

Our Case Number: ABP-321882-25

Your Reference: Connacht Hospitality LTD



An
Coimisiún
Pleanála

Cunnane Stratton Reynolds
Copley Hall
Cotters Street
Cork
Co. Cork

Date: 13 August 2025

Re: Busconnects Galway: Dublin Road Development, Compulsory Purchase Order No BCGDR-CPO-001-2025
Dublin Road, County Galway

Dear Sir / Madam,

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

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at laps@pleanala.ie

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

Yours faithfully,



Lauren Griffin
Executive Officer
Direct Line: 01-8737244

CH08

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Aisling Reilly

From: Aisling Reilly
Sent: Friday 1 August 2025 12:31
To: cmorris@csrlandplan.ie
Cc: eprenter@csrlandplan.ie; chealy@csrlandplan.ie
Subject: RE: [CSR: 25207] Further Submission by The Connacht Hotel and Hospitality Group – BusConnects Galway: Dublin Road Scheme (Ref. Nos. 321776 and 321882)

A Chara,

The Commission acknowledges receipt of your email; official correspondence will issue in due course.

Kind regards,
Aisling

From: Callum Morris <cmorris@csrlandplan.ie>
Sent: Wednesday, 30 July 2025 16:06
To: LAPS <laps@pleanala.ie>
Cc: Eamonn Prenter <>; Conor Healy <chealy@csrlandplan.ie>
Subject: [CSR: 25207] Further Submission by The Connacht Hotel and Hospitality Group – BusConnects Galway: Dublin Road Scheme (Ref. Nos. 321776 and 321882)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Sir/Madam,

Please find attached a further submission made on behalf of our client, The Connacht Hotel and Hospitality Group, in relation to the proposed BusConnects Galway: Dublin Road Scheme, under An Coimisiún Pleanála Reference Numbers 321776 and 321882.

This submission is provided in response to the Commission's letter dated 10th July 2025, inviting observations on the submission received from Galway City Council on 17th June 2025. The enclosed document addresses the issues raised therein, in accordance with Section 217B of the Planning and Development Act 2000 (as amended).

We would appreciate confirmation that this submission has been received and that it will be considered by the Board in its determination of the application.

Should you require any further information or clarification, please do not hesitate to contact us.

Thank you,

Kind Regards,

Callum Morris MPLAN MIPI

Town Planner

CUNNANE STRATTON REYNOLDS

LAND PLANNING & DESIGN

Dublin, **Cork** & Galway

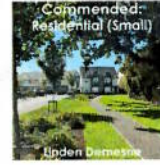
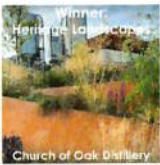
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Before printing, think about the Environment!

CSR Ref: CM/25207

CUNNANE STRATTON REYNOLDS

An Coimisiún Pleanála,
Strategic Infrastructure Division,
64 Marlborough Street,
Dublin 1,
D01 V902,

Date: 30th July 2025

Submission Via Email

RE: FURTHER SUBMISSION ON BEHALF OF THE CONNACHT HOTEL AND HOSPITALITY GROUP, DUBLIN ROAD, GALWAY, H91 K5DD TO AN COIMISIÚN PLEANÁLA REGARDING THE BUSCONNECTS GALWAY: DUBLIN ROAD DEVELOPMENT COMPULSORY PURCHASE ORDER (REF. BCGDR-CPO-001-2025)

AN COIMISIÚN PLEANÁLA REF. NOS. 321776 AND 321882

Dear Sir/Madam,

INTRODUCTION

We, Cunnane Stratton Reynolds Ltd., of Unit 3, Copley Hall, Cotters Street, Cork, T12 T938, make this further submission to An Coimisiún Pleanála on behalf of our client, The Connacht Hotel and Hospitality Group ("CH&HG"), whose principal address is The Connacht Hotel, Dublin Road, Galway, H91 K5DD.

