Our Case Number: ABP-314597-22

An Bord Pleanála

Shane Foran
68 Gort Greine
Rahoon
Co. Galway

Date: 11 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

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Niamh Thornton

From: Shane Foran <[redacted]>
Sent: Tuesday 4 July 2023 22:45
To: Niamh Thornton
Cc: [redacted]
Subject: Re: Case reference: HA61.314597 University Road to Dublin Road, Galway City.
Attachments: HA61.314597 _Bus_Connects_Cross_City_Galway_Further_Observations_Shane_Foran_Presentation RCa.pdf

Shane Foran
68 Gort Greine
Rahoon
Galway
H91 FY6R

[redacted]

Hi

In my response file sent earlier I included content from Roselyn Carroll as a supporting document for my own observations.

This material is intended to be read in conjunction with the attached file containing annotated maps of the scheme.

Regards

Shane

On Tue, Jul 4, 2023 at 5:42 PM Shane Foran <[redacted]> wrote:

Shane Foran
68 Gort Greine
Rahoon
Galway
H91 FY6R

[redacted]

Hi

As requested in Board's letter of 31-May-2023, please find attached further observations on the above application.

Regards

Shane Foran

On Mon, Jul 3, 2023 at 11:37 AM Niamh Thornton <n.thornton@pleanala.ie> wrote:

Hi Shane,

Responses can be submitted by email to my email address or to laps@pleanala.ie

Kind regards,

Niamh Thornton

Executive Officer

From: Shane Foran <[redacted]>
Sent: Monday, July 3, 2023 10:05 AM
To: LAPS <laps@pleanala.ie>
Cc: [redacted]
Subject: Case reference: HA61.314597 University Road to Dublin Road, Galway City.

Shane Foran

68 Gort Greine

Galway

H91 FY6R

[redacted]

Hi

I have a query regarding this scheme

Case reference: HA61.314597 University Road to Dublin Road, Galway City.

https://www.pleanala.ie/en-ie/case/314597

On 31 May the Board issued a letter inviting feedback on responses made by the applicants to observations received.

I would like to confirm if we can submit feedback by e mail and the required format or if paper copies are required?

Regards

Shane Foran

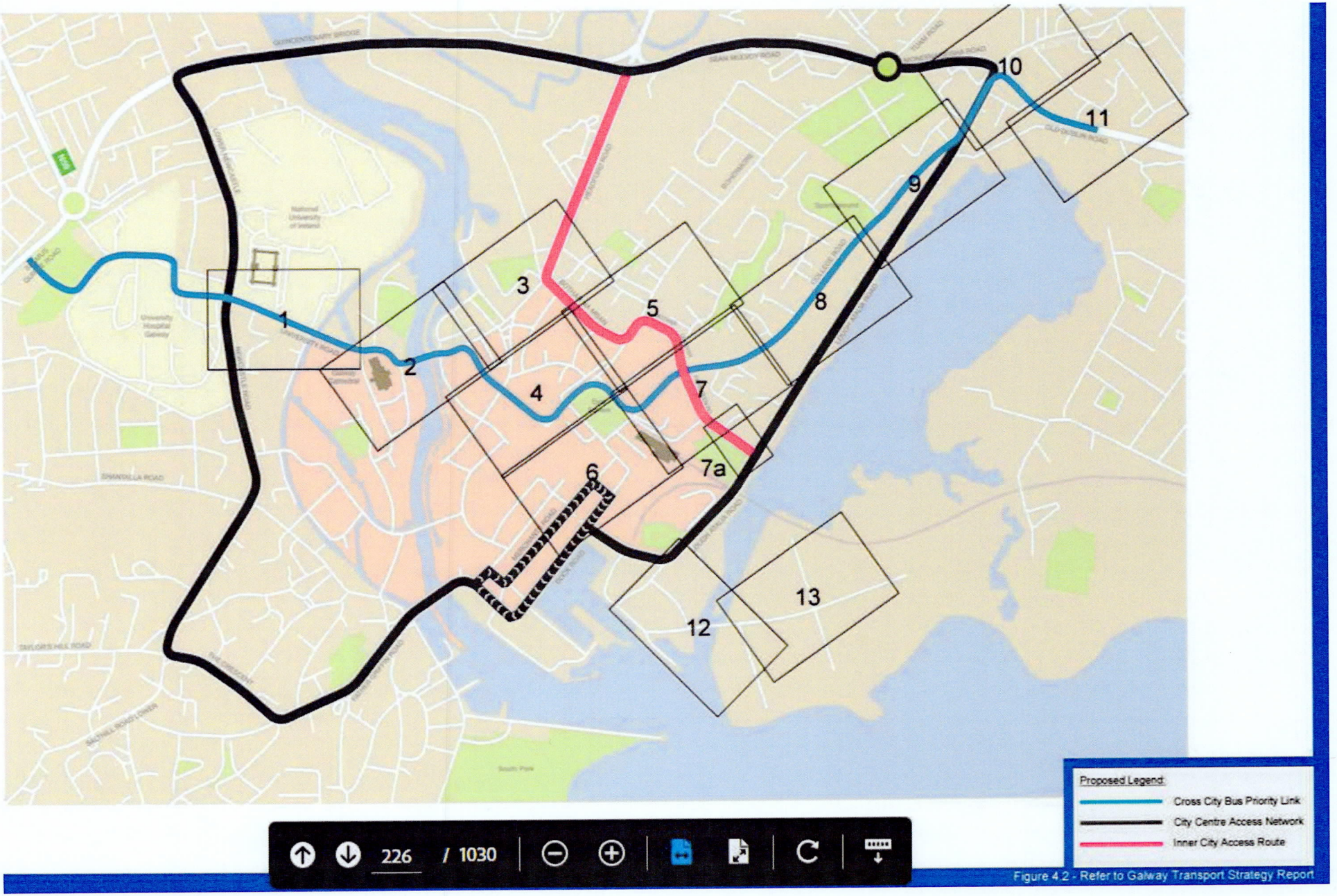
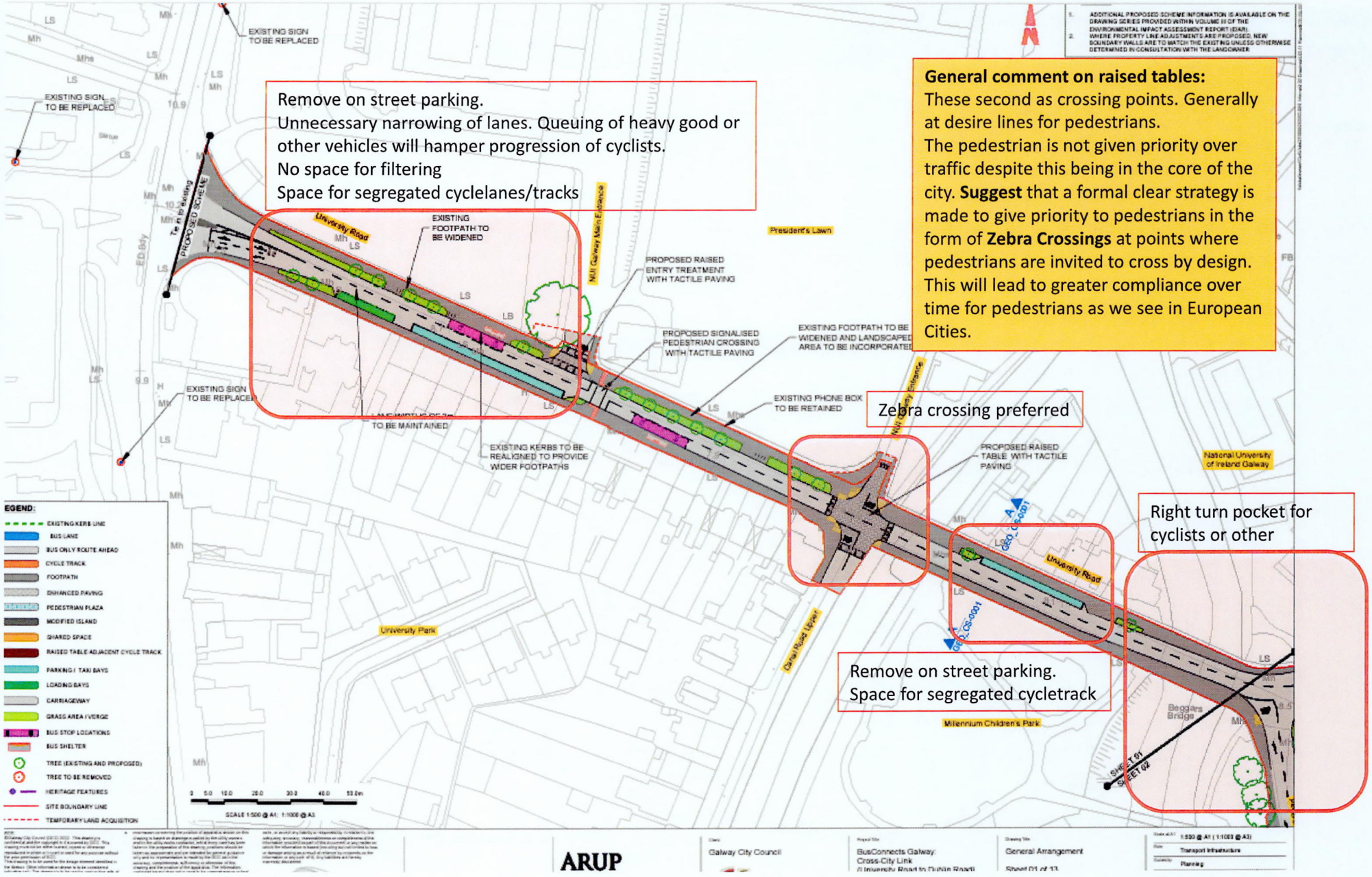
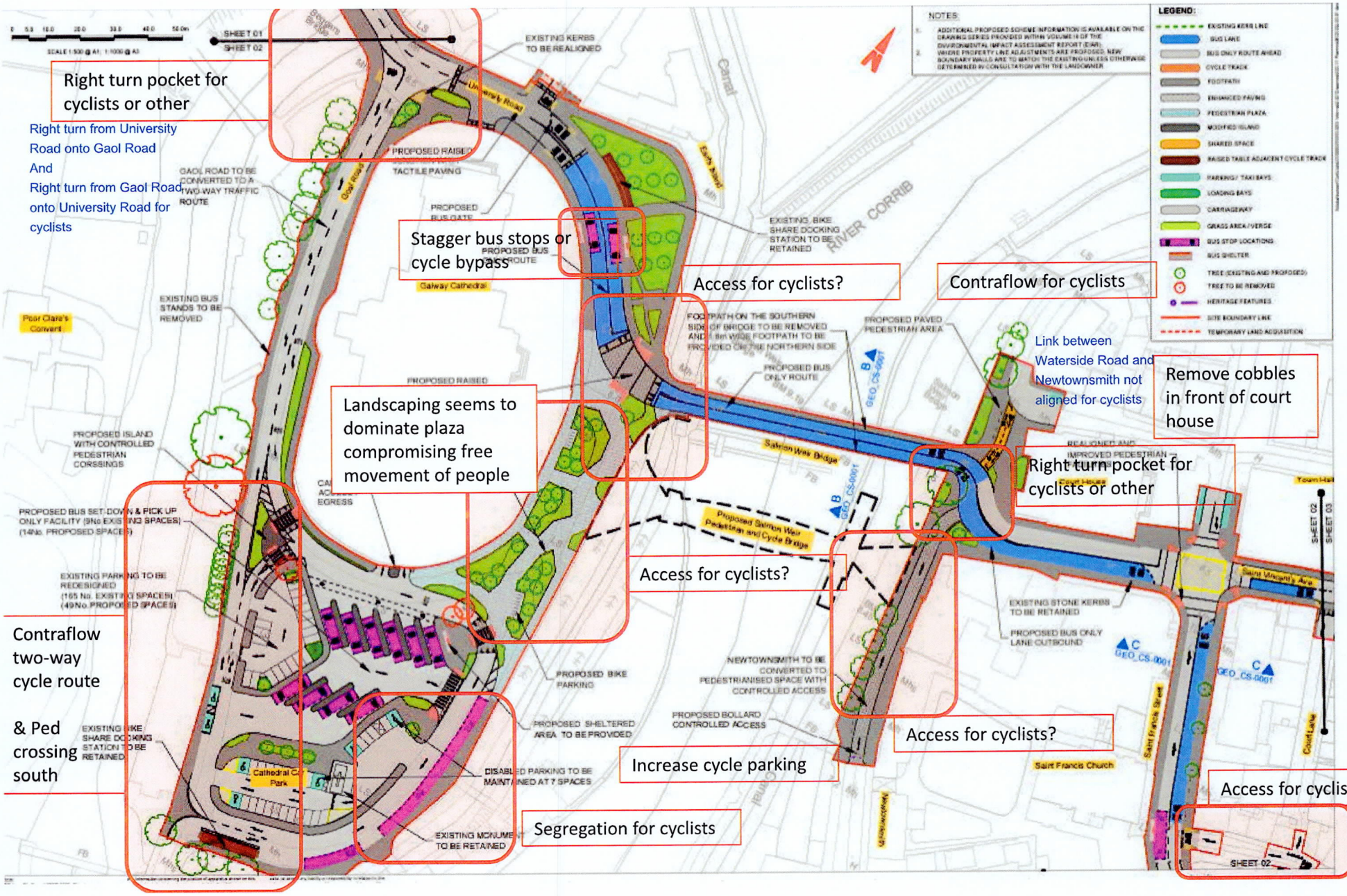
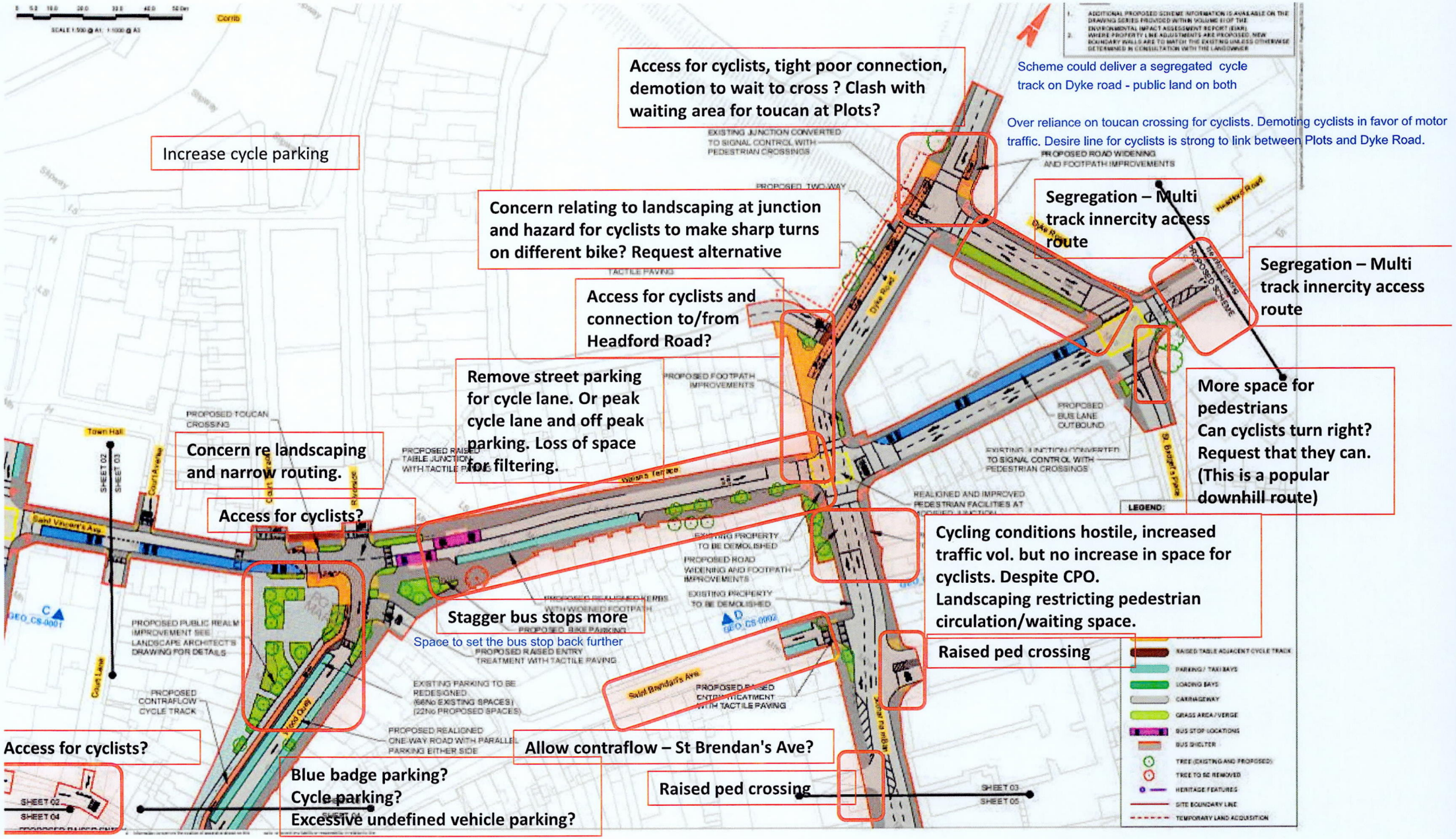


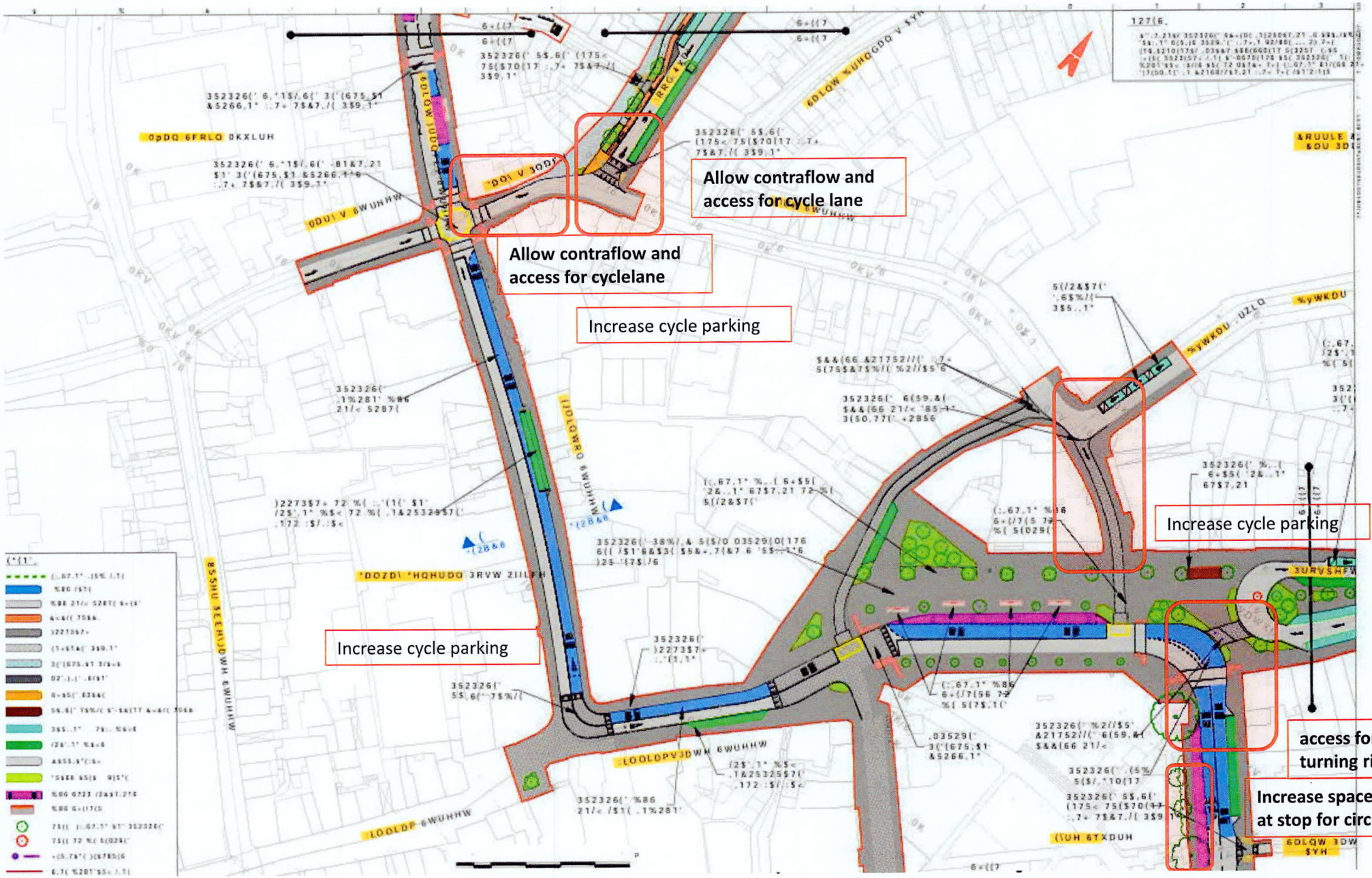
Figure 4.2 - Refer to Galway Transport Strategy Report

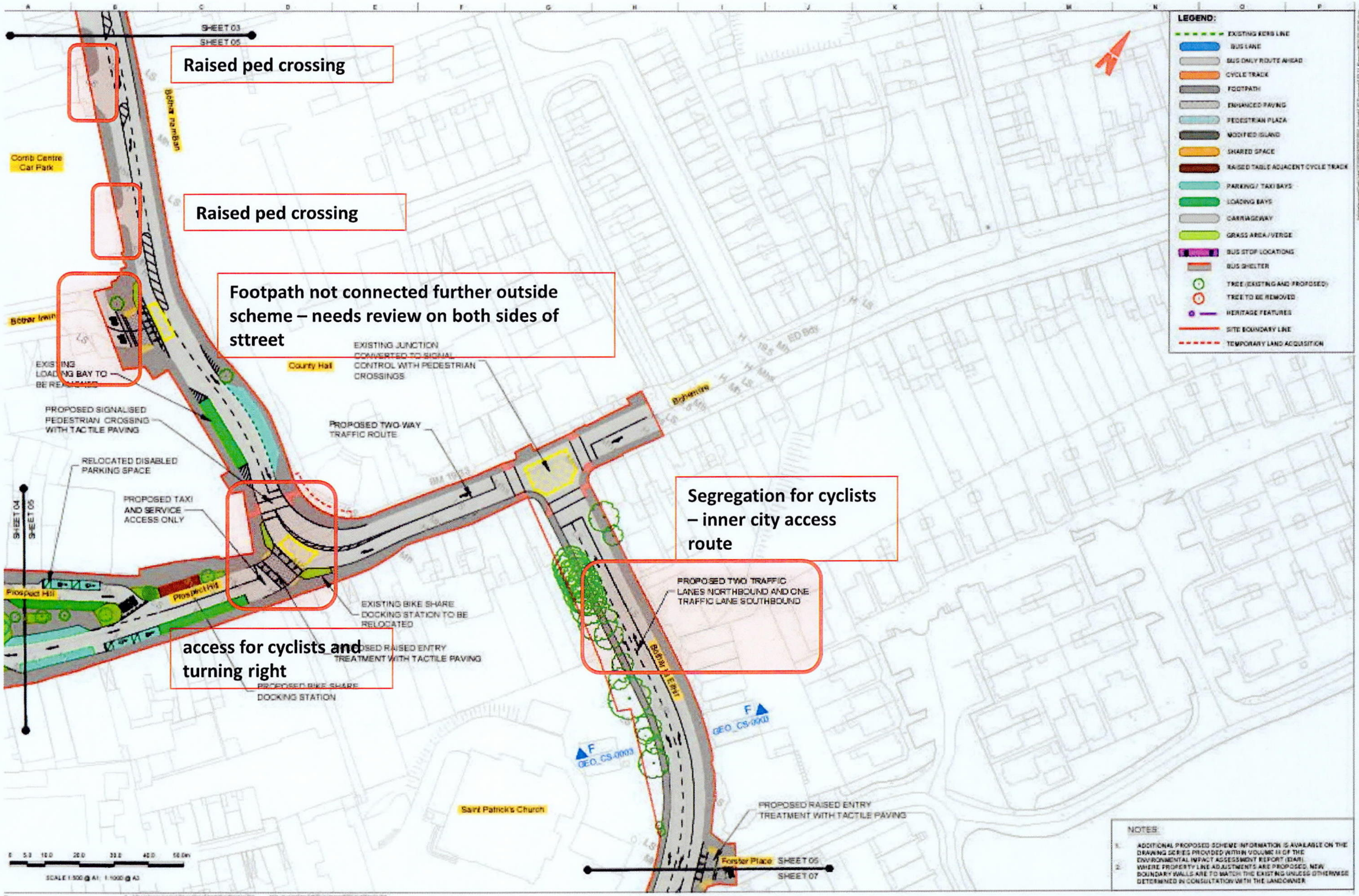
No bike parking shown



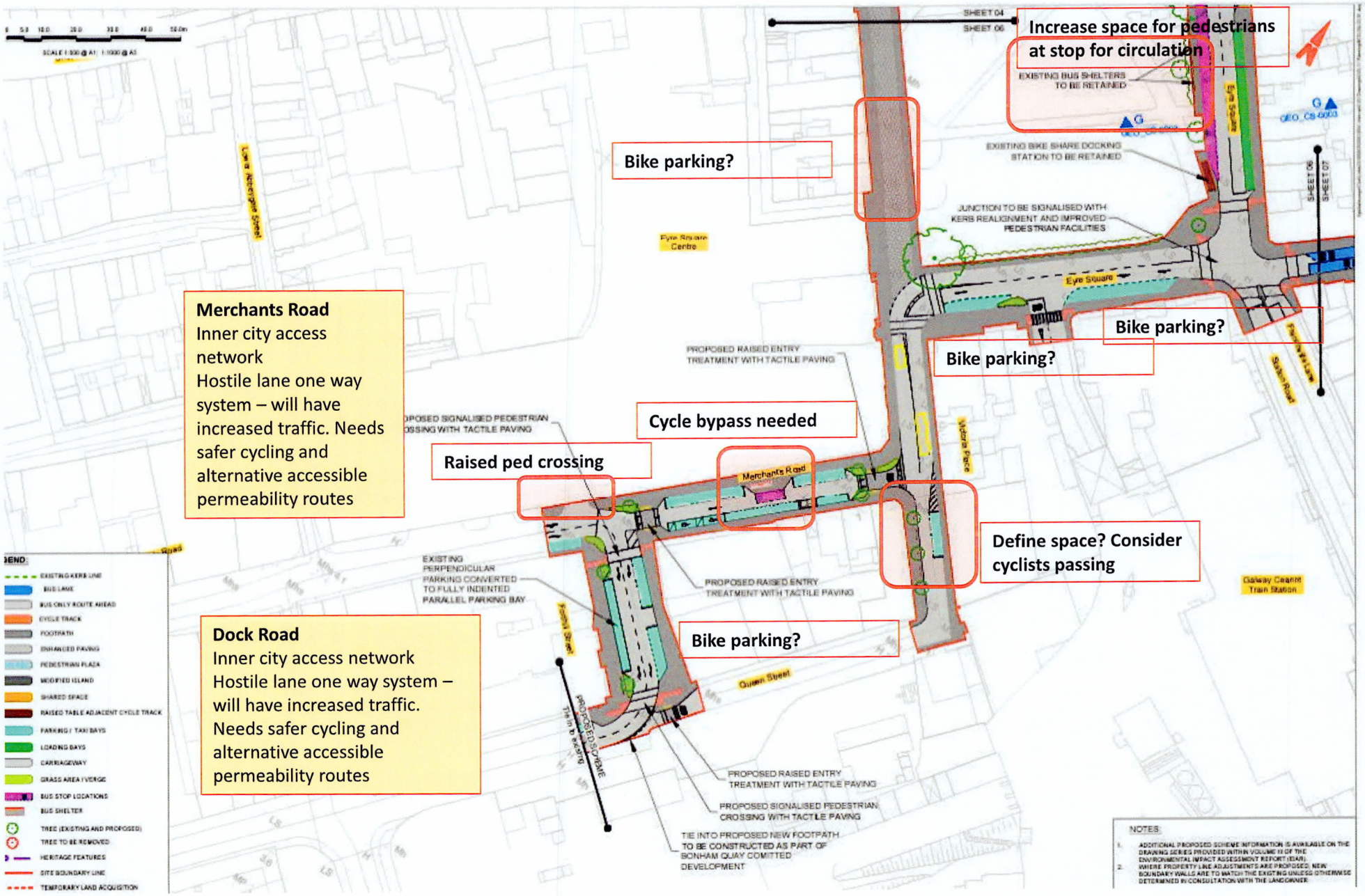

Right turn pocket for cyclists or other
Right turn from University Road onto Gaol Road
And
Right turn from Gaol Road onto University Road for cyclists
Stagger bus stops or cycle bypass
Access for cyclists?
Contraflow for cyclists
Link between Waterside Road and Newtownsmith not aligned for cyclists
Remove cobbles in front of court house
Landscaping seems to dominate plaza compromising free movement of people
Right turn pocket for cyclists or other
Access for cyclists?
Contraflow two-way cycle route
& Ped crossing south
Increase cycle parking
Access for cyclists?
Access for cyclists?
Segregation for cyclists
No bike parking shown

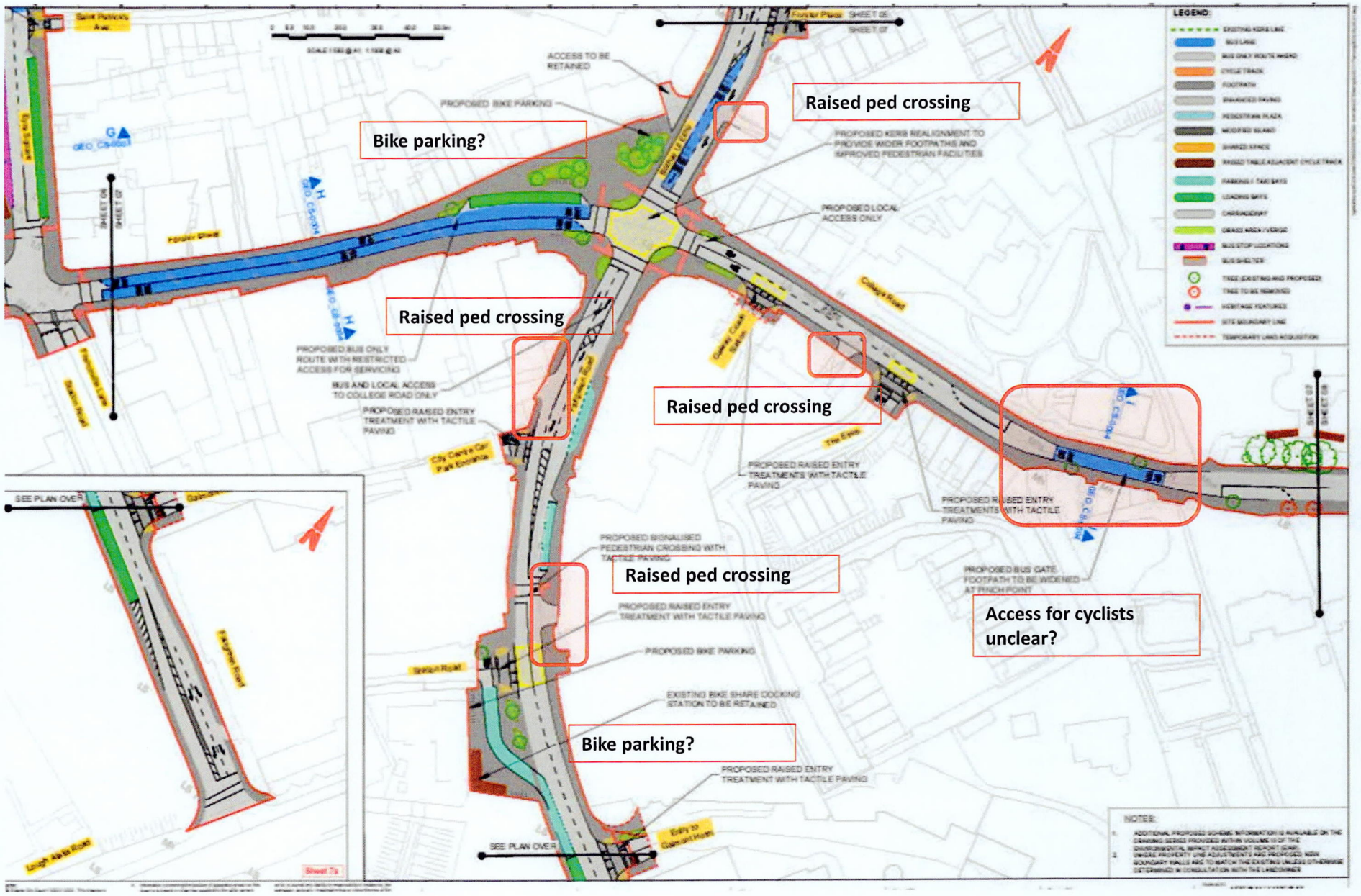

Access for cyclists, tight poor connection, demotion to wait to cross ? Clash with waiting area for toucan at Plots?
Scheme could deliver a segregated cycle track on Dyke road - public land on both
Over reliance on toucan crossing for cyclists. Demoting cyclists in favor of motor traffic. Desire line for cyclists is strong to link between Plots and Dyke Road.
Increase cycle parking
Concern relating to landscaping at junction and hazard for cyclists to make sharp turns on different bike? Request alternative
Segregation – Multi track innercity access route
Access for cyclists and connection to/from Headford Road?
Segregation – Multi track innercity access route
Remove street parking for cycle lane. Or peak cycle lane and off peak parking. Loss of space for filtering.
More space for pedestrians
Can cyclists turn right?
Request that they can.
(This is a popular downhill route)
Concern re landscaping and narrow routing.
Access for cyclists?
Cycling conditions hostile, increased traffic vol. but no increase in space for cyclists. Despite CPO.
Landscaping restricting pedestrian circulation/waiting space.
Stagger bus stops more
Space to set the bus stop back further
Raised ped crossing
Access for cyclists?
Allow contraflow – St Brendan's Ave?
Blue badge parking?
Cycle parking?
Excessive undefined vehicle parking?
Raised ped crossing
PROPOSED TOUCAN CROSSING
PROPOSED RAISED TABLE JUNCTION WITH TACTILE PAVING
PROPOSED FOOTPATH IMPROVEMENTS
PROPOSED BUS LANE OUTBOUND
EXISTING JUNCTION CONVERTED TO SIGNAL CONTROL WITH PEDESTRIAN CROSSINGS
PROPOSED ROAD WIDENING AND FOOTPATH IMPROVEMENTS
REALIGNED AND IMPROVED PEDESTRIAN FACILITIES AT MODIFIED JUNCTION
EXISTING PROPERTY TO BE DEMOLISHED
PROPOSED ROAD WIDENING AND FOOTPATH IMPROVEMENTS
PROPOSED REALIGNED KERBS WITH WIDENED FOOTPATH
PROPOSED BIKE PARKING
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
PROPOSED PUBLIC REALM IMPROVEMENT SEE LANDSCAPE ARCHITECT'S DRAWING FOR DETAILS
PROPOSED CONTRAFLOW CYCLE TRACK
EXISTING PARKING TO BE REDESIGNED (66No EXISTING SPACES) (22No PROPOSED SPACES)
PROPOSED REALIGNED ONE-WAY ROAD WITH PARALLEL PARKING EITHER SIDE
Saint Vincent's Ave
Saint Brendan's Ave
Dyke Road
Headford Road
Court Lane
Town Hall
SHEET 02
SHEET 03
SHEET 04
SHEET 05
LEGEND:
RAISED TABLE ADJACENT CYCLE TRACK
PARKING / TAXI BAYS
LOADING BAYS
CARRIAGEWAY
GRASS AREA / VERGE
BUS STOP LOCATIONS
BUS SHELTER
TREE (EXISTING AND PROPOSED)
TREE TO BE REMOVED
HERITAGE FEATURES
SITE BOUNDARY LINE
TEMPORARY LAND ACQUISITION

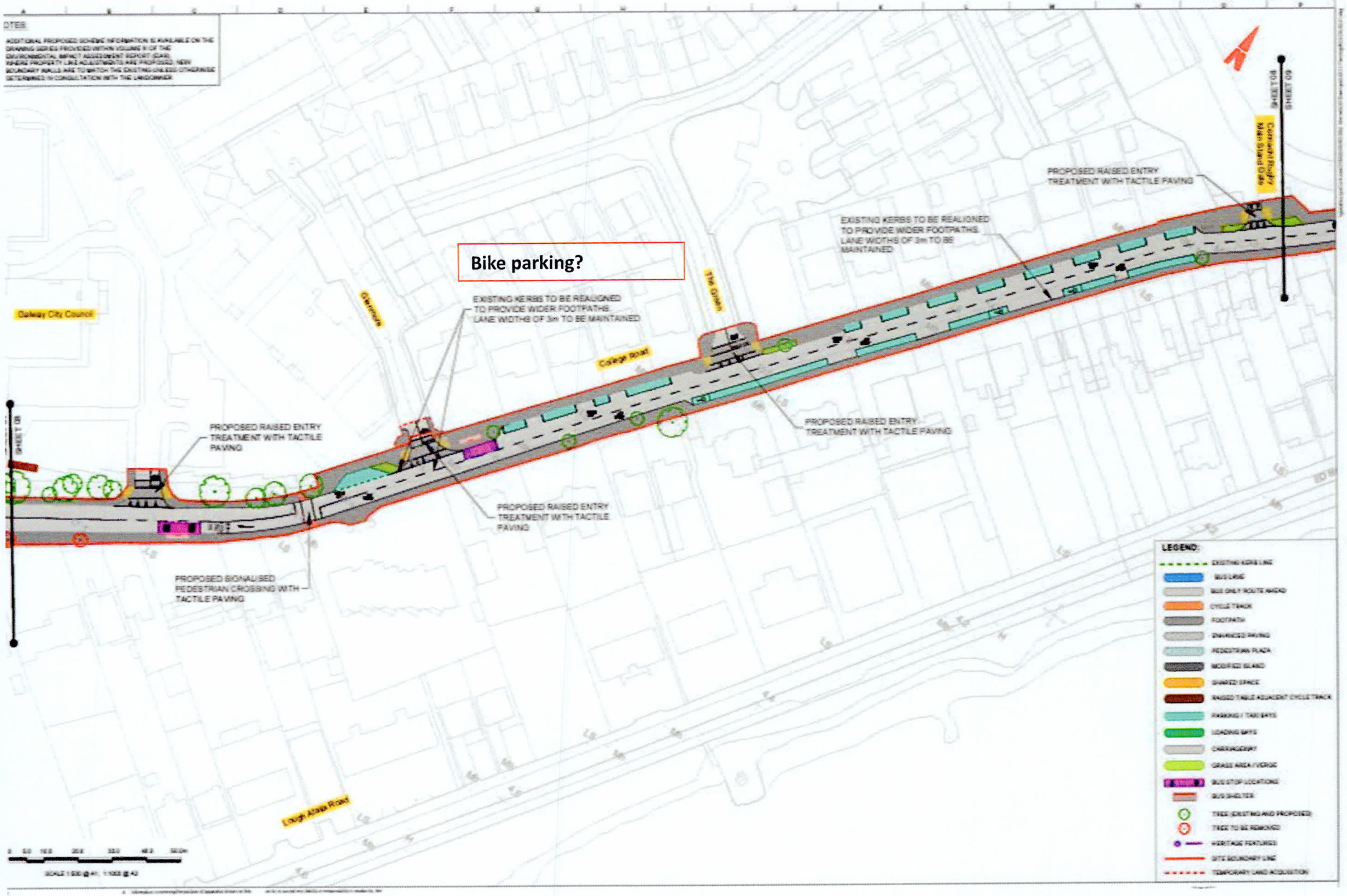

Allow contraflow and access for cycle lane
Allow contraflow and access for cyclelane
Increase cycle parking
Increase cycle parking
Increase cycle parking
access for cyclists and turning right
Increase space for pedestrians at stop for circulation



