

Our Case Number: ACP-323066-25



An
Coimisiún
Pleanála

Shane Foran
68 Gort Greine
Rahoon
Co. Galway
H91 FY6R

Date: 28 August 2025

Re: Gort Town Centre Public Realm Enhancement Project, Gort, Co. Galway
In the townlands of Gort, Co. Galway

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

As there is no fee associated with submissions for this application type, a refund of €50 will be issued to you under separate cover.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

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
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27 August 2025

FAO: An Coimisiún Pleanála

Re: Case reference: JP07.323066

Gort Town Centre Public Realm Enhancement Project, Gort, Co. Galway

To whom it may concern

I wish to make an observation on the above planning application.

Summary

The current proposals are deeply flawed and conflict with the applicant's duty of consistency with the Climate Action and Low Carbon Development (Amendment) Act 2021 and the associated Climate Action Plans. The roads affected by proposed works represent the main routes through Gort for all traffic including cycle traffic. The affected roads lie on obvious cycling desire lines. This includes a desire line between the main body of the town and obvious cycling destinations such as the train station, the community school, a gaelscoil, a community playground, a soccer club and a leisure centre housing the town's only swimming pool. Other affected roads lie on the main road to the national school at Tubber Rd and the adjacent rugby club.

Much of the affected roads lie on a direct route between the rural hinterland and a junction with the M8 motorway. The traffic counts show that the main corridor of the scheme is firmly within the traffic thresholds deemed to require separate cycling facilities under the applicable guidance (400 pcu/hr). Despite this, little attempt has been made to provide for cycling either through separate cycling facilities or improved (widened) road widths.

On the contrary the scheme documents suggest that road space is to be removed from bicycle users on most of the affected roads. The proposed residual roadway width (6.4m) creates avoidable conflicts with motor vehicles and is a width that has been criticised in the literature as unsuitable for mixed conditions where cyclists are sharing with heavy traffic. There is objectively space for cycling facilities or improved (widened) roadways throughout the affected roads. The scheme should be rejected in its current form. In the alternative, the commission should order its revision to a form consistent with requirements of the climate action plans.

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Introduction

I have been an advocate for sustainable travel in Galway and in Ireland for over 25 years and for many years I served as a community representative on the Transport and on the Planning Strategic Policy Committees of Galway City Council. I am from Loughrea originally with family in the Kinvara/Gort area. My observations below are somewhat critical. But the flaws with the scheme are a side effect of the failure of the state and the local authority to bypass Gort. If Gort was already bypassed then this could be a very good scheme.

The Climate Action and Low Carbon Development (Amendment) Act 2021

The 2021 Act introduced a significant change to the standard to be applied by relevant public bodies to that of consistency with the relevant Climate Action Plans. The *Climate Action Plan 2023* as adopted in December 2022 calls for high quality active travel infrastructure. The plan names as a key supporting element the prioritisation and reallocation of existing road space towards public transport and active travel. The climate action plans include objectives on school travel by sustainable means and promoting shared mobility such as public bikes. The *Climate*

Action Plan 2024 was approved by Government on 21 May 2024. The 2024 *Climate Action Plan* continues themes contained in its predecessors. The *Climate Action Plan 2024* states that providing for school journeys by active travel is a priority and implies that all public infrastructure projects should have regard for this aim.

Climate Action Plan 2024 –

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“15.2.4 Shift

15.2.4.1 Active Travel Infrastructure and Accessibility Work Programme

The provision of safe and accessible walking and cycling infrastructure is key to encouraging modal shift away from private car use and towards walking and cycling. The role of local authorities in the development of active travel infrastructure cannot be overstated, [...]”

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“Priority will be given to Safe Routes to School, CycleConnects routes, the National Cycle Network and scenic greenways. [...] In addition, quality walking and cycling infrastructure will be incorporated in all public infrastructure projects.”

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“Escort to education journeys undertaken by private car continue to represent a significant component of travel demand. The target of a 30% reduction in private car escort to education journeys will continue to be supported by measures including the Safe Routes to School (SRTS) Programme, and the introduction and take-up of local initiatives such as bike libraries and cycle buses.”

Through-traffic: a problem created by the failure of the applicants to adhere to the *National Cycle Policy Framework*.

A key difficulty for the applicants’ proposed design is their failure to first comply with a key provision of the 2009 *National Cycle Policy Framework* (NCPF). That is the requirement for a national programme of town bypasses. Objective 2.3 of the NCPF states:

“2.3 Through Traffic

We will support local authorities in removing through-traffic from urban centres and school routes through, amongst other measures, the provision of a national programme of ring-roads and town / village by-passes. As these are built, other measures to make the

This makes the town, and most of the roads affected by the scheme, a through-route for traffic going to or from the motorway from the local hinterland.

There are key locations that represent obvious destinations for cycle traffic particularly with regards to access to schools and recreational facilities. On the south west the national school and the rugby club are on Tubber Road which is a continuation of Church Street. To the south east and on the other side of the river the large circle includes the following destinations: Gort Community School, Gaelscoil na bhFilí, the Community Centre, a community playground, Gort soccer club and a leisure centre housing the town's only swimming pool.

