. While there is a potential risk to the development associated with fluvial flooding, should such an event occur it is considered associated with fluvial flooding, should such an event occur it is considered that the impact on the proposed development would be minimal as the building floor levels are above the predicted 1% and 0.1% AEP event water levels. Therefore, it is considered that there will be a negligible impact on flood risk and the floodplain as result of the proposed development.'*

It is therefore considered that given the appropriate design and engineering response of the proposed development the flood risk arising from fluvial flooding can be managed on site in accordance with best practice assessments.

### 5.3.3 Air Quality Pollution and Climate

The Environmental Protection Agency classifies the air quality of the application site as 'Good' as illustrated below at Figure 5.2. The possible effects on air quality as result of the development include a short-term increase in dust and emissions arising during the demolition and construction phases. The contractor will continuously monitor dust throughout the duration of works, ensuring EPA limits are adhered to.

As noted in throughout this section and in the accompanying Planning Report, it is duly noted that the development will encourage sustainable modes of transport such as cycling and public transport from the subject site. There will be a provision of 59 No. car parking spaces, and 656 No. bicycle parking spaces. Within the parking provision will also be an allocation of 4 No. electric car parking spaces. The reduction of underground car parking from 135 No. spaces to 43 No. spaces is also a positive contribution to a reduction in car dependency. The promotion of sustainable transport, especially active modes like walking and cycling, combined with reduced car parking will see less significant additional emissions emanating from the expansion of this development.

It is anticipated that the proposal would not be likely to impact on the environment in regard to air quality pollution and climate.

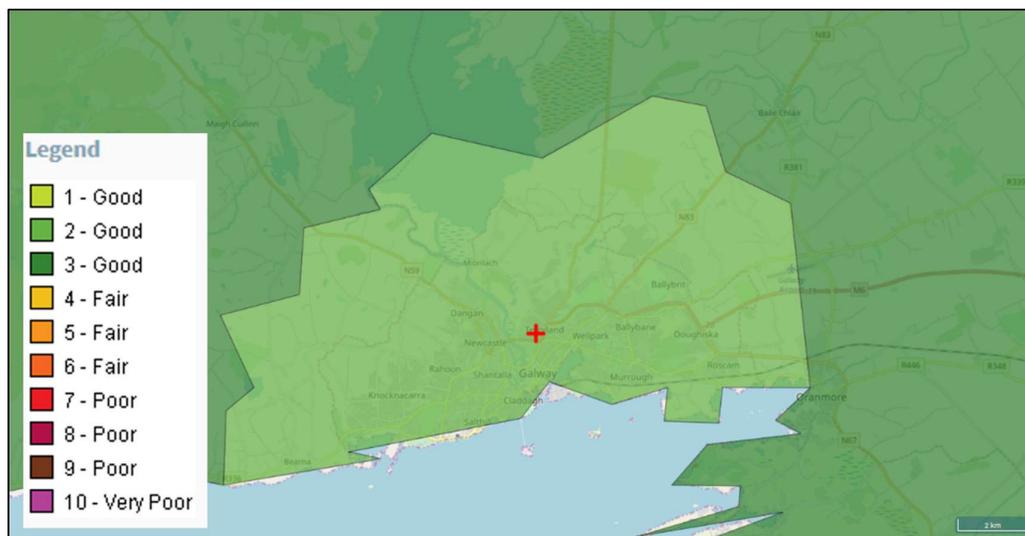


Figure 5.2 Air Quality Index Surrounding the Application Site (Indicative Location Denoted by Red Mark)

(Source: <http://www.epa.ie/irelandsenvironment/air/>, Annotated by Thornton O'Connor Town Planning, 2020)

### 5.3.4 Landscape

The application site is not located within an Area of High Landscape Value or does not have any specific amenity, landscape or visual objectives pertaining to the site. The application will however create a distinctive frontage from its position above the Terryland River and the Headford Road.