This submission is made in response to the correspondence issued by Galway City Council ("GCC") addressing third-party submissions received in relation to the proposed BusConnects Galway – Dublin Road Scheme, currently before the Board under Compulsory Purchase Order reference BCGDR-CPO-001-2025

Our client has carefully reviewed GCC's response and remains of the view that the key concerns raised in our original submission have not been adequately addressed or resolved. In particular, CH&HG continues to express serious concern about the likely adverse impacts of the proposed development on the safe operation, accessibility, and long-term viability of The Connacht Hotel. These concerns extend across a range of areas, including construction-phase disruption, traffic safety, site access constraints, business continuity, and compliance with the Galway City Development Plan 2023–2029.

This submission is accompanied by a technical assessment prepared by Mr. Gerard Hanniffy, Chartered Engineer and transportation consultant, of Oran Town Centre, Station Road, Millplot, Oranmore, Co. Galway (included at Appendix A). Mr. Hanniffy's report provides expert commentary on the deficiencies of the scheme as proposed, with particular reference to the unjustified removal of the dedicated right-turn lane and the operational implications for the hotel.

We respectfully request that An Coimisiún Pleanála give full and careful consideration to the concerns and evidence set out in this submission before reaching a decision on the Proposed Development.

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Response to Galway City Council's Submission to An Coimisiún Pleanála

This submission provides our client's considered response to the matters raised in GCC's correspondence to An Coimisiún Pleanála. For clarity and ease of reference, the structure of this response follows the issue-by-issue format adopted by the Council in its reply. Each issue is addressed in turn, reflecting the unresolved and ongoing concerns held by The CH&HG in relation to the operational, planning, and legal implications of the proposed scheme.

Response to Submission Issue (i): Construction-Phase Impacts on Access and Hotel Operations

Our client remains deeply concerned that the response issued by GCC fails to sufficiently acknowledge or address the seriousness of the issues raised in relation to site access and operational continuity during the construction phase of the BusConnects Galway: Dublin Road Scheme.

The Connacht Hotel is a major tourism provider, long-standing employer, and vital community amenity, strategically located along one of Galway's busiest transport corridors. Unlike many other businesses on the route, the hotel relies entirely on a single point of vehicular and pedestrian access directly from Dublin Road. This entrance is fully encompassed within the CPO boundary, leaving the hotel with no alternative access option and placing it in a uniquely vulnerable position in terms of construction-related disruption.

While GCC acknowledges that access arrangements will be "considered and discussed" with the landowner and refers to the future preparation of a Construction Traffic Management Plan (CTMP) by the appointed contractor, the response stops short of providing any binding commitment or enforceable safeguard. Instead, it relies on general intentions, discretionary practices, and future engagement with no concrete guarantee of uninterrupted access. This is of significant concern to a hotel that operates 24 hours a day, seven days a week, and whose services include accommodation, leisure facilities, food and beverage outlets, events, and group tours. A lack of certainty around access, even on a temporary basis, would introduce immediate commercial risks, disrupt service delivery, and create reputational and financial liabilities that cannot be offset afterwards.

Moreover, the Council confirms that construction along this section of the corridor is expected to last approximately 13 months. This prolonged period overlaps directly with the hotel's busiest season, which typically sees peak occupancy, event hosting, and heavy guest turnover. The suggestion that works at individual plots will be of shorter duration does not alleviate concern, as no timeline has been provided for works specifically along the hotel's frontage. The cumulative impact of construction activity, combined with the absence of phased scheduling or site-specific mitigation, raises serious doubts about the hotel's ability to maintain normal operations during this period.

The proposed appointment of a Public Liaison Officer is welcomed in principle but does not substitute for clear, pre-agreed operational safeguards. The function of a liaison role is inherently reactive and depends on continuous communication, rather than established protocols or guaranteed outcomes. For a business of this scale, reliant on pre-booked functions, contractual arrangements, and tourism scheduling, such ambiguity is neither practical nor acceptable.