There is also a HSE clinic and Galway and Roscommon Education and Training Board training centre. The map also shows that affected roads are the only means to reach the town's train station from the main part of town to the north.

The traffic counts and their implications for any public realm design for Gort

In Appendix P *Gort-Mobility Management Plan* of the planning application peak hour traffic counts are provided for seven sites. In every case the peak hour flow exceeds 400 passenger car units (pcu). I will include an appendix to these observations with the worked traffic counts. The applicable guidance, the 2023 *Cycle Design Manual* treats mixing cycles and motor vehicles at peak hour levels of 400 pcu and above as "Provision not suitable" for speed limits of 30km/h or above. At speed limits of 20km/h the *Cycle Design Manual* treats mixing cyclists and motor vehicles at these traffic levels as "Provision not suitable for all and may exclude some potential users (Departure required)" See Table 2.1 Cycle Facilities Selection Guide below.

Table 2.3 - Cycle facilities selection guide

Speed Limit ¹	Two-way traffic flow (peak hour pcus)	Remote Cycleway/ Greenway	Standard cycle track (incl. two-way tracks)	Stepped cycle track	Protected Cycle Lane	Mandatory Cycle Lane	Mixed Traffic
20 km/h	< 200						
	200-400						
	> 400						
30 km/h	< 200						
	200-400						
	> 400						
40 km/h	< 200						
	200-400						
	> 400						
50 km/h	< 200						
	200-400						
	> 400						
60 km/h	Any						
≥ 80 km/h	Any						

Provision should be suitable for most users.

Provision may not be suitable for all and may exclude some potential users (Departure required)

Provision not recommended as it's unlikely to be suitable for a range of users (Departure required)

Provision not suitable

Notes:

1: if the 85th percentile motor traffic speed is more than 10% above the speed limit, the next highest speed limit should be applied

I would also note that the 2023 *Cycle Design Manual* is directly referenced by the *Climate Action Plan 2024*.

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"The updated Cycle Design Manual published in September 2023 which has drawn on the experience of delivering cycling infrastructure across Ireland over the last decade, as well as learning from international experience, will ensure that the roll-out of infrastructure provides safe cycle facilities for people of all ages and abilities."

The potential for separate cycling facilities or improved road space within the affected corridors.

The Gort Community School on the south side of Gort can be treated as a key destination for cycle traffic under established state policy. Therefore for the purpose of discussing the scheme I will start in the south and work north.

George Street

For George Street the *Design and Planning Statement* states the design actions to be as follows:

- The double carriageway width is tightened to 6.4m to calm traffic down and reduce vehicle speed.

- The pedestrian footpaths width is increased to approximately 3.8m both sides of the street and resurfaced, thus enhancing the pedestrian environment.

The total width of these arrangements comes to 14 m. An alternative allocation for 14m is 2 x 2m footways, 2 x 2m cycle tracks and a 6m roadway.

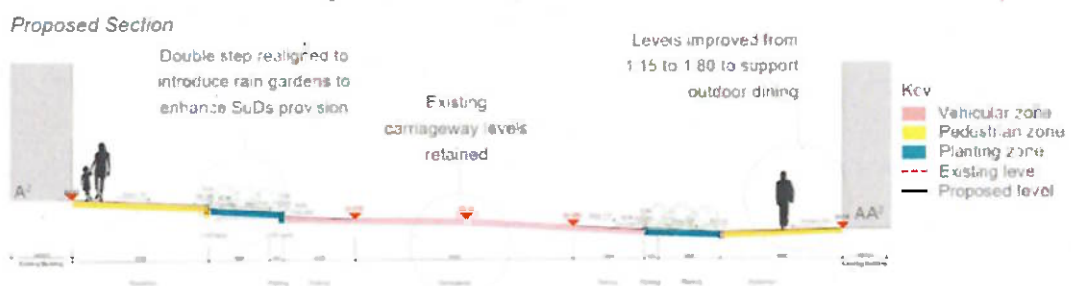
Bridge Street

Regarding Bridge Street the *Design and Planning Statement* has this to say at Section 3.3 on page 64:

“With approximately 20 meters width, it is one of the wider streets in the town core, offering many opportunities for public realm enhancement.”

Despite all this width the designers have made no attempt to provide for cycling access either through separate cycling facilities or adequate roadway width. On the contrary it seems that road space, comfort, convenience and safety for bicycle users is to be reduced by narrowing the roadway to 6.4 m.

There is a cross section provided in the *Design and Planning Statement* which shows both 4 m footways and 2 m of planting. The standard dimension for footways given in DMURS is 1.8 m other sources prefer 2 m. Objectively if there is room for 4m footways then there is room for 2m footways with 2m cycle tracks. Alternatively the proposed 2 m of vegetation on each side of the road could be replaced with 2 m cycle tracks.