The subject development provides an element of security and passive surveillance to the greenspace above the Terryland River and the pedestrian pathways between the Headford Road and the Dun Na Coiribe and Gort Na Coiribe developments. This is also the primary vehicular access for all three developments.

*Verified View Montages and CGIs* prepared by 3D Design Bureau and a *Landscape and Visual Impact Assessment* and *Landscape Masterplan* prepared by The Big Space Landscape Architects are enclosed with this application.

#### 5.4 Material Assets (Architectural and Architectural Heritage and the Cultural Heritage)

The existing Cúirt Na Coiribe is not listed on the Record of Protected Structures as set out in the *Galway City Council Development Plan 2017-2023* or listed on the National Inventory of Architectural Heritage. Built between 2001-2003 it is a recent construction. In the interest of sustainability, the proposed development seeks to expand upon its initial framework to create a larger and more robust purpose built student accommodation facility.

#### 5.5 The Existence of the Proposed Development

The proposed development is located principally on 'R' zoned residential land where it is anticipated that there will not be any negative impacts resulting from the operation of the development. It is noted that appropriate mitigation measures will be put in place for both the construction and operation of the scheme including a Student Management Plan. This application is accompanied by a Planning Report prepared by Thornton O'Connor Town Planning which provides a detailed rationale and justification for the development of the proposed scheme.

##### 5.5.1 Daylight/ Sunlight Report

To enact best practice in modelling the impacts of the proposed development, a daylight analysis was conducted by 3D Design Bureau in order to ascertain the potential of daylight loss within the development and on surrounding properties. The report prepared by 3D Design Bureau is enclosed as part of this planning application. The conclusion of this analysis notes that:

*'Should the proposed expansion to the student accommodation at Cúirt na Coiribe be constructed as per the current proposal, it will not result in a perceptible level of impact to the daylight or sunlight received by the neighbouring properties.'*

*'Future residents of the proposed development will enjoy excellent levels of daylight within the proposed units.'*

It is therefore considered that there will be no significant loss of residential amenity relating to the availability of daylight and sunlight into neighbouring developments.

## 5.6 The Use of Natural Resources

As outlined at Section 4.4.1 (c), the development will involve the consumption of some natural resources throughout the development process, however it is not anticipated to be to an extent that would have a significant impact on the environment having regard to the brownfield nature of the site. It is anticipated that throughout the demolition, construction and operation of the scheme, the development would not result in the use of large amounts of natural resources greater than that associated with comparable developments or to the extent that would have a significant impact on the environment.

For potential estimated material use in respect of the proposed development there is a *Draft Construction and Demolition Waste Management Plan* prepared by DCON Safety Consultants.

The following details the non-hazardous wastes which will be produced during the construction and demolition phase:

*'Excavations will be carried out at the site in respect of the proposed development as the existing site levels are variable. Excavations of up to approximately 3,550 m<sup>3</sup> will be required for the basement and infilling will also be required. Where possible, any excavated materials will be reused on-site or removed to an infrastructure project or landfill.'*

*'During the refurbishment and extension works phase there will be a surplus of building materials, such as timber off-cuts, broken concrete blocks, cladding, plastics, metals and tiles generated. Plastic and cardboard waste from packaging and oversupply of materials will also be generated. Construction workers on site for the duration of the project will also generate municipal waste in the form of organic food waste, dry mixed recyclables, mixed non-recyclables and glass mainly from staff canteens and offices. There may also be sewage sludge waste generated from the provision of welfare facilities.'*

It is through the adherence to the *Draft Construction and Demolition Waste Management Plan* that on-site waste management will be appropriately segregated and controlled in regard to best practices and record keeping. In advance of the commencement of works on site a Construction and Environmental Management Plan will be submitted to the Planning Authority.