Accordingly, our client urges that specific and enforceable commitments be established in advance of any works commencing. These must ensure that safe, continuous access is preserved at all times, that no closures or diversions will occur without prior agreement and workable alternatives, and that the hotel is provided with a detailed construction schedule to enable proper operational planning.

In the absence of these measures, the proposed development poses a disproportionate and unmanaged threat to the functioning of a key hospitality enterprise. The current lack of certainty around access, timing and duration, and mitigation undermines the very principles of balanced, inclusive, and sustainable infrastructure delivery.

Response to Submission Issue (ii): Removal of Existing Right-Turn Lane

The CH&HG maintains a strong objection to the proposed removal of the existing dedicated right-turn lane, which currently enables direct vehicular access to the hotel from the eastbound carriageway of Dublin Road. This turning lane is essential for the safe, efficient, and reliable operation of the hotel, and its removal represents a material threat to both accessibility and commercial viability. The response provided by GCC does not alleviate this concern and offers no compelling technical justification for such a significant alteration to existing access infrastructure.

The rationale advanced by the Council is grounded in the Design Manual for Urban Roads and Streets (DMURS), which promotes a context-sensitive and people-first approach to urban street design. While our client acknowledges the relevance of DMURS in guiding public realm improvements, the application of its principles must be grounded in the specific functional context of each location. In this instance, the subject site is not a residential neighbourhood or village centre, but a key arterial corridor serving a large, high-traffic hospitality facility with no secondary point of access. The circumstances do not support the assertion that removal of a designated turning lane aligns with best practice or contributes to a safer, more accessible street environment.

As outlined in the accompanying technical letter from Mr. Gerard Hanniffy, Chartered Engineer (Appendix A), and as stated in our original submission, and with regard to what we feel is an inadequate response, the proposed removal will create multiple adverse operational and safety consequences, including:

- Increased risk of traffic congestion and queuing on the westbound carriageway, as vehicles will now be required to stop in the through-lane while waiting to turn into the hotel;
- Diminished road safety, due to the introduction of new conflict points and stopping movements where none currently exist;
- Disruption of customer access during peak periods such as weekends and the tourism season, when the hotel accommodates over 1,200 patrons;
- Inefficient and potentially unsafe driver behaviour, as eastbound vehicles that miss the turn may proceed west to execute U-turns at high-traffic junctions such as The Huntsman or Joyce Roundabout;
- Deterrence of guest and supplier visits, due to reduced convenience and clarity of access arrangements.

The Council's suggestion that vehicles will still be able to turn right by waiting for a gap in oncoming traffic, and that a yellow box will assist during congestion, does not constitute an acceptable substitute for a dedicated turning lane. A yellow box is not a traffic calming or queuing solution, it simply designates a keep-clear area with no physical separation, no guaranteed priority, and limited effectiveness during high-traffic conditions. It places the burden on other drivers to yield, a condition that cannot be reliably enforced during peak times.

GCC's further justification, referencing improvements such as reduced pedestrian crossing distances, enhanced road alignment, reduced paved areas, and environmental benefits, has been assessed by Mr. Hanniffy and found to be inadequate in this context:

- No pedestrian crossing is planned at the location that would benefit from a narrower carriageway;
- The removal of the right-turn lane offers no meaningful reduction in hard surfacing or environmental impact;
- The current lane does not compromise alignment or the safety and comfort of vulnerable road users;
- The claim that removal would reduce impacts on private property is inaccurate, as the proposal directly compromises access to The Connacht Hotel, a private commercial enterprise.

The proposed removal of the turning lane is, therefore, a retrograde step. It prioritises intended or aspirational urban design objectives over the operational and safety needs of a major business with heavy and frequent vehicular use. The consequences extend beyond inconvenience to include material impacts on road safety, business continuity, and customer experience.

For these reasons, and in the absence of any credible technical justification or practical mitigation, our client strongly maintains that the dedicated right-turn lane must be retained and properly integrated into the final design of the BusConnects Galway: Dublin Road Scheme. Its removal is unjustified and unacceptable, and any alternative that fails to provide for protected right-turn access from the eastbound carriageway cannot be supported.