Queen Street/Church Road

Two of the roads affected by the proposed works are Queen Street and Church Road. This is the location of the town library. Queen Street is one-way going west from Bridge Street. It then turns into Church Road which is also one-way and runs north to meet Church Street. The peak hour traffic counts in the planning application show 72-93 vehicle movements per hour. Two-way cycling is not currently permitted

or provided for at Queen Street/Church Road. This is failure to provide for two-way cycling is in defiance of state policy on one-way streets going back to 1998¹.

Providing two-way cycling at Queen Street/Church Road would allow children going to school to avoid Market Square (and the proposed roundabout). In my reading of the files I find no reference to restoring two-way cycling or providing contra-flow cycling arrangements at Queen Street. This is in direct conflict with the applicable guidance in this case the 2023 *Cycle Design Manual* (CDM). The CDM discusses one-way streets at pages 68, 73 and 75 and states a presumption that one-way street restrictions and road closures should not be applied to cycle traffic.

On pages 198, 199 and 200 the CDM provides schematic designs for two-way cycling arrangements on one-way streets. This includes "TL110 Contraflow cycling on shared streets" on page 200. This explains the option of simply providing for two-way cycling on a mixed roadway that remains one-way for motor vehicles. This is stated to be acceptable at traffic levels up to 100 pcu per hour. I would note that this is more than the peak hour flow given for Queen Street/Church Road in the planning application.

Market Square (East)

The east side of Market Square is the north – south alignment which gets the bulk of the traffic for the motorway. The peak hour traffic counts for here show more than 1,000 passenger car units (pcu). I have taken a screen grab from Google Street view to show the amount of space available. As with Bridge Street, there may be 20m or more of road space available for the designers to use. Again despite all this width the designers have made no apparent attempt to provide for cycling access either through separate cycling facilities or adequate roadway width. On the contrary it seems that road space, comfort, convenience and safety for bicycle users is to be reduced by narrowing the roadway to 6.4 m.

¹ The 1998 *Provision of Cycling Facilities a National Manual* the 2009 *National Cycle Policy Framework*. and the 2011 *National Cycle Manual* all promoted contra-flow cycling arrangements.



Market Square (Main Square), Church St

I will discuss Market Square (Main Square) and Church St together. I would note that the peak hour traffic counts for Church Street at 754 pcu puts it (and Market Square) above the threshold at which cycling facilities are required under the 2023 *Cycle Design Manual* (400 pcu/hour). I would again note that Market Square and Church Street sit on an obvious cycling desire line to the Gort National School and the Rugby Club at Tubber Road. They are also the obvious route to and from the town centre for a large area of residential housing on the east side of the town.

Market Square (Main Square)

For the main square itself the designers have provided little by way of cycling provisions in terms of cycling facilities or improved (widened) roadway widths. There are some cycling ramps shown at the proposed roundabout. Apart from that it seems that road space is to be removed from bicycle users by narrowing the roadways to 6.4m. A welcome element of the scheme is that some of the current parking at Market Square is to be relocated elsewhere. That the space obtained was not then used to assist cyclists is regrettable. At the same time a large block of perpendicular parking is to be retained on the south side of the square with the main flow of traffic (and bicycle users) passing behind it.



It seems to me to be a highly questionable design decision to restrict the road space available for people on bikes, mix them with a heavy traffic flow and then also route them directly behind a long block of perpendicular parking spaces. In my view this design creates an avoidable risk of conflict with reversing drivers.

In my view the whole concept for Market Square should be refactored to provide for formal cycling provisions linking the east side of Gort with Crowe Street and Bridge Street. It might be that the perpendicular parking could be relocated to the north side and parallel parking provided on the south thereby reducing conflicts and providing space for cycling facilities.

Church Street

At Church St what is objectively happening is that road space is being removed from bicycle users, not to provide improved pedestrian provision, but to provide more car parking. According to the applicant's *Design and Planning Statement* the proposed design actions are as follows:

- The double carriageway width is tightened to 6.4m to calm traffic down and reduce vehicle speed.
- The pedestrian footpaths is retained as existing: 1.9m on the northern side of the street and 2.4m on the southern side. This is to allow the inclusion of on-street parking both sides of street.

The car parking being added makes up eight spaces. According to my calculations between the new car parks at Barracks Street and Crowe Street the final scheme adds 10 additional spaces to the existing parking stock in Gort. So these new spaces

at Church St can be treated as additions to the overall parking supply. The affected section of Church St is within 50-100m of a concentration of parking at Market Square.

There is also parking at Queen St/Church Road which is immediately adjacent. The parking occupancy review in the scheme mobility management plan indicates that this parking is under used. It is also my perception that there are no businesses on the affected section of Church Street that can be argued to have an absolute need for on-street parking outside their doors. The adjacent Gort Family Practice has its own off street parking.

In my view a more defensible use of the road space at Church Street is to remove the existing on-street parking and provide formal cycling facilities linking up with Market Square. In my view removing road space from bicycle users to increase the parking stock is not a supportable design.

