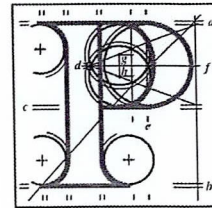


**Our Case Number:** ABP-314597-22



**An  
Bord  
Pleanála**

An Taisce  
Galway Association - Planning Committee  
26 Manor Avenue  
Kingston  
Co. Galway  
H91C98X

**Date:** 05 July 2023

**Re:** BusConnects Galway Cross-City Link Scheme.  
University Road to Dublin Road, Galway City.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

CH08

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Niamh Thornton

---

**From:** Bord  
**Sent:** Tuesday 4 July 2023 13:18  
**To:** SIDS; Niamh Thornton  
**Subject:** FW: Bus Connects Galway Cross-City Link Scheme

---

**From:** Derrick Hambleton <derrickhambleton59@gmail.com>  
**Sent:** Tuesday, July 4, 2023 1:16 PM  
**To:** Bord <bord@pleanala.ie>  
**Subject:** Bus Connects Galway Cross-City Link Scheme

**An Taisce**  
*The National Trust for Ireland*  
*Galway Association – Planning Committee*

An Bord Pleanála  
64 Marlborough Street, Dublin 1,  
D01 V902

4<sup>th</sup> July, 2023.

FaO, Niamh Thornton  
Executive Officer

**Ref: Strategic Infrastructure Development – Galway BusConnect # 314597**

Dear Sir/ Madam

The Galway Planning Committee of An Taisce welcomes the response made (see Attachment A below) by Galway City Council to the submissions we made (See Attachment B below) on this case.

Having read the response however we submit that Galway City Council have not addressed the core issues that we raised.

We therefore submit the following clarity to our original submission.

**Submission issue (i)** We proposed that dedicated cycle lanes be provided on all streets and roads within the boundaries of the Bus Connect proposal.

Galway City Council have responded to this issue by suggesting that there is no need to provide dedicated cycle lanes because (a) traffic reduction will be achieved along the majority of the route of the Proposed Scheme, (from University Road to College Road inclusive and (b) it is proposed by Galway City Council to reduce traffic speeds to 30 Km/hr.

In the absence of any shared Bus / Cyclist Lanes from University Road of College Road, we submit this is an inadequate response from Galway City Council to the health and safety issues which arise for cyclists. We submit that all on-street car parking on the full length of the proposal



should be converted to separate bus lanes and cycle lanes to the maximum extent allowable without demolishing houses.

We submit that no homeowner in a city centre should be considered to have a right to park a car outside their house as adequate off-street parking capacity exists in the city centre to provide space for these cars. Galway City Council could consider financial incentives to such homeowners (if needed) to compensate them for the inconvenience of not being able to park outside their house.

**Submission issue (ii)** We proposed that all on-street parking be converted to bus lanes on College Road and University Road.

Galway City Council have responded by claiming that College Road (north of Forster Street) will experience a reduction of 113 PCU, College Road (between Lough Atalia Road and Dublin Road) will experience a reduction of 219 PCU, while University Road will experience a reduction of 519 PCU. The claimed reductions in traffic flows are then claimed to improve journey speeds for buses on the length of the proposals, thereby removing the need for conversion of on-street car parking to bus lanes.

We submit that the logic contained in the Galway City Council response seems flawed as is likely based on an erroneous assumption that drivers will not use College Road because they cannot get over the Salmon Weir Bridge. Those car drivers can (and will) use College Road to get to Dock Road which will take them over the river on the Wolfe Tone Bridge. The reductions claimed in PCU's are, we submit, inadequate metric as their conversion into public transport journey travel times has been explained. A modal shift to public transport is brought about by a reduction in journey times and an increase in reliability of public transport timetables. The proposal, we submit, does not adequately explain its impact on those metrics at both peak travel times and at other times.

More importantly Galway City Council have provided no response to why on-street car parking on College Road and University Road should not be converted to Bus Lanes. As Galway City grows more car drivers will use both College Road and University Road. The only proven way to reduce demand for road space by car drivers is to provide the maximum amount of bus lanes. We submit that the proposal (as currently submitted) is a lost opportunity to maximize the extent of bus lanes and will prove to be such. Therefore we submit that it should not proceed without the conversion of all on-street car parking on College Road and University Road should not be converted to Bus Lanes because the provision for cycling and walking are inadequate to achieve the necessary modal shift to active travel modes which will achieve the mandatory Carbon Budgets. The proposal, being just one part of what should be a series of projects aimed to achieve the mandatory Carbon Budgets, should have detailed its contribution.

### **Attachment B: Response made by Galway City Council to issues raised by the Galway Planning Committee of An Taisce (included below as Attachment B)**

2.1 01 – An Taisce It is acknowledged that the submission welcomes the intent of the proposed scheme.

**Submission issue (i)** The submission suggests that in the hierarchy of sustainable travel, cycling should come before mechanised travel and that this is not reflected in the proposed scheme, which it is stated has only token inclusion of cycle lanes. The submission suggests dedicated cycle lanes be provided on all streets and roads within the boundaries of the Proposed Scheme. Response (i) It is acknowledged that cycling should “come before” mechanised travel in the hierarchy of sustainable travel, with the Design Manual for Urban Roads and Streets (DMURS) identifying the hierarchy of user priorities to be considered (i.e., designing for cyclists



should be considered before designing for public transport and private motor vehicles). In terms of how to practically make provision for this, the National Cycle Manual (Section 1.7.3) also sets out a hierarchy of provision for designers to consider when designing for cyclists. The first two steps in this hierarchy are traffic reduction and traffic calming, with the provision of cycle lanes and cycle tracks being number 5 in the hierarchy. This is the approach adopted for the Proposed Scheme. Traffic reduction will be achieved along the majority of the route of the Proposed Scheme, (from University Road to College Road inclusive), thereby providing a safer, more attractive environment suitable for cycling. Galway City Council (GCC) has proposed to introduce a 30 km/hr speed limit in Galway City Centre, that would include the Cross-City Link from University Road to College Road inclusive.