Response to Submission Issue (iii): Temporary and Permanent Land Take and Potential Restriction of On-Site Parking

Our client remains concerned that the response issued by GCC fails to provide sufficient clarity or assurance regarding the extent and implications of the proposed land take associated with the BusConnects Galway: Dublin Road Scheme, particularly in relation to on-site car parking and circulation at The Connacht Hotel.

While the Council asserts that parking capacity "will not be impacted," this statement is presented without the support of detailed, site-specific analysis. Given the operational importance of the hotel's parking areas and circulation routes, particularly for guest arrivals, service deliveries, and coach movements, greater precision is required to fully assess and mitigate any potential disruption.

A review of the General Arrangement Drawing (Volume 3, Sheet 02 of 13) and the relevant Deposit Map extracts (Plots 209.a101–103 and 209.c.201–204) highlights a number of outstanding concerns:

- The CPO boundary extends into the landscaped buffer and green verge directly fronting the hotel car park, with no clear indication of how this boundary will be physically separated from marked parking bays.
- The permanent land take appears to encroach upon areas essential to circulation, vehicle manoeuvrability, and guest drop-off, particularly in proximity to the main access point from Dublin Road.

- The temporary land take, as delineated in plots 209.c.201–204, spans nearly the full extent of the hotel's frontage. This raises a significant risk of disruption during the construction phase, particularly in the absence of any detailed phasing, traffic management, or mitigation plan.

From an operational standpoint, even modest encroachment on the hotel's frontage, whether into landscaped areas or active circulation zones, has the potential to adversely affect the business. At a minimum, it would necessitate re-landscaping the front of the site, with possible knock-on effects on parking circulation, vehicle manoeuvrability, and visibility into and out of the premises. During peak periods such as weekends or the high tourism season, these disruptions could lead to logistical inefficiencies and diminished guest satisfaction.

Accordingly, we respectfully request that the Board seek further clarification from the applicant, supported by appropriate technical documentation, to confirm:

- That there will be no loss or restriction to marked car parking spaces or key circulation routes at any stage of the works; and
- That a comprehensive phasing strategy, including clear communication protocols and operational safeguards, will be put in place to ensure full functionality of the hotel site throughout the construction period.

In the absence of such clarification, our client is not in a position to accept the conclusion that the proposed land take, whether temporary or permanent, will have no material impact on car parking capacity or hotel operations. As currently presented, the proposal lacks the necessary level of detail and certainty to support that claim.

Response to Submission Issue (iv): Construction Timeline and Operational Disruption

Our client welcomes the additional context provided by GCC regarding the anticipated construction timeline for the Proposed Development. However, the response remains too general and lacks the level of detail and certainty necessary to reassure a business of the scale and operational complexity of The Connacht Hotel.

The Council has indicated that works between Moneenageisha Junction and Skerritt Junction are expected to take approximately 13 months, with shorter durations anticipated at individual plots. It is further noted that the overall scheme may span up to 24 months, with more precise scheduling to follow once a contractor is appointed. While these timelines are acknowledged, they are presented in broad terms, with no confirmed commencement date or detailed phasing plan. Critically, they do not account for the hotel's peak business periods, including the summer holiday season, Galway Race Week, major GAA fixtures, and key Connacht Rugby events. In the absence of any firm commitments or mitigation strategy, the proposed works pose a significant risk to the hotel's operations and profitability throughout this timeframe.

From the perspective of The Connacht Hotel, this absence of a site-specific construction programme, including defined start and end dates for works along its frontage, represents a significant operational risk. The hotel functions on a 24/7 basis throughout the year, hosting a wide range of services including accommodation, large-scale events, restaurant and bar facilities, a leisure centre, and coach tourism operations. Planning for such activities requires long lead times and certainty around access, parking, and service continuity.