Crowe Street

On first consideration the building lines make Crowe Street one of the more challenging locations to find space for cycling. However the Crowe Street is also on the direct line to the motorway junction. The applicant's *Design and Planning Statement* describes Crowe Street as the "main road coming into town from the North, it connects directly with Market Square. This axis has one of the predominant flows of traffic in town." These flows of traffic make this an important place to consider cycling access. The peak hour traffic counts are just under 1200 pcu putting Crowe Street firmly above the threshold at which cycling facilities are required under the 2023 *Cycle Design Manual* (400 pcu).

The proposed design involves objectively removing road space from bicycle users by narrowing the roadway to 6.4m. It is stated that the footways are to be widened to 2.7m on each side and that the current on street car parking is to be retained on the east side of the street. Leaving aside the parking the designers comments suggest that 11.8m is available. In my view other options are available for this space that take cycling into consideration.

Using 2 m footways leaves 7.8 m or 2 x 3.9 m traffic lanes. Using 1.8m footways leaves 8.1 m or 4.05 m traffic lanes. If the speed limit is restricted to 30km/h then, for sharing with cars, 3.9 m or above is outside of the critical width and within the acceptable widths given by some sources for mixed traffic (See discussion below). However some sources would not consider this wide enough for lanes where bicycle users are mixing with HGVs at 30km/h and would argue for 4.6 m or wider.

One partial fix for this would be to omit any central line markings. Removing central line markings is an established traffic calming technique that has been shown to reduce traffic speeds. It has also been shown that drivers will use slower overtaking speeds when passing bicycle users on roads that do not have central line markings.

However, even with wider lanes it will still be uncomfortable and unappealing for many potential bicycle users to be sharing with heavy traffic.

The question that then needs to be asked is “what could be done if on-street parking was not present?” Assuming a parking space width of 2.1 m this suggests that 13.9 m is available. If a roadway width of 6.4m is used this leaves 7.5 m which could be allocated to 2 x 1.8m footways and 2 x 1.8 m cycle tracks on each side of the road. The problematic section of Crowe Street is less than 200m long. Looking at Google Satellite view there appears to be extensive lands behind the building line that are already used for car storage or are adaptable to that use.

There is an extensive yard/car park behind Sullivan’s Hotel, there is an extensive yard behind the post office that includes HGV parking, there is an extensive yard behind Kevin Burke tyres, and it might be that the car park at Lidl is under used much of the day. A possible point of contention is the disabled parking on the other side of the road from the Post Office. The current single space is not directly opposite the post office. It seems to me the disabled parking could be relocated to the north east corner of Market Square and still be convenient to the Post Office.

In my view a reasonable observer would conclude that there are alternative parking opportunities that would support a solution consistent with the applicant’s duties under the Climate Act and 2023 *Cycle Design Manual*. I would also remind that the main reason for the technical challenge at Crowe Street is the original failure to provide a town bypass as an alternative route to the motorway.

The negative implications of removing road space from bicycle users

The lane width recommendations in the *Gort Town Centre Public Realm Enhancement Project* are not compliant with international best practice. The designers’ proposals involve the reduction of roadway widths to 6.4m on main roads through the centre of the town. This width translates to traffic lanes of 3.2m. This represents the systematic removal of road capacity from cyclists. If combined with heavy traffic this also implies the creation of avoidable conflicts with moving motor vehicles. It also implies the systematic creation of inconvenience and obstruction for bicycle users who meet slower or halted motor vehicles.



Figure: Photograph showing the impact that using a 3.2m traffic lane on an arterial road has on road space for people on bicycles. Location: Tuam Road, Galway.

It is a long understood principle of designing for cycling that adequate lane width is needed in situations where mixed traffic conditions apply. *Cycle-Friendly Infrastructure* (IHT 1996) argued for a marked lane width of 4.25m; *Cycling: The way ahead for towns and cities*, the 1999 European Commission policy document on cycle promotion, lists "widening of right-hand lanes" as a specific measure for cycling that does not require planning. The 2009 *Irish National Cycle Policy Framework* has a Hierarchy of Solutions that includes "(4) Redistribution of the carriageway - Can the carriageway be redistributed? Such as by marking wide kerb lanes or shared bus/cycle lanes?"

The current *Cycling Embassy of Denmark* guidelines state "On roads where cars drive 30-50 km/ h and often pass cyclists at the same time as cars coming from the opposite direction pass by, the choice should be whether to segregate cyclists from cars or mix cyclists and cars in a wide traffic lane, depending on traffic volumes, parking facilities and available space."

The 1998 Irish guidance *Provision of Cycling Facilities a National Manual for Urban Areas* was based on Dutch guidance and provided a system for calculating the correct lane widths to be used for mixed traffic. The widths needed were dependent on the vehicle mix and traffic speeds. According to that source for speed limits of 50km/h 4.2m lanes were needed where traffic was mainly cars. Where traffic included HGVs 5.05m lanes were needed. At lower speed limits of 30km/h 3.75m lanes were needed for mainly cars and 4.6m lanes if HGVs were present. Similar advice continues to be repeated in various sources down to the present day. (Please see the extract from Parkin 2018 below).