The Elected Members of Galway City Council (GCC) have recently (January 2023) approved proposals to bring forward the proposed speed limit changes to Public Consultation. It is envisaged that a 30 km/hr speed limit will be introduced in advance of the opening of the proposed scheme. The introduction of such a speed limit would further enhance the environment of the Cross-City Link for cycling and walking. The submission suggests that dedicated cycle lanes should be provided on all streets and roads within the boundaries of the proposed scheme. This is not the design intent within the core city centre area along the route of the Proposed Scheme for the reasons set out above, the outcome of which being the establishment of primacy along streets for cyclists.

Furthermore, it is not considered to be a practically viable option to deliver physically segregated cycle lane infrastructure in numerous locations along the route of the Proposed Scheme due to the limited available road / street curtilage (i.e., from building line to building line), existing constraints presented along the road and street network in Galway City Centre, and in keeping with the sustainable travel hierarchy, the intent to retain and enhance where possible the environment for pedestrians. In addition, a detailed Options Assessment process and report was undertaken for the entire scheme, whereby alternative options were assessed on a section-by-section basis across the Proposed Scheme in order to determine the preferred option for each section.

For example, streets including Forster Street and Eglinton Street are narrow city centre streets with multi storey buildings fronting, making any road or street widening impossible without significant building acquisition and demolition. Without road or street widening, the provision of dedicated cycle lanes would require the use of most of the available road space and / or reduction or elimination of footpaths, which would result in no buses or any other vehicles being able to use these streets. Galway City Council is aligned with An Taisce in terms of the outcomes it wants to achieve for the city centre, with the Proposed Scheme being a catalyst for allowing the city centre to breathe again, and adhering to the seven guiding principles set out in the Galway Transport Strategy (GTS), the first of which is “to promote and encourage sustainable transport, and in particular to make it convenient and attractive to walk, cycle or use public transport”.

**Submission issue (ii)** The submission suggests that the proposal will lead to higher private car usage on College Road and on University Road, with consequent delays for buses. The submission therefore proposed that all on-street parking be converted to bus lanes on College Road and University Road. Response (ii) Galway City Council does not agree with the suggestion that the proposed scheme will lead to higher private car usage on College Road and University Road. The Proposed Scheme includes the provision of a bus-gate over the Salmon Weir Bridge and College Road. These bus gates will effectively remove through traffic on both of these roads (with the exception of buses, taxis and emergency services).

The removal of through traffic will result in lower traffic volumes on both University Road and College Road. Table 6.82 in Chapter 06 Traffic & Transport of the Environmental Impact Assessment Report (EIAR) identified the road links that will experience a reduction of greater than 100 Passenger Car Units (PCU) during the AM peak hour in the year of opening of the scheme.



This table identified that College Road (north of Forster Street) will experience a reduction of 113 PCU, College Road (between Lough Atalia Road and Dublin Road) will experience a reduction of 219 PCU, while University Road will experience a reduction of 519 PCU.

In the PM peak hour, University Road will experience a reduction of 363 PCU, while College Road south of Lough Atalia Road will experience an increase of 215 PCU and between Lough Atalia Road and Dublin Road will experience an increase of 100 PCU. The estimated flow increase on College Road south of Lough Atalia Road results from a diversion of local trips (i.e. starting or ending on College Road itself) from previously two access points to a single access point. General traffic entering and leaving College Road has to do so from the junction with Lough Atalia Road alone due to the proposed bus gate at the southern end of College Road. This gives the appearance of an increase in traffic but is overall a similar volume of trips using different sections of the local road network. Overall, along the entire lengths of University Road and College Road, a reduction in private car usage is predicted as a direct result of the implementation of the Proposed Scheme.

### **Attachment B: Submission made by the Galway Planning Committee of An Taisce.**

An Taisce  
The National Trust for Ireland  
Galway Association – Planning Committee

An Bord Pleanála  
64 Marlborough Street, Dublin 1,  
D01 V902

Ref: Strategic Infrastructure Development – Galway BusConnect # 314597

All efforts to bring about a modal shift away from cars to walking, cycling and the use of public transport. Our planet's survival depends on reduced carbon emissions so any efforts to bring about this modal shift is urgently needed.

While welcoming the intent of BusConnect proposal, we wish to make the following submissions:

1. In the hierarchy of sustainable travel, cycling should come before mechanised travel (public transport and private cars). This is not reflected in the BusConnect proposal in that there is only token inclusion of cycle lanes. We propose that dedicated cycle lanes be provided on all streets and roads within the boundaries of the BusConnect proposal.
2. The BusConnect proposal will lead to higher private car usage on College Road and on University Road, with consequent delays for buses. This would undermine the efforts to prioritise public transport in the city. We propose therefore that all on-street car parking be converted to bus lanes on College Road and University Road.
3. The Galway Docks should have been included in the BusConnect proposal, with on-street car parking on Dock Street/R336 from St Nicholas Street to New Dock Street being converted into an outgoing bus lane.
4. University College Galway Hospital should have been included in the BusConnect proposal, with a plan to route buses through the hospital to Seamus Quirke Road.

Yours faithfully

Derrick Hambleton, Secretary, on behalf of  
An Taisce – Galway Association - Planning Committee