The current level of ambiguity around the duration, phasing, and timing of works undermines the hotel's ability to manage risk, allocate resources, and maintain service levels during what is already anticipated to be a highly disruptive period. This concern is further amplified by the fact that the proposed construction timeline overlaps directly with Galway's peak tourism season. The summer months are crucial to the hotel's revenue and include many of its largest annual events, tour group arrivals, and family bookings.

Without early and reliable information regarding potential access disruptions, our client will be unable to implement mitigation strategies or communicate effectively with guests, tour operators, and service providers, exposing the business to reputational and financial harm.

While the Council's commitment to appointing a Public Liaison Officer and developing a Construction Traffic Management Plan (CTMP) is noted, these measures are not substitutes for proactive engagement or clearly defined timelines. For a business of this nature, it is imperative that communication be timely, accurate, and underpinned by binding commitments rather than broad intentions.

In particular, The Connacht Hotel requires the following assurances in advance of any construction commencement:

- A clear and confirmed schedule for works directly affecting its site frontage;
- A formalised early-warning protocol to facilitate planning around high-occupancy periods and major bookings; and
- A binding guarantee that full vehicular and pedestrian access to the hotel will be maintained at all times during construction, particularly during core trading hours and scheduled events.

Absent these safeguards, the statement that construction impacts will be "short-term" or "minimised" remains speculative and unconvincing. Our client reiterates that the current lack of a definitive and enforceable works programme constitutes a material weakness in the scheme's implementation strategy and continues to pose an unacceptable level of operational risk to the hotel.

We respectfully request that the Board seek further clarity and specific commitments from the applicant on the matters outlined above prior to advancing the proposal.

Response to Submission Issue (v): Roadside Signage and CPO Implications

The CH&HG acknowledges GCC's recognition of the significance of the hotel's freestanding roadside sign, which is partially located within the temporary CPO boundary. The sign is a key visual and functional element of the property's interface with Dublin Road, supporting commercial visibility, guest navigation, and brand presence.

However, despite this acknowledgement, the response issued by the Council lacks the necessary clarity and certainty to provide reassurance regarding the sign's retention or protection. The matter is deferred to the "detailed design stage," without any commitment to preserving the sign in situ or ensuring its timely reinstatement should relocation be required. This ambiguity is of concern, given the critical role the sign plays in daily operations.

As outlined in our original submission, the sign serves several essential functions. It provides a visible, immediate point of reference for new guests arriving from the east, aids in wayfinding for coach tours and families unfamiliar with the area and reinforces brand recognition for passing traffic. It is particularly important during evening hours and poor weather, when visibility is reduced. Any interruption in the sign's presence, whether through removal, obstruction, or delay in replacement, would undermine customer experience, erode brand consistency, and compound the disruption already anticipated from access and frontage works.

While it is noted that costs associated with relocation and compensation may be addressed through the CPO process, our client submits that this does not resolve the operational risks of interim loss or visual absence. The continuity of visibility and brand communication must be maintained at all times, especially during a period where construction activity may already impair the approach to the site.

Furthermore, the Council's response fails to specify whether the sign will be protected in situ or whether relocation is considered unavoidable. In either case, a more definitive approach is required to ensure that commercial functionality is not compromised.

Accordingly, our client respectfully requests that An Coimisiún Pleanála seek the following clarifications from the applicant as a condition of any future approval:

- A definitive confirmation as to whether the existing roadside sign is to be retained in situ or relocated;
- In the event relocation is necessary, a commitment that replacement signage of equal size, prominence, and visual quality will be agreed with the hotel and installed in advance of any removal of the existing structure;
- A firm assurance that there will be no period during which the hotel is without visible, functional roadside signage and branding.

This issue extends beyond matters of design detail or compensation. It relates directly to the visibility, commercial identity, and navigability of the hotel site during a period of otherwise high disruption. As such, it must be addressed with the same level of planning certainty as access and circulation.

We respectfully request that these assurances be secured as part of the Board's consideration of the Proposed Development.