TABLE 3.5 MEASURING DRIVING SPEEDS TO DETERMINE THE WIDTH OF A CROSS-SECTION (SIZES IN METRES)

Driving Speed Measuring-segment	Maximum 30 km/h		Maximum 50 km/h
Cyclist		0.75	
Passenger car		1.75	
Goods vehicle		2.60	
Bicycle to edge (kerbstone)		0.25	
Bicycle to parked vehicle		0.50	
Bicycle to moving vehicle	0.85		1.05
Vehicle to vehicle (both moving)	0.30		0.80
Moving vehicle to kerb	0.25		0.50

The measurement bicycle-to-vehicle is greater than the measurement vehicle-to-vehicle. This is because the behaviour of bicycle traffic is more difficult to predict than that of motorised traffic. Bicycle traffic is also more vulnerable.

Figure: The original carriageway width calculator from *Provision of Cycling Facilities a National Manual for Urban Areas 1998*.

FIGURE 3.18 MEASURING SEGMENTS

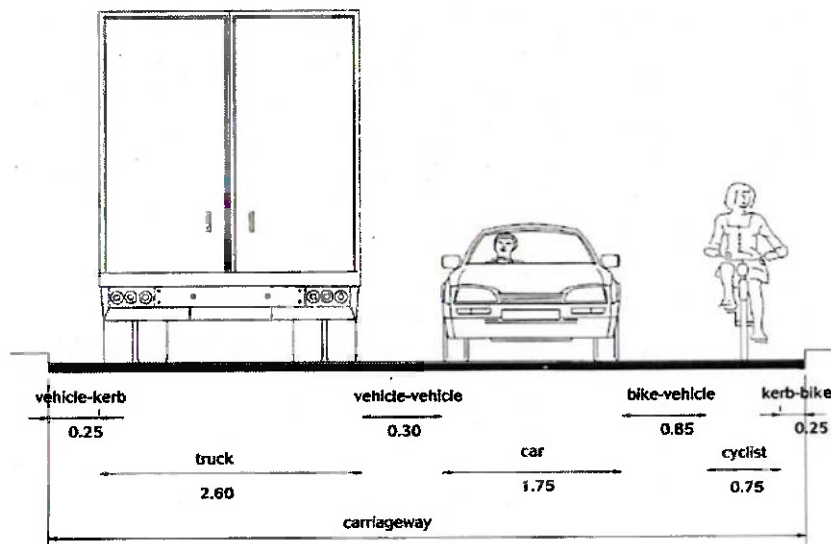


Figure: Diagram showing the use of the carriageway width calculator.
Source: *Provision of Cycling Facilities a National Manual for Urban Areas 1998*.

Lane width calculations passenger cars at 50km/h		Lane width calculations HGVs at 50km/h	
Bike to edge	0.25	Bike to edge	0.25
Person on a bike	0.75	Person on a bike	0.75
Bicycle to moving vehicle	1.05	Bicycle to moving vehicle	1.05
Passenger Car	1.75	HGV	2.6
Vehicle to vehicle	0.8	Vehicle to vehicle	0.8
Passenger Car	1.75	HGV	2.6
Bicycle to moving vehicle	1.05	Bicycle to moving vehicle	1.05
Person on a bike	0.75	Person on a bike	0.75
Bike to edge	0.25	Bike to edge	0.25
Total width (4.2m per lane)	8.4m	Total width (5.05m per lane)	10.1m

Figure: Carriageway width calculations for two-way traffic and a design speed of 50km/h passenger cars on the left and HGVs on the right. Source: *Provision of Cycling Facilities a National Manual for Urban Areas* 1998.

Table 5.1

Widths of tight, critical and spacious lanes

Speed limit (miles per hour)	Traffic mix	Tight (m)	Critical (m)	Spacious (m)
30	Cars only	<3.1	3.1-4.3	>4.3
	With larger vehicles	<3.6	3.6-5.0	>5.0
20	Cars only	<3.1	3.1-3.8	>3.8
	With larger vehicles	<3.6	3.6-4.6	>4.6

the cyclist should be the same distance that a driver would give to a car that he or she might overtake. but may be acceptable in low flow situations where there is little oncoming traffic. Mitigation measures

Figure: Extract from Parkin (*Designing for Cycle Traffic* 2018) showing 4.3m and 5.m lane widths needed for sharing with passenger cars or HGVs respectively at 30mph (50km/h) speed limits.

Critical widths

In addition to the question of what might be adequate road space for mixing cyclists there is the question of what happens where space is inadequate. Various road design sources discuss the issue of critical widths or critical road sections and also tight road sections. A critical width is one where some drivers feel encouraged to try passing people on bikes without leaving the lane but where the residual space is not actually enough for this to be safe or comfortable. Put simply the critical width is one that encourages "close passing" manoeuvres of people on bicycles by a proportion of drivers. The critical width is usually expressed as a range and there is not universal agreement among the literature about upper and lower bounds. However a lane width of 3.2 m is within the critical width for cars given in for various sources.

Some sources identify two critical ranges one for cars and one for HGVs and may further distinguish by speed limit. Parkin (2018) defines the following critical widths.