## 5.7 The Emission of Pollutants, the Creation of Nuisances and the Elimination of Waste

### 5.7.1 Traffic and Access

The proposed development will provide for 59 No. car parking spaces and the expansion of dedicated bicycle parking to 656 No. bicycle parking spaces. Currently the 135 No. car parking spaces underground are underutilised, as are the surface spaces/ set down area behind the ancillary services building. Therefore, the following reduced car parking spaces will be provided:

#### **Underground:**

- 35 No. standard spaces
- 4 No. Accessible spaces
- 4 No. Electric car parking spaces

**Total:** 43 No. spaces

#### **Surface:**

- 14 No. standard spaces
- 2 No. Accessible spaces

**Total:** 16 No. spaces

**Total Car Parking:** 59 No. spaces

This shift in balance reflects that owing to its proximity to the NUI Galway Campus and the habits of students in general, few drive in order to reach college. This has meant that the car park has been undersubscribed during the course of its existence to date.

To promote sustainable transport practices, the expansion of bicycle parking will allow for the storage and maintenance of more bicycles for a greater number of students.

### 5.7.2 Noise

The temporary noise emitted during the construction and demolition phases of the development will have the potential to impact on the surrounding areas.

The demolition and construction works will be carried out in accordance with the recommendations of BS 5228 '*Code of Practice for noise and vibration control on construction and open sites - Part 1: Noise*' and comply with BS 6187 Code of Practice for Demolition. Mitigation measures will be undertaken through the development in accordance with best practice guidelines as detailed in the *Draft Construction and Demolition Waste Management Plan*.

During the daily operation of the Student Accommodation, and during times where short-stay accommodation is in use, the residents will be obliged to respect the residential amenity of those within the complex and the surrounding residential areas. The on-site Management Team will provide a code of conduct and maintain on-site engagement with residents in relation to noise disturbances. The accompanying Student Management Plan provides the following statement in regard to potential antisocial behaviour and undue noise:

*'The Management Team requires that noise levels at night, between 11 pm and 7 am, do not exceed 45dB, and social gatherings will be shut down immediately if they are in breach of this to the extent of causing annoyance to other residents or neighbours. A 24 hour telephone service is available to our neighbours to inform the Management Team of antisocial behaviour.'*

It is not anticipated that the operation of the development would result in any long-term noise impacts to neighbouring properties as the development will be appropriately managed as it is currently.

### **5.7.3 Waste**

An *Operational Waste Management Plan* has been prepared by AWN Consulting and is enclosed as part of this submission as well as other supporting technical documents. This report sets out measures to ensure effective management of waste at the development site, to maximise recycling of construction waste and to minimise the environmental impact of waste generated by normal operations.

## **5.8 Analysis of Identified Impacts**

Thornton O'Connor Town Planning have identified the potential impacts anticipated to arise from the proposed development as detailed by the supporting technical documents prepared by the design team and consultants. The identified impacts are not anticipated to have long term negative impacts on the surrounding environment subject to appropriate mitigation measures. Similarly, the cumulative impacts of the development are not considered to be significant. The proposed development is considered to have a positive impact in terms of meeting the needs of the population who are seeking student accommodation and seeking residential accommodation (and tourist population in the summer months).

## 6.0 SUMMARY AND CONCLUSIONS

This report has been prepared in accordance with Schedule 5 and Schedule 7 of the *Planning and Development Regulations 2001* (as amended) and has had due regard of the criteria set out within the European Directive 2014/52/EU. The report has assessed the proposed development in terms of the possible effects on the environment including human, biodiversity, flood, air, water, cultural heritage, traffic and access, noise, material assets and landscape. Through an EIA screening methodology of EIA thresholds, it has been established that an Environmental Impact Assessment Report (EIAR) is not required to accompany the subject application.

The proposed development has been assessed against the criteria for sub threshold projects. It has been established that it is anticipated that the proposal would not be likely to have a significant effect on the environment as result of the characteristics of the proposed development, location of proposed development or subject to appropriate mitigation measures.

This report is to be read as in conjunction with the *Appropriate Assessment Report* and *Natura Impact Assessment* as well as all other related technical documents as part of this application.