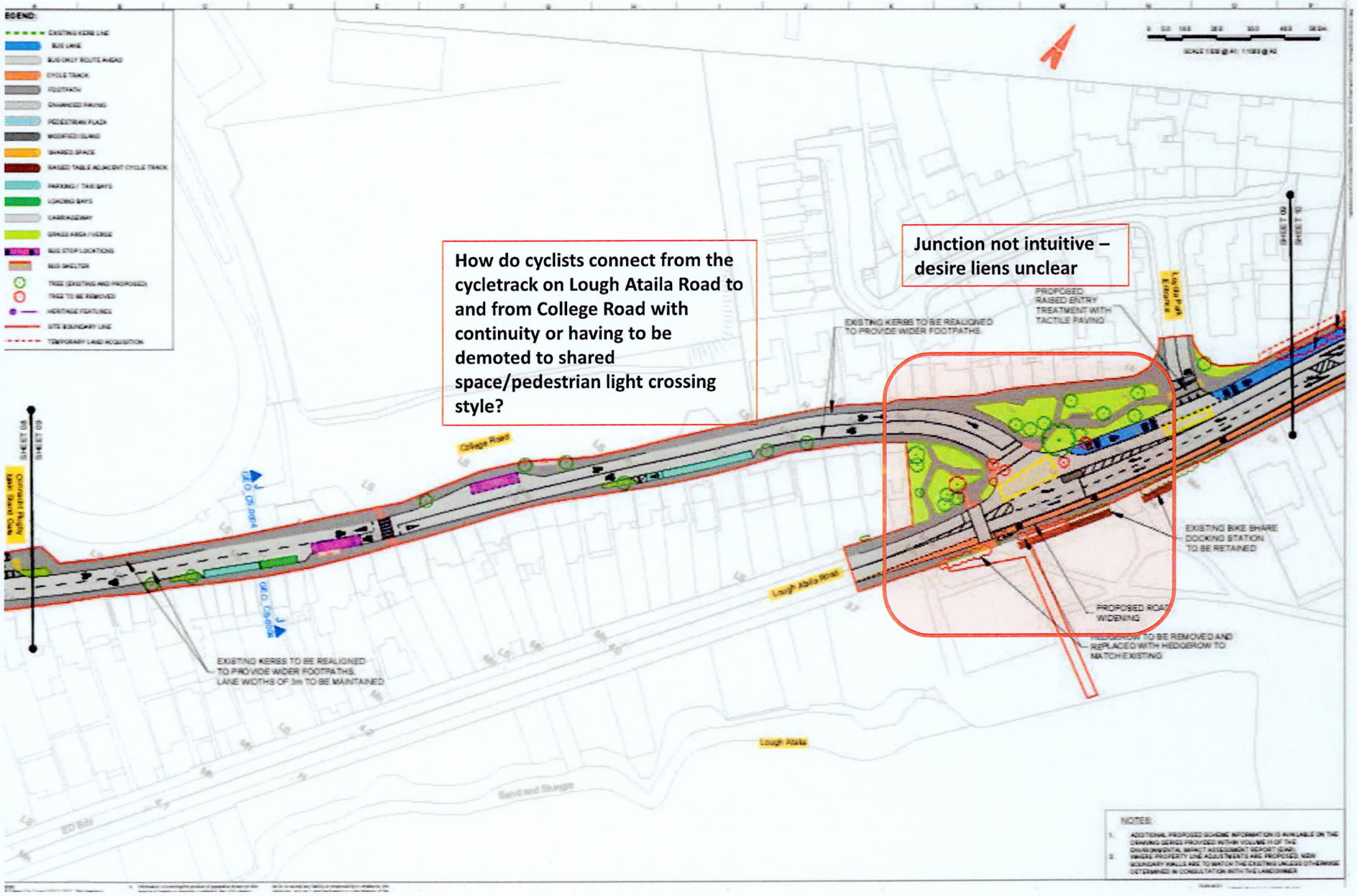
Raised ped crossing
Raised ped crossing
Footpath not connected further outside scheme – needs review on both sides of sttreet
Segregation for cyclists – inner city access route
access for cyclists and turning right
SHEET 03
SHEET 05
Corrib Centre Car Park
County Hall
EXISTING JUNCTION CONVERTED TO SIGNAL CONTROL WITH PEDESTRIAN CROSSINGS
PROPOSED SIGNALISED PEDESTRIAN CROSSING WITH TACTILE PAVING
PROPOSED TWO-WAY TRAFFIC ROUTE
RELOCATED DISABLED PARKING SPACE
PROPOSED TAXI AND SERVICE ACCESS ONLY
EXISTING BIKE SHARE DOCKING STATION TO BE RELOCATED
TREATMENT WITH TACTILE PAVING
DOCKING STATION
PROPOSED TWO TRAFFIC LANES NORTHBOUND AND ONE TRAFFIC LANE SOUTHBOUND
Prospect Hill
Saint Patrick's Church
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
Forster Place
SHEET 05
SHEET 07
SHEET 04
LEGEND:
EXISTING KERB LINE
BUS LANE
CYCLE TRACK
FOOTPATH
ENHANCED PAVING
PEDESTRIAN PLAZA
MODIFIED ISLAND
SHARED SPACE
RAISED TABLE ADJACENT CYCLE TRACK
PARKING / TAXI BAYS
LOADING BAYS
CARRIAGEWAY
GRASS AREA / VERGE
BUS STOP LOCATIONS
BUS SHELTER
TREE (EXISTING AND PROPOSED)
TREE TO BE REMOVED
HERITAGE FEATURES
SITE BOUNDARY LINE
TEMPORARY LAND ACQUISITION
NOTES:

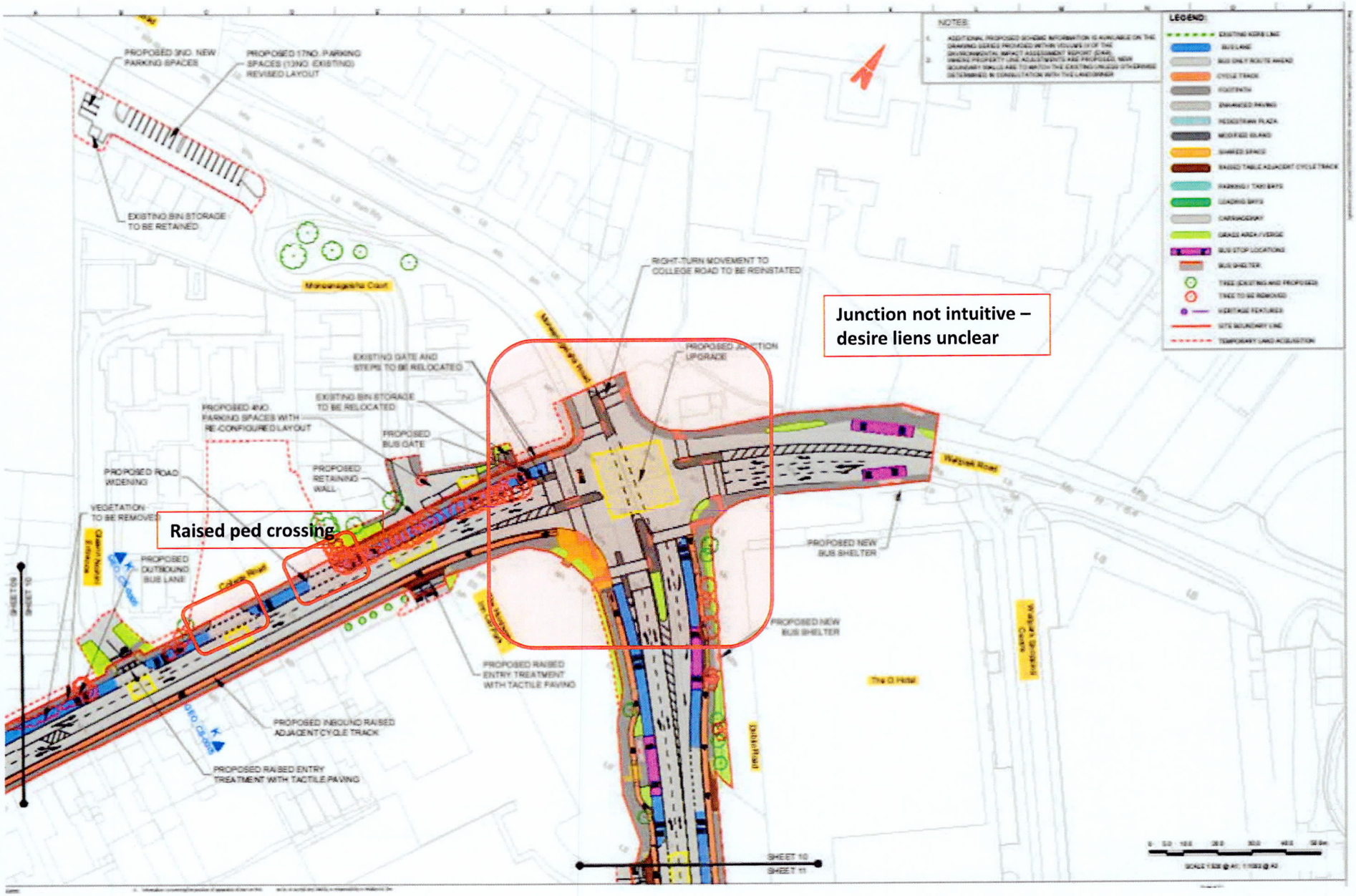

Increase space for pedestrians at stop for circulation
Bike parking?
Bike parking?
Bike parking?
Cycle bypass needed
Raised ped crossing
Define space? Consider cyclists passing
Bike parking?
Merchants Road
Inner city access network
Hostile lane one way system – will have increased traffic. Needs safer cycling and alternative accessible permeability routes
Dock Road
Inner city access network
Hostile lane one way system – will have increased traffic. Needs safer cycling and alternative accessible permeability routes
EXISTING BUS SHELTERS TO BE RETAINED
EXISTING BIKE SHARE DOCKING STATION TO BE RETAINED
JUNCTION TO BE SIGNALISED WITH KERB REALIGNMENT AND IMPROVED PEDESTRIAN FACILITIES
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
PROPOSED SIGNALISED PEDESTRIAN CROSSING WITH TACTILE PAVING
EXISTING PERPENDICULAR PARKING CONVERTED TO FULLY INDENTED PARALLEL PARKING BAY
PROPOSED SCHEME TIE IN & GRADE
TIE INTO PROPOSED NEW FOOTPATH TO BE CONSTRUCTED AS PART OF BONHAM QUAY COMITTED DEVELOPMENT
Eyre Square
Eyre Square Centre
Merchants Road
Queen Street
Victoria Place
Galway Ceannt Train Station
SHEET 04
SHEET 06
SHEET 08
SHEET 07
NOTES:

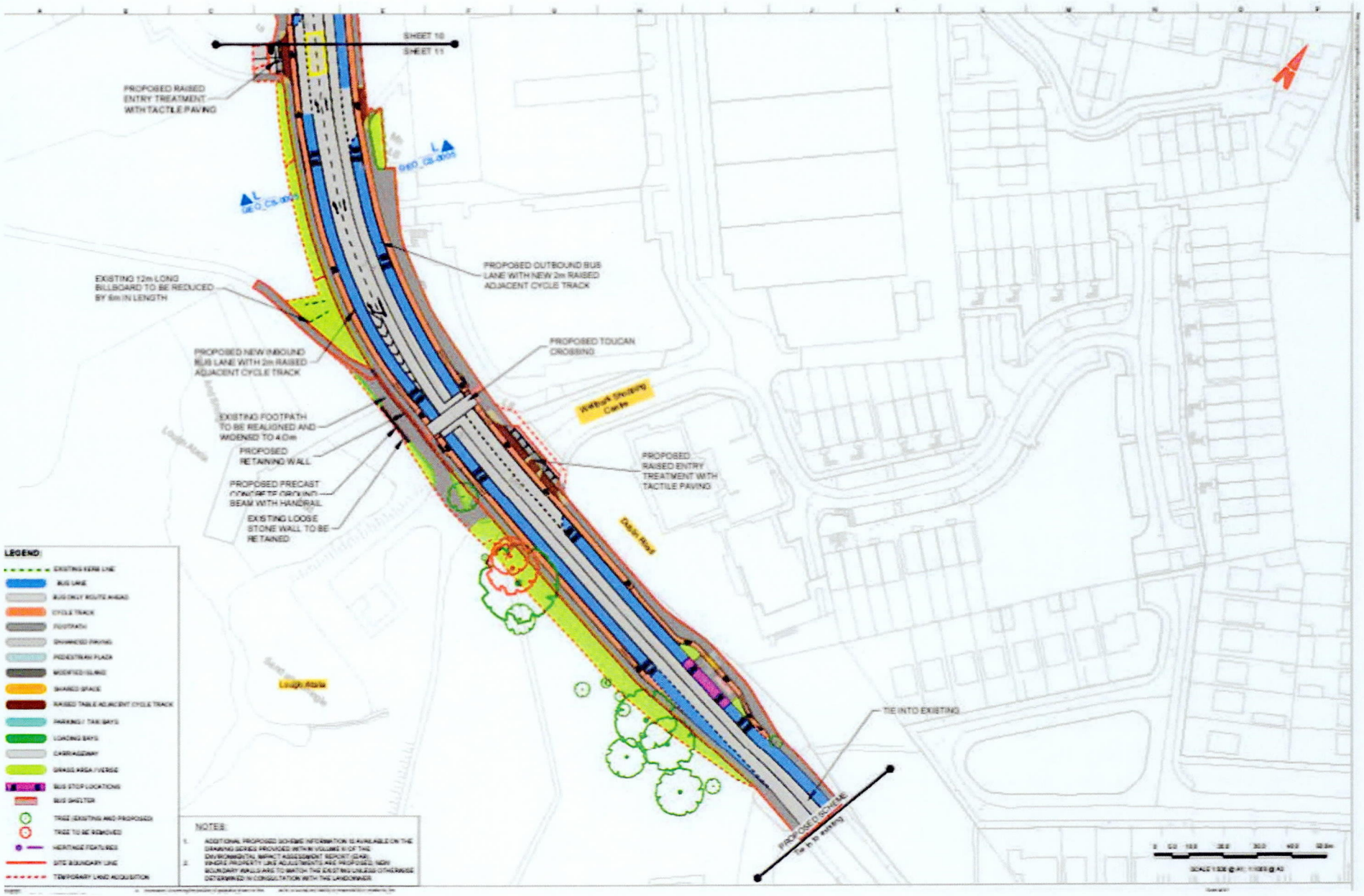

Raised ped crossing
Bike parking?
Raised ped crossing
Raised ped crossing
Raised ped crossing
Access for cyclists unclear?
Bike parking?
ACCESS TO BE RETAINED
PROPOSED BIKE PARKING
PROPOSED KERB REALIGNMENT TO PROVIDE WIDER FOOTPATHS AND IMPROVED PEDESTRIAN FACILITIES
PROPOSED LOCAL ACCESS ONLY
PROPOSED BUS ONLY ROUTE WITH RESTRICTED ACCESS FOR SERVICING
BUS AND LOCAL ACCESS TO COLLEGE ROAD ONLY
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
PROPOSED RAISED ENTRY TREATMENTS WITH TACTILE PAVING
PROPOSED SIGNALISED PEDESTRIAN CROSSING WITH TACTILE PAVING
PROPOSED BUS GATE, FOOTPATH TO BE WIDENED AT PINCH POINT
PROPOSED BIKE PARKING
EXISTING BIKE SHARE DOCKING STATION TO BE RETAINED
SEE PLAN OVER
LEGEND
NOTES

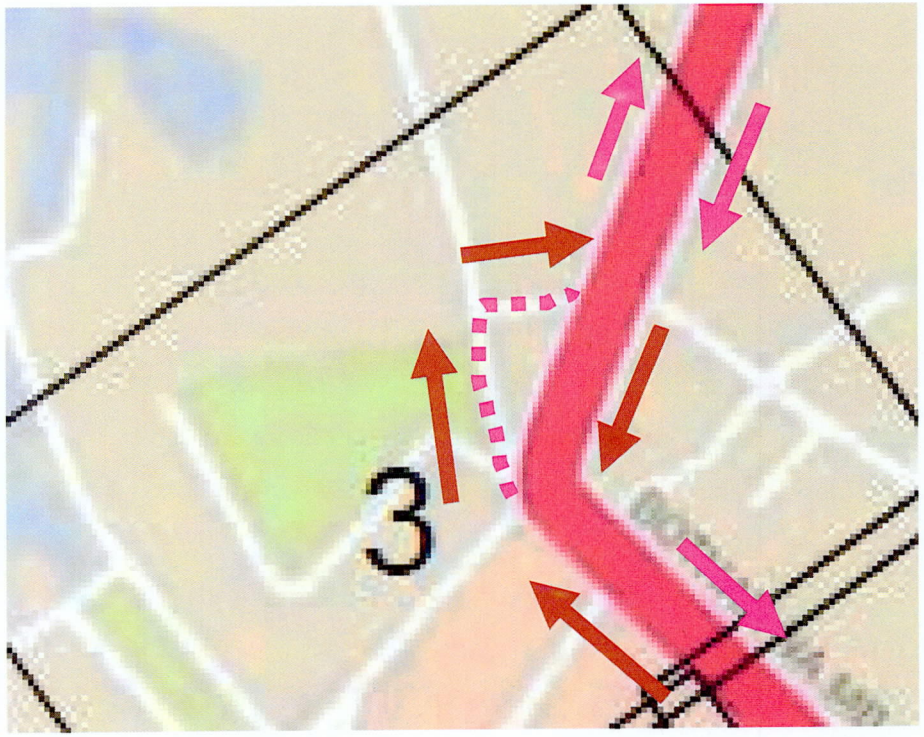


Bike parking?
EXISTING KERBS TO BE REALIGNED TO PROVIDE WIDER FOOTPATHS. LANE WIDTHS OF 3m TO BE MAINTAINED
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
EXISTING KERBS TO BE REALIGNED TO PROVIDE WIDER FOOTPATHS. LANE WIDTHS OF 3m TO BE MAINTAINED
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
PROPOSED SIGNALISED PEDESTRIAN CROSSING WITH TACTILE PAVING
Galway City Council
College Road
The Green
Lough Atalia Road
Connacht Rugby Main Stand Gate
SHEET 08
SHEET 09
LEGEND:


How do cyclists connect from the cycletrack on Lough Ataila Road to and from College Road with continuity or having to be demoted to shared space/pedestrian light crossing style?
Junction not intuitive – desire liens unclear
College Road
Lough Ataila Road
Lough Ataila
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
EXISTING KERBS TO BE REALIGNED TO PROVIDE WIDER FOOTPATHS
EXISTING BIKE SHARE DOCKING STATION TO BE RETAINED
PROPOSED ROAD WIDENING
HEDGEROW TO BE REMOVED AND REPLACED WITH HEDGEROW TO MATCH EXISTING
EXISTING KERBS TO BE REALIGNED TO PROVIDE WIDER FOOTPATHS. LANE WIDTHS OF 3m TO BE MAINTAINED
NOTES:

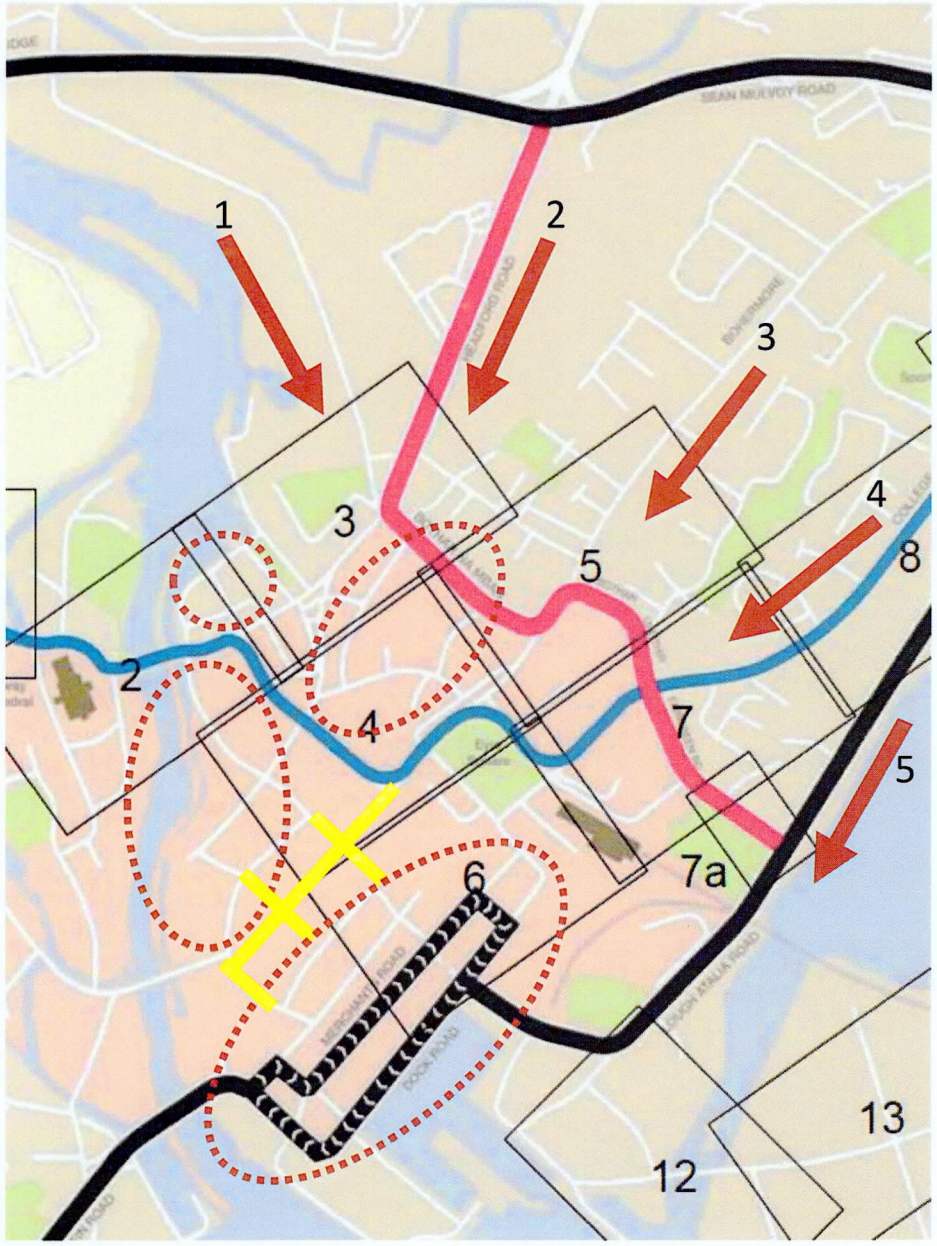

Junction not intuitive – desire liens unclear
Raised ped crossing
PROPOSED 9NO. NEW PARKING SPACES
PROPOSED 17NO. PARKING SPACES (13NO. EXISTING) REVISED LAYOUT
EXISTING BIN STORAGE TO BE RETAINED
RIGHT-TURN MOVEMENT TO COLLEGE ROAD TO BE REINSTATED
PROPOSED JUNCTION UPGRADE
EXISTING GATE AND STEPS TO BE RELOCATED
EXISTING BIN STORAGE TO BE RELOCATED
PROPOSED 4NO. PARKING SPACES WITH RE-CONFIGURED LAYOUT
PROPOSED BUS GATE
PROPOSED RETAINING WALL
PROPOSED ROAD WIDENING
VEGETATION TO BE REMOVED
PROPOSED OUTBOUND BUS LANE
PROPOSED NEW BUS SHELTER
PROPOSED NEW BUS SHELTER
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
PROPOSED INBOUND RAISED ADJACENT CYCLE TRACK
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
NOTES
LEGEND
SHEET 10
SHEET 11


SHEET 10
SHEET 11
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
EXISTING 12m LONG BILLBOARD TO BE REDUCED BY 6m IN LENGTH
PROPOSED OUTBOUND BUS LANE WITH NEW 2m RAISED ADJACENT CYCLE TRACK
PROPOSED NEW INBOUND BUS LANE WITH 2m RAISED ADJACENT CYCLE TRACK
PROPOSED TOUCAN CROSSING
EXISTING FOOTPATH TO BE REALIGNED AND WIDENED TO 4.0m
PROPOSED RETAINING WALL
PROPOSED PRECAST CONCRETE GROUND BEAM WITH HANDRAIL
EXISTING LOOSE STONE WALL TO BE RETAINED
PROPOSED RAISED ENTRY TREATMENT WITH TACTILE PAVING
TIE INTO EXISTING
PROPOSED SCHEME
Tie in to existing
Dublin Road
Lough Atalia
LEGEND
NOTES:



Inner city access

- This route in and out bound **will have an increase in motor traffic** (as per Engineering report for this scheme)
- Routes with **two lane motor traffic**
- Cycle facilities – no segregation*
  - *exception one disconnected strip of two way off road cycle lane adjacent to the plots.
  - Cyclists coming from Dyke Road must follow motor traffic and pass through several light sequences in line with traffic



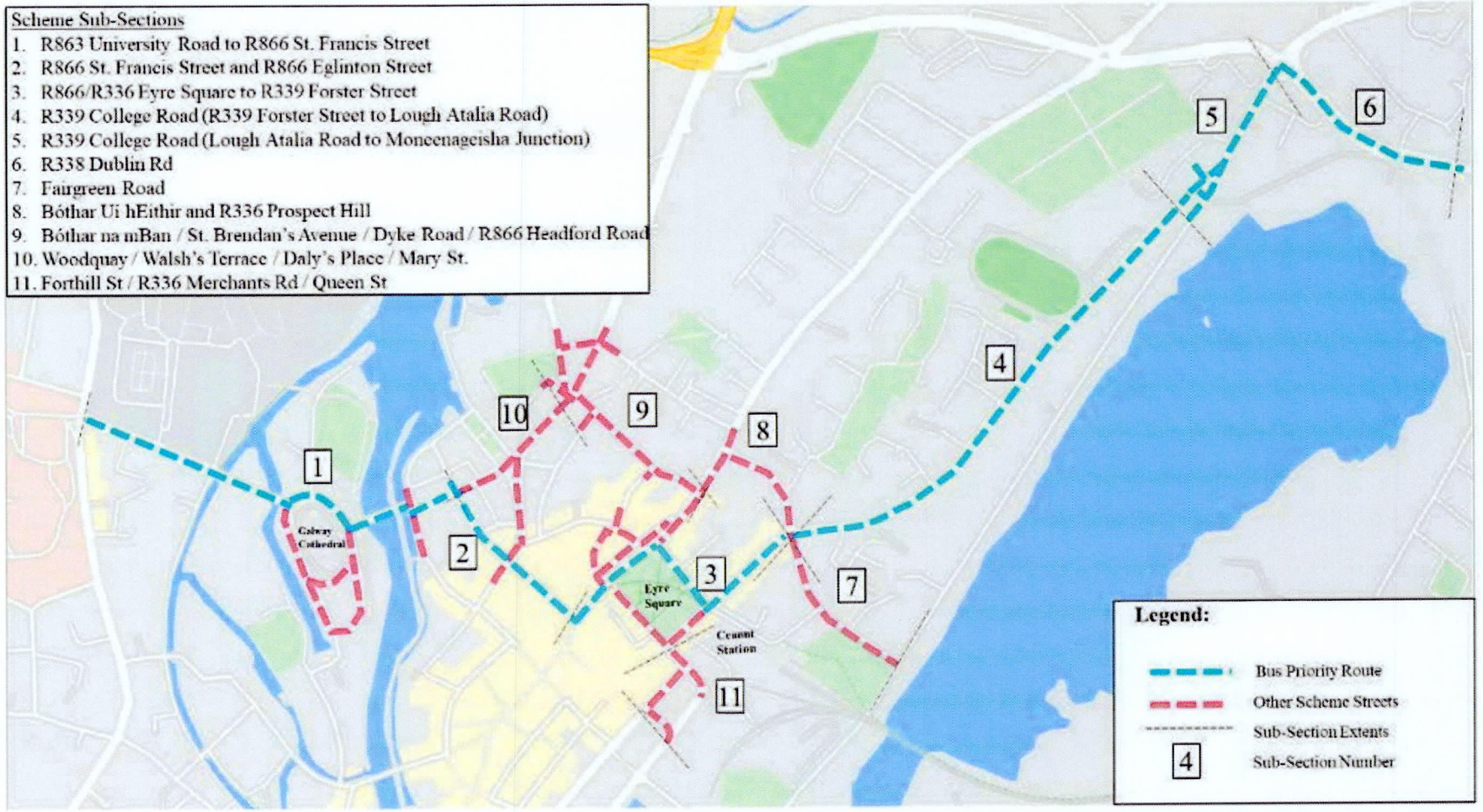
Access by bike into the city from North or East

1. Dyke Road – no segregation for cyclists at present. A the at start of scheme cyclists either cross road like a pedestrian at the Plots and travel to waterside
2. Headford Road – no segregation for cyclists at present. No change with scheme. On inner city access route.
3. Botharmore - no segregation for cyclists at present. Meet inner city access route which is multilane and one way.
4. College Road – no segregation but will have busgate will there be a lot of private cars using it to drop off and collect?
5. Lough Ataila – no segregation

Complex network of one way streets designed to force motor traffic out of the city and or on long detours. Cyclists must follow the same routes as motor traffic in Galway. Thus creating long cycle routes, low permeability and unfriendly.

Pedestrian streets currently in operation where cycling is prohibited. Resulting long detouring for cyclists around Galway Medieval City Core

The Proposed Scheme sections are illustrated in **Diagram 3.1**:



4.10.1 Extent of Route Sub-Section BA

Diagram 4.9 illustrates the extent of the Inner-City Access Route sub-section being considered where modifications are required to accommodate the delivery of the Cross-City Link.

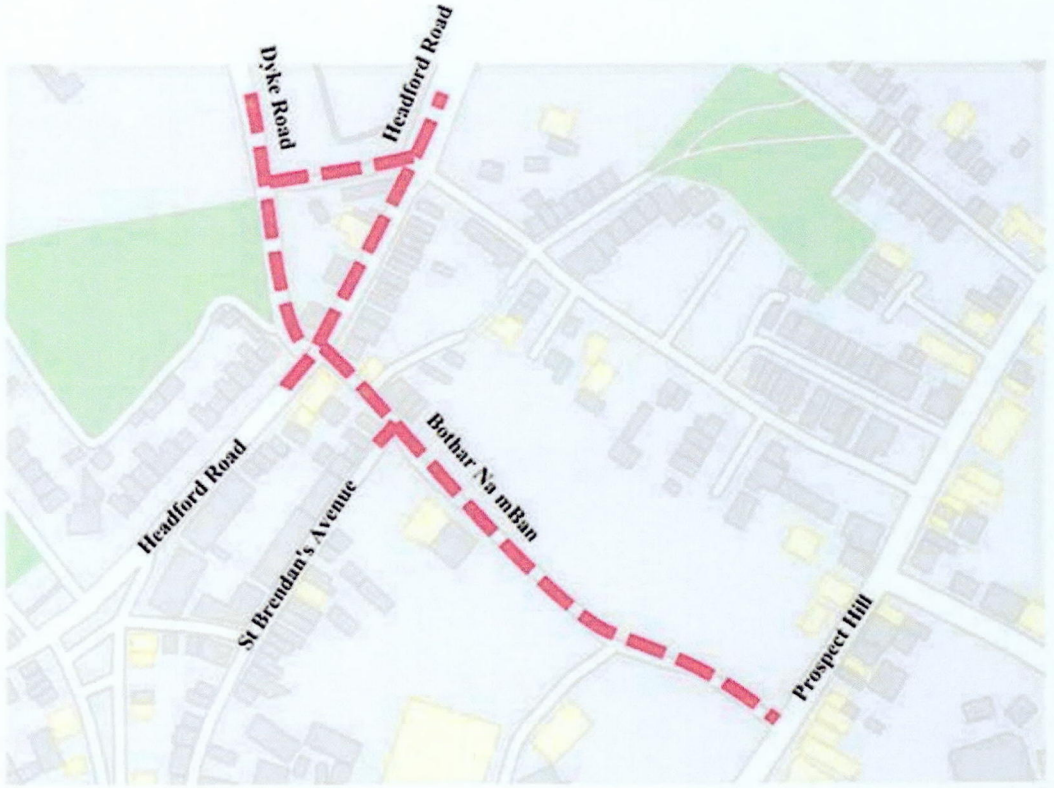


Diagram 4.9: Bóthar na mBan / St. Brendan's Avenue / Headford Road / Dyke Road Inner-City Access Route Sub-section

Niamh Thornton

From: Shane Foran [redacted]
Sent: Tuesday 4 July 2023 17:43
To: Niamh Thornton
Cc: [redacted]
Subject: Re: Case reference: HA61.314597 University Road to Dublin Road, Galway City.
Attachments: HA61.314597 _Bus_Connects_Cross_City_Galway_Further_Observations_Shane_Foran.pdf

Shane Foran
68 Gort Greine
Rahoon
Galway
H91 FY6R

[redacted]

Hi

As requested in Board's letter of 31-May-2023, please find attached further observations on the above application.

Regards

Shane Foran

On Mon, Jul 3, 2023 at 11:37 AM Niamh Thornton <n.thornton@pleanala.ie> wrote:

> Hi Shane,
>
> Responses can be submitted by email to my email address or to laps@pleanala.ie
>
> Kind regards,
>
> Niamh Thornton
>
> Executive Officer

From: Shane Foran [redacted]
Sent: Monday, July 3, 2023 10:05 AM
To: LAPS <laps@pleanala.ie>

Cc: [redacted]

Subject: Case reference: HA61.314597 University Road to Dublin Road, Galway City.

Shane Foran

68 Gort Greine

Galway

H91 FY6R

[redacted]

Hi

I have a query regarding this scheme

Case reference: HA61.314597 University Road to Dublin Road, Galway City.

https://www.pleanala.ie/en-ie/case/314597

On 31 May the Board issued a letter inviting feedback on responses made by the applicants to observations received.

I would like to confirm if we can submit feedback by e mail and the required format or if paper copies are required?

Regards

Shane Foran

Shane Foran
68 Gort Greine
Rahoon
Galway
H91 FY6R

[redacted]

4 July 2023

FAO: An Bord Pleanala

Further Observation Regarding: Case reference: HA61.314597 University Road to Dublin Road, Galway City

Applicant: (Galway City Council)

Development Description: Application to An Bord Pleanála, under Section 51 of the Roads Act 1993, for the proposed Bus Connects Galway: Cross-City Link (University Road to Dublin Road) scheme.

With regard to the letter of 31 May 2023. I strongly request that the Board reconsider its decision not to hold an oral hearing into this scheme.

In my view various aspects of the proposals are in violation of objectives of the Climate Action Plan 2023 (the Plan). The applicants have chosen measures that dedicate road space to motorised travel at the direct expense of active travel; arguably this undermines government objectives under Chapter 15.3.1 "Horizontal". This section of the Plan states a need to achieve public buy in and motivate personal change. By choosing to prioritise motor travel over active travel in a small university city, the applicants are likely to discredit government efforts on climate change and demotivate citizens who want to contribute by avoiding transport choices that consume high resources.

The applicant's proposals are also in clear violation of government objectives under Chapter 15.3.2 "Avoid". Under 15.3.2, the Plan "requires the creation of permeable paths and street networks that allow users to move through an area directly and via many different routes". The proposals made by the applicants contain various examples where they propose measures that remove space from active travel and limit permeability. Most curiously the applicants even propose measures that will limit permeability for active travel users trying to move along roads. They also propose to impose one-way street restrictions on active travel users in a manner that conflicts with decades old policy in such matters.

Section 15.3.2 of the Plan states "Public authorities should work towards a reduction of on-street car parking spaces where it complements measures to prioritise active travel and public transport and to improve the public realm." In Bus Connects Cross-City Link, the

applicants invert this and choose instead to prioritise on-street car parking at the expense of active travel even though alternative parking arrangements are available. Examples include University Road, Headford Road, College Road and various other roads affected by the scheme. At Wood Quay parking is to be reduced at a location where it does not interfere with space for active travel. But just around the corner at Walsh's Terrace, on-street parking is retained thereby removing space from active travel on a route to a key river crossing and the university.

By choosing measures that obstruct and inconvenience users of the Galway Public Bike Share scheme, the applicants undermine the previous state investment in that scheme. The applicants proposed actions also undermine state investment in rail travel since public bike share and multimodal bike–rail travel are a standard component of the northern European model of rail transport. The Cross-City Link proposals are also in strong conflict with section 15.3.3 "Avoid and Shift" of the Plan. Under "Avoid and Shift" the Plan calls for road space reallocation in favour of active travel and public transport. The applicants have chosen instead measures in opposition to this objective. The applicants are instead proposing measures that remove road space from cycle-traffic.

Rather than "reallocating" road space to active travel a more accurate description of the applicants' proposals is that they effectively "dedicate" road space to motor traffic at the expense of cycle traffic. This effect is likely to be greatest at rush hour. On various roads that are not being modified as part of the scheme, the applicants state that their actions will result in a greater intensity of motor traffic in the limited space. The weight of opinion in the literature suggests this will be at the direct expense of cycle traffic. No mitigation is proposed even at locations where space is clearly available either in the form of land or on-street parking. In this regard particular impacts are identified to the roads around the university and the roads in the Docks area that cycle-traffic is forced to use as a result of previous actions by the applicants.

In the Plan, Section 15.3.4 "Shift" discusses an Active Travel Infrastructure Programme. This discussion specifically flags the issue of car use associated with escort to education journeys. The Bus Connects Cross-City Link proposals can be shown to create obstacles and inconvenience for child cyclists trying to get to school. In the case of the Educate Together Secondary School, the proposals imply a diversion of 2.4km for children trying to cycle to school from the east. This should be viewed in context of long standing practices by the applicants that make active travel to other city-centre schools more difficult and which have continued into 2023.

On page 200 the Climate Action Plan cites initiatives such as cycle buses to schools "which can be greatly enhanced through the provision and promotion of infrastructure". In my view the proposals, and other actions of the applicants, undermine such initiatives and hence undermine the Climate Action Plan.