Speed Limit	Traffic Mix	Critical Width (m)
30 mph (50 km/h)	Cars only	3.1 – 4.3
30 mph (50 km/h)	With larger vehicles	3.6 – 5.0
20 mph (30 km/h)	Cars only	3.1 – 3.8
20 mph (30 km/h)	With larger vehicles	3.6 – 4.6

Guidance produced for Cycling England in 2008 goes even lower and starts at 2.75 m and describes the 2.75 to 3.5m as being “the worst section for cyclists”. This particular passage is relevant to a discussion of the Gort proposal to use 3.2 m lanes.

“Critical Narrow Section 2.75 m - 3.5 m

Cars are unable to overtake cyclists with adequate clearance but some motorists will still attempt it, even at the bottom of the width range. Lane widths between 2.75m and 3.25m should be avoided in most cases.” (Emphasis added by me)

Critical	Wide	3.5 to 4.5	To be avoided where there is a high percentage of large vehicles. Large vehicles (HGVs/buses) are likely to pass cyclists but with inadequate clearance.
	Narrow	2.75 to 3.5	To be avoided in most cases. Cars are likely to pass cyclists at the upper end of the range but with inadequate clearance. The worst section for cyclists.
Narrow		2.6 to 2.75	Generally only suitable over short lengths e.g. at pinch points and narrowings. All vehicles unable to overtake cyclists. HGVs can just pass through gap at the upper end of range.

Figure: Extract from Cycling England (2008) *Design Portfolio A04 Clear Space*

Table 4.1.1 Cross-section comments and mitigation

	Spacious	Critical	Tight
Definition	Sufficient room to safely overtake cycle traffic	Dangerous close overtaking	No room within the lane for overtaking of cycle traffic
Dimensions	At 30 mph: 4.20m (cars only) or 5.05m (HGVs) At 20mph: 3.75m (cars only) or 4.60m (HGVs)	3.10 to 3.75 metres	3.10 metres or less (cars) or 3.60 metres or less (with HGV traffic)
Comment	acceptable at most speeds but more space or separation needed as speed increases.	- not advised as it encourages dangerous overtaking; - more acceptable if it is easy to overtake (e.g. little oncoming traffic, no central island).	- only normally acceptable for short distances; - speeds lower than 20mph; - good visibility; - more acceptable if next to lanes that allow easy overtaking (e.g. no barrier, little traffic).
Mitigation		- reduce speeds; - an advisory cycle lane or cycle logos within the main carriageway may help to boost cyclists' confidence and keep traffic to the right.	- reduce speeds; - wide advisory cycle lane to alert drivers to cycle traffic presence and lack of overtaking space.
Application	Main roads, distributor roads with cycle lanes	Not recommended without off-carriageway cycle path	Residential roads

Figure 4: Derived from Dutch guidance issued in 1993 (*CROW Sign up for the Bike*) this extract from *Lancashire the Cyclists County* (2005) discusses the impact of lane widths.

In Section 4.4.2 *Traffic lane widths*, the 2016 *London Cycling Design Standards* (TfL 2016) state: "The rule-of-thumb is to avoid situations where motorised vehicles and cyclists are expected to move together through a width between 3.2 metres and 4 metres [...] Traffic composition also needs to be taken into account. Where there are larger vehicles, the minimum nearside lane width for safe, comfortable overtaking should be 4.5 metres. It should also be noted that widths greater than 4 metres are preferable for most non-standard cycles because of their additional width."

The issue of the negative effects of narrow lanes and engineered pinch points has long been a concern for people who use bicycles and has been raised repeatedly in various submissions. The 2009 *National Cycle Policy Framework* (NCPF) defined road narrowing schemes as a cycling unfriendly intervention that requires remedial treatment.

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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*

The consensus guidance on cycling infrastructure is simple: mixed or shared street cycling on narrow traffic lanes should only be recommended where there is little or no through-traffic and traffic speeds and volumes are low (particularly HGV volumes). Thus, unless meaningful and systematic reductions in through-traffic, traffic speed, and the removal of HGVs is ensured, then the deliberate narrowing of traffic lanes is incompatible with best practice to ensure the safety and appeal of cycling.

The likely effect of scheme for people on bicycles

In the *Gort Town Centre Public Realm Enhancement Project* the designers propose to use 3.2m lanes where cyclists are mixed with heavy flows of through traffic coming to or from a motorway. The following effects can be identified from the literature.

- People using bicycles will be at increased risk of close passing by some drivers.
- This width means that drivers of HGVs, buses and many light commercial vehicles/vans will be unable to pass people on bikes unless the oncoming lane is clear.
- This may result these vehicles being “stuck” behind people on bicycles and being restricted to cycling speed. In effect people on bicycles are being used as a form of mobile traffic calming. This is likely to feel intimidating and threatening for many potential bicycle users including schoolchildren and their parents.
- Where traffic queues form the reverse effect is likely where there will no longer be adequate road space to allow people on bicycles to maintain progress by “filtering” on the left. The proposed roundabout at Market Square is likely to generate traffic queues at peak hours such as school travel times.