Response to Submission Issue (vi): Conflict with the Galway City Development Plan

Our client recognises the strategic role of the BusConnects Galway: Dublin Road Scheme in progressing national and regional transport objectives. However, GCC's response does not adequately engage with the primary concern raised in our original submission, that the Proposed Development, in its current form, conflicts with several key policies and objectives of the Galway City Development Plan 2023–2029. These include, most notably, those related to equitable access, economic resilience, and the safeguarding of Galway's tourism infrastructure.

While the Council references overarching strategies such as the Galway Metropolitan Area Strategic Plan (MASP) and the Regional Spatial and Economic Strategy (RSES), the invocation of these broader policy frameworks cannot substitute for compliance with the specific provisions of the statutory City Development Plan.

The City Development Plan is the legally adopted framework guiding development within Galway City, and proposed infrastructure must be demonstrably aligned with its core objectives, especially where adverse impacts on established economic operators are likely.

The Council's response references Objectives 4.1 and 4.2, which support a transition toward integrated transport and a reduction in car dependency. However, it omits the important qualifying elements of these objectives, which also require that transport initiatives facilitate safe, equitable, and convenient access for existing users, including significant commercial and tourism providers such as The Connacht Hotel. These balancing provisions are not peripheral; they are essential to the practical and inclusive implementation of transport policy in an urban environment.

Particularly relevant in this case is Objective 8.8, which explicitly commits the City Council to:

"Prioritise the safe movement of people on streets and create a high-quality environment through design promoting connectivity, accessibility and the principles of universal design."

The current scheme, as proposed, directly undermines these principles. It removes the existing right-turn lane that enables safe access to the hotel, disrupts the hotel's sole vehicular and pedestrian entry points, encroaches on circulation and parking areas essential to day-to-day operations, and introduces uncertainty regarding visibility and branding due to signage displacement. These effects are not incidental, they strike at the operational core of a high-capacity business that plays a pivotal role in the local hospitality and tourism economy.

While it is acknowledged that the Preliminary Design Report references design guidance such as DMURS, the National Cycle Manual, and Building for Everyone: A Universal Design Approach, it is critical to note that each of these documents stresses the importance of context-sensitive design. In this case, the failure to meaningfully engage with the operational realities of The Connacht Hotel, and to balance sustainable mobility objectives with continuity of business activity, illustrates a misapplication of those principles rather than their fulfilment.

Furthermore, the Council's argument that the project's alignment with national and regional strategies overrides local considerations is not consistent with proper planning practice. National and regional frameworks are intended to inform and complement local plans, not supersede them. Where a development materially undermines the viability of a prominent and long-standing tourism enterprise, the resulting conflict with local policy must be acknowledged and addressed.

Our client maintains that the Proposed Development does not adequately reflect the balance required under the Galway City Development Plan between advancing sustainable transport infrastructure and protecting economic activity, established land uses, and tourism assets. The failure to account for this balance results in a proposal that is inconsistent with core statutory planning objectives, particularly those underpinning connectivity, inclusivity, and economic resilience.

We respectfully request that the Board take these issues into full consideration when assessing the proposal's compliance with the local planning framework and its broader implications for Galway's economic and tourism landscape.

Response to Submission Issue (vii): Restriction on Future Parking Expansion

Our client notes GCC's assurance that the existing car parking provision at The Connacht Hotel will not be physically reduced under the Proposed Development. However, this assurance does not address the core issue raised in our original submission, namely, the scheme's long-term impact on the hotel's ability to expand or adapt its on-site parking provision, which is essential for maintaining operational resilience and responding to evolving demand.

The Connacht Hotel is a high-capacity hospitality venue serving over 1,200 guests at peak occupancy, in addition to hosting conferences, events, coach tours, and leisure centre users. The scale and nature of this activity require substantial and flexible parking provision for both private vehicles and larger transport modes such as coaches. Demand is particularly acute during the high tourism season and weekends, where any constraints on capacity or circulation can materially affect the guest experience, operational efficiency, and customer satisfaction.