On page 200 (Still under 15.3.4 Shift) the Plan advocates the promotion of alternatives to the private car and specifically refers to mobility services, such as bike-share schemes. Galway already has a public bike share scheme but it is struggling largely as a result of the failure of the applicants to implement the infrastructural measures that were supposed to support it.

The Bus Connects Cross-City Link proposals can be expected to have further negative impacts for the bike share scheme. The applicants have specifically declined to consider either cycling impacts or cycling provisions on key routes affected by the scheme that also include, or directly connect, bike share stations. Here the list of streets is extensive New Dock St., Merchants Road, Dock Road Bothar Na Long, Fair Green Road, Bothar Na mBan and Bothar Ui Eithir, Prospect Hill, Lough Atalia Rd.

One prominent claim made by the applicants and their consultants is that in their view Fairgreen Road, the location of the main transport interchanges (both rail and private coach), and some of the connecting roads, are not considered part of the nominated cycle network. In my view people with a background in mainstream European transport planning would be bemused by this position.

There are stakeholders in the city who had hoped to present their concerns at the anticipated oral hearing. This would be the normal process for large schemes such as Bus Connects Cross-City Link with wide ranging impacts, many negative. One person is Roselyn Carroll who volunteers in a cycling school bus initiative from the east side of the city along a route affected by the scheme proposals. It seems she is not now to have such an opportunity. Therefore I am attaching her material as an appendix to my own submission. It should be considered a supporting document for my own observations.

As requested I attach a reply to the response provided by the applicants and their consultants to the Board in February. I note that this is a very large scheme and even this reply will have to leave out certain matters due to time constraints. It is my view that given the technical nature of the profound problems identified the matter is best dealt with by an oral hearing where the matter can be interrogated in detail.

Recommendation

In the alternative, the proposals should be rejected in their current form and the applicant instructed to modify the scheme to reflect the recommendations of the *National Cycle Policy Framework* and the various design sources cited so as to provide for convenient and logical bicycle access consistent with a small university city in Northern Europe.

Yours Sincerely,

Shane Foran

Contents

As requested by the Board in the letter of 31-May-2023 this document has been drafted as feedback to a response provided by the applicants and their consultants to observations made on the original planning application. At this time I do not see any reason to modify my original observations. If I do not mention particular specific issues in my reply below, the default assumption should be that I reject the response of the applicants. Overall the response of the applicants reinforces cause for concern and provokes additional observations that identify profound problems with the planning application as submitted. It is also relevant that the applicants are the roads authority for Galway. In my view it is necessary to frame the content of the response not just in its own terms but in the context of other actions of the applicants. In my view it is relevant that the applicants have a long history (20+ years) of conducting aspects of their roads-management in a manner that is in apparent opposition to established state policy on active travel. Recent actions by them reinforce this apparent pattern. The Bus Connects Cross-City Link proposals also seem in opposition to long standing guidance on sustainable travel and should be interpreted with reference to a wider context of apparent resistance to standard measures to promote active travel. I give recent examples below to reinforce this point. Readers who are familiar with the policy context going back to 1998 should go straight to my observations on the applicant's response. There is a history of proposals for contraflow cycling going back over 40 years in Galway, there is also a history of two decades of concerns being expressed about the use of narrowed traffic lanes that remove road capacity from cycle traffic or create avoidable conflicts between cycle-traffic and motor-traffic. I will add a summary note at the end synopsising the history of this matter. I also add a note discussing the Galway Transport Strategy since this is used by the applicants as a supporting document.

? junctions

Background Assumptions and Guidance:

In order to correctly frame my response I will provide some background on policy and guidance. In their responses, the applicants and their consultants, Donal McDaid and Brian Burke of Arup, make several references to the Hierarchy of Provision from the 2011 *National Cycle Manual.* The applicants or their consultants state:

On page 32 (36)

> "The National Cycle Manual (Section 1.7.3) 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,"

On page 54 (58)

> "[…] would significantly reduce the volume of traffic along University Road, removing the necessity for segregated cycle tracks".

In my view, these comments suggest a misunderstanding of the guidance and how it is supposed to be used. In the *National Cycle Manual,* the source for the Hierarchy of Measures or Hierarchy of Solutions comes from page 18 of the 2009 *National Cycle Policy Framework* (NCPF). I personally feel some ownership of the Hierarchy of Solutions. It was adapted by me based on the content of the 1996 Institute of Highways and Transport document *Cycle Friendly Infrastructure-Guidelines for Planning and Design.* In that format, the Hierarchy of Solutions appears in the 2003 Galway Cycling Campaign submission on the then draft Galway City Development plan. It

has also appeared in various other submissions over the intervening 20 years. In 2009, the hierarchy was adapted into the *National Cycle Policy Framework* as a central component of state policy on cycling promotion.

The purpose of the Hierarchy of Solutions is that it sets out a sequence to follow in considering issues that impact the safety, practicality and convenience of cycling. The purpose is not that complying with one level in the sequence removes the need to consider the interventions that follow. Cycle Friendly Infrastructure states

> "These measures are not discrete alternatives. Those further up the hierarchy make it easier to introduce successfully the lower level measures or they may render them unnecessary"

The intent of the Hierarchy is to require designers to approach infrastructure management in a holistic manner. Among the reasons for approaching it in this sequence was practical experience on the ground. There was a repeated experience with cycling schemes that failed to address obvious existing problems or added new problems that made cycling conditions objectively worse. Examples include cycling facilities that then delivered people on bikes into multilane roundabouts of a design associated with significantly increased risk for cyclists – in Galway an example of this would be the Western Distributor Road. Other examples are cycle facilities where cyclists lost normal priority at junctions and were systematically inconvenienced. In Galway, an example of this is the Doughiska Road, a scheme that required cyclists to yield to crossing traffic at every junction. I think it is relevant to restate the Hierarchy of Solutions here.

(1) Traffic reduction

Can traffic levels be reduced, particularly heavy goods vehicles (HGVs)? Measures could include restricting the movements of HGVs from local roads, building by-passes to divert through-traffic, and environmental road closures to discourage through-traffic.

(2) Traffic calming

Can speed be reduced and driver behaviour modified? Here the emphasis must also be on enforcement (whether through increased use of speed cameras or other technologies). The concept of "traffic calming" should also be broadened to include physical measures to revise the perceived design speeds of roads, and other measures, such as the removal of one-way street systems. Multi-lane one-way street systems require cyclists to take detours rather than direct routes. They can also be daunting for cyclists since, if one intends to take a right hand turn at a junction, then one is required to weave across several lanes of (often fast-moving) traffic.

(3) Junction treatment and traffic management

This includes:

- urban traffic control systems designed to recognise cyclists and give them priority;
- contra-flow cycle lanes on one-way streets / making two-way streets for cyclists;
- exemptions to cyclists from certain banned turns and access restrictions;
- combined bus/cycle priority measures - and building upon the successful examples already developed in Irish cities (and learning from examples of QBC/cycle designs in which the route is not perceived to be cycle-friendly).

- on-street parking restrictions;
- advanced stop lines for cyclists at traffic signals - as has already been done in some cities around the country;
- by-passes for cyclists at traffic signals;
- signalising roundabouts, changing priorities at junctions so as to make cycle friendly;
- advanced transport telematics: designing new systems to benefit cyclists.

(4) Redistribution of the carriageway

Can the carriageway be redistributed? Such as by marking wide kerb lanes or shared bus/cycle lanes?

(5) Cycle lanes and cycle tracks

In addition, having considered and, where possible, implemented all of the above, what cycle tracks or cycle lanes (if any) are necessary in order to make a route cycling-friendly?

(6) Cycleways (public roads for the exclusive use of cyclists and pedestrians) What opportunities exist to create traffic-free routes linking, for example, residential areas to important destinations? These might include links between (previously unconnected) residential areas using parks, canal and river-side routes, e.g South Dublin County Council plan for cycling in parks. It can be seen from the above that in making provision for cyclists in the urban environment, it is often less about providing dedicated cycling facilities and more about wider traffic interventions that benefits all of the more vulnerable road users, not just cyclists.

When to provide specific cycling measures

Having considered the hierarchy, the decision of whether or not to provide cycling facilities usually informed at first by an analysis of the volume and speed of motor traffic. In the literature there is a consistent understanding that as traffic volume and speeds increase, mixing cycle-traffic with motor-traffic becomes less acceptable. This is where tools like the guidance graph at Chapter 1.7.4 in the 2011 *National Cycle Manual* are used. The 2011 NCM is open to criticism that the graph is confusing and that solutions provided to go with the graph are incomplete. However, the 2011 NCM also states some assumptions in the text under Note 6 on page 21 (30).

"Note 6 – Critical Thresholds – 10,000 AADT and 5,500 AADT

In reviewing the graph, the threshold of 10,000 AADT is important. At 30km/h actual traffic speed, this represents the maximum level of traffic flow at which mixed cycling is likely to be the most appropriate choice. 10,000 AADT is roughly equivalent to 1000 PCUs in the peak hour, or 666 PCUs inbound in the morning peak hour.

At 50km/h actual speed (the standard urban speed limit) the maximum traffic flow is 5,500 AADT if mixed cycling is preferred. This is equivalent to 360 PCUs inbound in the peak hour – a relatively low volume of traffic."

The 2011 NCM is much more tolerant of mixed traffic than more recent sources. In the UK, *Local Transport Note 1/20 Cycle Infrastructure Design* has a table (Table 4.1.3) "Appropriate protection from traffic on highways". At a speed limit of 20mph (~30km/h) mixed traffic is only deemed suitable for most people at traffic volumes up to 2000 vehicles per day (or 200 per hour). At between 2000 and 4000 vehicles per day (or 200 to 400 an hour) mixed traffic is described as "provision suitable for few people and will exclude most potential uses and/or have

safety concerns". Above 4000-5000 vehicles per day mixed traffic is treated as "provision suitable for few people and will exclude most potential uses and/or have safety concerns". At a speed limit of 30mph (~50km/h) and anything above 2000 vehicles per day (or 200 per hour), *Cycle Infrastructure Design* treats mixed traffic as "provision suitable for few people and will exclude most potential uses and/or have safety concerns".

Transport Scotland's 2021 *Cycling by Design* document gives a table of traffic and volume and speeds versus different types of interventions. This treats mixed traffic as "should be avoided" at two-way traffic levels above 400pcu (4,000 cars per day) and 85th percentile speeds of 30km/h. At 85th percentile speeds between 30km/h and 50km/h anything above 200 vehicles per hour falls into the "should be avoided" category with regard to mixed streets. For 85th percentile speeds above 50km/h roads with more than 200 vehicles per hour are treated as "should not be used" with regards to mixed traffic. In May 2023 a draft of the latest version of the NTA *National Cycle Manual* was obtained under FOI by Irishcycle.com. For speed limits of 30km/h this draft treats mixed traffic above 200 vehicles per hour as "provision may not be suitable for all people and may exclude some potential users". For traffic levels above 400 vehicles per hour at 30km/h limits is classified as "provision not suitable for a range of users". For 50km/h speed limits mixed traffic is treated as "provision not suitable for a range of users" up to traffic volumes of 600 vehicles per hour. Above 600 vehicles per hour mixed traffic is treated simply as "provision not suitable".

The 2011 edition of the Irish *National Cycle Manual* also gives a rule of thumb for interpreting traffic count data such as that provided by the applicants and their consultants. This will become important further below.

> "Note 3 – Traffic Volumes - some rules of thumb [...]
>
> 1 Peak hour traffic volumes = approximately 10% of 24-hour AADT
>
> 2 Peak hour traffic splits 66% inbound 33% outbound
>
> 3 A bus or HGV is equivalent to 3 PCUs (passenger car units). A busy bus lane (e.g. a bus every minute, and regular taxies) could have as high a traffic flow (in PCUs) as the next traffic lane
>
> 4 A busy inbound urban traffic lane within a signalised system carries between 650 – 850 PCUs per hour"

An issue to be determined is how to account for multilane one-way systems for the purpose of deciding if the thresholds are met. This will become important for discussing the traffic impacts of the applicant's proposals on the Dock Road/New Dock St/Merchants Road/Forthill St gyratory system. Both cycle-traffic and motor traffic are unlikely to distribute themselves evenly between both lanes. It might be that many drivers and cyclists will tend to stay in the left-hand traffic lane. Is the 66% rule still applicable for estimating traffic in the left-hand lane? Is a 30km/h speed limit a valid predictor of actual likely traffic speeds on a multilane one-way system with long straight stretches? Experience might suggest that many drivers are unlikely to drive at 30km/h without active enforcement or traffic calming. In that case it might be more valid to treat even 30km/h multilane one-way streets as 50km/h environments for the purpose of analysis.

Tools like the guidance graphs and traffic volume thresholds apply in both directions. They are used for designing the cycling environment when a planner wishes to develop a cycling scheme for a particular corridor. However they are also used to analyse the impacts and necessary mitigations when a designer is proposing to change the traffic volumes on a particular road or set of roads. In this regard it should be noted that the applicants and their consultants propose to increase traffic on various roads in small European university city with a historically strong cycling culture.

The implications of the Applicants Traffic Volume arguments:

The traffic reduction arguments of the applicants and their consultants work both ways. They imply the applicants accept that actions by them leading to an increase in traffic volumes bring a requirement to examine whether cycling provisions are needed to mitigate this impact. In the EIAR, Chapter 6 ('Traffic and Transport') documents the assessment of the road network and predicted traffic impact arising from the proposed scheme. Tables are provided forecasting peak hour traffic volumes. I have pulled these values into tables below and added the 66% rule of thumb values. I note again that according to the current *National Cycle Manual* the upper thresholds for mixed traffic at 50km/h speeds is 360 vehicles per hour and 666 vehicles per hour at 30km/h speeds. The first table below shows roads within the 50km/h zone that are expected to go above this threshold as a result of Bus Connects Cross-City Link. There is a longer list of roads where the 360 vehicles per hour threshold is already exceeded and traffic levels are forecast to also further increase. These are discussed in specific sections for each location below.

Road Name	AM/PM	Do Minimum Flows (PCU)	Do Something Flows (PCU)	Flow Difference (PCU)	% Change	66% Rule of Thumb - Do Minimum	66% Rule of Thumb - Do something
Bothar Le Cheile	AM	429	605	+175	+40.8%	283.14	399.3
Circular Road	AM	468	613	+145	+31%	308.88	404.58
Circular Road	PM	486	619	+132	+27%	320.76	408.54
Bushypark	AM	539	649	+110	+20.4%	355.74	428.34
Sandy Road	PM	472	654	+182	+38.6%	311.52	431.64
Wolfe Tone Bridge	PM	527	698	+171	+32.5%	347.82	460.68
Seamus Quirke Road (Lower Newcastle Road - Browne Roundabout)	AM	447	858	+411	+92%	295.02	566.28

Table: Roads within the 50km/h zone that will experience traffic increases putting them above the 2011 *National Cycle Manual* maximum threshold for mixed traffic on roads with 50km/h actual traffic speeds.

Setting the Policy and Design Context: A Note on one-way streets

Among the issues that come up in the applicant's response is the issue of one-way streets as they affect access for cycle-traffic. I will put quick note here at the start to set the context before dealing with the response of the applicants below. Although there are no contra-flow cycling arrangements in Galway, there is a 44 year history of proposals for contra-flow cycling on one-way streets in the city. I will put in a note on this history at the end as in my view it is very illustrative.

Since 1998 it has been state policy on cycling that one-way streets should be two-way for cyclists whenever feasible. In 1998 the state adopted *Provision of Cycling facilities A National Manual for Urban Areas*. This states on Page 46

> **General comments**
> - To prevent cyclists having to make detours it is desirable to provide for two-way cycle-traffic on all roads, particularly on all new traffic calming schemes.

And on page 56

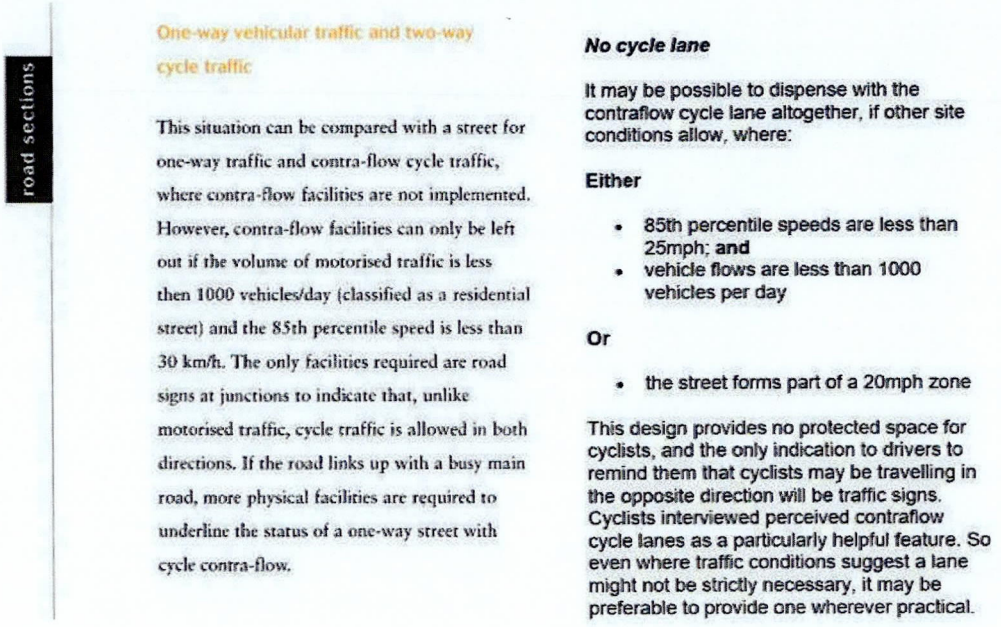
> **General comments**
> - Contra-flow cycle facilities should always be considered for one-way streets and for all new traffic calming schemes.

The manual gave examples of contraflow arrangements using cycle tracks but it also gave an example of unsegregated arrangements

> "However, contra-flow facilities can only be left out if the volume of motorised traffic is less than 1000 vehicles/day (classified as a residential street) and the 85th percentile speed is less than 30 km/h. The only facilities required are road signs at junctions to indicate that, unlike motorised traffic, cycle-traffic is allowed in both directions. If the road links up with a busy main road, more physical facilities are required to underline the status of a one-way street with cycle contra-flow."

Also in 1998 the UK Department for Transport released similar guidance *Traffic Advisory Leaflet 06/1998 Contraflow Cycling*. This also states that unsegregated contra-flow arrangements are possible in similar traffic conditions.

> "It may be possible to dispense with the contraflow cycle lane altogether, if other site conditions allow, where:
>
> Either
>
> - 85th percentile speeds are less than 25mph; and
> - vehicle flows are less than 1000 vehicles per day
>
> Or
>
> - the street forms part of a 20mph zone"



road sections

One-way vehicular traffic and two-way cycle traffic

This situation can be compared with a street for one-way traffic and contra-flow cycle traffic, where contra-flow facilities are not implemented. However, contra-flow facilities can only be left out if the volume of motorised traffic is less then 1000 vehicles/day (classified as a residential street) and the 85th percentile speed is less than 30 km/h. The only facilities required are road signs at junctions to indicate that, unlike motorised traffic, cycle traffic is allowed in both directions. If the road links up with a busy main road, more physical facilities are required to underline the status of a one-way street with cycle contra-flow.

No cycle lane

It may be possible to dispense with the contraflow cycle lane altogether, if other site conditions allow, where:

Either

- 85th percentile speeds are less than 25mph; **and**
- vehicle flows are less than 1000 vehicles per day

Or

- the street forms part of a 20mph zone

This design provides no protected space for cyclists, and the only indication to drivers to remind them that cyclists may be travelling in the opposite direction will be traffic signs. Cyclists interviewed perceived contraflow cycle lanes as a particularly helpful feature. So even where traffic conditions suggest a lane might not be strictly necessary, it may be preferable to provide one wherever practical.

Figure: Extracts from 1998 guidance regarding one-way streets and cycle traffic. Left from Ireland (*Provision of Cycling Facilities A National Manual for Urban Areas* Department of the Environment and Local Government) Right: UK (*Traffic Advisory Leaflet 6/1998*) discussing necessary conditions for unsegregated contra-flow cycling

Contraflow cycle lanes and tracks

6.4.21 There should be a general presumption in favour of cycling in both directions in one way streets, unless there are safety, operational or cost reasons why it is not feasible.

6.4.22 Cycle lanes and tracks may operate in the opposite direction to motor traffic, although contraflow cycling is also permissible with signs but without a marked lane or cycle track – see Chapter 7.

6.4.23 Contraflow cycle lanes should normally be mandatory, although an advisory lane may be considered where the speed limit is 20mph and the motor traffic flow is 1,000 PCU per day or less. The entrance to the street for cyclists in the contraflow direction should always be protected by an island to give protection against turning vehicles (see Figure 6.25) where traffic speed and flow is higher.

Figure 7.4: Contraflow cycling in a narrow street with no marked lane, Brighton

Mode filtering through exemptions to TROs for cycling

7.3.3 An assessment should be undertaken to review whether cyclists can be safely exempted from turning bans, No Entry and one way restrictions and be permitted access to vehicle restricted areas either at all times or within peak hours.

7.3.4 Permitting contraflow cycling in one way streets and using point-closures to close certain streets to motor vehicle through traffic will generally provide a more direct route for cyclists and should always be considered. On quiet low speed streets, there may be no need for a cycle lane (see Figure 7.4 and Section 6.4), enabling cyclists to use narrow streets in both directions. Where there is good visibility cyclists and on-coming drivers should be able to negotiate passage safely. Contraflow cycling should be signed in accordance with the advice in the Traffic Signs Manual.

7.3.5 Where speed is low in urban areas, contraflow cycling without a dedicated cycle lane has been found to be successful even on narrow streets with on-street car parking. The following minimum carriageway widths are recommended:

- 2.6m with no car parking
- 3.9m based on car passing cycle, no car parking
- 4.6m with car parking on one side of the road
- 6.6m with car parking on both sides of the road

78

Figure: Extracts from current UK guidance (*Local Transport Note 1/20 Cycle Infrastructure Design*) discussing contra-flow cycling. This includes both segregated and unsegregated arrangements. See 6.4.22, 7.3.4, 7.3.5 and Figure 7.4

Irish Traffic Regulations around contraflow cycling

In 1998 in support of the new design manual new Traffic Regulations were introduced in Ireland. On Tuesday, 16 Nov 1999 the then Junior Minister Mr Bobby Molloy TD gave a written answer explaining

> "In March 1998 my Department, in association with the Dublin Transportation Office, published a design manual for cycle facilities entitled Provision of cycle facilities – National Manual for Urban Areas which was subsequently circulated to all local authorities. The manual was prepared with the assistance of major international consultants and reflects good international practice in relation to the provision of quality cycle facilities. The manual specifically addresses the need for continuity in relation to cycle facilities and shows examples where this can be achieved with particular reference to the question of continuity through junctions and at pinch points. [...] In September 1998 regulations were made to give legal effect to certain of the new arrangements proposed in the manual".

In relation to one-way streets the 1998 Traffic Signs regulations introduced by the minister provided for the addition of an exemption plate to the RUS 11 "No Straight Ahead" Sign. The exemption plate meant that certain traffic buses, taxis, cyclists etc could disregard the no straight ahead instruction. The regulations also provided that where the "no straight ahead" sign was used in conjunction with no-entry road markings on the road surface, a cyclist could pass the markings by means of a cycle track. However there is no requirement that the "no-straight ahead" sign must be used with no-entry markings as this would defeat its purpose in some applications.

RUS 011: NO STRAIGHT AHEAD

Here are examples from Galway of the no straight ahead sign used without any no-entry markings.

Figure: Examples from Galway of "No straight ahead" signs in operation. Left image: Station Road is closed to traffic other than buses, taxis and bicycles. Centre and right images: A section of Sea Road/William Street West is closed from two different directions – in this case the sign closes the road to all traffic at certain times. A point to note is that there do not have to be no-entry markings on the roadway.

Additional Context: Making Life Difficult for Children Cycling to School

One impact of the proposed scheme is that applicants will apparently ban cycling south on Newtownsmith. This is confirmed in my reading of their response. The Galway Educate Together Secondary School recently relocated to Newtownsmith and the apparent effect of the design will be to require cycle-traffic, including secondary students, to make a 2.4km detour to reach that location from the east. This is reviewed in more detail below but the wider context is an established pattern of actions by the applicants that make cycling access by schoolchildren in the city more difficult and inconvenient. See photos below.

Figure: No entry/one-way street restriction that recently (2023) appeared at the Small Crane in Galway. The railings on the left are the Colaiste Iognaid Secondary School Campus. Underneath is a map of the location from open street map showing Colaiste Iognaid and the associated national school Scoil Iognaid. The cluster of "P" symbols are the bike parking serving the schools. The applicants have made it unlawful for children on bikes to turn right towards Sea Road/William St West from the end of Raleigh Row. In the 1970s a third of Colaiste Iognaid students would have cycled to school.

Cycling access to other schools in the city had already been obstructed by this practice on the part of the applicants including St Nicholas Parochial School at Wood Quay, St Patrick's School at Lombard St, the "Bish"

Secondary School at Nuns Island. Prior to making the Small Crane one-way the applicants had previously chosen to make it unlawful for children cycling to Colaiste Iognaid and Scoil Iognaid to travel west along Raleigh Row. See also below the recent decision by the applicants to implement a permanent ban on cycling through the old core of the city – historically a main school route.

Additional Context: Recent Changes to City Centre Traffic Circulation Flood Street, Middle Street Cross Street

A recent example of the applicants acting in apparent opposition to state policy on active travel happened in February 2021. The applicants imposed new one-way street restrictions that closed down Flood St, Cross Street and Middle Street as an access route for cycle-traffic coming from the Wolfe Tone Bridge. The districts west of Wolfe Tone Bridge are an area of the city that historically has had among the highest levels of cycling participation. The result of the 2021 traffic rearrangements is that all cycle-traffic coming from the Wolfe Tone Bridge direction to access the city centre must now use Merchants Road, part of a multilane gyratory system. In the NCPF's Hierarchy of Solutions at Level 2 "Traffic Calming" multi-lane one-way systems are specifically mentioned for the difficulties they created for cycle-traffic (see above). This illustrates one of the typical reasons for providing two-way cycling on one-way streets; it may allow cycle-traffic to avoid roads that are much more unsuitable cycling environments. Merchants Road is one of the streets that is directly affected by the proposed scheme with significant increases in peak hour traffic predicted (See discussion below). The traffic changes made by the applicant also had the effect of cutting off cycling access to the public bike share station at Mainguard Street from the south and east.

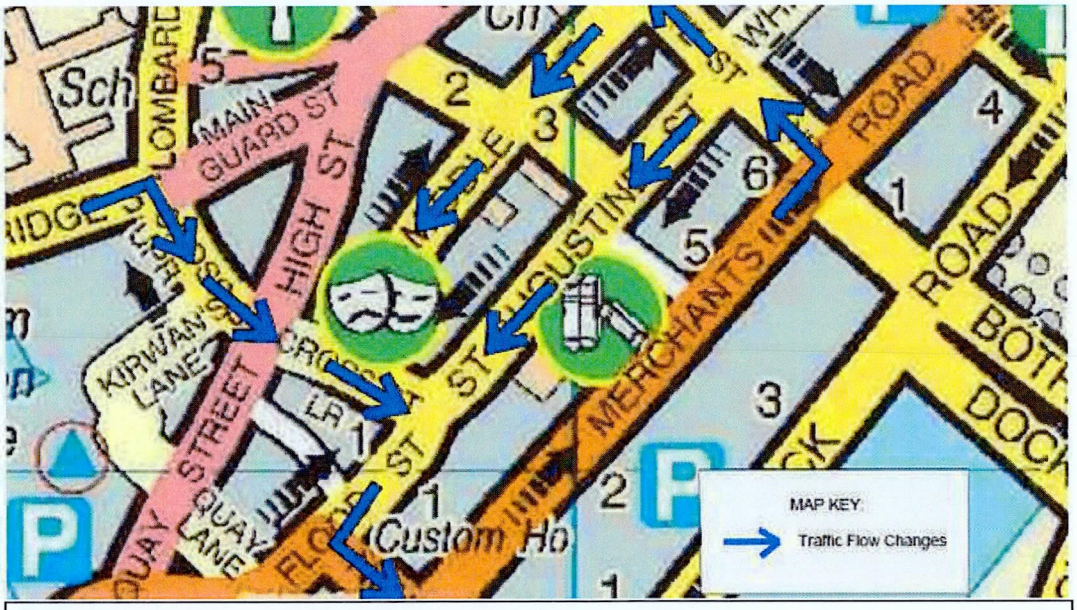


Figure: Map from the public announcement of traffic management changes made in February 2021. The direction of traffic flow was reversed on Cross St., the northeast end of Flood St., Middle St. and Abbeygate St lower. In defiance of long established state policy, no-attempt was made to maintain cyclist access from the west. All eastbound cycle traffic crossing the Wolfe Tone Bridge must now use Merchants Road.

Additional Context: The Banning of Cycling Through the City Core

During the pandemic when other local authorities were implementing "pop-up" cycling infrastructure, the applicants erected signage creating a permanent ban on cycling through the medieval core of the city. (The applicants did not implement any temporary cycling infrastructure on any main roads during the pandemic). RUS 055 "No Cycles" signs appeared around the core of Galway City. The signs have a legal effect of creating a permanent ban on cycling even though the same routes remain open to motor vehicles at certain times of the day. The 2019 *Traffic Signs Manual* states "It is strongly recommended that this sign should only be used where a separate cycle route has been specifically provided". In Galway City no other routes were provided and the applicants have since made cycling access to other streets more difficult. Those routes that are available – Dock Road/Merchants Road and the Salmon Weir Bridge are discussed below.

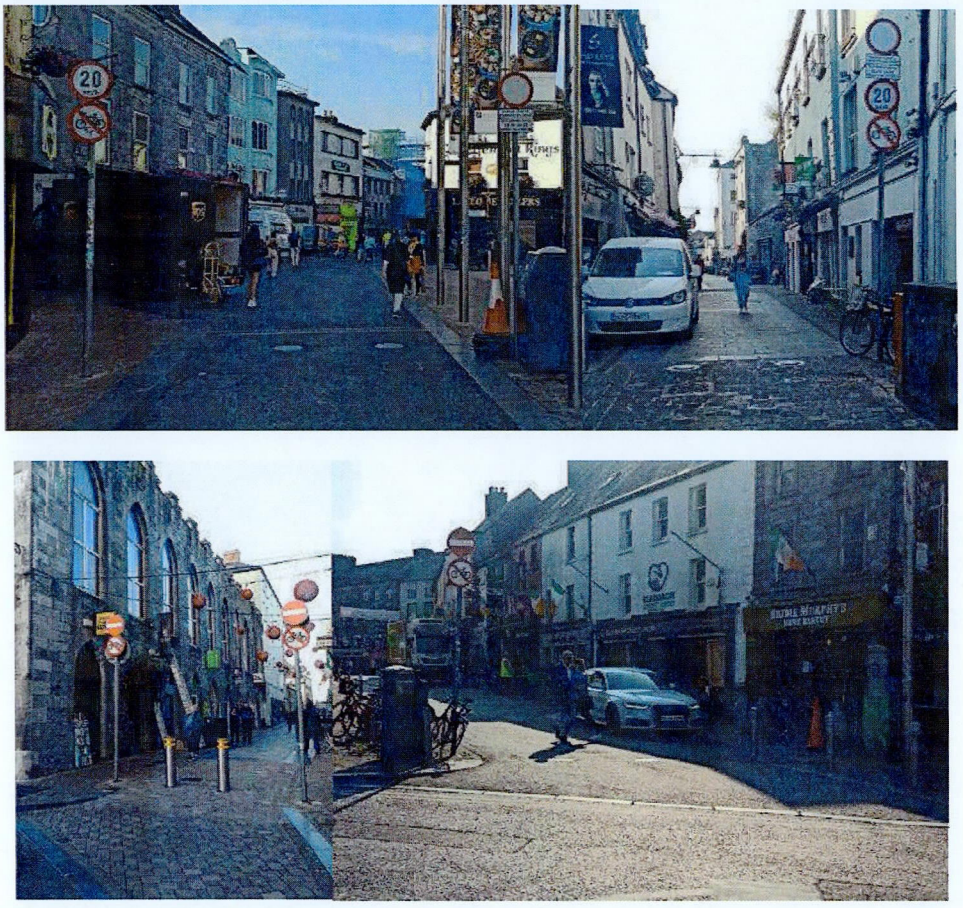


Figure: RUS 055 "No Cycles" signs that appeared around the core of Galway City during the pandemic response. The signs have a legal effect of creating a permanent ban on cycling even though the same routes remain open to motor vehicles at certain times of the day. The structure behind the parked car in the photo at bottom left is the Mainguard St. public bike share station. As discussed above, in 2021 the applicants made other traffic changes that had the effect of cutting off cycling access to this site from the south and east.

NO CYCLES, NO HORSES, ETC.

5.12.8 The No Cycles Sign, RUS 055, indicates that cycling is prohibited. It is strongly recommended that this sign should only be used where a separate cycle route has been specifically provided.

5.12.9 The No Animals Sign, RUS 056, indicates that animals are not permitted unless enclosed in vehicles.

RUS 055: NO CYCLES

Figure: Extract from the 2019 *Traffic Signs Manual* regarding the use of RUS 055 No Cycles Signs.

A point to note here is that in 1998 the official Irish guidance, *Provision of Cycling facilities A National Manual for Urban Areas* argued for the integration of cycle-traffic into car free zones and shopping areas. It states on page 68;

> **3.10 Cyclists and pedestrians only**
>
> Where to apply
>
> In shopping areas, residential areas and parks with access for pedestrians and cyclists only.
>
> Specification (Table 3.6; 3.7)
>
> - Always plan for two-way cycle traffic (it will be very hard to enforce one way cycle traffic in these situations).
>
> - With low volumes of both cyclists and pedestrians, simple road-markings might be sufficient, but a well designed street lay-out is preferable
>
> - In shopping areas it is advisable to allocate an exclusive space to cyclists in the middle of the road, identified by a different pavement and/ or colour. During off-peak hours the track can also be used to give access for loading vehicles.

The 2009 *National Cycle Policy Framework* also recognised that the current exclusion of cycle-traffic from pedestrian zones required intervention.

15.7 Further Legal Changes

We will introduce / explore other ideas to facilitate cyclists, such as the following:

(i) exempting cyclists from no-entry / one-way street restrictions in urban areas;

(ii) "logo-only" routes / shared lane road markings such as the California style "shared lane road markings" or equivalent treatments that have been tried in Australia and Scotland and elsewhere.

(iii) providing default exemptions of cyclists from restrictions in pedestrianised streets;

The 2011 the NTA and Department of Transport commissioned a report from Jacobs on public bike share for the regional cities. This report also argued for cyclist permeability through pedestrian zones in support of the proposed public bike schemes.

> **Recommendations are made on the complementary measures which would be needed as a new scheme is introduced. Perhaps the most important one would be an increase in permeability for cycle traffic in the city centres through the provision of two-way cycling on one-way streets, and by opening up pedestrianised areas to cycling where conditions allow.**

The supporting measures in the Jacobs report were also never actually implemented by Galway City Council. The Galway public bike scheme is reported to be one of the worst performing in the country with a daily rental per bike rate of 0.2 (Dublin is 6.2). These roads through the medieval core historically served as key cycling routes. An important context is that most of the secondary schools in the city are on the west side of the Corrib creating a requirement for children to cross the river from east to west to get to school.

Observations on the response provided by the applicant.

Issue Road Safety Audit (Response file page 51 (55)

The applicants offer as a defence for their proposals the fact that a Road Safety Audit was carried out. The Road Safety Audit is found in Appendix D of the Preliminary Design Report. In my view the furnished Road Safety Audit document is inadequate. (As an aside I would question the general fitness for purpose of the Irish Road Safety Audit process as currently practiced.) To give one example of an obvious problem with the furnished Road Safety Audit. According to chapter 6 Traffic and Transport of the EIAR various roads in the city that are currently used by cyclists are to experience increases in peak hour traffic as a result of the scheme. Examples include Lough Atalia Road and Bothar Na Long (Eurovelo 1) which are to experience increases of over 1,000 vehicles an hour at peak times. Various roads around and serving the university, Newcastle Road, St Mary's Road, Seamus Quirke Road are to experience increases in peak hour traffic. Fair Green Road and Bothar Na mBan, roads serving the city train station and therefore a key cycling route under longstanding national policy, are also to experience peak hour traffic increases, in the case of Fair Green Road by over 400%. None of these obvious impacts are considered by the Road Safety Audit in my reading of the document provided.

Issue (i) Design Standards (Response file page 52 (56))

The applicant's response states that "The use of DMURS is mandatory for all Local Authorities for all urban roads and streets"

Observation: In my view this response is inadequate. While there are Departmental Circulars that make DMURS and the *National Cycle Manual* mandatory those same circulars also set out a process for seeking derogations or departures from those standards. The recent Kirwan Roundabout replacement in Galway had a derogation from the pedestrian crossing requirements in DMURS. Longstanding observers of the situation in Galway City might find it curious that derogations can be sought when it involves increasing traffic capacity and convenience for motorists but derogations are not sought to retain capacity, safety and convenience for bicycle users. Observers might also find it difficult to understand why derogations are not sought for well described and documented aspects of road design practice that are simply not addressed by either standard. It is therefore open to the applicants to seek such a derogation, or for An Bord Pleanala to instruct that such a derogation be sought.

Issue Fr Griffin Road Response File Page 53 (57)

Summary of Response: The submission presents Fr. Griffin Road as a practical illustration of a key cycling route in Galway and why the lane widths on this route are unsuitable for cycling. However, Fr. Griffin Road is in no way comparable to the Cross-City Link in the Proposed Scheme. The Proposed Scheme intends to remove through traffic along the route, thereby removing the congestion and queuing presented as occurring along Fr. Griffin Road. It is not accepted that this is a reasonable comparison to the Proposed Scheme.

Observation: Applicant's response states that the modified roads will be open to general traffic between 7pm and 7am and that there will be a loading window between 10am and 1pm. This suggests that some of the modified roads will be open to through traffic for the greater part of the day. The experience of Fr Griffin road and the application of 3m lanes suggests that cyclists will be impeded whenever queuing takes place. Unless the applicants can guarantee that absolutely no traffic queues will ever happen on the modified roads then there is an assumption that the scheme will create obstacles for cycle-traffic in the city. It is worth noting that University Road is forecast to have peak hour traffic levels of 900 vehicles an hour (See Below). Is it reasonable to expect that no queuing will be expected at volumes of 900 vehicles an hour?

Fr Griffin Road is not the only example in Galway of what happens when the applicants have used 3m lanes on cycle routes. The photos below show an example of what traffic congestion looks like on a road with 3m lanes - in this case Rahoon Road. A point to note is what a bus looks like when it is occupying a 3m traffic lane. The photos also show the typical reaction of some bicycle users to this road design practice.