The origins of the lane-width advice in the Gort Public Realm proposals

In Appendix P *Gort-Mobility Management Plan* the designers state that they base their proposals on the 2019 (2013) *Design Manual for Urban Roads and Streets* (DMURS). In my view DMURS is not credible guidance for traffic lane widths on urban roads with heavy traffic. I would note that the credibility of DMURS is currently being challenged in two High Court cases to which An Coimisiún Pleanála is a party: H JR 2024 725 Glenveagh Homes (Case Reference: 318687-23) and H JR 2024 1448 BusConnects Cross City Link (Case Reference: HA61.314597).

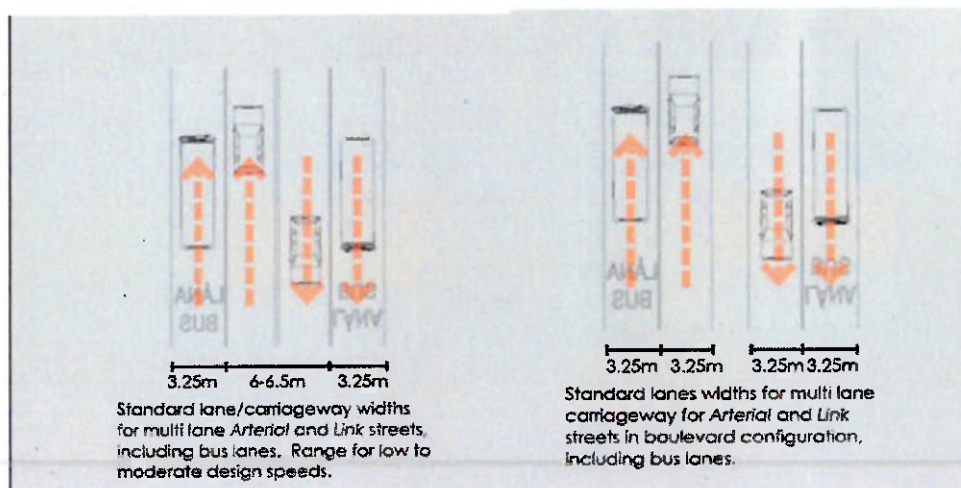


Figure: Extracts from DMURS Showing unsuitable lane widths on arterial roads.

The rationale for the lane width advice in DMURS is given on page 101.

"4.4 Carriageway Conditions

4.4.1 Carriageway Widths

Research from the UK has found that narrow carriageways are one of the most effective design measures that calm traffic.³¹ The width of the vehicular carriageway is measured from kerb to kerb or from the outside line of a Cycle Lane or from the edges of parking spaces (where the latter facilities are provided)."

DMURS gives as its source "31 Refer to Figure 7.16 of UK Manual for Streets (2007)". However a review of this diagram from *Manual for Streets* does not support the interpretation given in DMURS. What is shown in the *Manual for Streets* is that the speed reducing effect comes from the combination of lane width and visibility along the axis of the road. The diagrams show that an 8m wide (cycling friendly) road with short forward visibility distances has a better average-speed reducing effect than a 5m wide (cycling hostile) road with long forward visibility distances.

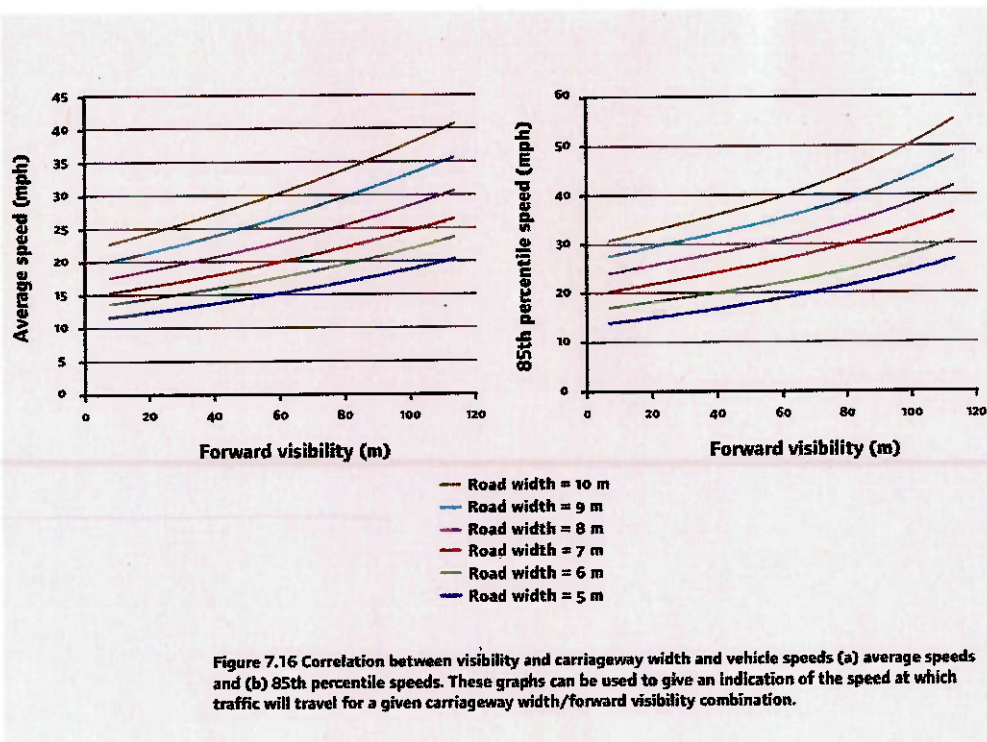


Figure: Figure 7.16 of UK Manual for Streets (2007)