The scheme's proposed permanent and temporary land take, especially at the hotel's frontage, will significantly curtail the hotel's capacity to adapt or expand its parking infrastructure in future. Although the Council suggests that any such limitation may be addressed through the CPO compensation process, our client respectfully submits that financial compensation is not an adequate or appropriate substitute for the permanent loss of development flexibility. A once-off payment cannot restore the future utility of land that has been acquired or sterilised, particularly where evolving operational needs may require reconfiguration of access, circulation, or parking layouts.

The Council also appears to suggest that enhanced access to public transport may reduce the need for future parking provision. While our client fully supports sustainable mobility and recognises the value of public transport improvements, this reasoning does not reflect the operational realities of the hospitality sector. Many of the hotel's guests, particularly families, corporate groups, tourists with luggage, and individuals with mobility challenges, will continue to rely on private vehicles and coach transport. Public transport improvements may complement access options, but they will not eliminate the demand for on-site parking in the foreseeable future.

In planning and operational terms, preserving the ability to respond to future demand through site adaptation is a cornerstone of sound development management. The Proposed Development, as currently designed, removes this flexibility without offering any practical or compensatory measures to maintain long-term viability. The result is not simply a static loss, but an erosion of the hotel's ability to remain responsive to future needs, market expectations, and evolving visitor behaviour.

Accordingly, our client maintains that the permanent and temporary land take associated with the scheme imposes a material and lasting constraint on the future operational capacity of the hotel. This concern remains unaddressed in GCC's response and should be afforded appropriate weight by the Board in its consideration of the wider consequences of the CPO.

CONCLUSIONS

As outlined throughout this submission, The CH&HG remains fully supportive of sustainable transport investment and recognises the strategic intent behind the BusConnects Galway: Dublin Road Scheme. However, following a detailed review of GCC's response to third-party submissions, our client remains seriously concerned that the fundamental issues raised in its original submission have not been meaningfully addressed or resolved.

In particular, the absence of clear safeguards relating to vehicular access, right-turn provision, construction-phase management, and long-term site flexibility presents a tangible and disproportionate risk to the operation of a large-scale hospitality business. These concerns are grounded not in theoretical speculation but in the practical realities of managing a 24/7, high-occupancy facility that plays a critical role in Galway's tourism and economic landscape.

The Council's reliance on high-level references to national and regional transport policy does not adequately account for the site-specific and operational consequences that this scheme, as currently designed, would impose. Furthermore, the suggestion that potential impacts can be addressed solely through the CPO compensation process overlooks the fact that many of the identified risks, such as disrupted access, diminished guest experience, and constrained future development potential, cannot be remedied through financial means alone.

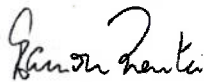
Our client respectfully submits that the proposed scheme, in its current form, fails to strike an appropriate balance between the delivery of sustainable transport infrastructure and the protection of existing economic assets. The Connacht Hotel is not only a long-established and strategically located business but also a major employer and contributor to the city's hospitality offering. Its continued success depends on maintaining reliable access, operational resilience, and the capacity to adapt to future needs.

We therefore request that An Coimisiún Pleanála give full and careful consideration to the concerns raised in this submission, alongside the technical evidence provided by Mr. Gerard Hanniffy, Chartered Engineer (Appendix A), before reaching any decision on the Proposed Development.

We look forward to receiving an acknowledgement of this submission and to engaging further in a constructive and solution-oriented manner.

If any additional information or clarification is required, please do not hesitate to contact me.

Yours sincerely



Eamonn Prenter

Director

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CUNNANE STRATTON REYNOLDS

**APPENDIX A: BUS CONNECTS GALWAY – DUBLIN ROAD – ADDITIONAL ENGINEERING
ASSESSMENT – PREPARED BY GERARD HANNIFFY CONSULTANT CIVIL ENGINEER**

Gerard Hanniffy B.E. M.I.E.I.