Lastly the planning application documents clearly state that Fr Griffin Road will be directly impacted by the scheme. Although it is a key cycle route in and out of the city, Fr. Griffin Road is a location where the applicants have already chosen to remove road capacity from cycle-traffic so as to cater for motor traffic. According to the planning documents, traffic using Fr. Griffin Road is increase by 60% in the PM peak. The photo below illustrates what this already looks like for cycle-traffic.

Road Name	AM/PM	Do Minimum Flows (PCU)	Do Something Flows (PCU)	Flow Difference (PCU)	% Change	66% Rule of Thumb - Do Minimum	66% Rule of Thumb - Do something
Father Griffin Road	PM	264	427	163	61.7%	174.24	281.82

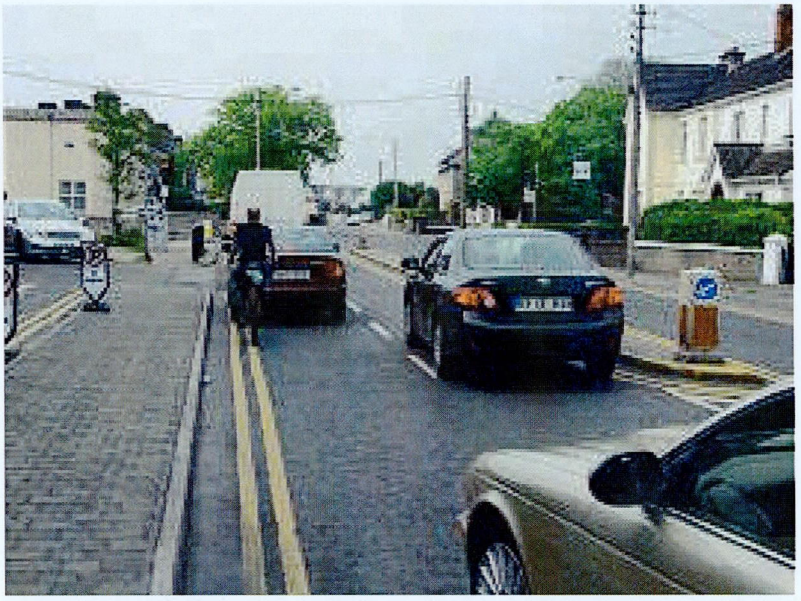


Figure: Photo illustrating cycling conditions on Fr. Griffin Rd outbound at the junction with Whitestrand Rd./Fr. Griffin Ave/the Crescent. The applicants have effectively removed road capacity from cycle-traffic by marking narrow stacking lanes at the traffic signals. Under Bus Connects Cross-City Link, evening rush hour traffic is forecast to grow by 61.7% with no cycling-provision proposed. Rush hour traffic using the Crescent, which is served by, and justifies, the right turn lane above is forecast to fall by 34%. The same issue of cyclists being blocked by traffic in narrow lanes was raised using the same photo in submissions on the draft *Walking and Cycling Strategy* (2010), the 2011-2017 *Galway City Development Plan* (2010), the *Galway Transport Strategy* (2015) and the 2017-2023 *Galway City Development Plan* (2016). Mr. Donal McDaid acted as a consultant on both the *Galway Transport Strategy* and *Bus Connects Cross-City Link*.

Issue University Road (Response File Page 54 (58))

Summary of applicant's response: The removal of through traffic along University Road and over the Salmon Weir Bridge would significantly reduce the volume of traffic along University Road, removing the necessity for segregated cycle tracks and providing space for wider footpaths, including bus shelters.

Observation: The morning peak-hour traffic on University Road is forecast at 844 vehicles per hour and 1099 vehicles per hour in the evening peak. This traffic will be occupying 3m lanes with no cycling provision. Based on the 2011 NCM, the calculated one-direction flow (66%) is 422 vehicles per hour in the morning and 527 in the evening. Both these numbers exceed the 360 vehicle per hour threshold given in the 2011 NCM for mixed traffic conditions at 50km/h. This was the speed limit that applied at the time the proposals were drafted.

In the Preliminary Design Report Section "4.5 Design Speed and Speed Limits" states as follows;

> "For regional roads (R863 University Road to St. Francis St. / R336 Eyre Square to Victoria Place & Merchants Road / R339 Forster Street to Old Dublin Road / R338 Old Dublin Road /R866 Headford Road to Eyre Square) the design speed is based on the existing speed limit.

> The current speed limit for the Proposed Scheme is 50km/h. It is not proposed to amend the speed limits throughout the Proposed Scheme and so the design speed shall be 50km/h"

So the designers proposed a mixed traffic regime on 3m lanes at traffic volumes and speeds were in apparent violation the recommendations of the design guidance they claimed to be following. The preliminary report notes that the elected city council may reduce the limits to 30km/h at a future date but the design assumes 50km/h limits.

Road Name	AM/PM	Do Minimum Flows (PCU)	Do Something Flows (PCU)	Flow Difference (PCU)	% Increase	66% Rule of Thumb - Do Minimum	66% Rule of Thumb - Do something
University Road	AM	1363	844	-519	-38.08	899.58	557.04
University Road	PM	1,002	639	-363	-36.23	661.32	421.74

The elected city council recently adopted a proposal for 30km/h limits that include University Road. This brings University road below the 666pcu threshold in the 2011 NCM for mixed traffic on roads with 30km/h speeds. However according to the 2023 draft *National Cycle Manual* these volumes place the University Road proposals into the category of "provision not suitable for a range of users". Under Transport Scotland's 2021 *Cycling by Design* mixed traffic is treated as "should be avoided" at two-way traffic levels above 400 vehicles per hour and 85th percentile speeds of 30km/h. *Under Local Transport Note 1/20 Cycle Infrastructure Design* mixed traffic at 400+ vehicles per hour is treated as "provision suitable for few people and will exclude most potential uses and/or have safety concerns".

Figure: Photo showing what a bus looks like in a 3m lane (Rahoon Road) in congested conditions. There is no room for a cyclist to pass, or if motor traffic was moving, for the bus driver to pass a cyclist within the same lane.

The applicant's proposal to use narrow lanes at locations like University Road suggests that bus drivers will not be able to overtake cycle-traffic if there is traffic in the opposing lane. This suggests that a side effect of the scheme is to limit buses to cycling speed at certain times of the day – particularly rush hour. According to the 2016 census, 10.67% of Galway 3rd level students used bicycles as their main form of transport. At a pre-application meeting with An Bord Pleanala on 13-Jan-2022 the applicants indicated that they expected a bus using the route every two minutes. See also discussion below regarding traffic impacts around the university and university hospital campus.

Issue St. Francis Street (Response Page 54 (58))

Summary of applicant's response: The design does not intend to reduce the footpath width any narrower than existing to reallocate this space to road carriageway.

Observation: St Francis Street is a location where cyclists are currently obstructed by traffic queuing for the lights at the Courthouse. In my original submission, I noted that the cross-section seemed to allow for standard 2m footpaths and 4.4m traffic lanes which should provide space for cyclists to maintain progress. The figures given in the EIAR documents forecast that traffic using Francis St. in the PM peak is to rise by 40% to 405 vehicles an hour. This suggests that queuing at the traffic lights and the associated obstruction of cycle-traffic is likely to get worse. The result of the applicants one-way street proposals are that cycle-traffic will now be prevented from using both Daly's Place and St Anthony's Place to reach the Headford Road. It seems all cycle traffic trying to reach the Headford Road must now go via Francis Street and the Courthouse traffic lights. I stand over the proposal that more road space should be provided by widening the traffic lanes to 4.4m while meeting the standard for 2m footpaths.

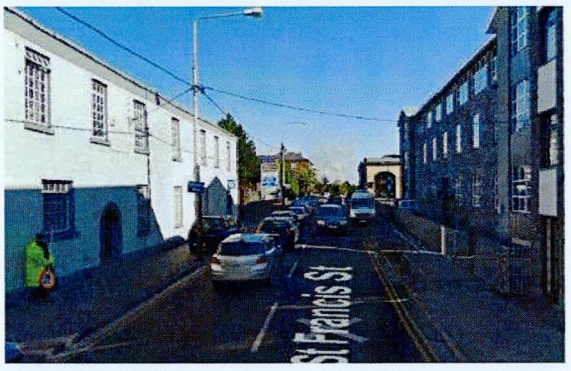


Figure: Extract from Google Street View dated June 2009 showing traffic queuing on St Francis Street. Under Bus Connects Cross-City Link, peak-hour traffic here is forecast to grow by 40% with no formal or informal cycling provision

Issue: Access to the City Train and Private Coach Stations

I will address the corridor comprising St. Brendan's Avenue, Bóthar na mBan, Prospect Hill, Bóthar Ui Eithir and Fairgreen Road together. The access points for both the train station and private coach station are located on Fair Green Road. This corridor represents a main access route to those destinations from the north. Fair Green road was not discussed in the original submission but access to the train station cannot be discussed without discussing Fair Green Road. These roads also include two public bike share stations at Prospect Hill and at the train station. There are also public bike share stations on the Headford Road; at Woodquay, the Dyke Road Car Park and the Galway Shopping Centre. This corridor represents an obvious route for cycle-traffic between those stations and the train station or other city centre bike share locations. In mainstream European transport planning public transport interchanges would be considered key locations for bike share services.

Figure: Captioned Google Satellite View screen grabs of sections from the corridor serving the train and private coach stations, South to North (L to R) Fair Green Road, Bóthar Ui Eithir and Bóthar na mBan. In direct conflict with longstanding state policy, there is no cycling provision directly serving the train station. In all the sections shown there are verges, waste ground or public lands that the designers have made no apparent attempt to use.

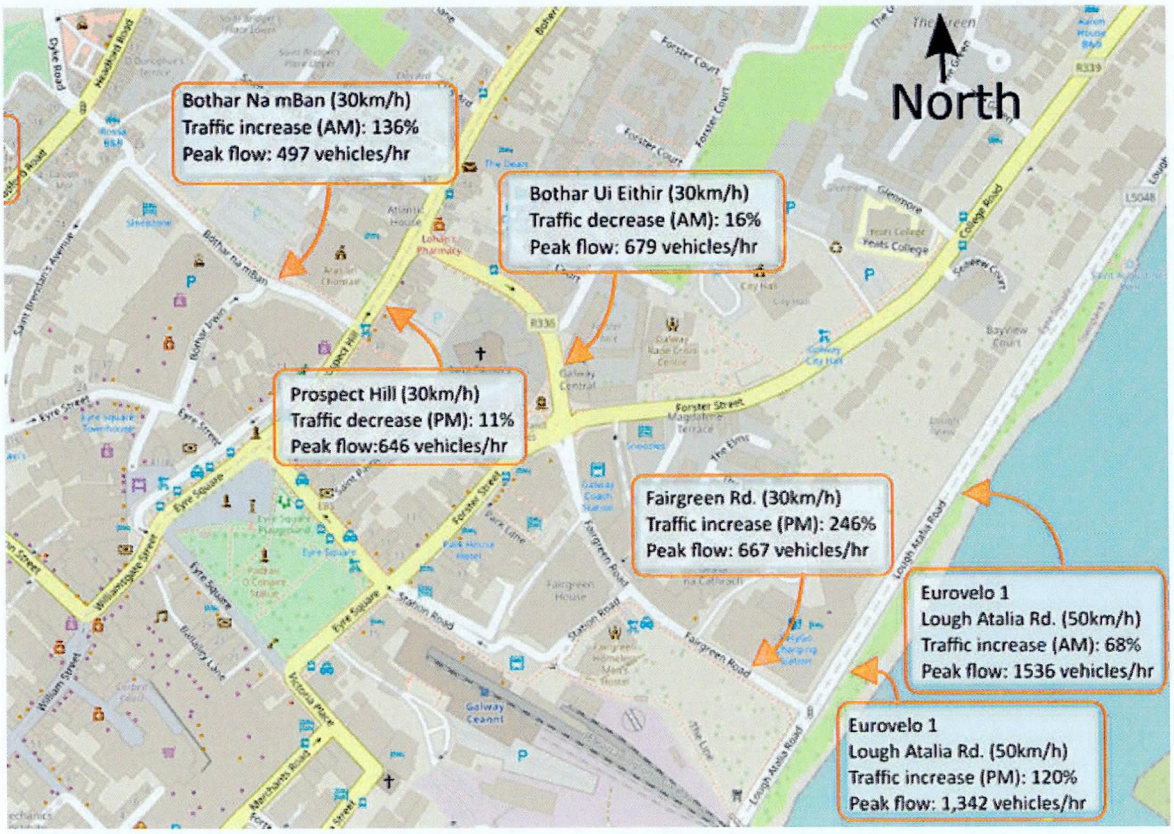


Figure: OpenStreetMap extract labelled to show predicted traffic changes on the roads serving the main city and county public transport interchanges.

The response of the applicants and their consultants regarding this corridor is "This section of the Galway City road and street network has not been identified as part of the Galway Cycle Network in the GTS." I note that in the drawings Fairgreen Road also has no apparent cycling provision whether formal or informal presumably for the same reason i.e. Fairgreen road is not part of the cycle network identified in the GTS. The applicants also appear to dispute the availability of space along this corridor.

Before the discussing the actual streets I think a separate observation is needed on the opinions of the applicants and their consultants. It is a long established concept in mainstream European transport planning that sustainable travel should be treated as integrated and multi-modal in nature. In my view most experts in sustainable transport planning would be bemused by the idea that in 2023, in a northern European university city, the local authority and their consultants would be arguing that roads directly serving the main public transport interchanges are not considered part of the nominated cycling network.

The 2009 *National Cycle Policy Framework,* which applied at the time the GTS was compiled, had a specific objective in relation to safe cycling access to public transport interchanges.

8.1 Safe Routes to Stations

We will require Local Authorities to provide safe and attractive cycling routes to PT stations / stops in collaboration with the PT operator. This might include, for example, the creation of a new entrance or route across lands owned by the PT agency / provider. there needs to be high quality cycling parking at all PT stops and stations. It is noted that of all train travellers in the Netherlands, 33% use the bicycle to get between home and the station. (Ministerie van

> verkeer en Waterstaat, 2007). There also needs to be improved provision for the carriage of bikes on public transport vehicles. The main market here is not daily commuters who will generally leave their bikes at one (or both) end(s) of the PT trip but those recreational / tourist users who want to bring their own bikes to the scenic destination.

In defence of this opinion the applicants and their consultants refer to the *Galway Transport Strategy* which, in defiance of the national policy that applied at the time, does not treat various key routes leading the train station as being part of the proposed cycle network. One of the consultants on Bus Connects Cross-City Link is Donal McDaid who was also a consultant on the *Galway Transport Strategy.* Mr. McDaid appears to be Brian Burke's superior on the Bus Connects project. So a sequence occurs as follows, Mr. McDaid was a senior contributor on a *Galway Transport Strategy* document that apparently fails to reflect commonly understood principles in transport planning and national policy. His subordinate, Mr. Brian Burke then goes on to use that apparent failure as a reason for similar omissions in the proposals for Bus Connects Cross-City Link. In my view there are various other problems with *Galway Transport Strategy*. Instead of getting into that here I will add a note at the end with regard to the apparent conduct of Mr. McDaid and his subordinates in relation to the *Galway Transport Strategy*.

I have pulled the EIAR traffic forecast values for these roads into the table below. (It is assumed here that what is referred to as "Prospect Hill" in the traffic forecasts is the section of road between Bothar Na mBan and Bothar Ui Eithir. In the drawings this is shown as "Bohemore Road"(Sic)).

Road Name	AM/PM	Do Minimum Flows (PCU)	Do Something Flows (PCU)	Flow Difference (PCU)	% change	66% Rule of Thumb - Do Minimum	66% Rule of Thumb - Do something
Bothar Ui Eithir	AM	1223	1029	-194	-16%	807.18	679.14
Bothar Ui Eithir	PM	796	954	158	+20%	525.36	629.64
Bothar Na Mban	AM	320	754	434	+136%	211.20	497.64
Bothar Na Mban	PM	270	605	335	+124%	178.20	399.3
Fairgreen Road	AM	292	1,011	719	+246%	192.72	667.26
Fairgreen Road	PM	184	944	760	+413%	121.44	623.04
Prospect Hill	PM	1,105	979	-126	-11%	729.30	646.14

In all cases the numbers exceed the 360pcu upper threshold given in the 2011 NCM for mixed traffic conditions at 50km/h. This was the speed limit and stated design assumption that applied at the time the proposals were drafted. Bothar Ui Eithir and Fairgreen road exceed the 666pcu upper threshold given in the 2011 NCM for mixed traffic conditions at 50km/h. Prospect Hill is only 20 vehicles an hour below that threshold. With regard to the 2023 draft of the NCM, all of the roads can be categorised as "provision not suitable for a range of users" (traffic levels above 400 vehicles per hour at 30km/h limits). Along this corridor there are significant sections of lands that could be considered adaptable to providing cycle facilities within the corridor with no impact on the existing or proposed allocations of road functions.

Fair Green Road (South)

The southern end of Fair green road is bounded on its southwest side by a 2.5-3m strip of waste-ground (it is nearly 5m wide in places). The total width is 19-20m. It seems to me there is no engineering reason why cycle facilities could not be provided here to link the train station with the proposed cycle route coming in Lough Atalia. Lough Atalia Road is already a designated international cycling route (Eurovelo 1)

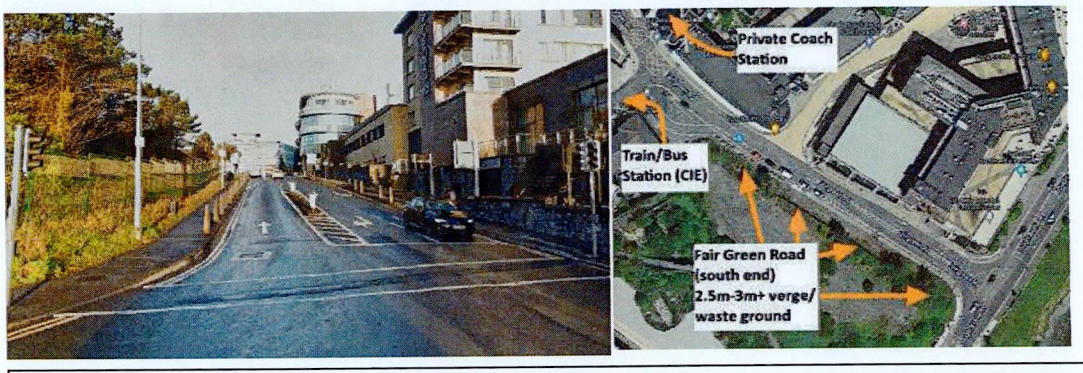


Figure: Google Street view and Satellite view images of the southern end of Fairgreen Road. Fairgreen road is the only way for cycle-traffic to access the train station or private coach station. Although there is a wide strip of waste ground on one side of the road, no cycling facilities are proposed. Under Bus Connects Cross-City Link, PM peak traffic is forecast to grow by 400%, AM peak traffic by 246%.

Northern Section of Fair Green Road

The available space here is of the order of 14m building line to building line. Within this there would be space for 2 x 2m footpaths 2x2m cycle tracks and 2x3m traffic lanes. A complicating factor would be the taxi rank and loading for the Private Coach Station. However, in my view a reasonable observer would perceive that alternatives are available for both. There is a large two-level car park underneath the Private Coach Station. This car park can be accessed directly from inside the coach station. It seems the coach station itself has only operated at 2/3rds capacity since it opened. There are 14 bus bays but I understand that only 9 are in operation. In my view, a reasonable observer would conclude that the space occupied by the 5 disused bays could be refactored for a taxi rank and set down area. The bus operators themselves have their depots at other locations and do not park buses in the coach station when not in use. The Private Coach Station is owned by Galway City Council and was built with public funds.

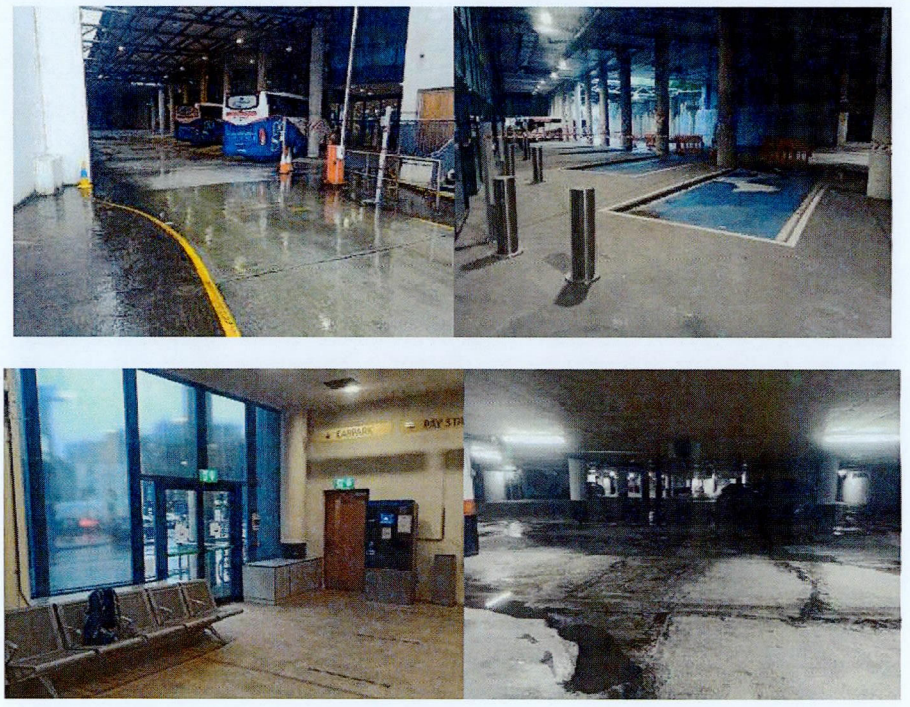


Figure: Photographs from the Private Coach Station on Fairgreen Road. Clockwise from top left, the entrance with the operational bus bays nearest the camera, some of the five non-operational bus bays at the back of the station, one of the two levels of underground car-parking beneath the coach station and the door to the underground car park inside the station.

Bóthar Ui Eithir

Along most of the west side Bóthar Ui Eithir the scheme drawings show a 4.5m verge. Taking the verge into account there is 20m width available within the corridor. There is a pinch point at the southern end of the road where the grounds of St Patricks church run along the boundary (the width here is 13.5m) however the lands inside the boundary are green space. The scheme "Landscape General Arrangement" drawings show this part of the church grounds as "retained vegetation". It seems to me it could be possible to CPO enough width without impacting any of the buildings within the church grounds. Just south of the entrance to the church grounds there is another pinch point at the corner of the building that currently houses the driver (theory) testing centre. At this point in the road the width between building curtilages is 16.7m. The drawings show a short length of bus lane marked here for buses turning right into Forster St. Within this 16.7m there is still scope for giving cyclists space by providing 2 x 2m footpaths 2 x 4.8m traffic lanes and a 3m central bus lane.

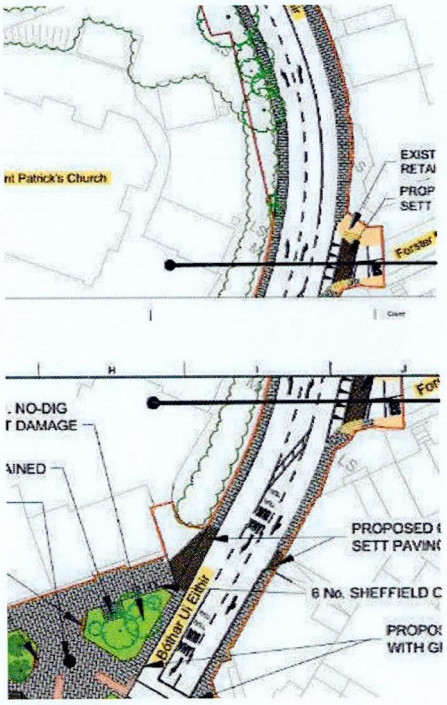
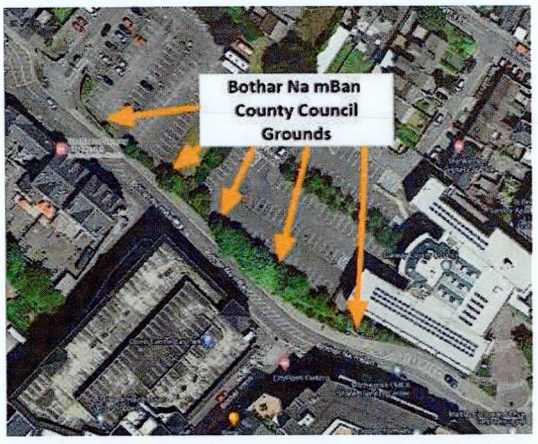


Figure: Extracts from design report landscape drawings BCG-LA-00-05 and BCG-LA-00-07. The drawings show the small section of St. Patrick's Church grounds along the west boundary of Bóthar Ui Eithir as "retained vegetation" (green lines). This establishes that the designers are aware this land could be CPOd without affecting any buildings within the church grounds.

Bóthar na mBan



All of the land along the north eastern boundary of Bóthar na mBan is already in public ownership as it comprises the grounds of the Galway County Council Buildings at Prospect Hill. The existing land use is as the council car-park or green verges. The vegetation at this location is not shown in the landscape drawings. There is one section at the south east end of Bóthar na mBan where the council buildings are close to the road edge. The existing width at this point is 17m, which should allow for the incorporation 2m footpaths, 2m cycle facilities, 3m traffic lanes and the existing loading bay (3m) within the existing road space. It seems to me that most reasonable people would struggle to see an engineering reason why a 4m a strip of county council land could not be transferred to the city council for the purpose of creating a coherent cycling link with the city's (and county's) main transport interchanges. This would also have the effect of making the county council offices more accessible for people arriving in the city by public transport and switching to the public bike share. There is a bikes share station directly outside the county council offices on Prospect Hill.

The Implications of the Applicants Traffic Volume Arguments: Lough Atalia Road

Under Bus Connects Cross City-Link Lough Atalia Road is predicted to experience significant traffic impacts. The road is in the 50km/h zone and the predicted traffic increase is over 1,000 vehicles per hour in the PM peak. The calculated inbound flow is 1342 vehicles per hour which is multiples of the 360 vehicle per hour threshold for mixed traffic in the 2011 *National Cycle Manual*. Both in theory and practice Lough Atalia Road is a key route for cycle-traffic between the east of the city and the city centre and also for cycle-traffic moving between the two sides of the Corrib. In contrast to the gradients on College Road, Lough Atalia road is flat since follows the coast. It also leads directly to the Wolfe Tone Bridge. Lough Atalia Road is a natural route between the city and eastern suburbs such as Mervue, Ballybane, Castlepark, Doughiska and also the concentration of industry at Parkmore.

Road Name	AM/PM	Do Minimum Flows (PCU)	Do Something Flows (PCU)	Flow Difference (PCU)	% Change	66% Rule of Thumb - Do Minimum	66% Rule of Thumb - Do something
Lough Atalia Road	PM	922	2,034	1,111	120.50	608.52	1342.44
Lough Atalia Road	AM	1,384	2,328	944	68.21	913.44	1536.48

Lough Atalia is also officially designated as an element in an international cycling route Eurovelo (1) the Atlantic Coast Route. This starts in northern Norway and follows the Atlantic coast down through Scotland, Ireland, England, France and Portugal. There is also a public bike share station on Lough Atalia Road at the playground near the junction with College Road. Lough Atalia Road is the natural route between this bikeshare station and the bike share station at the train station. Lough Atalia is also a natural route for cycle-traffic trying to access the train station itself and the private coach station.

Figure: On the left a screengrab from Google satellite view showing Lough Atalia Road and the green verge along the shore. On the right a road sign on Lough Atalia Road showing that this is part of Eurovelo 1, the Atlantic Coast Cycling Route, and directing Eurovelo cycle-traffic into the Dock Road/Merchants Road Gyratory system. See below for a discussion.

On paper Lough Atalia road would appear to be an ideal candidate for fast delivery segregated cycling provisions. It is already bounded on the sea side by an extensive green strip. The coastal location also means there are no junction conflicts to be resolved if a two-way cycle-path was provided on the sea side. The footpath on the sea side is spacious, 2.7m-2.9m wide for much of its length. Extending this by 30cm could create a 3m two-way cycle track which could be shared with foot-traffic. Alternatively there would appear to be scope for a dedicated cycle track plus a footway.

Figure: Lough Atalia Road: On the left a person on a bicycle cycles on the road in front of a fuel tanker – Lough Atalia is the main road to the city harbour and a large fuel depot. On the right a lady on a bicycle uses the footpath in preference to cycling mixed in with motor traffic. The existing footpath is 2.7-2.9m wide. The applicants erected the no-cycling signs on Lough Atalia when a new public bike share station was installed at the northern (College Road) end in 2018. The signs were removed in mid-2022. Under Bus Connects Cross-City Link, peak hour traffic on Lough Atalia Road is forecast to grow by over 1,000 vehicles an hour with no cycling provision provided.

The Implications of the Applicants Traffic Volume Arguments: The Roads Accessing the University

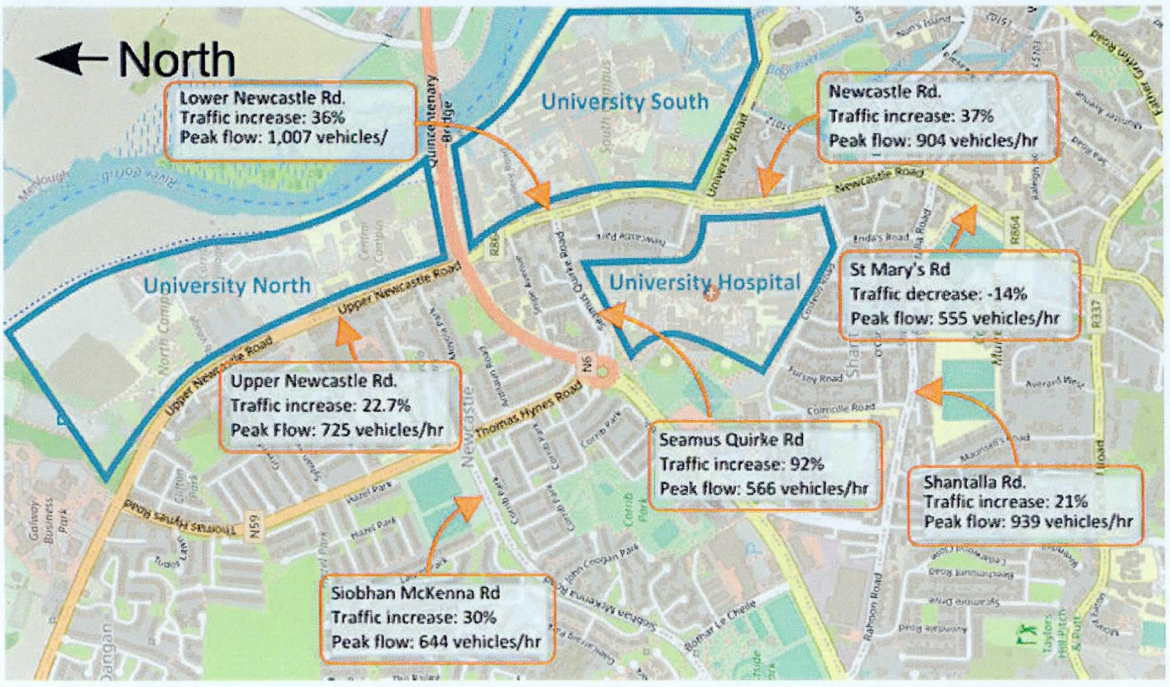


Figure: OpenStreetMap extracts labelled to show forecast traffic changes around the university and university hospital campus. The 2011 *National Cycle Manual* gives a single direction flow of 360 vehicles per hour as the upper threshold for mixed traffic on 50km/h roads. This threshold is exceeded on all the indicated roads with no cycling provision proposed. In the case of Seamus Quirke Rd, Newcastle Road and Lower Newcastle Road, the size of the predicted traffic increase is larger than the 360 vehicle cut off.

In mainstream transport planning, universities are treated as key locations likely to be a source and destination for cycle-traffic. According to the 2016 census 10.67% of Galway 3rd level students used bicycles as their main form of transport, the second highest level in the country after Dublin at 11.1%. In 1996 the proportion of Galway students using bicycles was 20%. The university campus and the associated University Hospital Galway grounds also host four of the city's public bike share stations. In my view, the Bus Connects Cross-City Link proposals have a strong potential to negatively impact cycling access to both locations. Since the roads impacted also lie on key cycling routes into the city there is also an implied general impact for cycling to and from the city. In my view the current Bus Connects Cross-City Link proposals represent a threat to the use of bicycles for accessing the university and city generally.

The table below sets out the predicted traffic changes for the roads serving the university and the hospital campus.

Road Name	AM/PM	Do Minimum Flows (PCU)	Do Something Flows (PCU)	Flow Difference (PCU)	% Change	66% Rule of Thumb - Do Minimum	66% Rule of Thumb - Do something
Seamus Quirke Road (Lower Newcastle Road - Browne Roundabout)	AM	447	858	411	+92%	295.02	566.28
Lower Newcastle Road (University Road - Seamus Quirke Road)	PM	1,121	1,527	406	+36.2%	739.86	1007.82
Lower Newcastle Road (University Road - Seamus Quirke Road)	AM	1,270	1,643	373	+29.4%	838.20	1084.38
Newcastle Road	AM	998	1,371	372	+37.3%	658.68	904.86
Seamus Quirke Road (Lower Newcastle Road - Browne Roundabout)	PM	233	528	295	+126.6%	153.78	348.48
Newcastle Road	PM	953	1,241	287	+30.1%	628.98	819.06
Shantalla Road	AM	1,174	1,423	250	+21.3%	774.84	939.18
Siobhan Mckenna Road	AM	748	976	228	+30.5%	493.68	644.16
Lower Newcastle Road (Seamus Quirke Road - Snipe Av)	PM	896	1,099	203	+22.7%	591.36	725.34
Upper Newcastle Road	PM	896	1,099	203	+22.7%	591.36	725.34
Shantalla Road	PM	778	944	165	+21.2%	513.48	623.04
Siobhan Mckenna Road	PM	699	819	119	+17%	461.34	540.54
St Mary's Road	AM	737	841	104	+14.1%	486.42	555.06
Thomas Hynes Road	AM	664	563	-101	-15.2%	438.24	371.58
St Mary's Road	PM	690	571	-119	-17.3%	455.40	376.86

The Implications of the Applicants Traffic Volume Arguments: Bothar Na Long and the Dock Road/Merchants Road One-Way System

Submission issue (viii)

The submission notes that the proposed scheme does not propose to provide a contra-flow cycle track along Merchants Road. The submission suggests that a cycle track should be provided along Merchants Road between Abbeygate Street and Victoria Place as the beginning of an alternative circulation route into and through the old core of the city.

Applicant's response (viii)

> "The proposed scheme incorporates a short section of Merchants Road, between Forthill Street and Victoria Place. The section of Merchants Road between Abbeygate Street and Forthill Street are outside the scope of the proposed scheme."

Observation: Bothar Na Long/Dock Road/New Doc Street/Merchants Road/Forthill Road make up what is effectively a large roundabout (Sometimes termed a "gyratory" in the traffic management literature). Such systems of multi-lane one-way streets are viewed as cycling hostile and were specifically cited in the 2009 *National Cycle Policy Framework* as requiring remediation. There are no cycle facilities and cycle-traffic is mixed in with motor traffic. Along Dock Road itself there are hostile pedestrian guard rails beside the roadway at handlebar height (See below). Under Bus connects Cross-City Link, this one-way system is one of only two routes by which bicycle users approaching the city from the east can access the historic core of the city (the other is the Salmon Weir Bridge). Dock Road is also the only route available for westbound cycle-traffic to access the Wolfe Tone Bridge and the Claddagh area. It is worth restating that that applicants have banned cycling on the Shop St/Mainguard Street corridor through the city at all times even when those streets remain open to motor traffic. It is also worth restating that the applicants recently rearranged the one-way system at Flood St., Cross St and Middle St in a manner that removed these streets as a means for cycle-traffic to access the city core from the Wolfe Tone Bridge direction. The applicants also implemented a permanent ban on cycle-traffic using Abbeygate Street in either direction even at those times when it remains open to motor traffic.

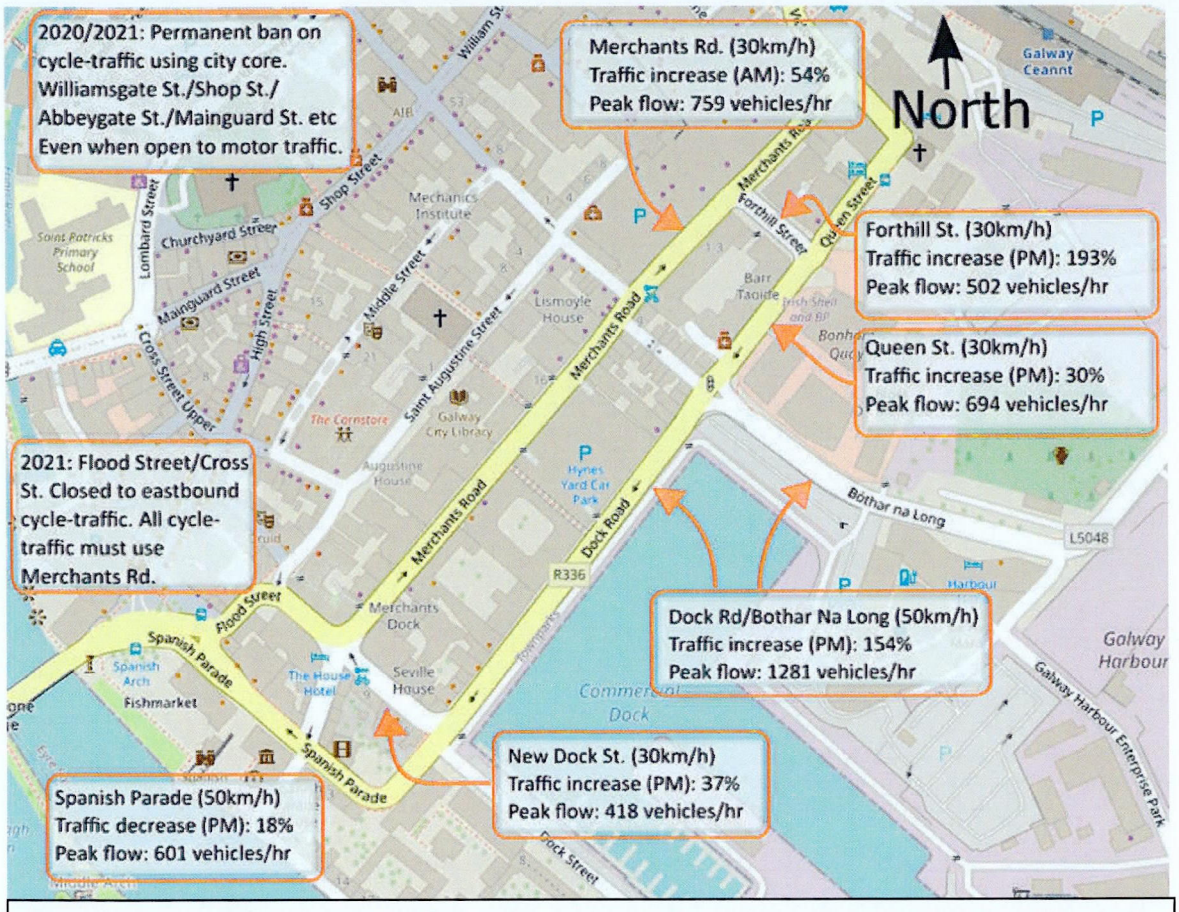


Figure: Open streetmap extracts labelled to show forecast traffic changes around the Dock Road/Merchants Road Gyratory (Roundabout) system. The 2011 *National Cycle Manal* gives a single direction flow of 360 vehicles per hour as the upper threshold for mixed traffic on 50km/h roads. This threshold is exceeded on all the indicated roads with no cycling provision proposed. In the case of Bothar Na Long/Dock Road, the size of the predicted traffic increase is multiples of the 360 vehicle cut off. In recent years the applicants have implemented a complete ban on cycling through the city core and have made changes to other streets meaning that all eastbound cycle-traffic must use Merchants Road. For westbound cycle-traffic Dock Road is the only way to reach Wolfe Tone Bridge.

The applicants argue that at places where traffic is predicted to fall cycle facilities do not need to be considered as they are lower in a hierarchy. The reverse of this argument also applies. If the scheme is increasing vehicle movements at particular location then this creates a need to consider if additional interventions are needed to support cycling such as more road space or cycling facilities. It is also relevant that there are public bike share stations at New Dock Street and Merchants Road (See blue symbols in map above). It is also relevant that GTS appendix on cycling infrastructure (Appendix F) and the proposed cycle network does not mention the public bike share scheme at all.

Road Name	AM/ PM	Do Minimum Flows (PCU)	Do Something Flows (PCU)	Flow Difference (PCU)	% Change	66% Rule of Thumb - Do Minimum	66% Rule of Thumb - Do something
Bothar Na Long (50km/h)	AM	1,174	2,043	869	+74%	774.84	1348.38
Bothar Na Long (50km/h)	PM	763	1,942	1,179	+154.5 %	503.58	1281.72
Spanish Parade (50km/h)	AM	1115	912	-203	-18.2%	735.9	601.92
Merchants Road (Saint Nicholas Street - Forthill Street) (30km/h)	AM	845	1,150	305	+36.1%	557.70	759
Queen Street (Bothar Na Long - Forthill St) (30km/h)	PM	806	1,052	246	+30.5%	531.96	694.32
Flood Street (30km/h)	PM	809	1,034	225	+27.8%	533.94	682.44
Forthill Street (30km/h)	AM	534	847	313	+58.6%	352.44	559.02
Forthill Street (30km/h)	PM	260	762	502	+193.1 %	171.60	502.92
Merchants Road (Saint Nicholas St - Forthill St) (30km/h)	PM	461	692	230	+49.9%	304.26	456.72
New Dock Street (30km/h)	PM	461	634	173	+37.5%	304.26	418.44

Table: Road sections in the docks district forecast to have Do Something Peak-hour traffic above the 360 vehicle per hour threshold for mixed traffic in the 2011 *National Cycle Manual*.

Figure: Google Street View image of traffic on Merchants Road. In February 2021, the applicants made changes to the city centre one-way system that had the effect of blocking eastbound cycle traffic from using Flood Street and Cross Street to travel east. All eastbound cycle traffic crossing Wolfe Tone Bridge must now use Merchants Road, which has no formal cycling provision. Under Bus Connects Cross-City Link, the traffic volumes using Merchants Road are to increase by 36.1% in the AM peak and 49.9% in the PM peak. Forecast AM peak traffic volumes (759 vehicles/hr) are to exceed the thresholds for mixed traffic in the 2011 *National Cycle Manual*. No provision is proposed for cycle-traffic.

Figure: Google Street View image of Dock Road. Under Bus-Connects Cross-City Link, this is the only way for cycle-traffic to reach Wolfe Tone Bridge from the east. Under Bus Connects Cross-City Link, traffic volumes using Bothar Na Long/Dock Road are to increase by 74% in the AM peak and 154.5% in the PM peak. Forecast traffic volumes (2,043 AM peak/1,942 PM peak) are to significantly exceed the thresholds for mixed traffic at 50km/h in the 2011 *National Cycle Manual* (360 vehicles per hour). No provision is proposed for cycle-traffic. Galway City Council is the sole shareholder in the Galway Harbour Company. There is 20m available between the quay edge and the building line.

Issue Daly's Place and St Anthony's Place rearrangements (page 62 in response document)

Response by applicants:

> "Both Daly's Place and St. Anthony's Place are not sufficiently wide enough to provide footpaths, a one-way traffic lane and a cycle track along their length within the existing street curtilage (both are bounded directly by buildings). It is unclear if the submission is suggesting that contra-flow lanes should be provided or acknowledging the constraints preventing it. In either event, it is not considered practicably feasible to provide a contra-flow cycle lane at these locations as part of the Proposed Scheme."

Observation: The impact of closing Daly's Place to eastbound cyclists is not trivial. Sustainable transport planners will sometimes argue that bicycles should be thought of as "mobile shopping baskets". Below is worked example of the impact for a prospective shopper who wishes to travel from Eglington St to Marks and Spencer at the top of Eyre St. Bearing mind also that for some older cyclists a bicycle is a form of mobility aid. Arthritis or other joint conditions may make walking uncomfortable but cycling is a low impact form of transport that allows people to stay mobile for longer.

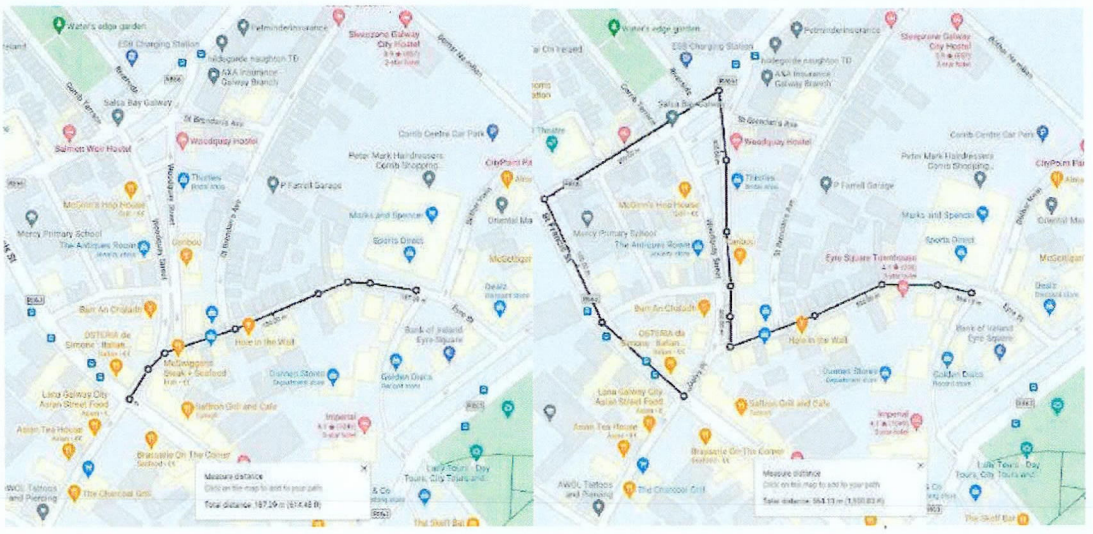


Figure: Google measuring tool used to show the impact of closing Daly's Place to bicycle users travelling east. On the left the current journey from Eglington Street to Marks and Spencer at the top of Eyre St is 190m. On the left the new route under Bus Connects Cross-City Link is 560m. As well as being longer the new route also involves turning right at the traffic lights at the Town Hall Theatre/St. Francis St. As stated above, under the plans for Francis St., cyclists are also likely to be forced to wait among queues of motor vehicles.

The same diversion will also apply for people travelling towards the Headford road and north eastern suburbs by bicycle. The applicants have already made cycling access to the city core from the eastern suburbs more difficult and inconvenient relative to cycling access from the west, the Daly's Place proposals reinforce this pattern.

As noted above, previous Irish and UK guidance, and the current Irish Traffic Regulations provide for contra-flow cycling arrangements without segregation at traffic speeds of 30km/h or less and traffic volumes of less than 1,000 vehicles per day. Daly's Place, St Anthony's Place and Court Lane are to be in the new 30km/h city centre speed limit zone. The in EAIAR Vol 2 Chapter 6 the traffic forecasts state that traffic volumes using Daly's Place are expected to fall by 100% in both the AM and PM peaks. The traffic forecasts show zero traffic using Daly's Place at those times. This would seem to put Daly's place below long understood thresholds for allowing unsegregated contraflow cycling. I would also note that any traffic trying to reach Daly's Place from Wood Quay first has to pass over a speed ramp/entry treatment shown in the drawings. As noted above, current UK guidance allows for unsegregated contraflow cycling at lane widths as low as 2.6m. By my measurements the narrowest point in Daly's Place is 6.4m. If 1.8m footpaths were used that would leave 2.8m for a traffic lane. Alternatively if effectively zero motor vehicles are expected to use Daly's place then perhaps it could simply by refactored as a mini shared space or plaza with a raised table entry-treatment at footpath height. If a raised entry treatments are already proposed for the southern end of Wood Quay and also St Anthony's Place then why not also within Daly's Place?

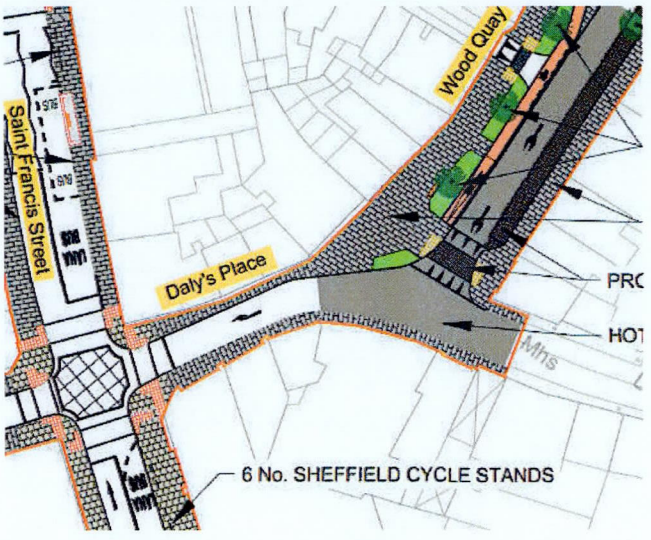


Figure: Extract from Preliminary Design Report Drawing BCG-LA-00-04 showing Daly's Place. A point to note is the raised entry/speed ramp/table at the southern end of Wood Quay. The traffic forecasts provided in the planning reports predict zero traffic will use Daly's Place at peak travel hours yet it is still proposed to be blocked to cycle-traffic travelling east.

The applicants' report does not provide traffic forecasts for St Anthony's Place and Court Lane. It seems to me that both these streets will be less useful to drivers than Daly's Place. Therefore if the peak hour traffic using Daly's Place is to fall to effectively zero, then it is reasonable to expect similar traffic levels at St Anthony's Place and Court Lane. This would seem to bring both locations within a long established threshold (<1000 vehicles per day) for unsegregated contra-flow cycling. I also note that there is to be a raised entry treatment at the entry to St. Anthony's Place. This can be expected to further slow entering vehicles and hence support the retention of two-way access for cycle-traffic.

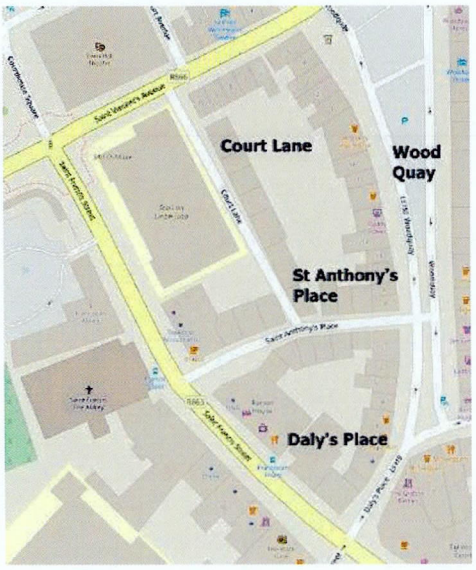


Figure: Extract from open street map showing locations of Daly's place St Anthony's Place and Court Lane. All these streets are to be one-way with no provision for two-way cycling. Traffic forecasts provided in the planning reports predict zero traffic will use Daly's Place at peak travel hours yet it is still proposed to be blocked to cycle-traffic travelling east. Traffic movements on St Anthony's Place and Court Lane are likely to be lower than at Daly's Place.

Issue Cycling Access to Newtownsmith

Observation: The Galway Educate Together Secondary School recently relocated to the old Mercy Secondary campus at Newtownsmith. So Newtownsmith now directly serves a school as well as being the location where a new walking and cycling bridge crosses the river. Newtownsmith also serves as a cycling route to the city centre from the University as it allows cyclists to avoid a right turn at the traffic lights at the Courthouse/Town Hall Theatre. It is also used by parents cycling small children to school from the Headford road direction as they take a route through Woodquay to avoid traffic and then travel south along into Newtownsmith to use the canal walk.

In my original submission, I could have done a better demonstration of the extent of the diversions imposed on cycle-traffic by making the northern section of Newtownsmith one-way north bound. I have reworked the map to better illustrate the issue. Under Bus Connects Cross-City Link, a secondary student trying to lawfully access the Educate Together School Campus by bicycle from the east faces a diversion of 2.4km.

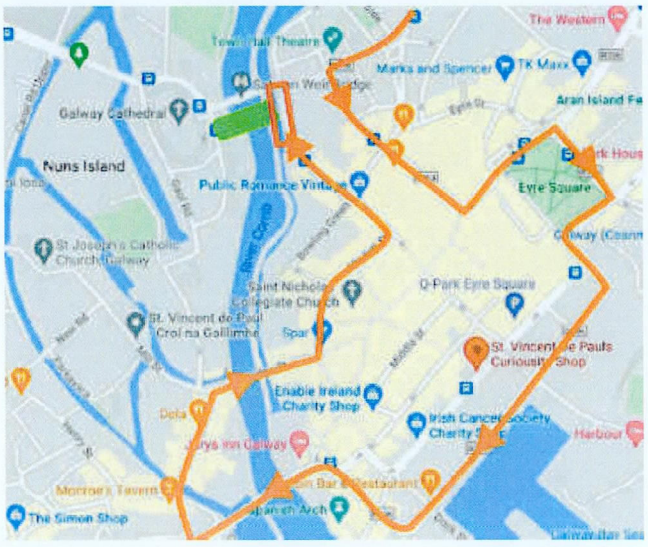
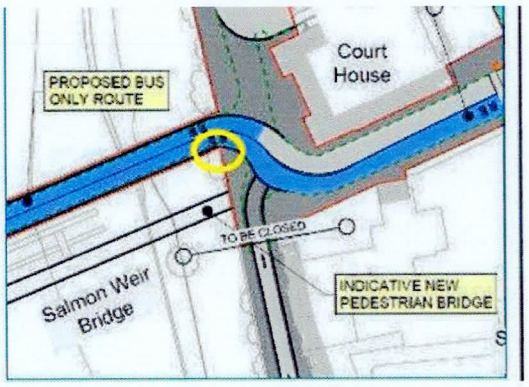


Figure: Extract from Google Maps showing the location of the new Pedestrian and Cycle Bridge (green bar). The red box shows the proposed new one-way street restriction. The orange arrows show the new route that will be needed for cyclists to access the secondary school or the new bridge to travel west. To reach Newtownsmith, a cyclist coming from the east would need to follow the hostile one-way street system around the docks - cross the river at Wolfe Tone bridge - and double back via Dominick St - crossing the river again at O'Brien's bridge and then follow the one-way street system around to the bridge, a diversion of 2.6km.

In their response, the applicants and their consultants make claims with regards to their intentions towards cyclists. I will copy verbatim the relevant text from the preliminary design report.

> 3.2.3 Newtownsmith/St. Francis Street
>
> 3.2.3.1 General vehicular provision
>
> From the eastern end of Salmon Weir Bridge, it is proposed to close Waterside (to the west of the Courthouse) to traffic and increase the public space at this location. The eastbound lane (travelling away from the bridge) is to remain open to general traffic in order to facilitate traffic exiting from Newtownsmith, turning right and heading east.
>
> Similar to the western side of the Salmon Weir Bridge, it is also proposed to improve the public space at the northern extent of Newtownsmith. In tandem with this, it is proposed to implement restrictions on traffic flow from Newtownsmith onto St. Vincent's Avenue. Newtownsmith will remain a two-way route as far north as the Mercy College Car Park. From this point, the route will become one-way northbound only, and at the junction with St. Vincent's Avenue Newtownsmith will be realigned so as to permit right-turns only.
>
> This section of northbound-only route on Newtownsmith will be bollard controlled so as to restrict traffic from using the route to access St. Vincent's Avenue (and routing on to the Cross-City Link), at specific times. Localised access will still be permitted at specific times to facilitate the movements of delivery and loading vehicles along Newtownsmith (for example, at the Abhainn na mBradán retail premises). Outside of these times, the northern extent of Newtownsmith will be closed so as to prohibit traffic from turning right onto St. Vincent's Avenue.

The drawings in the Road Safety Audit (Appendix D) also clearly indicate that the northern entry to Newtownsmith is to be closed.



In their response, the applicants and their consultants do not deny that a key section of Newtownsmith will become northbound only. Statements implying that cyclists will still have access to Newtownsmith are a distraction if that access will only be lawfully available to travel north on the disputed section of the street.

> "Both pedestrians and cyclists will be permitted to traverse Newtownsmith in both directions when the bollards are up, permitting access and egress in both directions for cyclists. References in the design to a one-way relate to vehicles exiting Newtownsmith during the loading window when the bollards are retracted and are not intended to restrict cyclist permeability"

As someone who has studied the traffic regulations, I cannot personally identify a way for the legal status of a road to change depending on the position of some bollards. It is not clear how the position of the retractable bollards, which might not be visible to cyclists from the St Vincent's Avenue/Courthouse end, might confer any change to the legal meaning of any proposed roads signage. However if we accept this premise that the one-way restriction is dependent on the position of the bollards then this confirms that at certain times of the day it will be unlawful for cycle traffic to use that section of road in both directions.

There are established mechanisms available in law by which two-way access for cycle-traffic could be combined with one-way access for motor-traffic. It would be very easy for the applicants to state the legal mechanism by which two-way access for cycle-traffic would occur. The applicants could specify the road signs and amending plates and offer clarification around the road markings to be used. They have prominently failed to do so. It is worth recalling that the applicants already have an established pattern of conducting roads management in a manner that makes cycling access to other city centre schools more difficult and inconvenient, a practice that continues in 2023 (See above regarding the Small Crane).

What long-time observers of traffic management in Galway might find very curious is that there was previously an active proposal for a contra-flow cycle lane at Newtownsmith (and also Abbeygate St.) For Bikeweek in 2010, the applicant trialled a contra-flow cycle lane at Newtownsmith. At the time of the contraflow trial Brian Burke worked for Galway City Council (He was employed there between 2008 and 2015). The *Galway City and Environs Walking and Cycling Strategy* adopted in 2012, also included a proposal for a contraflow cycle lane at Newtownsmith. Four years later in 2016, when Mr. Donal McDaid and his subordinates compiled the *Galway Transport Strategy*, there is no apparent mention of this proposal in their document. The Cycling Network proposals put together by Mr. McDaid and his subordinates do not include Newtownsmith and also do not include

any mention of contra-flow cycling or any apparent discussion of the impacts of one-way streets in Galway for cycle-traffic. However, in the 2016 GTS, Mr. McDaid and his subordinates do propose to make Newtownsmith one-way going north. The 2012 *Walking and Cycling Strategy* also now seems to have disappeared from the applicant's web site. For background on this see the discussions at the end regarding the content of the GTS.

Figure: Contra-flow cycle lane trial at Newtownsmith from Bikeweek 2010.

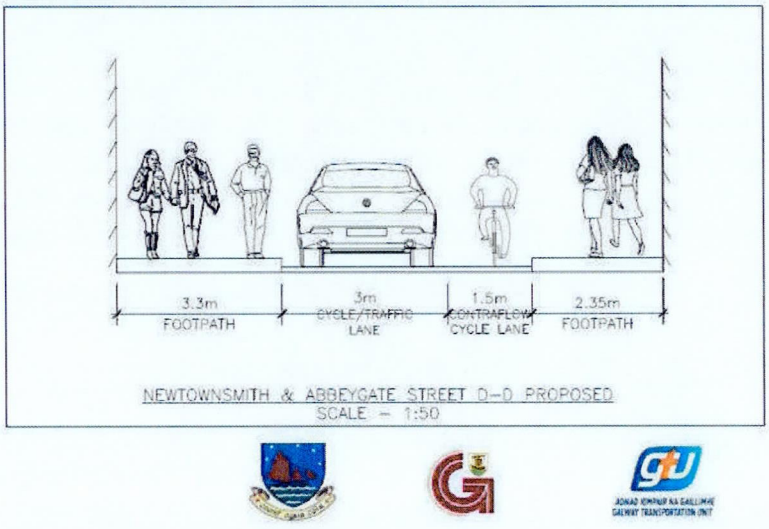


Figure: Contra-flow cycle lane proposal for Newtownsmith (and Abbeygate Street) from the 2012 *Galway City and Environs Walking and Cycling Strategy*.

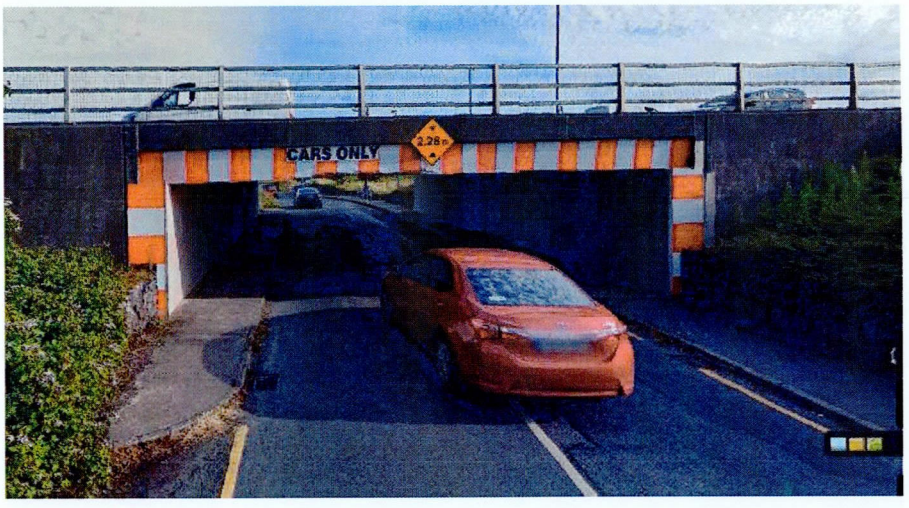
The Treatment of Junctions Throughout the Scheme

I had hoped to include a more detailed discussion of the treatment of cycle-traffic at various junctions within the scheme. It seems I will not have enough time but I view the arrangements as unsatisfactory. A flavour of the problems identifiable with the junction treatments within the scheme is available in the article below on IrishCycle.com. See also observations by Roselyn Carroll below.

> Galway Cross-City Bus Link reduces traffic on some streets but goes as far as knocking houses to increase capacity to car parks
>
> September 13, 2022 by Cian Ginty
>
> https://irishcycle.com/2022/09/13/galway-cross-city-bus-link-reduces-traffic-on-some-streets-but-goes-as-far-as-knocking-houses-to-increase-capacity-to-car-parks/

As a general observation, cycle tracks are shown terminating in shared space arrangements on the footway at junctions. This is unworkable in my view and creates avoidable conflicts. For example the Wood Quay contra-flow cycle track ends in a shared space arrangement on the footpath. This is unworkable for many bicycle users particularly food delivery cyclists of which there will be many at this location. A likely result is that some will just cycle contra-flow on the road and ignore the cycle track.

The new roundabout/gyratory at the Dyke road car park sits on a theoretical cycle route between the north campus of the university and the east city centre. It serves the same purpose for suburbs along the Headford and Menlo Roads. The Headford road is rightly seen as a most hostile environment for cycle traffic. The Dyke road is a lower traffic alternative route into the city. In fact there is a height restriction on the Dyke Road where it passes under the Quincentennial Bridge. This means it cannot be used by heavy vehicles or the emergency services. For many years community interests have argued that the Dyke Road should be closed to traffic at the bridge underpass and designated as a quite route for walking and cycling into the city.



The junction arrangements at the Headford road end should be refactored to include better cycling provision by taking land from the Dyke Road car park, which is owned by the applicants. There is also a public bike share station in the Dyke Road Car Park at the boundary with the Headford Road.

A summary history of key concerns for active travel in Galway: Proposals for two-way cycling on one-way streets and the use of unsuitable traffic lane widths.

There is a 44 year history of concerns being expressed about the negative effects for cycling of the one-way street system in Galway and of proposals that the situation should be mitigated by the provision of contraflow cycling arrangements. In 1979, Michael J Brennan a lecturer in civil engineering in UCG, produced a 41 page report for An Foras Forbartha: *RS242 Bicycle Travel in Galway City*. The issue of one-way streets or contra-flow arrangements is mentioned on five of the pages. The disadvantage for cycling of one-way streets is acknowledged. The use of contra-flow cycle lanes is discussed and a photograph is provided of a contraflow cycle track arrangement then present in the English town of Peterborough (See below). The final list of suggestions includes *"(3) contra-flow cycle lanes in the city centre;"*.

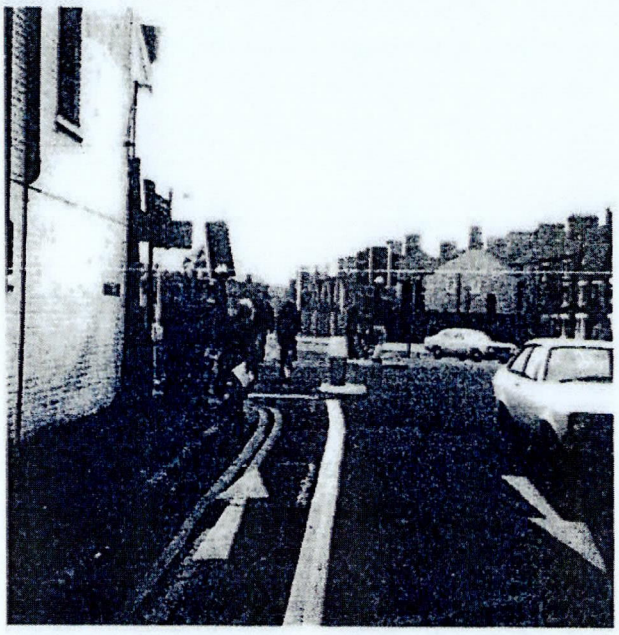


Figure 6: Contra-Flow Cycle Lane and Signal Installation in Peterborough, England

There is also a history going back 25 years of Irish guidance and policy for contra-flow cycling arrangements by default on one-way streets. In 1998 the Dublin Transportation Office (DTO), the precursor of the National Transport Authority, published *Provision of Cycling Facilities a National Manual for Urban Areas*. On page 46 (Section 3.6 Contra-flow Cycle Tracks) it discusses contraflow arrangements and notes "To prevent cyclists having to make detours it is desirable to provide for two-way cycle traffic on all roads, particularly on all new traffic calming schemes". On Page 56 it states "Contra-flow cycle facilities should always be considered for one-way streets and for all new traffic calming schemes". The diagrams provided show various examples for contra-flow cycle tracks. One Pages 56 and 60 the new design manual also considered situations where contra-flow cycling might be provided without formal contra-flow facilities. It states that for conditions with low traffic (<1000 vehicles/day) and an 85 percentile speed of 30kmh or below "The only facilities required are road signs at junctions to indicate that, unlike motorised traffic, cycle traffic is allowed in both directions."

Also in 1998 in support of the new design manual, Mr. Robert Molloy, TD for Galway West and Minister of State at the Department of the Environment and Local Government published the Road Traffic (Signs) (Amendment)

Regulations, 1998 (S.I. No. 273/1998). These regulations provided for less formal contra-flow cycling arrangements as explained in the new DTO manual. They provided for a plate granting cyclists an exemption from "no straight ahead" signs (the Irish equivalent for the no-entry sign at that time). The regulations also provided that those in cases where a road mouth had painted "no-entry" markings, cyclists could pass that marking by means of a marked cycle track.

Since the introduction of the new regulations in 1998, local authorities other than Galway City Council, have implemented contra-flow cycling arrangements. In Dublin, examples without physical segregation and using the signage from the 1998 regulations are found at Leinster St. North in Phibsborough and at Usher St. off Ushers Quay. Examples using segregation are found at Ryders Row off Capel St., Bull Alley St. Dublin 8 and at St Andrews St. Dublin 2. The signage set out in the regulations has been used in Galway City but not to provide contra-flow cycling. At the entrance to Ceannt Train Station at junction of Fairgreen Rd and Station Road there is a no-entry (no straight ahead) sign with an exemption plate "Except buses cyclists local access and disabled set down". This establishes that the Galway City Council Executive is independently aware of the existence of the 1998 regulations.

There is a 20-year history of cycling interests in Galway expressing concerns to Galway City Council and their consultants, complaining of the negative effects for cycling of one-way streets and proposing solutions. In 2001 the Galway Cycling Campaign produced an information sheet on *"One Way Streets and Banned Turns":* This document references the following sources.

- *Cycling the way ahead for Towns and Cities*, European Commission, 1999
- *Cycle Friendly Infrastructure*, Guidelines for Planning and Design, Institute of Highways and Transportation, 1996
- S.I. No. 273/1998 - Road Traffic (Signs) (Amendment) Regulations, 1998

The information sheet notes that some European cities had already made all one-way streets two-way for cycling and notes an EU commission policy recommendation that contra-flow arrangements be implemented. The Cycling Campaign notes that contraflow arrangements can be implemented either through engineering or through the legal exemptions provided for in the new traffic signs regulations.

There is also 20-year history of cycling interests in Galway expressing concerns to Galway City Council and their consultants, complaining of the negative effects for cycling of engineered road narrowings and narrow traffic lanes. In 2001 the Galway Cycling Campaign produced another information sheet on "*Road Narrowings and Pinch points*": This document references the following sources.

- *Cyclists at Road Narrowings*, DG Davies, TJ Ryley, SB Taylor and ME Halliday, Transport Research Laboratory Report No. 241, 1997
- *Footway buildouts at pedestrian crossings*, Cambridge Cycling Campaign, September 1996
- *Cycle Friendly Infrastructure*, Guidelines for Planning and Design, Institute of Highways and Transportation, 1996
- *Cyclecraft: Skilled cycling Techniques for Adults*, John Franklin, UK Stationery Office, 1998

The Cycling Campaign document discusses the impacts of kerb build outs and central islands and references the discussion from *Cycle Friendly Infrastructure* that lane widths in the region 3.1m to 3.9m should be avoided and that adequate running lane widths are needed. On page 5 *Cyclists at Road Narrowings* refers to cyclists being the principle speed reducing feature in some designs. On page 32 *Cycle Friendly Infrastructure* expresses the view that cyclists should not be "used" as traffic calming by leaving insufficient room at road narrowings.

Since 2001 the issue of negative effects of one-way streets, engineered road narrowings or narrowed traffic lanes, has been a routine feature of Cycling Campaign submissions to Galway City Council on transport policy.

In 2001 the Galway City Community Forum (the precursor for the Public Participation Network) adopted a policy document on "*People friendly roads infrastructure for Galway*". ~~(Extract attached)~~ This policy document included a discussion on the negative impacts for cyclists and pedestrians of one-way streets and the impact of road narrowings on cyclists. This document acknowledged the perception that in effect cyclists were being used as traffic calming features within streams of moving motor traffic. The Community Forum called on the City Council to cease using these features on the city's roads. Further it called for existing examples of pinch points and road narrowings to be examined for compatibility with community forum policies and remedial action such as replacement with speed ramps, modified widths or zebra crossings.

In 2003, the Galway Cycling Campaign made submission on the Draft City Development Plan (2005-2011). This expands on the discussion regarding one-way streets and banned turns from 2001. The 1979 Foras Forbartha report *RS242 Bicycle Travel in Galway City* was referenced (having been rediscovered in the university library). New examples such as Sacramento and London are introduced regarding addressing one-way street impacts. The submission also includes a three-page discussion on the impacts of road narrowings. This restates the discussion from 2001 that such features should be avoided and that adequate traffic lane widths are needed (5m to 5.1m). This submission includes a somewhat hypothetical discussion of the literature around lane width and cycling. On the use of narrow traffic lanes, the submission argues that their use must be predicated on strict enforcement of lower speed limits. However, even if this could be achieved, the submission argues that "many less experienced cyclists could be expected to find narrow kerb lanes highly stressful" and argues for remedial works to widen narrow lanes. The same observations were made in the consultation phase of the following City Development Plan (2011 to 2017).

In 2004 the elected council of Galway City discussed and adopted the following amendment to the next Galway City Development Plan 2005-2011. At the Council meeting of 6th October 2004, the Mayor Cllr. Catherine Connolly (currently Leas-Cheann Comhairle of the 33rd Dail) proposed the following amendment that;

- "The City Council will implement two-way access for cyclists on one-way streets in the city wherever feasible and appropriate".

This was seconded by Cllr. Nial O'Brolchain and agreed. A point to note is that this debate referenced the 1979 Foras Forbartha report *RS242 Bicycle Travel in Galway City*. The meeting minutes record that the then Director of Services, Mr. Ciaran Hayes objected to the amendment on the grounds that he disputed the validity of the Brennan report. The then city manager is said to have cautioned that it was dangerous to include such a provision in the development plan. Although this decision of the elected council is recorded in the meeting minutes, this objective on two-way cycling access to one-way streets did not appear in the final published version of the Development Plan 2005-2011.

In 2005, Galway Cycling Campaign made observations to Galway City Council regarding proposed roadworks on the Headford Road in Galway. The submission notes the recommendation of 4.25m lane widths on roads shared with HGVs from *Cycle Friendly Infrastructure*. This submission includes a discussion of the negative effects of road narrowings and restates the view that cyclists are effectively being used as traffic calming devices in some schemes. The submission calls for adequate widths along the road and at island features.

In 2008 Cycling Campaign groups formed a national organisation Cyclist.ie. The founding document for Cyclist.ie raises the issue of one-way streets and calls for the elimination of one-way street systems and for remaining one-way streets to be made two-way for cycling. It calls for single lane one-way streets to be made two-way for cyclists by default. The same document call for cyclists to have adequate space for overtaking. Wider kerb

lanes are recommended and that shared bus/cycle lanes should have appropriate widths. The document expresses disapproval of narrow stacking lanes at junctions and calls for adequate lane widths (> 4.25m) in mixed traffic conditions. The document specifically refers to adequate width being needed to allow cyclists to filter past halted motor traffic in congested conditions.

In April 2009 Minister Noel Dempsey T.D. launched the *National Cycle Policy Framework* (NCPF). The NCPF acknowledges the problems created for cycling by one-way streets. On page 7 the NCPF suggests the removal of cyclist unfriendly one-way systems. Under the Hierarchy of Solutions on page 18, multi-lane one-way streets are acknowledged as an aspect of road design focused on motor vehicles at the expense of cyclists and pedestrians. The removal of one-way systems is cited as a recommended intervention under traffic calming. Under junction treatment and traffic management one of the interventions required is stated as "contra-flow cycle lanes on one-way streets / making two-way streets for cyclists". Later on in the document dismantling one-way street systems is also suggested under Objective 2.3 Through traffic. Under Objective 2.5 one-way streets are listed as an example of the type of infrastructure affecting cyclists that will require audits.

The NCPF also considers the issue of road narrowings and lane widths and their impacts for cycling. Under Objective 2 "Hierarchy of Solutions" the NCPF specifically mentions redistributing the carriageway by widening traffic lanes as an intervention in favour of cycling. Under Objective 2.5 the NCPF cites road narrowings and narrow traffic lanes among a list of existing items of infrastructure that will require audit. Under Objective 2.6 the NCPF lists road narrowing schemes as an example of cycling unfriendly features that will require remedial measures. Under Objective 2.9 the NCPF stated that all designs will have the principle objective of preserving cyclist momentum.

It is also relevant that Objective 8 of the NCPF was "Ensure Proper Integration between Cycling and Public Transport (PT)". Under Objective 8.1 Safe Routes to Stations the NCPF stated "We will require Local Authorities to provide safe and attractive cycling routes to PT stations [...] It is noted that of all train travellers in the Netherlands, 33% use the bicycle to get between home and the station."

In 2010, a Ministerial Circular (PSSP-8 – 2010) was issued that instructed that the NCPF was to be considered national policy for the purpose of drafting development plans.

With the issue of contraflow arrangements on one-way streets, narrow traffic lanes and engineered pinch points now reflected in national guidance, the Galway Cycling Campaign and others continued to raise these issues with Galway City Council in various submissions. In 2010, submissions on the draft *Galway City and Environs Walking and Cycling Strategy* called for inventories of locations where cyclists were being obstructed by queues of stationary traffic for the purpose of identifying remedial works. The same submissions called for inventories of engineered road narrowing and pinch points for the same purpose. The issue of one-way streets was raised with calls for an audit of all one-way streets for the purpose of identifying remedial measures.

For bike week in June 2010 Galway City Council trialled a new one-way street restriction, combined with a contra-flow cycle lane, at Newtownsmith in Galway. The trial was controversial with local businesses who felt they had not been adequately consulted. Galway Cycling Campaign also had reservations since creating a new one-way street in the name of trialing a contra-flow cycling lane did not add anything useful for cycling in Galway. The road had been two-way for cycling and remained two-way for cycling. The impression was created that the main intent of the trial was not the contraflow cycling lane but an experiment on the effect for motorised traffic of extending the one-way street system. Although it only lasted for a few days, this fact that this trial occured establishes that the city council executive understood that contra-flow cycling arrangements were legally possible in Ireland. Despite this now being adopted council policy, a recommendation of the then applicable design

guidance and also being provided for in the traffic regulations, no permanent provisions for contra-flow cycling on one way streets were implemented during the remainder of the operation of the City Development Plan 2005-2011.

In 2010 AECOM were appointed consultants on a proposed *Walking and Cycling Strategy* for Galway City and Environs (Adopted in 2012). On page 22 the final strategy document notes "One way streets exacerbate connectivity issues for cyclists". On page 24 the authors note cyclists "persistently" using one-way streets in the City Centre in both directions. In an appendix to the strategy reviewing best practice, it is noted of the Dutch city of Groningen that one-way streets are always two-way for cyclists. Despite these observations, the published strategy contains only one-suggestion for contra-flow cycling, again a proposal for Newtownsmith. Since Newtownsmith was still a two-way street this would have also involved making Newtownsmith one-way for motor traffic. To some observers this might suggest that the main objective was the extension of the city's one-way street system rather than facilitating cycling. There is no other mention of contraflow cycling in the strategy document but the presence of this suggestion for Newtownsmith again indicates that the city executive understood such arrangements to be legally possible under Irish traffic law.