Consultant Civil Engineer

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BusConnects Dublin Road Project

Engineers Reply to a further submission to An Bord
Pleanála from Galway City Council

related to

Compulsory Purchase Order BCGDR-CPO-001-2025
BusConnects Galway: Dublin Road Development
Compulsory Purchase Order

FOR

CONNACHT HOTEL
DUBLIN ROAD, GALWAY

DATE: 29th July, 2025

This Reply has been written by Finbarr Kelleher BE (Hons) CEng MIEI PEng.

And reviewed by Gerard Hanniffy BE.

Reply:

I have made a review of Galway City Council responses to An Bord Pleanal, as per below.

Item No. 02

The response by Galway City Council in relation to removal of the turning lane has not altered our original opinion, i.e. that "This turning lane should be retained, and should be incorporated into the BusConnects project. Our view is that this is IMPERATIVE, and the Hotel should accept no alternative but to leave this turning lane in place".

Galway City Council has referenced the DMURS document, and have based their decision to remove the right-turning lane on their interpretation of the guidance in this document, i.e. they have interpreted that the 'appropriate' conditions have been met to allow this turning lane to be removed, based on the DMURS guidance.

We strongly disagree with their interpretation.

Currently, vehicles travelling in a westerly direction are not hindered by vehicles that wish to turn right into the hotel grounds (since these vehicles have a dedicated turning lane). But under the proposed arrangement, westerly moving traffic will now have to stop and queue as a right-turning vehicle waits to turn safely, since the dedicated turning lane has been removed, or to describe it more accurately: the right-turning lane still exists, but it has been incorporated into (rather than separated from) the main carriageway.

Their reasoning (as outlined in their response) is based on:

- Shortened pedestrian crossing distances - this does not apply, pedestrians crossing points form part of the overall BusConnects works on this stretch of road, and no such pedestrian crossing point will be incorporated at this location
- Reduced vehicle speeds, traffic calming and improved road safety - by this logic, removal of a dedicated turning lane will improve road safety - how can this be justifiable? In fact, the opposite is true: the presence of a dedicated turning lane makes the road safer.
- Improved road alignment - our opinion is that road alignment is not/will not be impacted negatively by a dedicated turning lane.
- Improved safety and comfort for vulnerable road users - our opinion is that safety and comfort for vulnerable road users is not/will not be impacted negatively by a dedicated turning lane.
- Reduced environmental impacts, with less overall paved area - our opinion is that environmental impacts, with less overall paved area is not/will not be impacted negatively by a dedicated turning lane.
- Reduced impacts on private properties - our opinion is that this reason is flagrantly untrue - the removal of the dedicated turning lane can only have a negative impact on the hotel.

Continued/

Long Term Impacts:

From original report

Loss of Turning Lane

The section of Dublin Road immediately to the front of the Hotel contains a turning lane – this serves vehicles approaching the Hotel from an easterly direction, and permits such vehicles to queue safely, without impeding other traffic, as they wait to cross the on-coming lane, and thus turn into the Hotel property.

The proposed works (related to the BusConnects project) shows no such turning lane.

Accordingly, the proposal is, thus, to remove the turning lane entirely.

Our opinion is that, whereas the BusConnects project is deemed to be a step forward, the proposed removal of the turning lane is, in fact, a step backwards.

This submission identifies that on a busy Friday night with full occupancy of the Hotel and bar and full occupancy of the restaurant and leisure facilities, there could be up to 1,200 people using our client's facilities. In the absence of a right turning lane there will be significant obstruction to traffic coming from the east. That queuing of traffic may be so substantial that drivers then proceed westwards past the entrance into our client's hotel to turn either at The Huntsman or going further onto Joyce Roundabout (where Sean Mulvoy and Moneenageisha Road meet) and turning there back to the hotel, thereby increasing unnecessary and unsustainable car trips and deterring visits altogether.

This turning lane should be retained, and should be incorporated into the BusConnects project.

Our view is that this is IMPERATIVE, and the Hotel should accept no alternative but to leave this turning lane in place.

End of Reply To Submissions From Galway City Council