For the next iteration of the City Development Plan (2011-2017) the objective on contra-flow cycling adopted by the elected council in 2004 was included in the consultation draft. The same objective remained in the final version of the Development Plan adopted by the elected council. During the operation of the 2011-2017 City Development Plan no further contra-flow arrangements were attempted by the city executive whether in trial or permanent form.

- Provide bicycle parking facilities at appropriate locations throughout the city such as city centre, district centres, neighbourhood centres, beaches, cemeteries and parks.
- Implement two-way access to cyclists on one-way streets where feasible.
- Where a road has been assessed having regard to the statutory and national guidance requirements (including the hierarchy of solutions in the National Cycle Policy Framework) and a need identified for such treatments as hard shoulders or on road cycle lanes, such treatments shall be a minimum width of 2 metres.

Figure: Extract from Galway City Development Plan 2011-2017 (Chapter 3.6 Specific Objectives: Cycling) showing the objective to provide contraflow cycling arrangements on one-way streets in Galway. The city executive removed this from the following Development Plan (2017-2023) based on their claim that amendments to roads legislation would be needed.

In 2011 the NTA commissioned a report from Jacobs Engineering: *Proposals for Introducing Public Bike Schemes in Regional Cities – Technical Feasibility Study*. The report was launched by An Taoiseach Enda Kenny in November 2011. It was this report that was the basis for the extension of public bike schemes to Cork, Limerick and Galway. The Jacobs report makes several references to a need for two-way cycling arrangements on one-way streets, it states: "Recommendations are made on the complementary measures which would be needed as a new scheme is introduced. Perhaps the most important one would be an increase in permeability for cycle traffic in the city centres through the provision of two-way cycling on one-way streets, and by opening up pedestrianised areas to cycling where conditions allow." The supporting measures in the Jacobs report were also never actually implemented by Galway City Council. The Galway public bike scheme is reported to be one of the worst performing in the country with a daily rental per bike rate of 0.2 (Dublin is 6.2).

In 2013, despite the content of the NCPF and repeated receipt of submissions stating concerns over road narrowings, Galway City Council implemented a cycling hostile "traffic calming" scheme on Fr. Griffin Road (a key cycling route into the city). The effect of these works was to remove road capacity from cyclists with the result that cyclists found themselves obstructed when queuing by motor vehicles took place. (See original submission to An Bord Pleanala for photographs)

2015-2016 *Galway Transport Strategy* drafted and adopted – see below for a specific discussion of what took place in relation to the *Galway Transport Strategy*.

In 2016, a consultation took place regarding the next iteration of the Galway City Development Plan (2017-2023). The then 12 year old city objective for contra-flow cycling on one-way streets was removed from the consultation draft by the city executive. The Galway Cycling Campaign made a submission calling for the reinstatement of the previous objective for cycling on one-way streets. The same submission also called for the text regarding public bike share in the draft plan to be amended to reference the recommendations of the Jacobs report (2011) on providing two-way access on one-way streets. In his response on these submissions, the Chief Executive recommended their rejection as follows.

> "The provision of cycle infrastructure will be addressed in the GTS, amendment to Chapter 3 Transportation. While the implementation of two-way exemptions for cyclists require amendments to roads legislation and NTA guidelines."

So in 2016 the Galway City executive had changed its apparent position from having a *Walking and Cycling Strategy* that contained an active proposal for a contra-flow cycling arrangement at Newtownsmith to a position claiming that such arrangements would require changes to national legislation. The legal claims made the Chief Executive would also appear to be incorrect. Other local authorities, most prominently Dublin City Council, have proven capable of providing various contra-flow cycling arrangements within the existing legislation (SI 273/1998) and guidance.

The Galway Cycling Campaign submission on the 2017-2023 Draft Development Plan also restated the concerns about cyclist-hostile roads engineering practices in the city such as engineered road narrowings and the removal of road capacity from cyclists through the use of narrow traffic lanes. Although these were by now also matters covered in the NCPF and reinforced by Ministerial circular PSSP-8 – 2010, the Chief Executive also recommended against including these matters in the plan, claiming them to be operational matters and incorrectly claiming them to be addressed by the *Galway Transport Strategy*. The elected city council accepted this characterisation of the issue and in June 2016 the elected council approved the Chief Executive's recommendations. As is shown in the discussion below, when the *Galway Transport Strategy* was subsequently published it contained no mention of these issues.

In November 2018 it was announced that Galway City Council had been allocated €2,900,000 against cycling and walking under the first round of the Urban Regeneration and Development Fund (URDF). The requirements of the URDF funding specifically mention collaboration with the community and voluntary sector. It appears that in applying for the URDF funding, Galway City Council offered as evidence of "collaboration" the fact that a consultation process had been held into the *Galway Transport Strategy*. It is worth restating that the final GTS

fails to mention various issues that were raised in that consultation, and which were also specific objectives of the *National Cycle Policy Framework*. The GTS also fails to mention the Jacobs report on public bikes and the associated infrastructural recommendations. It is also worth restating that no meetings were offered in relation to that consultation. The Galway Cycling Campaign and the Galway City Community Network wrote to the Director of Services, Ruth McNally to request meetings to understand the intended use of the URDF funds. Ms. McNally rejected both meeting requests in writing.

In 2019 the Galway Cycling Campaign made a submission on the proposed *Galway Public Realm Strategy*. It notes again pre-existing concerns about the use of narrow traffic lanes and pinch points in the city. It references design guidance from 2005 *Lancashire the Cyclists' County* for a discussion on what lane widths might be appropriate under what conditions. The submission states the view that "reduced traffic lane widths are unacceptable without (1) provision of segregated space for cycling, or (2) reduction in the volume of motor traffic via removal of through motor-traffic.". The same submission also had a section on one-way streets. It includes maps illustrating the severance and diversions created for cyclists in the city centre due to the one-way street system. For example, to travel from Newtownsmith to Mainguard St in the city centre the nominal distance is 340m. Because of the manner of the application of the one-way street system, the actual travel distance needed between those two points is 1km via the northern route and 2.11km via the southern route. The legal situation (SI 273/1998) is explained and sources of policy on one-way streets are provided (National Cycle Policy Framework and the 2011 Jacobs Reports on Regional Bikeshare). The submission also provides examples from Dublin of Contraflow arrangements achieved both with and without specific cycling infrastructure.

In 2021, during the public consultation on the *Clybaun Road Active Travel Scheme,* the City Council again received submissions raising concerns about engineered pinch points and narrow traffic lanes.

In 2022, for the next iteration of the City Development Plan (2023-2029) these concerns were again restated in submissions to the City Council. On the matter of contraflow cycling arrangements on one-way streets, submissions from the following groups and individuals called for the implementation of the Jacobs report on regional bike schemes; The Galway City Community Network, the Galway Cycling Campaign, the Galway Commuter Coalition, Roselyn Carroll and Aran Murray. The Galway Cycling Campaign submission points out the legal background under SI 273/1998 and that contra-flow arrangement are provided for in the National Cycle Manual. The origins of the Jacobs report as having been commissioned by the National Transport Authority is made clear and direct quotes are provided from the text. However the consultation report by the Chief Executive to the elected council contains some very curious claims.

> Page 176
>
> "2 Way cycle on one-way streets is not legitimate unless segregated. The current policy is to avoid one-way systems. Option would be assessed on a case-by-case bases at project stage."
>
> "The Jacobs report [commissioned by GCC circa 2007/2008] has been superseded by GTS in 2016."
>
> Page 189

> "Comments are noted. The Jacobs report has been superseded by the GTS. Transport Department has indicated that two way cycling on a one way street is not legislated for and it is therefore not supported or included for in the draft plan."

It is unclear how a the Jacobs Report on regional bike share can now be claimed to be commissioned by Galway City Council when the report itself notes it was commissioned by the NTA and when the report was launched in Dublin by An Taoiseach Enda Kenny at Government buildings. It is also unclear how a national report could be said to be superceded by a local *Galway Transport Strategy*. The GTS itself contains no apparent reference to any Jacobs report on regional bike share schemes whether it be from 2007, 2008 or 2011.

The Chief Executive's responses on the legal situation do not appear internally consistent. One sentence appears to accept that contra-flow cycle track arrangements are provided for in law and then another sentence appears to argue that no contra-flow cycling arrangements are provided for in law. How a measure could simultaneously be present in various official documents such as the 1998 *DTO Cycle Facilities Manual*, the 1998 *Traffic Signs Regulations*, the 2009 *National Cycle Policy Framework*, the 2011 *National Cycle Manual*, the 2011 *Regional Bikeshare* report and also not be provided for in law is not clarified by the Chief Executive.

On the issue of narrow traffic lanes and pinch points, the Cycling Campaign recommended the addition of this wording to Chapter 4.4 Sustainable Mobility - Walk and Cycle,

> • The Council specifically acknowledges Policy Objective 2.6 of the National Cycle Policy Framework that traffic-calming schemes based on road narrowings, such as the traffic islands on the Headford Road, are cyclist-unfriendly and require remedial works. For the purpose of prioritising such remedial works, the council will conduct and publish an audit of all traffic islands and other similar features creating such pinch points forcing cyclists and motorised traffic into close proximity.
>
> • The Council acknowledges that the use of narrow traffic lanes on main roads has the effect of creating hostile conditions for cycling and removing road capacity from cyclists. The council recognises narrowing schemes as hostile features that are identified as requiring audits in the National Cycle Policy Framework. The use of narrow traffic lanes is in direct conflict with the National Cycle Policy Framework Objective 2.9 stipulation that designs should have a principal aim of allowing cyclists to maintain momentum. Where feasible, the council will identify remedial works for places where narrow traffic lanes are found in the city.

In his 2022 report on the consultation to the Draft Development Plan, the Chief Executive recommended the rejection of these additions based on the incorrect claim that the *Design Manual for Urban Roads and Streets* and the *Galway Transport Strategy* "supports" these concerns. In fact neither DMURS nor the GTS contains any discussion of the negative effects of road narrowings or narrow traffic lanes for cyclists. This recommendation by the Chief Executive was accepted by the elected council.

On 5 May 2022 two meetings were held in Galway City Hall to discuss proposed active travel schemes. The delegations included An Taisce, Engineers Ireland West, the Galway Cycling Campaign, An Mheitheal Rothar and the Galway City Community Network. Present for the council were Mr. Uinsinn Finn and Mr. Michael Lally. At both meetings, concerns were restated by different delegations regarding the negative impact for cyclists of the proposed road widths in active travel proposals. There were particular concerns regarding schemes proposed for Renmore and Clybaun Road having an actual effect of removing road space from cycle-traffic. I was present at one of those meetings and my recollection is that no willingness was indicated on the part of the council staff to modify the schemes.

For a discussion of the Renmore proposals see here on the Irish Cycle Website

> "Scary, dangerous, not appropriate for children" plan to spend millions on Galway "active travel" schemes
>
> December 4, 2021 by Cian Ginty
>
> https://irishcycle.com/2021/12/04/scary-dangerous-not-appropriate-for-children-plan-to-spend-millions-on-galway-active-travel-schemes/

In June 2022, according to a newspaper report, both Mr. Finn and Mr. Lally presented the Renmore Avenue/Ballyloughane Road scheme to the elected city council as a "cycling enhancement" scheme. Mr. Lally is said to have claimed to the elected council that 'roads were no longer just for cars' and that the proposed scheme involved reallocating road space. It is not clear from the article if Mr. Lally explained to the elected council that the road space to be "reallocated" is that currently being used by people on bicycles. Nor is it apparent from the newspaper article if Mr. Lally explained to the elected council that a predictable effect of the design would have cyclists obstructed by cars at peak travel hours. The artist's impression provided with the newspaper report, and presumably given to the elected council, shows no traffic on Renmore Avenue and very little traffic on Ballyloughane Road. Mr. Lally is also said to have claimed to the elected council that the Ballyloughane scheme was part of an overall strategy "to improve cycling options".

The elected council had received representations from cycling interests refuting these claims of "improving cycling options" and after some discussion at the June 2022 meeting the elected council agreed to postpone a motion to reject the scheme. In April 2023 the city executive again sought to present the scheme to the elected council for approval I understand without material changes to the most problematic features of the design. Representations were made again pointing out serious negative implications for cycle-traffic particularly children cycling to school. The elected council rejected the proposal in its current form.

A note on the Galway Transport Strategy and the role of Donal McDaid.

In their response the applicants and their consultants Donal McDaid and Brian Burke, make various references to the 2016 *Galway Transport Strategy* in support of the proposals. Mr. Donal McDaid of Arup is directly involved in as a consultant on both. In the main or Technical Report for the GTS, Donal McDaid is listed as having checked and approved the report. In my opinion, the cycling proposals in the GTS are not credible and seem to me to turn long understood principles of sustainable transport planning on their head.

What was to became the GTS started in 2015 with a consultation announced on a proposed *Integrated Traffic Management Program*. The Galway Cycling Campaign made a submission based on the content of the *National Cycle Policy Framework* (NCPF) with sections emphasising issues of particular local importance. The Hierarchy of Solutions was restated in full in that submission. The submission raised the issue of cycling-hostile road design practices in the city. The matter of one-way streets is raised and the history of contra-flow proposals is restated, the fact that contra-flow cycling is an objective of the city development plan is restated, the one-way street recommendations of 2011 Jacobs report on regional bike share are restated. Another matter raised was the apparently systematic practice of the city council arranging and configuring traffic signals in a manner that means they do not detect cyclists or change for them. Examples were provided of signalised junctions in Galway that cannot detect people on bikes and where the traffic lights cannot change unless a motor vehicle arrives to trigger the traffic light sequence.

There is a section in the submission that restates previously stated concerns about engineered road narrowings. Another section deals with the effective removal of road capacity from cyclists in the city through the use of narrow traffic lanes. The Fr. Griffin Rd scheme referenced above is used as an example of this hostile practice. As usual in campaign submissions there is also a discussion on what road widths should be deemed adequate for mixed traffic conditions. The same submission disputes the suitability of the lane width advice in the *Design Manual for Urban Roads and Streets* (DMURS).

No meetings or discussions were offered or held with the Galway Cycling Campaign before the subsequent *Galway Transport Strategy* GTS was published and adopted in 2016. In my view the content of the final GTS is remarkable for its failure to reflect various items that by then were established state policy on active travel and cycling promotion. The text of the GTS does acknowledge the existence of the *National Cycle Policy Framework*. The GTS Technical Report contains a two-page summary of the NCPF so the authors cannot be said to be unaware of its existence. The GTS Technical report also includes a three page summary of *Galway City and Environs Walking and Cycling Strategy* and states that some measures in the strategy have been implemented and claims that the remainder are included in the GTS where appropriate.

The published GTS contains no discussion of the issue of one-way streets in Galway as a barrier to cycling. There are no proposals for contra-flow cycling on any one-way streets in the city. This might be viewed as remarkable since at the time the then applicable *City Development Plan* had a specific objective on restoring two-way access for cycle-traffic on one-way streets. In the *National Cycle Policy Framework,* "contra-flow cycle lanes on one-way streets" and "making two-way streets for cyclists" were specific items in the Hierarchy of Solutions. The recently adopted *Walking and Cycling Strategy* had proposal with design drawings for a contraflow cycle lane at Newtownsmith. Similar measures were proposed in the Jacobs report on public bike share in the regional cities.

In the GTS, not only is the contra-flow cycle lane proposal for Newtownsmith not mentioned, but Newtownsmith is not listed as a component in the proposed "cycle network". However, the GTS does include a proposal to make Newtownsmith one-way going north. On page 73 as one of the measures in a "Cross-City Link" proposal the GTS includes "Creating a clockwise one-way loop around Woodquay, Mary Street, Newtownsmith and St.

Vincent's Avenue;" (This would involve reversing the direction on Mary St.) In effect the GTS turns a key aspect of state policy on cycling promotion upside down.

The text of the GTS summary of the NCPF contains two references to the objectives on integrating cycling and public transport. However, the proposed "cycle network" in the GTS does not include Fairgreen Road, Bóthar Ui Eithir, Bóthar na mBan or Prospect Hill. These are all key access routes for both the city's train station and the private coach station. Fairgreen Road is effectively the only route available to access the train station by bicycle (the station only has an exit onto Eyre Square operated by barriers). Arguably this is another key aspect of state policy on cycling promotion being inverted in the GTS.

The GTS summary of the NCPF also acknowledges the NCPF objective for the "Creation of municipal bike systems to complement an improved PT system". However *Appendix F: GTS Cycle Network & Infrastructure Development* does not apparently mention the then already operational public bike share scheme at all. The proposed cycle network does not include any discussion of the locations of the public bike share stations or whether any measures might be needed to improve cycling connections between them. In fact there are locations that have already have bike share stations are not part of the nominated cycle network at all such as Fairgreen Road (train station), Prospect Hill, Newtownsmith, Merchants Road and New Dock St. As already stated, the GTS also fails to acknowledge the existence of the 2011 Jacobs report on public bike share or the recommendations of that report.

There are various other policy areas in which the 2016 GTS is apparently non-compliant with the NCPF. The GTS contains no discussion of, or proposals for, 30km/h zones in Galway. There is no discussion or analysis of speeding in the city. There is also no discussion of any requirement for enforcement of speed limits in the city. There does not appear to be any general discussion of the poor treatment of cyclists by the city council at traffic signals and there is no apparent commitment to any general program to address the issue. HGV management is only discussed with regards to a core city centre zone. There is no apparent discussion of any need to limit through traffic, especially HGVs, from roads around schools.

With regard to a key problem with Bus Connects Cross-City Link, the published GTS contains no apparent mention of the negative effects of pinch points or narrow traffic lanes for cycling. Not only were these issues raised directly in submissions but they are also reflected in the *National Cycle Policy Framework* which included road narrowings and narrow traffic lanes as measures that required audit and remediation (along with one-way streets)

> 2.5 Audits of Existing Infrastructure
> We will carry out audits of existing urban infrastructure to assess the quality of the cycling routes using an agreed set of criteria. This would include not only existing dedicated cycling facilities but all of the other elements of the roads infrastructure used by cyclists – roundabouts, one-way streets, road narrowings, narrow traffic lanes (in the context of the development of the Quality Bus Network etc)
>
> 2.6 Remedial Measures
> We will carry out remedial measures on existing cyclist-unfriendly urban roads with a special focus on roundabouts, multi-lane one way streets and road narrowing schemes. Without addressing the difficulties posed by high capacity, high speed roundabouts in urban locations – and particularly those between residential areas and schools - it will be very difficult to encourage more of the public to cycle.

It is also worth remarking that the NCPF specifically required that cyclists have space to keep moving and adequate separation from passing motor vehicles with or without cycle lanes.

> 2.9 Urban Cycle Networks
>
> We will develop cycle-networks as part of wider cyclist-friendly local traffic plans / traffic management plans in all urban areas. The use of the concept of "cycle network" will not imply that the routes forming it will only consist of linked cycle-lanes and cycle tracks (as was the original interpretation of much of the network in Dublin). Instead the design philosophy will be based on the "hierarchy of measures" as described above with the focus being on the reduction of vehicular speeds, ensuring that all junctions are cycling friendly etc. We will ensure that designs are created with the principal aim of preserving cyclist momentum. We will also ensure that designs will provide for a safe passing distance of 1.5m between motorised vehicles and bicycles.

In fact as it has turned out the GTS seems to be a blueprint for removing road capacity from cycle-traffic across the city. In the GTS cycle network proposals the following phrase, or variations on this phrase, is the stated intervention for 35 road sections making up over 30km of roads in the city

> "Currently no facility in place. Proposal to provide traffic calming measures and signage to reduce motorised traffic speeds and advertise the presence of cyclists".

Without getting into the detail of other schemes it has turned out that what this means is removing road capacity from cyclists and implementing measures that create avoidable conflicts between cycle-traffic and motor traffic (including children cycling to school). For an example of one of the cycling-hostile schemes proposed under the GTS see an article here on the proposed Renmore, Ballyloughane Active Travel Scheme (which has now been rejected by the elected city council in its current format).

> "Scary, dangerous, not appropriate for children" plan to spend millions on Galway "active travel" schemes December 4, 2021 by Cian Ginty
>
> https://irishcycle.com/2021/12/04/scary-dangerous-not-appropriate-for-children-plan-to-spend-millions-on-galway-active-travel-schemes/

The same design pattern is repeated in other currently active Galway City Council proposals such as the Mervue Safe Routes to School Scheme, the Clybaun Road Active Travel proposals, and the Bus Connects Cross City Link proposals discussed here. Other locations that are to apparently to receive this "treatment" under the GTS include key cycling corridors into the city such as the N59 Moycullen Road, the Tuam Road, Fr Griffin Road, Whitestrand Road, Newcastle Upper and Lower and St Mary's Road. Some of these are roads that are to have significant traffic increases under Bus Connects Cross-City Link but the applicants apparently then propose to remove road capacity from cycle-traffic at some future date in the name of "traffic calming". If it gets funded, and is allowed to proceed according to current proposals, then much of the so called "Galway Cycle Network" found in the GTS is likely to have a strong negative impact on cycling in Galway. The implication is the sterilisation of key corridors from the perspective of cycling.

Two of the roads that are listed for this "traffic calming" treatment in the GTS require particular discussion; Cappagh Road and Ballymoneen Road in Knocknacarra. These are both roads of a mainly residential nature with housing estates fronting on to them. The predominant building pattern is impermeable cul-de-sacs. This means there are few alternatives to using either Cappagh Road or Ballymoneen Road to reach other places on foot or by bike. Under the GTS "cycle network" proposals both roads are listed for the same treatment as Renmore Avenue and Ballyloughane Road. Under the N6 Galway Ring Road proposals both roads are to have junctions with the proposed new orbital route. The N6 Ring Road scheme drawings do not propose any changes

to either road as part of the ring road project. The implication is that under the guise of the "Galway Cycle Network", the NTA and City Council will remove road capacity from cyclists on both roads and then repurpose those same roads, without further modification, to feed arterial traffic to the new ring road. Arup are also consultants on the N6 Ring Road project.

It seems to me that even on paper, the proposals in the GTS are not compliant with the statement in the NCPF that cycle networks "must adhere to the five main requirements for cycling: safety; coherence; directness; comfort; attractiveness." What the various policy omissions mean is that even the theoretical "cycle network" in the GTS can be argued to disappear as it approaches the city centre. It is not a cycle network in the commonly accepted sense. To sum up, in my view, the content of the cycling components of the *Galway Transport Strategy* cannot be said to represent the outcome of any meaningful collaboration with cycling or community interests in Galway. In my view, the GTS also shows little evidence of meaningful engagement with key official policy documents and reports on cycling promotion that should have been expected to inform its content. In my view, the cycle network proposals in the GTS are not credible and what is proposed does not conform to the commonly understood concept of a cycle network. An apparent effect of the GTS has been to justify the allocation of funds from central government to be subsequently used in a manner likely to produce effects opposed to the intent of the funding agency.

Supporting Document: Observations by Roselyn Carrol of the East Corrib Cycle Bus Initiative

Roselyn Carroll

33 Carraig Ban

Galway City

H91 F8HX

8th June 2023

Re: An Bord Pleanála 314597: University Road to Dublin Road, Galway City.

Case reference: HA61.314597 University Road to Dublin Road, Galway City.

URL: https://www.pleanala.ie/en-ie/case/314597

Contents

1. Introduction

This submission was prepared for An Bord Pleanála case 314597. It was submitted before the deadline and paid for in November 2022. However, it was subsequently returned as my address was not fully written on the submission. I would appreciate if you can consider my concerns and suggestions in relation to the scheme and incorporate them into the delivery of this scheme. I thank you in advance for your time and energy in considering my submission.

Please also see the attached presentation to support this text.

Considering the draft National Cycle Manual (NCM) (Feb 2023) is at an advanced stage I urge you to recommend that the Cross City Link Scheme be re-evaluated in light of the new guidance document that the National Transport Agency (NTA) have developed. This document is at a stage where designers can improve design based on international best practice which has formed the backbone of the revised NCM. The Cross City Link project is a once in a generation project on the streets it encompasses, as well as the streets is does not reach based on the current red line boundary. As such this is a pivotal moment to get things right or at least knowingly improve what we know can be done better at this moment in time.

As an active travel user I welcome the delivery of improved bus corridors to Galway City and safer cycling conditions. BusConnects in Galway has the potential to unlock the city for its citizens and those who visit. The current plan, as presented, is the initial phase of introducing upgraded bus, cycle, pedestrian and public realm to Galway City under the National and Local Planning Policy to deliver sustainable transport nationally. However this plan together with the Dublin Road Cross City Link does not go far enough to service the needs of the city adequately. Cross-City Link is limited as it does not connect adequately with

- Residential communities North on the city on Headford road (no quality bus corridor or continuous segregated routes)
- Health care settings: Galway University Hospital (delayed engagement & plan for connection)
- Retail destinations such as Galway Retail Park and Galway Shopping omitted from transport plan (Headford Road)
- The 'West End' and much of Salthill of Galway (concentration of schools and seaside amenity)

Together with the connection issues raised above the scheme will not deliver change to the streets in the city centre, adjacent and linking to the scheme, that are already over capacity with motor traffic and delivery vehicles. In fact, the impact of deliveries on streets is an issue leading to unsafe cycling, pedestrian and motor traffic movements. This needs urgent attention if we are to learn from recent incidents in Irish cities where vulnerable road users are severely or sadly fatally injured. Vision Zero of the Road Safety Authority. Galway City can positively contribute to this target by 2030 through delivering safer cycling and walking conditions in out city centre. In Galway there is a high proportion of mixing of people and vehicles on our city centre streets. I would like to see greater segregation for all such that delivery vehicles are on dedicated routes

and cyclists are given a high permeability access to the city on quieter streets and segregated tracks on roads listed in this submission.

The primary aim of the government's new road safety strategy is to reduce the number of deaths and serious injuries on Irish roads by 50% over the next 10 years. This means reducing deaths on Ireland's roads annually from 144 to 72 or lower and reducing serious injuries from 1,259 to 630 or lower by 2030.

The above locations are heavily car dependant and located immediately adjacent to the scheme. If the scheme fails to deliver connected high quality sustainable mass transport for these locations in this its first phase Galway is unlikely to see modal shift towards sustainable transport for many years to come.

The scheme will not reduce the volume of traffic passing along the Headford Road (N6/N84 and in along the N84 and Inner city Access Route (shown in pink on Drawing PL01) nor does it reduce traffic along the N6 from Bothar na dTreabh to Newcastle as bus infrastructure upgrades do not reach these roads in the scheme.

Additional consideration and investment is needed immediately to address car dependency for residents in Galway City and also for those traveling across the city. These are vital routes and destinations that need investment and action now under the umbrella of BusConnects. The overall scheme of BusConnects in Galway needs to be further reaching first time around and bring more communities into the realm of sustainable transport change.

In essence it may be that traffic volumes in the inner city reduce at given periods of time. However the Preliminary Design reports states that traffic volumes will increase at junctions adjoining the scheme. The reality of this is that roads leading to the inner city will see greater traffic volumes of motor traffic. This will make cycling more challenging and less safe. Cyclists have no safe route to the 1km long or so quality bus corridor in the inner city. The delivery of a segregated or quiet high quality access route for cyclists to the city centre from any major residential origin does not exist and the current GTS is outdated, regardless of it contain a poor cycle network to begin with. This translates to a significant barrier for people to feel safe to cycle into the inner core of Galway City regardless of how close they live to it. The vast majority of roads adjacent to the inner city will become more hostile with multilane and in cases multilane one way streets. Or they may be too narrow, due to widening of footpaths and providing for on street parking, and full of slow moving traffic, hence no capacity for cyclists.

We may well have a few nice streets in the inner city, however with the increase in pedestrianisation, dominance of one way streets and new plazas navigating around the inner core is time consuming on long unnecessary routes for cyclists. We will not see families visiting the city like our European Counterparts in their medieval and historic towns/cities. This is because many will not see the space for them to safely do so from their homes to the centre. We may have an inviting network for tourists, but we must prioritise Galway Residents in this process first.

Galway city have parking wardens. Illegal parking is a major issue in the city and one that is often ignored. Parking on double yellow lines and on footpaths is widespread. A more ambitious management system for greater compliance is needed in Galway City. While parking enforcement is outside the scope of BusConnects an active system is needed that shows tangible outcomes in reducing street obstruction that the NTA can review on an ongoing process.

Ringing Galway City Council to report an illegally parked car and leaving a message with the receptionist or email seems to be outdated and protracted for action and enforcement.

2. Sustainable mass transport options in our community

As a mother to three children under the age of 5 who travels into the heart of the Medieval City of Galway twice daily by cargo bike I long for less congestion, less fumes, safer junctions, slower speeds and safe cycling routes. Some roads I travel 4 times a day by bike. My eldest child who is now 4.5 years old cycles his own bike approx. 5km to school as part of the Cyclebus a large portion of the school year. There is currently no viable alternative public sustainable transport option for us along the Headford Road/407 bus route for a variety of reasons. Mainly the route terminates in Eyre Square, is infrequent and there is no quality bus corridor.

The new BusConnects Network plans to deliver a new route No.7 along the Headford Road and this bus will continue to Salthill and Knocknacarra. This connection with Salthill is very welcome and will assist many on the Headford Road to reach Galway Cities iconic natural sea side amenity, Salthill, on sustainable transport. However the route will not be able to deliver quality public transport as it will compete will private traffic on the N84 and N6 making it slow and uninviting. BusConnects infrastructure upgrade as part of Cross City link should include a quality bus corridor on the Headford road.

BusConnects needs to be extended urgently along the Headford Road and surrounding communities. The community along the Headford Road was reported to have a population of circa 4700 people or 20% of population in the City Centre electoral area. Importantly this community is however split between two electoral areas and so is historically poorly represented at local level. A report titled *Needs Assessment of the Ballinfoile1 area For Galway City North Child and Family Support Network* (McNiff 2020) captures the needs of the community on the Headford Road. It comprises of many small areas with considerably high levels of deprivation. I would urge you to include the community on the Headford Road/N84 who are closest to the City Centre but currently fail to benefit directly from the scheme. It will be many years before this community see change unless they are priorities by Galway City Council and the NTA. They have several rat runs and National Roads cutting the community. The current GTS plan shows a quality bus corridor along only part of the N84/Headford Road connecting to Woodquay. Plans need to be upgraded and acted on to see modal shift in this generation.

This community should be able to get to schools, hospitals appointments, major industry centres, the seaside in Salthill and so on without painfully having to travel into Eyre Square only a couple of kilometres, wait and change bus. There is also a lot of land zoned for residential development in the surrounding community.

3. Priority and space for cyclists and pedestrians

With increased space and priority at junctions and crossings, such as Zebra crossings, we will see walking and cycling growing in popularity all year round. The cyclists and pedestrians should not face long waiting times at shared spaces. How can this be measured and ensured appropriate balance of quality of service is given to them in the design?

Footpaths and existing waiting areas at junctions are already overcrowded. I accept that BusConnects will increase footpath widths however this will come with a cost to cyclists and pedestrians in different ways. Cyclists will lose road space and they are often forced onto shared

spaces to transition at junctions. This is not an acceptable compromise. The plans also propose many new shared spaces. However, with greater priority to cyclists and pedestrians this should not be the case. Motor traffic lanes are receiving perceived upgrades in the form of filter lanes for turning and multilane roads while cyclists and pedestrians are losing space in parallel in places. I do not agree with the balance in delivery of some of these upgrades and ask for review of same to rebalance and improve connectivity of some isolated shared or segregated cycle spaces as well as small shared areas at junctions. Or indeed the potential provision of segregated cycle tracks instead of stagnant on street parking.

Cyclists and pedestrians alike want to maintain progress. I see this daily along the Headford Road, from the N84 and along into Woodquay. Pedestrians do not wait for their designated crossing time. While cyclists cross when a break in traffic comes and 'make up' their own routes through car parks, along footpaths, on the wrong side of the road or cycle lane/track. They may be adult cyclists or cyclists with children. They do this to keep moving and avoid traffic jams where there is no space to filter or to avoid crossing at a junction that may take up to 5-7 minutes (e.g. Kirwan Junction). Many do not want to be alongside lorries or buses. They simply do not feel safe on the road in line with traffic. I urge you to provide for greater segregation from motor traffic and also at junctions to move away from shared spaces as they are not appropriate for more than a couple of users at any one time. With time more will choose to cycle and walk in the vicinity of the city and these shared spaces will be overcrowded. Considering more people are wearing headphones and there will be groups of 2 or more walking/waiting in opposite sides of the road it is not safe to mix cyclists with pedestrians.

The impact of poor weather on cyclists and pedestrians should be considered and increased priority at junctions and on routes (e.g. segregation) should be provided. It is unclear what duration of waiting times and quality of service cyclists will have when the scheme is delivered. In addition the hierarchy of road users should reflect increased priority for same particularly given the proximity of the residential communities to employment/health care/education etc in the city centre. I ask that cyclists and pedestrians are given greater priority at traffic lights, junctions and roads in terms of waiting times and space compared to previously delivered recent upgrades and shown in proposed plans. Can further review be made towards this goal?

4. General comment on raised tables:

These second as crossing points. Generally at desire lines for pedestrians. The pedestrian is not given priority over traffic despite this being in the core of the city. Suggest that a formal clear strategy is made to give priority to pedestrians in the form of Zebra Crossings at points where pedestrians are invited to cross by design. This will lead to greater compliance over time for pedestrians as we see in European Cities.

5. Experience of resolution of issues for cyclists and pedestrians at junctions once commissioned

From recent experience of the Kirwan Junction upgrade on the Headford Road pedestrians and cyclists have to wait long periods of time to get a few seconds to cross a half stage of an arm on the junction. This has resulted in many cyclists and pedestrians using their own judgement to cross when they see an opportunity. Adding to this the conditions when one must wait in cold, windy, dark, freezing or wet days/nights. It seems unfair to pedestrians and cyclists to have such long periods of time between crossing times in contrast to what motor traffic waits. There

is potential for adjustment however I have not received any engagement toward reviewing or improving this matter from TII or Galway City Council since Kirwan Junction was commissioned.

Shared areas were made larger at Kirwan after many requests were made prior to completion of the design and consideration was given to turning radii of bikes and comfortable passing distance as well as two way cycltrack. However it must be noted that extraordinary efforts were invested by voluntary members of the public and myself to reach some improvements.

At the time of design for Kirwan Junction a Zebra Crossing was requested under improvements via consultation on the local road, Coolough Road, as part of the Kirwan project. However no Zebra Crossing was considered and no plan for same since. This is on a raised table for a local road adjacent to a residential community. The logic for not providing for increased priority for pedestrians at this location is not clear to me. I ask for improved engagement and delivery of the hierarchy of road users in the BusConnects process during and post delivery between the public, key stakeholders and cycle groups.

In the case of Kirwan Junction a second opportunity for pedestrian and cyclists to cross for a few seconds should be given at all costs. The junction balance at Kirwan Junction seems to favour flow of motor traffic excessively. I trust that this will not be repeated in BusConnects at any of the major junctions for example where motor traffic gets two sequences of green lights to every one pedestrian green half stage crossing at an arm of a junction.

The placement of some signposts are not ideal at present at Kirwan Junction nor are the level differences between cycle lane and footpath as the design is not consistent and the transition from shared space where everything is at the same level to segregated is too sharp. In different lights and levels of awareness of cyclists (particularly new cyclists like visiting students) some have had bad falls from bikes and pedestrians trips on the level difference at segregated start points. To date no changes have been made at Kirwan despite reporting of issues.

I am fearful of how issues such as this will be treated with future infrastructure if changes are at the cost of taking a few seconds from motor traffic travel times in favour of pedestrians and cyclists. How does the NTA propose to manage this matter in conjunction with Galway City Council and TII where necessary?

6. Routing, desire lines and cycle access map in Galway City

We wait behind standing traffic, for example along the Headford Road, a key access route for many walking and cycling into the city core, adjacent to the two retail parks between Bodkin Junction and Woodquay. This area of the city has a high proportion of student accommodation and by default many do not own a car. Hence high quality walking and cycling infra are key.

We as cyclists travel along convoluted routes to follow the network of one-way streets that have been designed to route motor traffic in and out of the city. All the while cyclists have not been considered or given short safe permeability alternatives to network into, through or around the city. I fear the effect of narrowing streets, which is recommend by DMURS, to create a lower speed environment as this will further reduce the space for cyclists to make safe progress in standing traffic and will leave less space if we are overtaken by motor traffic like buses, delivery trucks or private traffic. Where streets are narrowed and it is along a key/primary cycle route especially where traffic will be queuing an alternative cycle route or segregated route should be

provided. I do not believe this has happened. Greater planning of a cycle network in tandem with BusConnects is needed to understand how cyclists access the city centre and travel through it. There is potential to designate some streets quieter streets suitable for safer cycling away from delivery lorries, buses and private traffic.

A cycle access map for Galway City should be produced as part of BusConnects. This could highlight quiet streets and show routes that cross the city centre from all sides and intersect at key central and orbital locations. It is short sighted of the current BusConnects plan to simply consider existing bus routes, access for private cars, shopping trip attractors and deliveries. It should deliver a planned upgraded access and connectivity map that links schools, shops, playgrounds, healthcare, education, large employment locations etc together with quite routes, link permeability to trails and safe cycle routes where cyclists can maintain progress without having to use busy narrow public footpaths or convoluted routes for access. Sensitive signposting or ground marking of such routes may be part of delivering the routes to help people new to the city around it.

7. Sharing 3m wide traffic lanes

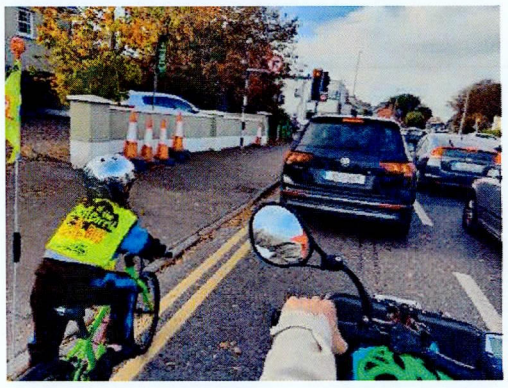
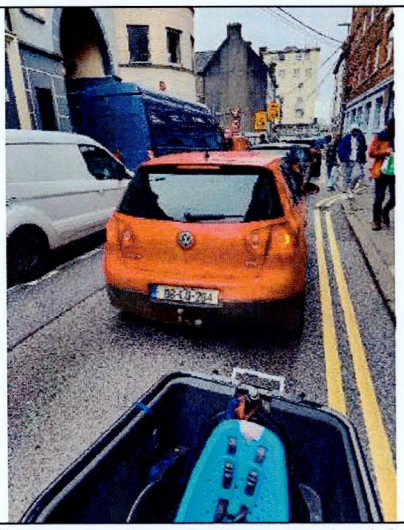
Where the footpath has been built out to reduce overall road width or calm traffic there will be a new risks to cyclists of all ages as busses, lorries and cars will likely overtake many cyclists in the city shared street. During the delivery hours of 10am-1pm there is a considerable increase in the risk to cyclists with delivery lorries operating in the 3 hours window and as they begin to enter and exit the restriction zones at the start and end. There will inevitably be traffic queuing and cyclists will be forced to wait in line, both inside and outside the scheme. This issue needs to be addressed and mitigated at junctions and approach to junctions. This will most likely result in cyclists opting for their perceived safer and quicker option of cycling on footpaths to reach the top of a junction and cross it potentially. All these movements are unsafe and undesirable for everyone.

The result of traffic queuing on 3m wide roads will cause reduced air quality for pedestrians. This will also have a significant negative impact on cyclists who are directly behind motor traffic that in many cases will emit toxic fumes and dioxins that are harmful to humas who are waiting to progress on their cycle trip.

Is it expected that motor traffic, buses/lorries/delivery vans/private cars will stay inline behind a cyclist and vice versa in the inner city where lane widths have been reduced and speeds to be 30km/hr?

Personal experience of cycling in Galway City and in Ireland in general suggests to me that motorist will overtake cyclists where at all possible. Regardless if they are finishing their trip in a few meter or turning off the main road ahead. Driver behaviour needs to be addressed in tandem with reducing speed limits and changing the engineering design of the street/road.

- Who will take responsibility to manage this messaging in a timely manner?
- What penalties will there be where motorists are compromising the safety and enjoyment of cyclists within this scheme?
- What additional measures can be taken to actively manage the issue of cyclists being overtaken who are progressing at a reasonable speed?

	
Lack of capacity to filter – consideration of effect at junctions needs to be planned for	Consideration of queueing at end of delivery hours and conflidts with bus/lorries for cyclists wanting to progress.

8. Inner city access routes and goods delivery routes

BusConnects may well reduce the volume of private traffic in the core of Galway city as the scheme simply redirects traffic out and around the core of the city onto the Inner City Access Route or City Centre Access Network. I am unconvinced that the volume of delivery vehicles will be reduced. In fact, at peak during the Delivery Hours of BusConnects there may be an increase in heavy goods vehicles within the scheme at that time. This poses an increased risk to cyclists who share the road with such large vehicles. I did not see any analysis of this scenario. Greater planning of routing of delivery vehicles should be part of BusConnects. Restriction to certain roads should be considered as a cycle access map for Galway City is generated as part of the project so too should a delivery access map be presented. Highlighting the different routes will lead to natural segregation of cyclists to preferred quiet direct routes into the city from all key origins/residential communities and through the core. This would reduce the need for cyclists to cross the River Corrib several times in one round trip or travel along multi lane roads. This approach will also lead to Galway being a more friendly walking and cycling city for residents and not just tourists living temporarily in the city centre.

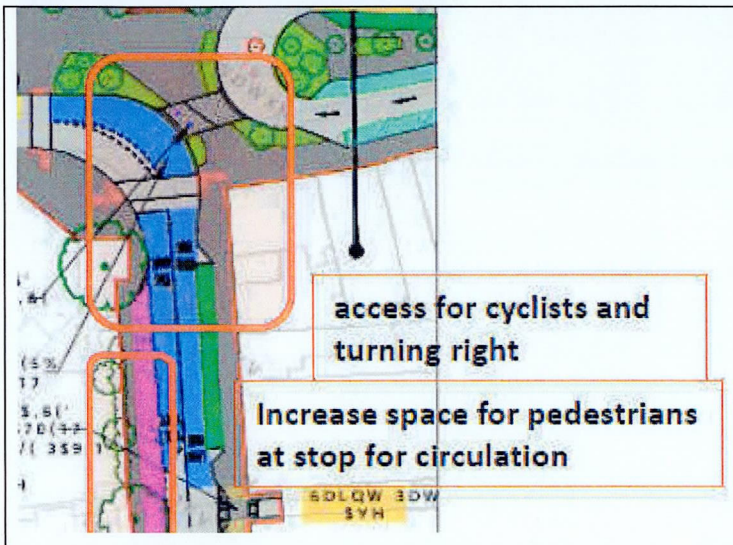
The Inner City Access Route or City Centre Access Network will see significant traffic increases, as is stated in the report. This will continue until such time as a restructured reliable alternative mass transport system is delivered for all communities to network in and across the city. However I fear BusConnects Cross-City Link on the outdated model of 2017 GTS will not assist with modal shift for many who currently use a private car to access or cross the city in the near future. I believe residents North of the city, along the Headford Road or indeed the many that travel into Galway along the N84, to connect to work, education or amenity locations do not have an inviting alternative to choose from going forward. They will all continue to use the private car. This is also in line with the poor modal shift in the modelling for the GTS.

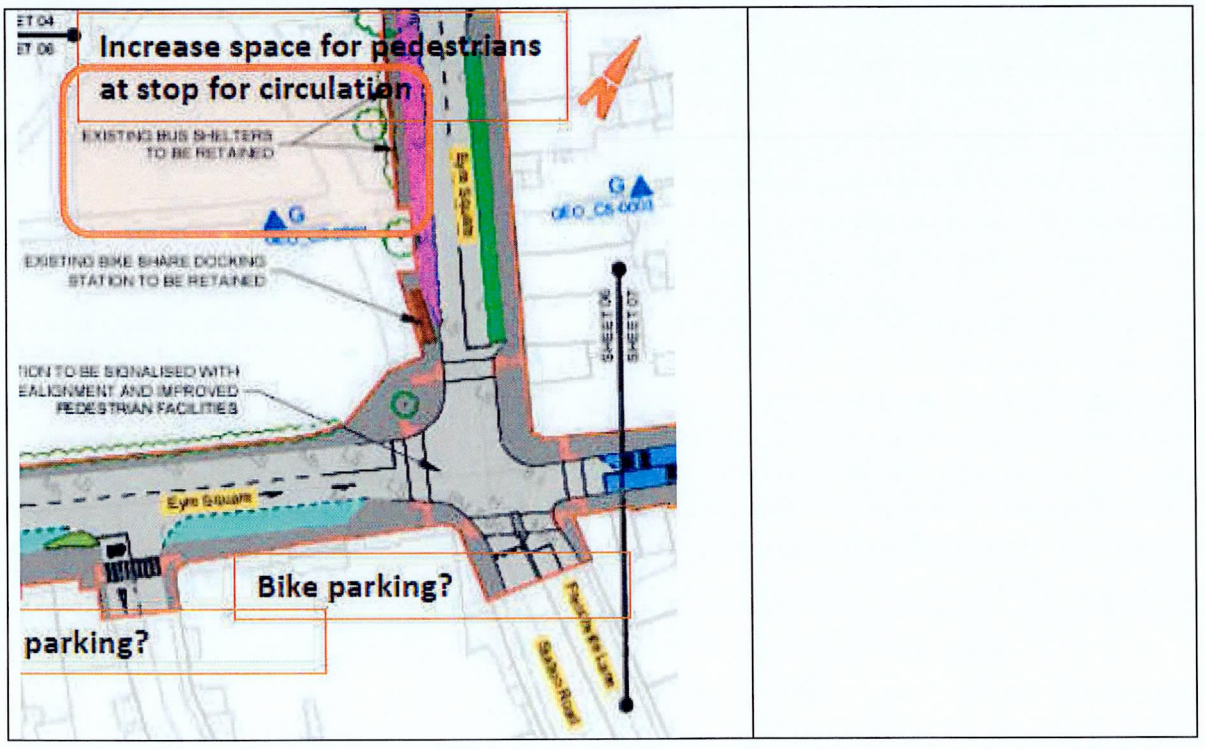
9. Bus Stops

Bus stops should be staggered more such that cyclists can pass if the possibility arrises and would not be prohibited by two buses stopped at the same time in oppsite directions – for example in Woodquay and at the Cathedral bus stops are directly oppsite one another on a busy route. The stops should be staggered at such locations. Consideration to cycle bypasses should be given at these locations.

Waiting areas in the city centre at connecting areas

There is a general lack of welcoming wating areas at bus stops. Footpaths are narrow and waiting areas are confined. If more people are to wait for a bus we will see grater mix is users waiting for buses at stops. They may be in wheelchairs, have buggies, have scoters etc. There is a lack of space for circulation and a feeling of confinement in many locations. Eyre Square, some Headford Road stops and Newcastle Road close to the hospital for example.

	The safety review for the Cross City link requested that bus stops be set back further from the kerb and greater circlation space be given at some bus stops in Eyre Square. It also noted that there were discontinious/lack of clear access routes approaching the bus stops due to upstands for example of trees. The space at the bus stops and access to the stops proposed at the North East side of Eyre Square needs review as greater number will use the bus. More space is needed for safety and to make the space inviting



Bus stops on Newcastle Road are in need of urgent upgrade and locating in more appropriate areas such that users are safe, cyclists are accommodated and traffic flow is maintained in a calm manner.

Key trip attractors (schools and amenities) and bus route options

I want a viable reliable alternative to my bike, in times of harsh weather conditions like storm gales or freezing roads. A quality bus service into and across the city is needed for my community either side of the Headford Road. For my family such a bus service would be frequent, reliable, make progress along the Headford Road and into the city. It would also importantly need to cross the River Corrib where most schools and amenities are located, on the West side of Galway.

We go to the beach in Salthill by private car sometimes or by bike. However this is not feasible for many who have no car or do not cycle. The idea of changing busses in Eyre Square is not inviting for me with my young children. Nor is it inviting on a stormy day and to complete our trip to school on foot across the Corrib having to walk for 15-20 minutes after a bus trip for young children is not viable. I fear that BusConnects is not doing enough to address the needs of the community North of the City along the Headford Road as the scheme stops short at Woodquay. Or indeed to interconnect more communities with key trip attractors like amenity of Salthill, Hospitals, education centres and areas where there is high employment.

I did not see review of key trip attractors like school runs feature in the review or areas outside the red line like The Prom in Salthill which many come to.

Childcare locations for example are key trip attractors. They are points to and from which parents travel onto work, shop or home at least twice a day. These should be part of the review process for sustainable transport. For Galway City to have a transport system that families use to get to and from work, childcare, schools and home it must be ambitious, and it must do that from the beginning. The bus service and BusConnects plan needs to provide a service for parents with their young children to travel together by bus by enlarge from residential origins to childcare/school/work/home/healthcare across the city. This is needed particularly for young families as the parents may also be carers for babies and or may not feel it appropriate to put a 4 or 10 year old on a bus on their own. Implementing modal shift that caters for families with young children will result in catering for many other people in the city to travel to different destinations.

For the most part the population living on the West of Galway City are largely unaffected by BusConnects in dropping and collecting young children to school. In contrast those on the East/North face new challenges to reach city centre locations/schools on West of the Corrib and the public amenity of Salthill seaside. As a result, I ask for a concerted investments in transport options to link into and across the city for these communities North and East of the Corrib. The trip attractor of simply dropping children to school is generally not isolated. It is either coupled with a trip to work or shopping and so it is a key attractor for trips and subsequent trips from schools as both origins and destinations.

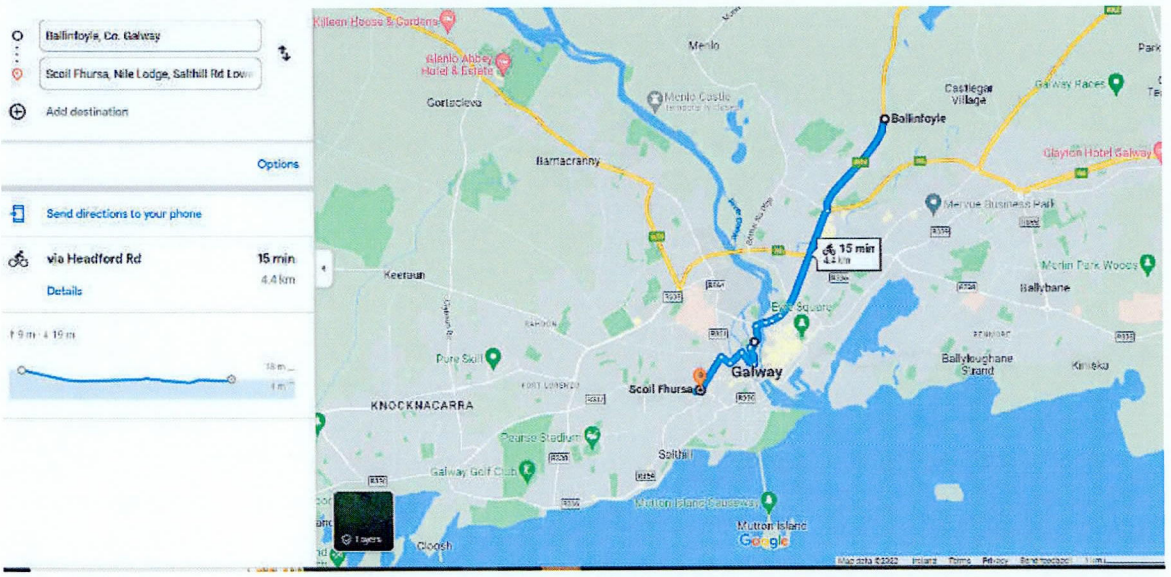
Note this is presented as a one way trip. However for me it is a round trip and I must do it twice a day. Consider the time for the trips below if it were four times a day to reflect what is necessary for many to drop children to school.

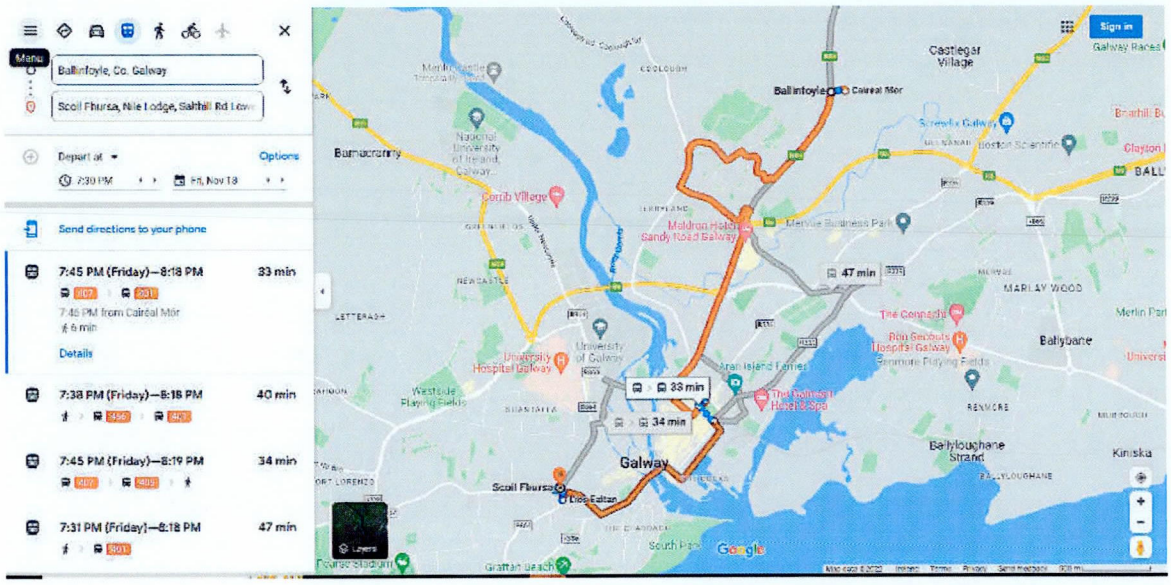
Below are examples of trips into the city from Headford Road area to a school on the West of the city for example by:

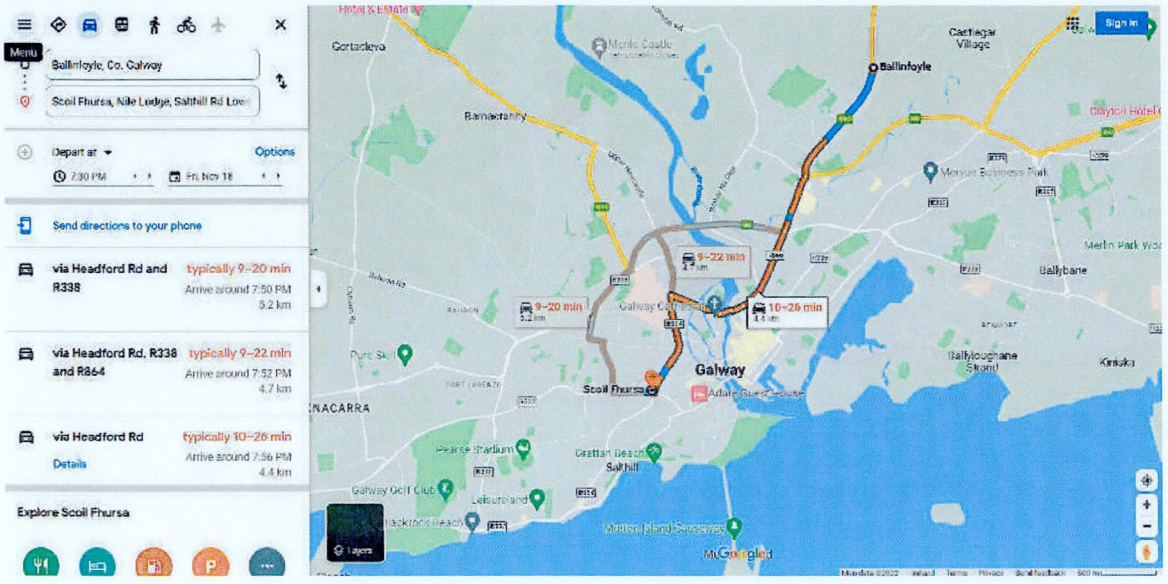
Bike 15 minute 4.4km –a definite sustainable trip and can leave whenever you like giving independence.

Bus – 33-47 minute –must be waiting before bus arrives, requires a connection change in city centre. Large part of trip based on current plan will still not have quality bus corridor. Walk the remaining section. Sustainable trip time consuming trip that is multi mode.

Car – 10-25 minute 4.4km – this will not be an option once BusConnects comes in and congestion to access and cross the Quincentennial Bridge or Docks inner city access route will be even greater than it is at the moment. Unsustainable trip.





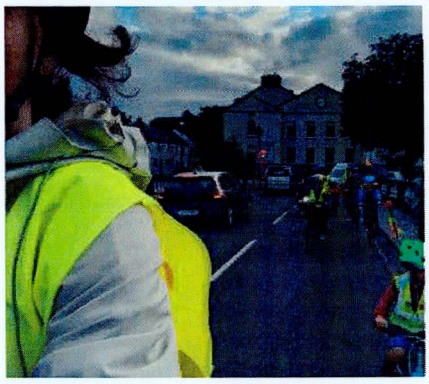


10. Modal shift to sustainable transport

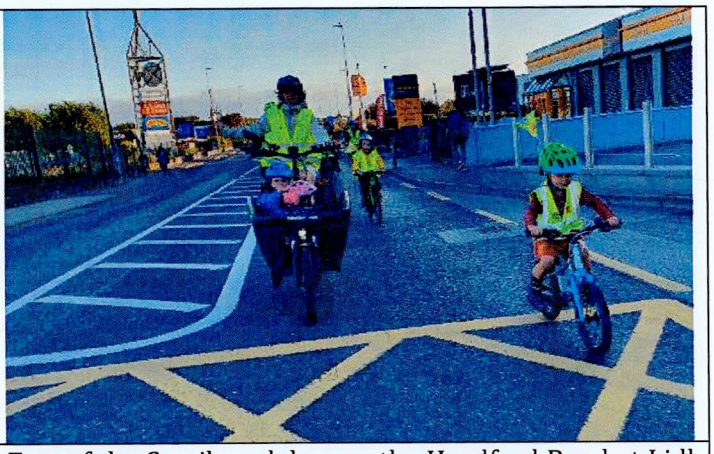
Sadly modelling of modal shift using the Galway Transport Strategy (GTS) of 2017 predicts a modal shift of less than 7% to public transport by 2039. Galway is in need of real mass transport alternatives and fast if we are to become a sustainable city in line with National and European policy and planning frameworks. The above prediction was also with the delivery of the Ring Road. This is not in line with Climate Action Policy. It would seem the public transport options are not ambitious enough for Galway at the present and without radical support for change and investment we are unlikely to see sustainable transport change in this or the next generation. Leading to the existing quality of live factors related to transport in Galway remaining the same. Investment of funds for sustainable transport should be coupled with quality and substantial improvements otherwise it is money poorly invested. The NTA and Galway City Council should be forced to deliver higher modal shift and show real reduction in kilometres travelled by private car in its investments.

11. East of the Corrib Cyclebus

As a voluntary member of East of the Corrib CycleBus it is an honour to enable young children feel safe and able to cycle a few kilometres into school. We are constantly learning and tweaking our behaviour on the route as we adjust to uncontrollable and controllable factors on our way to school. On stormy days when a gale warning come in from Met Eireann we reassess our options often judging if we will cycle or drive at the 11th hour. On frosty mornings we are all a little cautious wanting direct main safe routes to school. We have little by means of a viable public transport alternative – a bus every 30 minutes and only goes part of the way to the destination of school for us. Walking the final 20 minutes on frozen paths, strong winds or heavy rain is not viable for many families with young children.



East of the Corrib cyclebus on the Salmon Weir Bridge



East of the Corrib cyclebus on the Headford Road at Lidl approaching the Dyke Road Junction where we turn right to the quiet route by the Plots/Waterside.

Location: Headford Road approaching Woodquay with Bodkin Junction behind us
Outside BusConnects zone
GTS plan: shared bus and bike.
Desire: to include this in BusConnects and change GTS to deliver segregated cycling

The above route is the Headford Road alongside Galway retail Park and Galway Shopping Centre. This section of the road will not receive any works upgrade under BusConnects is circa 350 meters from where the above photo is taken. The Galway Transport Strategy (GTS) falls short on designating this section to have segregated cycling facilities. This is much needed as this road is the Inner City Access Route (Pink Colour). The Preliminary Report states that traffic along this route and at the junction of Headford Road and Dyke Road will increase due to BusConnects. It is likely the Dyke Road, a local road, that some members of the Cyclebus use will see increased traffic also. Again a negative impact for cyclists and pedestrians. This local road does not have a continuous footpath. As such I feel this section and surrounding areas, like the Dyke Road, should as much as possible have segregated cycling, traffic calming and be part of the scheme now. This road is a major route to distribute traffic around the inner city access network route for motor traffic coming from the N6 and N84 at the North and North East of the city. It should also have a quality bus corridor as part of this scheme. There is space for

segregated cycling if the NTA requests it adjacent to this route as it is largely car parking for retail parks and amenity space.

12. East of the Corrib population transport alternatives post BusConnects

Many of the primary and secondary schools in Galway City are located on the West of the City. The introduction of Busconnets to Galway as previously noted have relatively little impact on families living on the West of the City in terms of dropping and collecting children from schools. However by stark contract those families living on the North East, along the Headford Road, that access the city from Woodquay/Headford Road will now face a considerable challenge – how do the complete their round trip for school twice a day in most cases? Will there simply be more traffic on the Network and Access Routes?

BusConnets stops short at the University Hospital of Galway, a location where it needs to connect into and beyond to network East, West, North and South of the city. Not to mention the inclusion of quality access to a stop at the hospital for many who may have appointments, be visiting or indeed work at the hospital. It is a significant employer in the city and should be a key component in the BusConnects project.

13. Junctions – intuitive design for all users

I am concerned that many of the junctions in the plans, for example at the Huntsman/Wellpark or the College Road/Lough Atalia, lack intuition for many users. Many of the transition points to and from shared spaces, cycle lanes/track or the road are

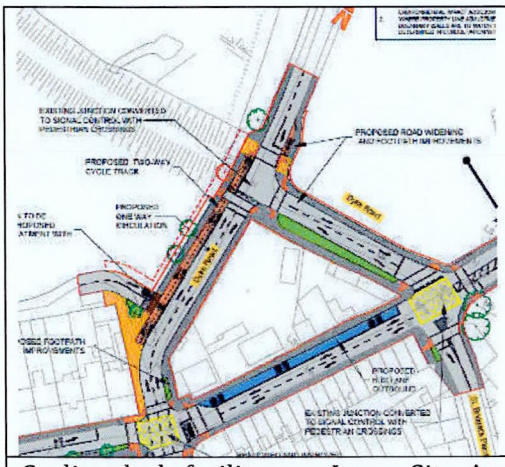
- poorly connected,
- have tight geometry,
- lack sufficient space and
- consideration for the safe movement or waiting of people travelling by bike or pedestrians.

I fear that such transition spaces are not capable of safely catering for more than a couple of people at a time. We are at a point in planning where adequate capacity and redundancy should be built into the design of all spaces for large numbers of pedestrians and cyclists, particularly in the city centre. Considering the projected population growth for Galway City is an additional 34,000 people by 2031, to a total of 115,000 people.

For example at Woodquay more could be delivered with improved transition to and from the Headford road from the south road at Woodquay. At the Dyke Road cyclists are expected to cross to the Plots via a sharp right turn at the base of the old railway embankment. Both the Dyke Road and Woodquay have segregated cycleways that are poorly connected directly to potential routes from the end/start of the segregated area. Further examples of poor linkage/transitions/unfavourable shared spaces for cyclists and pedestrians/

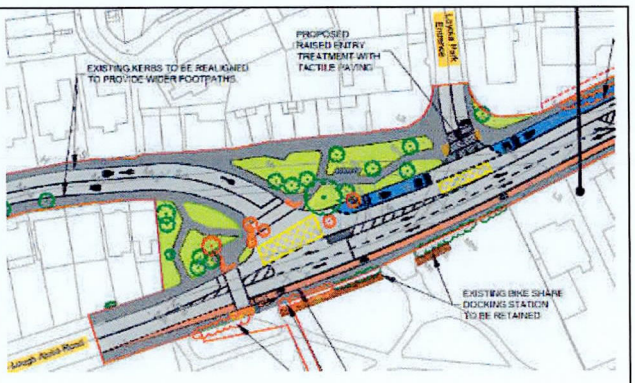
- South end of Dyke segregated cycleway not linked to Headford Road and narrow path at junction – provide more space on path
- North end of Dyke Road poor direct access to segregated cycleway - allow cyclist to connect directly to two way cycle track at plots and dyke road and vice versa. Provide priority for cyclists
- Introduction of new Multi lane intercity access route without segregation on Dyke Road – provide segregated cycle tracks
- Cannot link from Eglington St to Woodquay south end segregated cycle way. – provide confraflow
- Cyclists on the one way street of St Brendan's Ave cannot link into Woodquay safely due to small section of road on Eyre St one way – allow contraflow
- North end of Woodquay not well linked to Headford Road outbound or Waterside Road – should have cycle track/lane at junction instead of shared space
- Waterside Road should provide contraflow connecting the back of Court House to The Plots lane way at Riverside Road.
- Connectivity at College Road junction to and from quiet ways confusing and many filter lanes. Considering this is on the inner city network route greater priority and connectivity should be given to cyclists to transition this busy junction with intuition.

The introduction of a multilane one way triangular roundabout around the Dyke Road is not friendly towards cyclists as lane widths are narrowed and there is no segregation. These roads will see a significant increase in traffic as per the Preliminary Report and is on the Inner City Access Route. It should have segregation for cyclists, there is space for it on all sides.



Cyclists lack facilites on Inner City Access on one way multi lane roads, access from Dyke Rd to Plots cycle track design tight and low priority access. Lanes narrow – no space for filtering. Should have segregation for cyclits and advance start waiting areas for cyclits.

Little consideration and priority for cyclist accessing the city from the Dyke Road. Not all cyclists will use the Plots route.



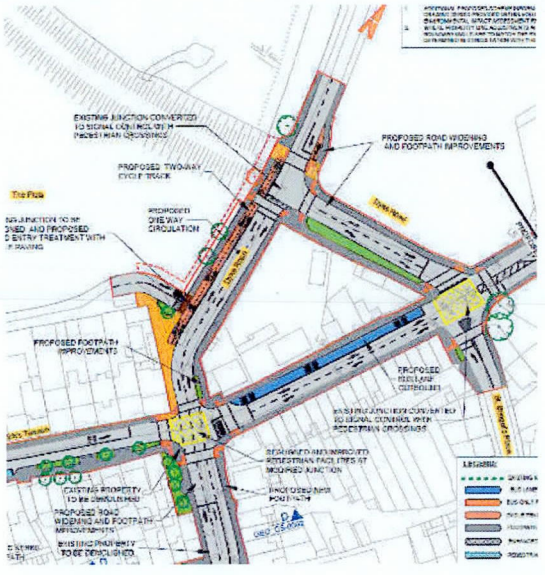
Desire lines from College Road to off road short cut behind Huntsman to access the Old Dublin Road is poor and lacks intuition. Cyclists would like to avoid the right turn at Wellpark earlier if possible. Access to dropped kerbs limited for cyclists who want to use permebaility routes coming from Lough Atalia/College Road.

How do cyclists connect from the cycletrack on Lough Ataila Road to and from College Road with continuity or having to be demoted to shared space/pedestrian light crossing style?

Dyke Road

Space to wait for cyclists to turn right toward the Plots from the Dyke Road, (inbound) adjacent to the Dyke Road Carpark, is too small. There does not seem to be enough space for several bikes to wait it traffic is moving forward from behind. Considering families often use the dyke road or groups of children, young cyclists or cargo bike users need to turn. More space to wait safely and turn is needed.

Turns around some of the junctions onto and off of cyclelanes/road crossings are very tight for some cargo bikes to safely make a turn. With a few cyclist or cargo bikes and cyclist mixing with pedestrians waiting to turn or cross. It is not ideal. More space for circulation is needed at these junctions for cyclist and pedestrian to avoid conflicts.



14. Shared areas

The BusConnects Cross City Link presents excessive use of shared areas for cyclists and pedestrians. This is particularly evident at junctions and transition areas throughout the scheme. Cyclists move for sections of segregation, to shared spaces and to mixed traffic flow. There is space in many cases to better design these areas for safer movement of people cycling and pedestrians. I strongly urge An Board Pleanala to issue instruction that the design and space for pedestrians and cyclists be reevaluated to make the scheme safer. Further I request that use of the Draft National Cycle Manually be used to improve design principals in this key piece of infrastructure for Galway City and its people.

Cyclists and scooter users will end up moving in unpredictable patterns around pedestrians. This s intimidating for pedestrians, creates confusion and is a hazard for all users. They many become frustrated and transition from footpath to on road creating a hazard for themselves and other road users.

Cyclists and pedestrians of all ages and levels of ability prefer to be segregated from each other.

The current National Cycle Manual (2009) states explicitly that such facilities should be avoided as far as possible:

1.9 Pedestrians and Cyclists

Urban design of town and city centres should aim for the optimum pedestrian Quality of Service consistent with the overall traffic plan. Shared facilities between pedestrians and cyclists generally result in reduced Quality of Service for both modes and should not be considered as a first option.

1.9.3 Shared Facilities

Shared facilities are disliked by both pedestrians and cyclists and result in reduced Quality of Service for both modes. With the exception of purpose-designed shared streets, shared facilities should be avoided in urban areas as far as possible.

Conflicts should be reduced in the design between cyclists and pedestrians. Greater space in needed in cases at junctions for the safe connection of cyclists to the next part of their route. This would benefit all road users and would mirror the hierarchy of road users.

Follow the release of extracts from the Draft National Cycle Manual (Feb 2023) recently it clearly states that "Footpaths should be clearly separated from cycle lanes and tracks wherever practicable".

Separation between Pedestrians and Cycle Users

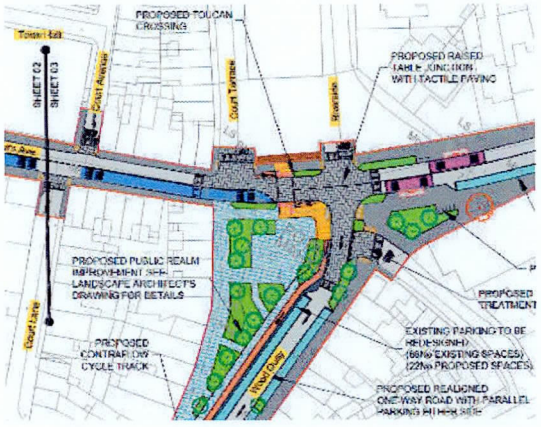
Footpaths should be clearly separated from cycle lanes and tracks wherever practicable. This reduces potential conflicting movements between pedestrians and cycle traffic and provides a more comfortable facility for all users.

The preferred and most easily detectable form of separation is a change in level between the footpath and cycle surfaces of minimum 60mm. This allows people who are blind, or vision impaired to detect the change in level. It is important that designers consider the legibility of the segregation kerb/upstand for pedestrians; legibility can be increased by having a strong colour contrast between the adjacent surfaces.

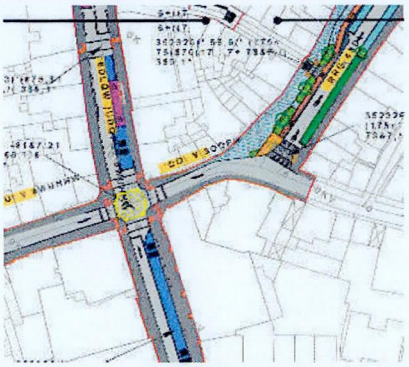
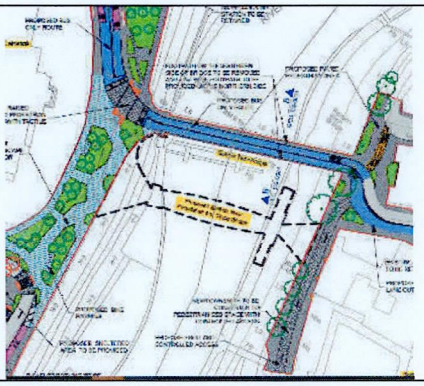
The kerb between the footpath and cycle track is typically vertical but use of splayed kerbs should be considered to make the inside edge of the cycle track more forgiving to cyclists.

Where pedestrians need to cross the cycle facility (e.g. to access bus stops or at pedestrian crossings), there should be suitable gaps in vertical segregation elements and kerbs upstands, and dropped kerbs and tactile paving provided at the interface between the footpath and the cycle facility. The decision on whether to provide informal or formal crossings of the cycle facility should be based on pedestrian and cyclist flows (one-way/two-way) and the width of the cycle facility.

Shared areas and their use by cyclists in the plans seem unclear to me as a user and I fear at times when there are a few pedestrians waiting or walking that there is too much potential for conflict either at tight corners of junctions or as cyclists transition through a plaza like Newtownsmith/Cathedra Plaza/Woodquay in either direction for example.



Woodquay:
Cyclist exit from cycleway to cross Headford road and turn right or left should be improved. Suggest to allow for cyclelane to come to the head for Woodquay side road. Doing this will allow for confident cyclists to avoid having to cycle on a shared footpath space at a junction where there are two areas at the corner where pedestrians will be waiting to cross. It is unnecessary to force all cyclist onto the path as the road into woodquay side road is one-way (inbound) for traffic.
There is space to bring the cycle track on the side road to meet the main Headford road.

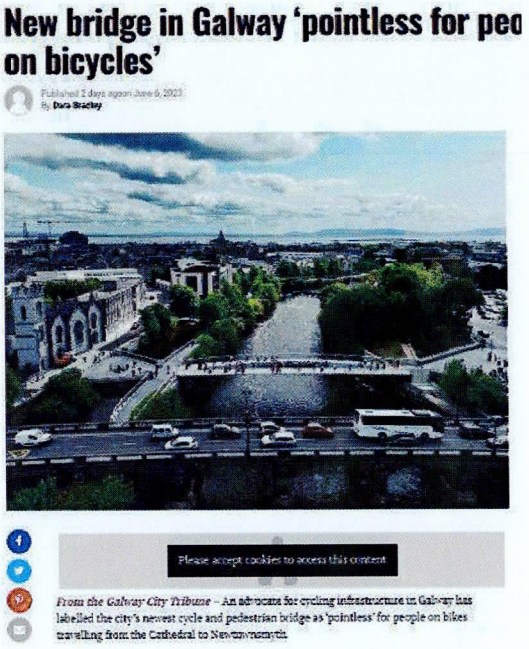
	stagger bus stops further to allow cyclists to bas standing bus safely or provide cycle bypass
	
Full connection with cycle lane on Woodquay to Headford road needed and avoid shared space clashes. Many cyclists woule like to connect from Eglington St to Woodquay without having to go to Court House traffic lights/'Out and around'. Dalys Pl lacks contraflow for cyclists to connect to the outbound cycletrack in Woodquay that seems to be of limited use in the present design as nobody can cycle to the start of the cycletrack. It is great to have the cycletrack in woodquay but it needed to be better connected all around.	Access to and from both Plazas at new pedestrian bridge and travel north/south unclear.

Following the recent opening of the new shared pedestrian and cycle bridge over the River Corrib adjacent to the Salmon Weir bridge some residents in Galway have expressed grave concern over the confusion and sharing of space on this new piece of infrastructure, See extract from Galway Advertiser 8th June 2023.

https://edition.pagesuite-professional.co.uk/html5/reader/production/default.aspx?pubname=&pubid=a2fc81f2-0ccf-4dbf-aca1-00bedf4bde35

Another article this week in the City Tribune (Connacht Tribune 6th June 2023) notes the bridge as pointless and connection to and from the bridge at either side is flawed as road traffic restrictions will not permit safe transfer to and from the bridge. The need for clarification of contraflow for cyclists is a key issue at Newtownsmith. While cyclists are forced to exit the shared area at the Catherdral side at one point only – the shared toucan crossing. This will be busy and will not be a safe place for cyclists to continue or start their transfer to/from the bridge.

https://connachttribune.ie/new-bridge-in-galway-pointless-for-people-on-bicycles/



New bridge in Galway 'pointless for peo on bicycles'

Published 2 days agoon June 6, 2023
By Dara Bradley

Please accept cookies to access this content

From the Galway City Tribune – An advocate for cycling infrastructure in Galway has labelled the city's newest cycle and pedestrian bridge as 'pointless' for people on bikes travelling from the Cathedral to Newtownsmyth.

From the Galway City Tribune – An advocate for cycling infrastructure in Galway has labelled the city's newest cycle and pedestrian bridge as 'pointless' for people on bikes travelling from the Cathedral to Newtownsmyth. Galway City Council and National Transport Authority (NTA) said the bridge would remove conflicts between pedestrians, cyclists and traffic on the existing bridge. And it would also facilitate the BusConnects Cross-City Link scheme over the 200-year-old bridge, which is currently with An Bord Pleanála. But Shane Foran, a cycling campaigner and community member of the Council's Transport Strategic Policy Committee (SPC), claimed there is confusion whether people on bikes can access Newtownsmyth by turning right off the new bridge. He said that a review of the BusConnects proposal, "shows them to be inconsistent with the claimed purpose of the new bridge". "According to the drawings, there is to be a new one-way street arrangement at Newtownsmyth going north. There is no apparent provision for cyclists to move 'contra-flow' to the south. "Therefore how are cyclists travelling east-west to lawfully access the new cycle bridge from the Newtownsmyth side? The new legal restrictions will arguably also make it pointless for most eastbound cyclists, coming from the university direction, to use the new bridge to travel west to east," Mr Foran said	In a submission to An Bord Pleanála on the BusConnects plan, he sought clarity on whether cyclists can travel both ways along Newtownsmyth, to and from the new bridge. "From my reading of the plans, that would be forbidden. You would no longer lawfully be able to do that," he said. A similar submission to ABP was made by the Galway City Community Network. "It is not the intention of the proposed scheme to restrict access for cyclists to or from the new Salmon Weir pedestrian and cycle bridge," the Council said in response. "The proposed scheme intends that Newtownsmyth will be made a cul-de-sac utilising retractable bollards. The section of Newtownsmyth between the bollards and St Vincent's Avenue is proposed to act as a shared space for pedestrians and cyclists. "Both pedestrians and cyclists will be permitted to traverse Newtownsmyth in both directions when the bollards are up, permitting access and egress in both directions for cyclists. "References in the design to one-way relate to vehicles exiting Newtownsmyth during the loading window when the bollards are retracted and are not intended to restrict cyclist permeability," it told ABP. But Mr Foran was not convinced. "What happens when the bollards are down and if that section is made one-way for vehicles what legal mechanism makes it two-way for bicycles?" he asked.

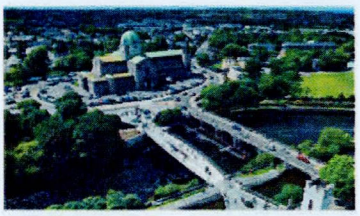
Extract from the Connacht Tribune 6th June 2023.

No cyclepath markings on the new bridge

Dear Editor

I very much welcomed the news that Galway City Council had unveiled the new Pedestrian/ Cyclist bridge over the river Corrib – a move that I had assumed would improve connections for all road users and would somewhat alleviate the strain on the existing Salmon Weir Bridge which for many years has been a precarious bridge to cross (with pedestrians, cyclists, cars and buses all vying for room).

As a regular cyclist, I was particularly interested to see how the new bridge would be safely segregated for its intended users (pedestrians and cyclists) and where the cycle path would be on the bridge.



Anyone who has viewed the new bridge will have ascertained that there are currently NO road markings indicating where cyclists should enter or exit the bridge or any sign of a cycle path or road signs. Seriously?

Following on from the recent disastrous/failed attempt by Galway City Council to improve cycling infrastructure in Salthill, one probably shouldn't be surprised. I sincerely hope that the Council is planning to address these serious omissions and that the bridge was opened in a hurry.

Surely, we Galweglans don't deserve another flawed, unsafe infrastructure in our city? We can only live in hope that this situation will be urgently resolved.

And as for anyone wishing to safely cross from the Fisheries Field side of the road to access the new bridge, good luck with that. You are reliant on the goodwill of passing motorists to let you cross, or a break in the traffic. Unbelievable that no provision or pedestrian crossing has been created in that regard opposite the cathedral.

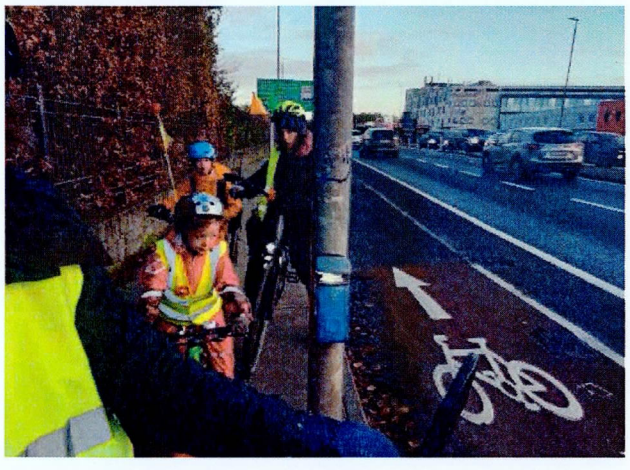
Not rocket science one would imagine?

Lower Salthill Cyclist & Pedestrian

(Name and address with editor)

Extract from Galway Advertiser 8th June 2023 in the Letters section.

Shared areas and shared crossings should be replaced with improved segregation and safer flow of people along desire lines and routes. At peak times the footpaths will become busy and this is no place for people on bicycles to mix with pedestrians of all ages and mobilities. At crossing points where design is poor and does not accommodate desire lines or cyclist are transitioning (see image below) there will be frequent conflict points between cyclists and pedestrians. Careful consideration and improved design is needed throughout the Cross City Link scheme such that this issue is mitigated. The infrastructure will in a whole be substandard for all users if it remains unaddressed.

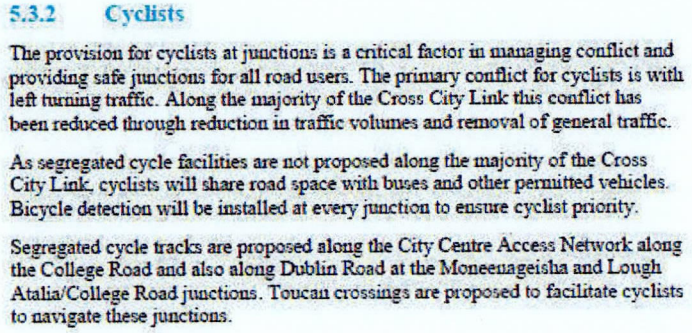
	
Cyclists wait on narrow footpath to cross N6 to continue inbound trip on inbound cycle track. Headford Road, N6. Desire line now shows majority of cyclists travel inbound on N6 between	Cyclists travel inbound on East side of N6 (designated outbound cycle track) to toucan crossing as multi stage crossing at Kriwan Junction (to the North) is not user

Kirwan and Bodkin Junctions.	friendly.

15. Primary conflict for cyclists and assessment

A significant concern for cyclists is indeed left turning traffic. However greater mitigation of this issue could be better managed with segregation at junctions for cyclists. Can further effort be made to provide same at more junctions.

I note that there are no segregated cycle tracks along College Road and consistency at the Lough Ataila/College Road junction is poor where there is space to provide more segregation as well as connection to the Old Dublin Road/Moneenageisha Junction.



5.3.2 Cyclists

The provision for cyclists at junctions is a critical factor in managing conflict and providing safe junctions for all road users. The primary conflict for cyclists is with left turning traffic. Along the majority of the Cross City Link this conflict has been reduced through reduction in traffic volumes and removal of general traffic.

As segregated cycle facilities are not proposed along the majority of the Cross City Link, cyclists will share road space with buses and other permitted vehicles. Bicycle detection will be installed at every junction to ensure cyclist priority.

Segregated cycle tracks are proposed along the City Centre Access Network along the College Road and also along Dublin Road at the Moneenageisha and Lough Atalia/College Road junctions. Toucan crossings are proposed to facilitate cyclists to navigate these junctions.

16. Flow and access for cyclists throughout the design

The following are concerns relating to the flow and access for cyclists to and from the roads/junctions/spaces (see attached presentation with highlighted red areas)

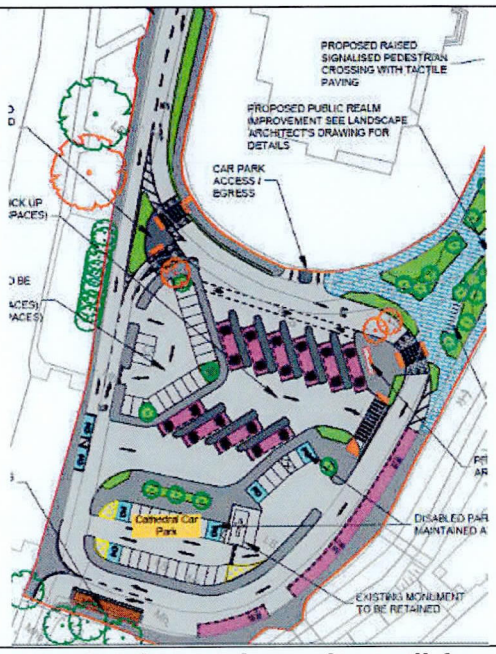
- Woodquay
- Newtownsmith
- the Plaza at the Cathedral,
- Nuns Island,
- Dyke Road,
- Right turns at junctions such
    - North East of Eyre Square
    - University Road and Gaol Rd behind the Cathedral,
    - Bothar na mBan and Prospect Hill,
- Movement through the
    - Bus Gate
    - College Road and Lough Atalia junction
    - Wellpark Junction.

17. Attached presentation

The attached presentation shows highlighted red areas. Issues not limited to the flow and movement. Issues by also relate to space and segregations for cyclists, bike parking, general access, raised crossings for pedestrians etc.

I am aware the report notes that cyclists can access Newtwonsmith. However it is unclear if any restriction will apply, be they time or direction of flow for example. A pedestrian plaza typically does not facilitate cyclists. In the Docklands specific signage has been put in place to permit

cyclists to travel through the pedestrian zone, see below, Shared pedestrian zone. It is prudent that such key elements and access corridors to the medieval core be clear and without restriction.



I am concerned about the convoluted route that cyclists will face to access Nuns Island and indeed the lifeline to almost all the city centre/medieval core from the North or East of the city.

Add pedestrian crossing points at the South of the Cathedral Parking area are poor and connectivity from footpath to footpath is poor overall.

Long routing – unnecessary for cyclists and should be actioned on through BusConnects
For my family getting to say Middle street or the Public Library on Augustine St we must cross the (1) Salmon Wier bridge and then turn left in front of the cathedral. This will no longer be appropriate from what I see of the plaza. We will now have to travel longer around the back of the cathedral and turn East again toward the Corrib and snake around the coach parking area as if we are a car before we can finally take the turn to Nuns Island towards St Josephs Secondary School. It seems illogical to not provide segregated two way cycling facilities that give a direct route to Nun's Island. Forcing mixing of cyclist with coach parking facilities and the people who access them seems unnecessary.
From there we must travel down Dominick St and around by the Fire station and cross the (2) Wolf Tone Bridge (now second time to cross the Corrib). We must then travel toward Merchants Road (very hostile multi one way road!) along the Inner City Access Network on a Multilane road with buses, car park access/exits and deliveries before we can turn left to Abbygate St lower.
The latter is also how those in the West of Galway access the City Library.

For those coming from Eyre Square they must travel along two mulit lane roads – Dock Road and Merchants Road. This is an unacceptable standard of access.

These roads are part of the Inner City Access Network (Black). They will have increased traffic. The effect of BusConencts must be managed such that it does not create more hostile cycling conditions else where as a by-product of the scheme.

***** A review of access into the city core is needed for cyclists from many key origins. *****

18. Pedestrain Plazas

Cycling on a footpath or pedestrian zone

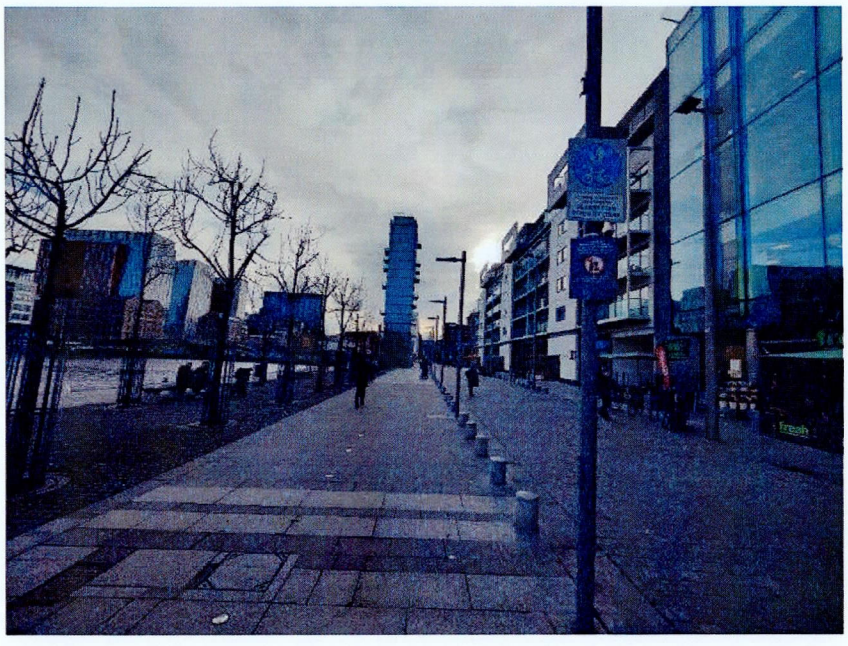
Extract from citizens information

Is it legal to cycle on a footpath?

You are not allowed to cycle on a footpath unless there is a designated cycle lane on the footpath or you are entering or exiting a property. Cycling on a footpath is not a specific fixed charge offence though. However, you could be fined for doing so if a garda deemed their cycling to be without '*reasonable consideration*'.

Similarly, you cannot cycle in a pedestrianized area at the designated times unless there is a cycle lane.

There is no designated cycle track/lane shown on the Newtownsmith street, as such I believe the commitment to the provision of two way cycling in Newtownsmith is limited. I note that there is a one way access route for motor traffic north bound on Newtownsmith and it may be that cyclists are permitted at given times on this section in this direction only. There does not seem to be adequate provision to cyclists in both directions along Newtownsmith. This is a key quiet access route into the city and to the new shared space bridge south of the Salmon Wire bridge.



Example of Docklands shared plaza in Dublin.

This area is larger than the plazas in Galway.

There is a clear access route will little clutter.
Fear that there is a lot of green planting planned for at Cathedral plaza what will reduce space for circulation of people and potential for bikes accessing the pedestrian/cycle bridge

See signage here. In tandem with lighting pole.
Reduces unnecessary poles in layout

What is the guidance from the NTA on the use of Plaza's as

	shared areas and for cyclists to travel through?

19. Cycle parking

A very limited number of cycle parking locations have been shown on drawings. Cycle parking is referred to in the Preliminary Report in subsections. However such reference is insufficient at this stage of the project as specific location, quantity and access to same is unknown and no commitment is made for delivery of quality well planned and accessible bike parking.

In planning and showing bike parking on BusConnects it is evident where cyclists are expected to cycle and from there cyclists can comment on the appropriateness of same. However a poor attempt to address this issue has been made thus far. With good planning it would also be evident where cyclists can actually safely and legally cycle to and park to shop/study/work/socialise/transition etc.

I ask that a review of parking be carried out and adequate parking be provided for. See comments on Cycle Parking in the Galway Cycling Campaign Submission.

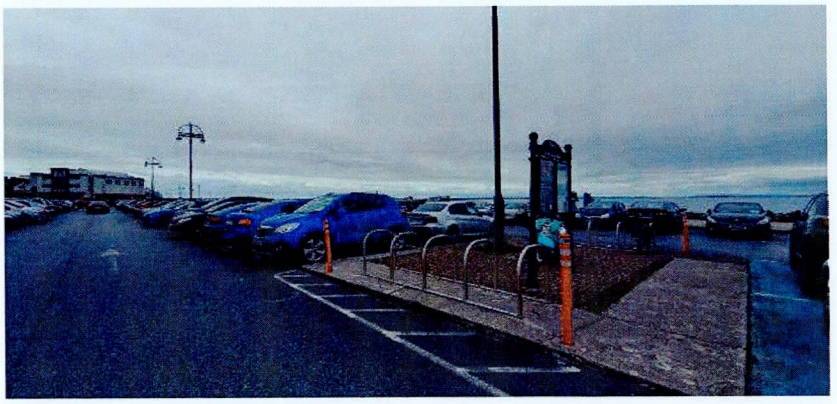
Cycle parking needs to cater for Good access in and out of the area, safe wating and away from motor traffic for safety with children. Cater for cargo bikes, space for shopping bags, well designed and spaced Sheffield stands. Control bikes tied to poles and introduce more parking close to amenities in the core of the city.

Locations shown are Woodquay (x2) and Bowling Green above

Cycle parking needs to be close to amenities and shopping streets. Access routes to cycle parking should be considered and how far a cyclist must walk to reach shopping streets. Is provision for crossing points along potential desire lines considered in the plans. Introduce parklets and facilities for wate disposal at bike parking.

Poor location of cycle parking shown below due to antisocial behaviour and lack of social passive surveillance. This is located at the North end of Eyre Square Park, see below. There is little through put of people walking in this area despite it being in full display of the public.

Other poor locations of cycle parking which have been delivered in Galway City include bike parking in the Salthill Carpark which is no within easy reach of demand locations like beaches or shops, see below. Cyclists like to park close to amenities and in areas that are safe for loading and unloading. Consideration of children in these locations should be made. Designating sufficient and appropriate locations to public bike parking is key to having a clean and clutter free city for people to walk around.



Bike parking at the top of Eyre Square adjacent to Eyre St seems to be removed as it is not shown in the plans, see below. This bike parking is well used and well located. This bike parking should be retained and more added in connected locations close to the pedestrian core.

20. Green strips

Inclusion of green amenity strips shown in drawings is noted. I ask that it be stipulated that grass, flowers, low planting (that is appropriate for management all year round) be made. It should not be acceptable to provide tarmac or concrete that is green in place of soil and grass/planting in these areas. Note Kirwan Junction has some painted green tarmac along the verge where green amenity was shown on planning drawings.

21. Bus shelters

There is space for a bus shelter at Woodquay bus stops. Shelters should be provided without impacting on the available width for pedestrians to walk. As such bus stops should and could be setback from the main footpath.

The footpath does not need to be built out if the available space behind bus stops was used for a shelter.

Bus waiting areas are still too narrow at Eyre Square for circulation of pedestrians. This was highlighted in the Road Safety Audit with particular reference to the area opposite St Patricks Ave. More footpath width and waiting areas are required. If passenger numbers are to increase then this is critical for overall safety and reaching design standards. Little effort is made to overcome pinch points at areas where trees and raised planting/landscaping are restricting the flow of pedestrians along desire lines. See south east end of Eyre Square.

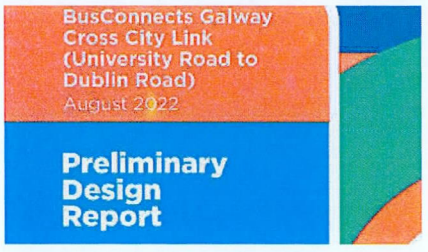
22. Increased traffic volumes in preliminary design report – what does and should that mean for cyclists?

Extract from page 16 of Preliminary Design Report.

It notes that traffic volumes are likely to increase at the junction of St Brendans Ave and Headford Road. However cyclists are not given segregated facilities. There is no restriction to access on this route inbound or reduction to traffic volumes. This is surely a significant shortcoming in the design for the provision for safe cycling access into the core of Galway City for anyone living north of woodquay. Anyone wishing to cycle into or through the city from Bodkin Junction, Kirwan Junction or turn of the primary cycle route along the Quincentennial Bridge/Sean Mulvoy Road.

Greater effort to provide for segregation along the Inner City Access Route on the Headford Road such that cyclists can access the core of the city should be made. It is one of the missing links in safe cycle access into the city from one of its residential suburbs which is only a kilometre or two from the Salmon Wire Bridge.

Similarly at the junction with the Headford Road and Local Dyke Road (essentially a multilane roundabout with traffic lights) should have fully segregated cycle facilities on all lanes as it connects to and will be a new part of the Inner City Access Route.



The Headford Road / Dyke Road was chosen as the other end of the Inner City Access Route to be included in this scheme. This was chosen due to the requirement to convert Fairgreen Road, Bóthar Ui Eithir, Prospect Hill, Bóthar na mBan and St. Brendan's Avenue a two-way link along its length, due to the restrictions placed along the Cross-City Link for general traffic. With the Cross-City Link in place, access to numerous car-parks along the Inner City Access Route will be required to be maintained. The most significant current constraint on this route for traffic and pedestrians is at St. Brendan's Avenue and Headford Road. It is expected that the traffic volumes at this junction will increase with the introduction of the Cross-City Link. This is also the location where one of the GTS bus routes intersects with the Inner City Access Network. The section of the Inner City Access Route along Headford Road, between St. Bridgit's Place and the N6 Bothar na dTreabh will likely be subject to another future scheme to be developed by Galway City Council to address the demands of all modes along that corridor.

23. Parking/Taxi/Loading etc

The number of Designated disabled parking spaces are to decrease or be located further away from destination points. In terms of location priority should be given to locating these as close to amenities as possible and priority be given to them over general parking spaces.

Loading bays could become Designated disabled parking outside the hours of the deliveries (10am-1pm). This would be a huge positive effect for disabled users to access the city and shops. These would need marked as designated disabled parking spaces to avoid confusion and show a sign for loading bays for the hours of deliveries.

It is unclear where taxi bays will be from the drawings. This is an important point and is discussed in the text but needs to be shown on the drawings for greater transparency of use of on street parking and taxi bays.

Parking on streets like Walsh's Terrace, University Road and College Road where on street parking is shown – suggest that this be at off peak times and only for residents/permit holders. The general public should use alternative parking. This is prime space that should be dedicated to cycletracks/lanes to make cycling safer and more inviting to support modal shift. This approach would reflect national policy in prioritising sustainable transport modes and be in line with the design guidance in the National Cycle Manual.

24. Annual Average Daily Traffic counts and Passenger Car Units

Request breakdown of vehicle type passing through the (A) core of the city /BusConnects project, (B) along the Inner City Access Route and (C) Inner City Network for:

(1) current status/do nothing, (2) 1yr after BusConnects and (3) 15yrs after BusConnects.

Carry out the assessment for the hours of: Delivery Operation, Peak am, Peak pm and AADT

- Annual Average Daily Traffic counts (AADT)
    - breakdown for delivery vehicles
    - breakdown for buses (public and private)
    - breakdown for car...other
- Passenger Car Units (PCUs)
    - breakdown for delivery vehicles
    - breakdown for buses (public and private)
    - breakdown for car....other

This information will help assess the impact of the scheme on the roads connecting to the city centre and the inner core itself which will inform the conditions for cyclists at various times at these different locations.

Short notes on a few design layouts

- Request cobble surface outside Court house to be made safer for cyclists as is slippery and very bumpy. Can cobbles be removed?
- Geometry and materials used for raised crossings – have they been trialled and tested already? Are they designed in accordance with cycle comport and safety?
- Dropped kerb needed at side lane to St Bridgets Court lower.
- Not enough circulation area at corner of Headford Rd and Bothar na mBan where house to be CPO'ed. There is excessive introduction of planting. With pedestrians waiting to cross there is not enough space for safe circulation considering the price paid to create this space. This will be a busy junction for traffic – need for space to step back and circulate away from kerb.

- Very limited bike parking indicated at Woodquay. This area is always full and more bike parking is needed here and further into Woodquay at Dalys Pl end.
- Other locations closer in city core need more dedicated bike parking.
- Ensure all side access and side roads have raised crossings, see attached presentation
- Some existing bike parking seems to be removed in the plans with no alternative adjacent locations planned
- Plans for scooter parking may be necessary?
- What is the predicted effect on the numbers of taxis operating in the city core during bus connects as a result of the scheme?
- Use of Forgiving/splayed kerbs in design instead of stepped 90 degree edges between footpath and segregated cycle track. Research has shown that these kerbs reduce hazards for cyclists of accidents while still maintaining a delineation between footpath and cycletrack which protects users with mobility or visual impairment.
- The draft National Cycle Manual (Feb 2023) recommends kerb upstand (at the edge of the cycle track) between the road and segregated cycle track. One positive aspect of this segregation between road and cycle track is that it can assist in reducing parking on cycle tracks. However care in design is needed such that cyclist are considered and can have necessary access/egress from the cycletrack at appropriate locations.
- Potential for scheme to deliver segregated cycle route on Dyke road lower section as this is public land.

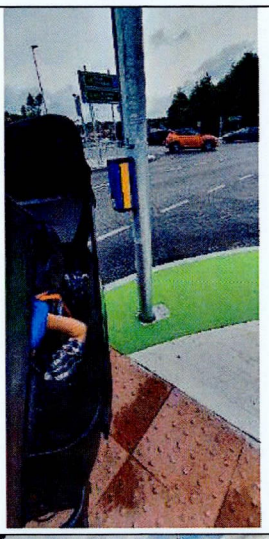
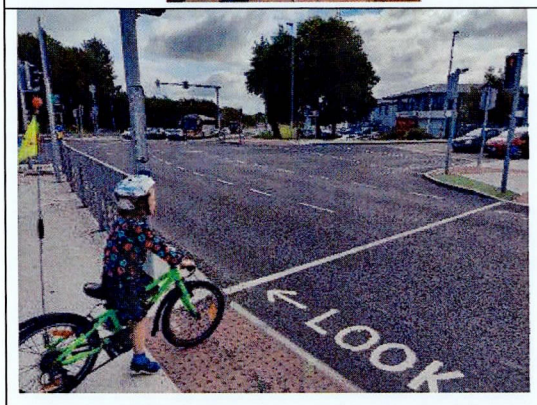
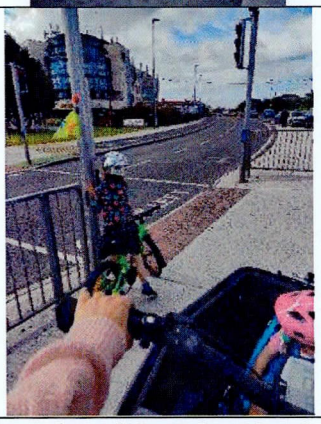
Restrictions for motor traffic are creating unnecessary rerouting for cyclists along roads with potential traffic queuing at lights for circulation. For example

- Cyclists will need to turn left and right at Dalys Place.
- Cyclists will want to also travel both directions on Dalys Place
- Cyclists will want to turn right and left on Marys St and go straight.
- Cyclists will want to turn right from Eglinton street onto St Anthony's Pl
- Cyclists will want to cycle both directions on Eyre St
- Will cyclists be permitted to cycle in front of Skeff at Eyre Sq – not shown
- Possibility to turn right from St Brendan's Ave to Woodquay – contraflow?
- Waterside contraflow
- Overall very few cycle symbols on the street

25. Toucan buttons and waiting areas at junctions

Toucan buttons should be set back form the kerb and consideration given as to how cyclists on larger bikes, those with kids on kid seats of bikes, those with buggies etc can safely reach and activate the toucan button without having to roll a front wheel onto the road or reach excessively. Also consider the area that the radar sensor picks up. The Cyclebus users have many a time lost the slot to cross as the radar does not pick them up as they wait to cross. Those with larger bikes may not be able to wait in the zone immediately at the kerb/road.

Cyclists should not be demoted to rely on use of toucan crossings in the scheme as much as they currently are. There should be greater flow and connectivity for cyclists in the scheme than is presented.

	
	
Above photos from Kriwan Junction Galway City	Above photos from Kriwan Junction Galway City
Access to toucan button not intuative or located appropriately for safe access for a cyclists	Pedestrians/cyclists may be set back from the waiting areas. This is problamiacit for the radra to pick up and so they may miss sequence and the radar does not pick them up and cancells the request to cross.
Cargo bike users are set back further from front wheel and so cannot safely reach toucan buttons. Manouvering is also difficult with load and angles to get to the button.	A child may way set back from the kerb and not be in the radar zone. Consideation to pick up more users waiting away from the kerb should be made

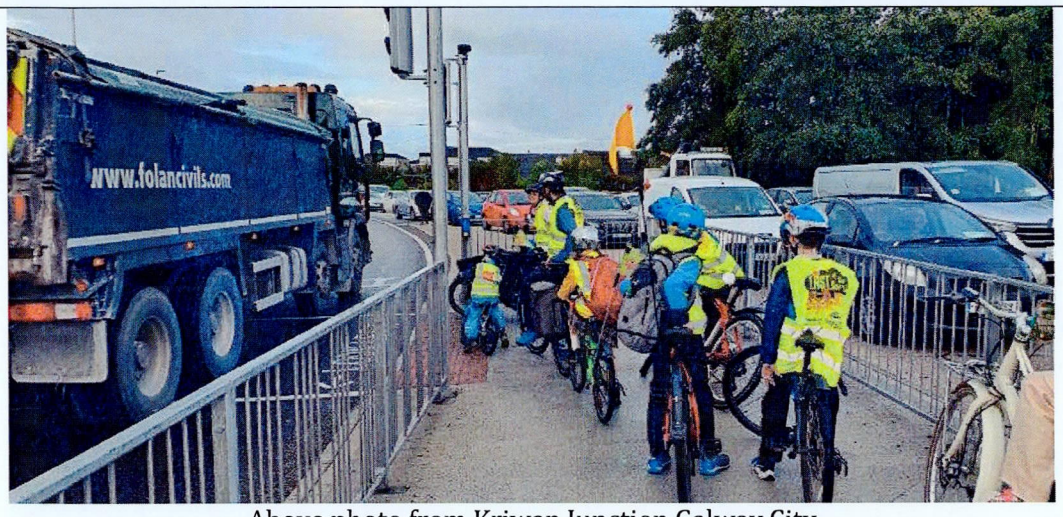
Design aspect to consider for toucan buttons: (not limited to this list) position of toucan button, space for passing, consider mixed pedestrians and cyclists, infra red zone, new cyclists flat toucan button at Kirwan is poor compared to standard larger pedestrian one. Audible and tactile feedback is almost none existent over the humdrum of motor traffic. Requests to increase audio and tactile feedback seem to be ignored. One engineer maintain nearby toucan crossing buttons noted that they have not seen these flat cyclist toucans before and there is no capacity to increase the audio in them. There is little space for error, need for high attention with traffic so close at theses crossing points.

Above a young child waits only centimetres from the road. I struggle to understand how we have come to accept this as a safe standard to activate a toucan button for cyclist. I as an adult often find it difficult to keep back from the road, activate the button and stay in the radar zone

until I get a green light. This may be several minutes with your hand gripping the break and balancing your children in your bike.

For a driver in a motor vehicle, their world of waiting in a car is dramatically different. Greater consideration and priority is needed for crossing of pedestrians and cyclists and I wish that BusConnects makes this a priority that is tangible such that these users feel they are being put first.

See below a large groups of cyclists on a central waiting island. There is little space for error. Add into the mix pedestrians which is often the case, its difficult for everyone to safely complete the crossing and move forward in the short time allotted. Its not always possible to predict the movements of pedestrians and they may stop or turn suddenly. These scenarios need to be given consideration and more space, time and greater segregation delivered with BusConnects. I which to ask that consideration of spared spaces with bikes be reviewed in BusConnects to mitigate any of the above issues.



Above photo from Kriwan Junction Galway City

- Note position of toucan buttons in relation to road and angle of cyclist.
- It is not possilbe for a cyclist to safely activate the toucan button in many new junction areas at Kriwan.
- Consider different sizes of bikes and ages of riders.
- Note slope of ground towards road.
- Consider of pedestrians were already waiting at the red tactile area. Time to corss is short and often pedestrian do not activate lights, as a result a cyclist cannot reach the lights easily.
- Often pedestrians do not look behind them when waiting or walking so they may not be aware of sourrounding cyclists or approachi cyclits from behind.
- Consider if a reduced mobility pedestrian, parent and toddler, parent and buggy, wheelchair user are waiting to cross. The combined movement of cyclists and these users is not at the same pase and not what new infrastructure delivers. There is a greater need for increased segregation and much more space where shared areas are.
- Consideration for waiting areas for different users.
- Cosideration is also needed to users on the opposite side of the road who will cross at the same time against the users waiting to cross above.
- All of the above leads to unfavourable shared spaces that are not ideal for users. Considering spends now we must approach shared areas with greater cuation and try to design them out of new infrastrucuter and indeed existing infrastructure.

Above photo from Kriwan Junction Galway City

To mitigate the above issues can the design locate the toucan activation buttons at crossings back form the kerb/road side. This will mean cyclists with non standard bicycles or carrying children (front or back) will not need to dismount to safely activate the toucan button. Alternatively use an induction loop in the waiting area that does not force the cyclist to wait at the kerb side.

Section 4.7.2 of the National Cycle Manual states that for toucan crossings design

Additional push buttons located for cyclists convenience – bicycle detection (loops, passive IR etc.) may be more appropriate.

Poor location of toucan activtion button – too close to road side.

Safer location of toucan activation button.

It is important the levels falling to road from path are minimal while allowing for surface drainage.

26. Drainage

Drainage kerb / channel between cycle track and footpath along alighting/disembarking area.

Drainage treatment should be under the footpath. A surface channel with a dished effect should not be permitted in public areas where pedestrian and cyclists are crossing. A flush drainage channel should be used and grill to allow for drainage of surface water to rapidly clear away from the pedestrian/cycle facility.

Request that drainage channels on footpaths and at intersections where cyclists transition over are recessed aco style drains. The use of surface concrete dished water channels is problematic for maintenance and presents a hazard of slip/trip for pedestrians and cyclists. They present additional issues for wheelchair, buggy and mobility impaired users as there is an unexpected change in level.

Additional issues relating to gradients for drainage and cleaning surface channels are eliminated with the use of recessed drains as shown below.

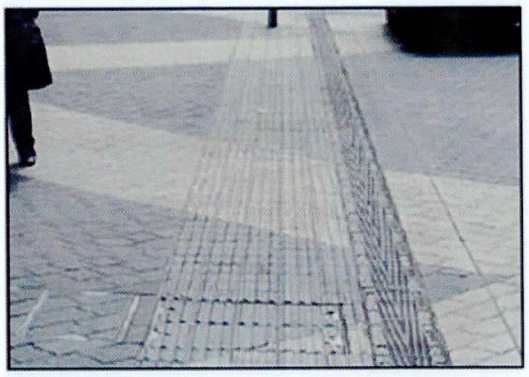


Figure 4.74: Example of an drainage channel on Exhibition Road, London. The kerb line indicates an area of pedestrian refuge and is used to guide the visually impaired.

Extract above from DMURS Section 4.4.8 - use of recessed drainage channel

Section 5.2 of the National Cycle Manual deals with drainage, extract below.

5.2 DRAINAGE

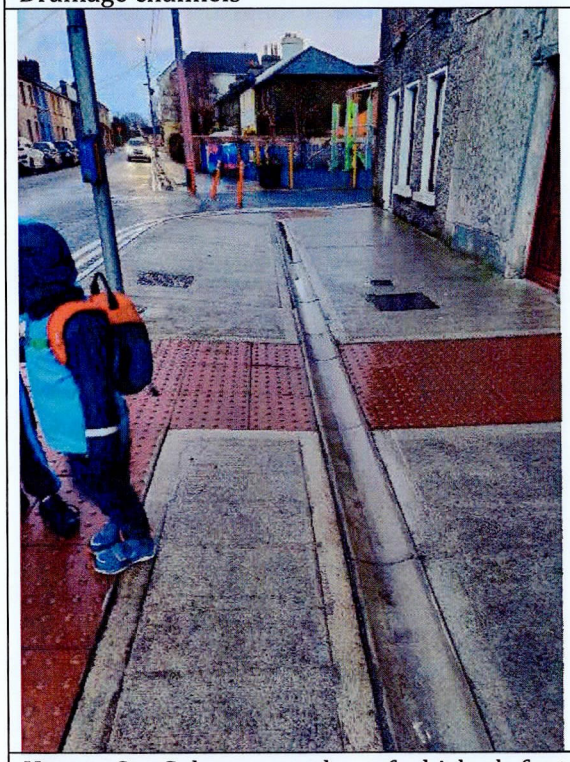
The appropriate detailed design of drainage can significantly impact on the quality and safety of cycling facilities.

Under the 1993 Roads Act (Section 13, Part 2), Local Authorities have an obligation to maintain public roads. The maintenance of cycle ways and cycle tracks falls within this remit.

5.2.1 Overview of Drainage for Cycling

The standard of drainage associated with cycle routes must be more effective than that for motorised vehicular routes. This is because:

- Bicycle braking systems and tyres are not as effective in the wet – it is harder to stop, and there is more risk of skidding in the rain
- Poor drainage increases the likelihood of standing water and spray, potentially drenching both cyclists and pedestrians
- Standing water can conceal serious surface defects, increasing the risk of accident for the cyclist or damage to the bicycle
- Excessive standing water or flooding on cycle lanes or tracks will result in cyclists cycling on parts of the road that are not designed for cycling

Drainage channels	
	
Henry St, Galway. newly refurbished footpath and crossing. Surface drainage channel. Creates hazard for pedestrians, reduced mobility users and any cyclists transitioning from side street at playground/canal route.	Henry St, Galway. newly refurbished footpath and crossing. Surface drainage channel. Challenge to get falls and drainage. Cleaning and maintenance an issue. In winter with cold temperatures this is a hazard for slips and trips to all users.
	
Abbeygate street, Galway. Recessed drainage channel	Recessed drainage channel provides safer level surface for pedestrains and cyclsits to move across.

Conclusion

As a cyclist with young children I am concerned as to how we will manage to cycle into the city while mixed with busses and or deliveries & taxis on 3m wide lanes. We will also be sharing the road for the majority of the route in along the N84, N6 and Headford Road at the retail parks with increased traffic. Our route from our home is along the inner city access route before we can reach the BusConnects outer red line start point at Woodquay/Headford Rd. Treatment of access routes to the city for cyclists needs urgent attention and there should be continuous segregated routes from residential communities to the city core and indeed inside the scheme there should be greater segregation.

The above route also needs attention if a quality public mass transport service is to be delivered to the residents on the Headford Road/new No. 7 route. Any increase in frequency will be nullified by the fact that the bus needs to travel in line with traffic accessing the city and it's inner city network/access routes. As such a quality bus corridor together with safer segregated cycle infrastructure is needed for the new No. 7 route.

I ask that further consideration be made to strike a better balance and where possible remove on street parking to facilitate cycle lanes or introduce cycle lanes at peak hours over parking spaces, which has been done in Dublin. I do not believe large vehicles will maintain in line flow for the majority of time. There is little room for error, there is little protection for right turns on many of these 3 m wide streets. Traffic will build up at the end of the delivery hours and it will be difficult for cyclists to maintain forward motion as motor traffic queues at junctions.

Inclusion of contraflow for cyclists along one-way streets is something that needs to be considered where possible. Or introduction of shared streets what permit traffic to enter only from one side thus allowing two way directional movement of cyclists. This would be of benefit in streets that are narrow with no space for expansion. Deliver a cycle access map in tandem with BusConnects and Delivery Route options.

A recommendation to reduce shared space and areas through greater segregation and flow of cyclists as pre the existing and draft National Cycle Manual.

To conclude I ask that further opportunity be given for refining plans and better serving the needs of communities in different areas of the city. I note that a fee of 50 euro is required to make a submission. This is something that will have put many who would have liked to engage briefly with the plans off from doing so.

Once again I welcome the introduction of BusConnects to Galway and understand the urgency for delivery of a sustainable modal shift option from the private car. I would like that the plan presented reach further to connect to communities and that the source of trips be addressed for peak hours, such as schools, as these transport users are more vulnerable and generally do not travel alone at a young age. Many dropping/collecting then go on to make more trips to and from schools throughout the day. There is a noticeable difference in peak traffic on rat run routes on days when schools are off. Addressing this is key to reducing some of the peak traffic on any road in Galway. This will lead to less hostile streets and roads in our city and close to schools.

Please also see attached presentation.

I thank you sincerely for your time in considering my submission and requests.

Roselyn Carroll