Table 4.1 Average flows and speeds

<i>Site</i>	<i>Average daily flow</i>	<i>Average speed (mph)</i>
Lower Earley	70.4	11.3
Guildford	481.9	18.2
New Town, Reading	242.6	14.4
Chichester	1372.8	19.4
Eastleigh	427.7	17.3
Belgravia	2029.5	25.7
Tower Hamlets	627.0	19.1
Ipswich	121.6	19.0
Lavenham	221.4	11.7
Newhall	482.9	15.6
Windley Tye	294.9	16.9
Beaulieu	83.8	10.2
Bloxham	112.3	12.5
Portishead	1161.1	15.8
Leicester	528.9	23.5
Manchester	1060.6	19.3
Lichfield	362.6	16.7
Glasgow	1575.4	10.3

Figure: Table 4.1 from TRL Report 661 The Manual for Streets: Evidence and Research

The source for the graphs in *Manual for Streets* is TRL Report 661 *The Manual for Streets: Evidence and Research*. This discusses the sites that were surveyed in generating the graphs above. The report looked at 20 sites all of them being residential streets but chosen to include a sample of different layouts - pre war vs new build, grid vs non-grid etc. The most common thing residents liked about their streets was that they were quiet.

The most common dislike was issues with car parking. Other concerns included through-traffic and traffic speed. There is a table showing the average daily traffic flows for the sites. Only one site (Belgravia) had more than 2000 vehicle movements per day and this site was excluded from further analysis. Thirteen of the sites have less than 1,000 vehicle movements a day and of these 11 have less than 500 vehicle movements a day. Therefore, the advice in DMURS recommending unsuitable lane widths for arterial and link roads in Irish towns and cities cannot be said to be based on research that examined this practice on actual link or arterial roads.

It is also relevant that the content of DMURS does not acknowledge the existence or the content of the 2009 *National Cycle Policy Framework* (NCPF) which applied at the time of its writing in 2013. Nor does DMURS contain any discussion on the established negative effects for bicycle users of particular lane widths and engineered road narrowings. These are concerns that go back to at least the 1980s in the wider road design literature.

We can establish the existing traffic volume context from the peak hour counts provided in Appendix P *Mobility Management Plan* of the planning files (and below).

• Site 1 North end of Market St/Crowe Street	1199 pcu/hour
• Site 2 Market Street (south end)	970 pcu/hour
• Site 3 Market Square and Queen Street	1079 pcu/hour
• Site 4 Church Street	754 pcu/hour

So the designers of the Gort scheme have based their traffic lane widths on a study where most of the sites had less traffic every day than their design is supposed to account for every hour.

The use of raised crossings and the traffic calming implications.

It is established in the literature going back to the 1980s that engineered road narrowings can create problems for people using bicycles. In addition to narrow traffic lanes other narrowing features may include kerb build outs, chicanes, traffic islands and engineered pinch points. These can all create problems for people on bicycles by forcing them into the path of moving motor traffic and vice versa. There is a substantial literature arguing against engineered road narrowings at locations where cyclists are present unless separate cycling facilities, cycling bypasses or other mitigation can be provided.

Therefore if the intention of a designer is to take cycling into account and improve cycling access, then the preference must be to use horizontal features such as speed ramps, raised table junctions, raised table crossing and continuous footways across side road entries.

In this regard the proposed scheme has welcome elements. In the *Planning and Design Statement* at page 22 "2.1 Pedestrian movement" the following is stated.

- Inclusion of 7 new controlled crossing points on Church Street, Market Square, Crowe Street, Bridge Street and George Street;
- Inclusion of 17 new uncontrolled raised crossing points on Church Street, Queen Street, Market Square, Crowe Street, Bridge Street and George Street;
- Overall, a new crossing point is provided every 80 - 120m on average to ensure the roads can be safely crossed throughout the town centre;

This is very welcome as is the observation that the controlled crossing points all seem to be raised table types including those on the main alignment to the motorway.

However the presence of these crossings also provokes a question: "If it is acceptable to use raised table features throughout the scheme – then what useful traffic calming purpose is served by also removing road space from bicycle users through narrowing the carriageways?" It seems to me that if horizontal traffic calming is acceptable within the scheme then removing road space from people on bicycles is not necessary to achieving a substantial traffic calming effect.

Impaired cycling access to the train station.

In sustainable transport planning the concept of multi-modal transport is well-established. A format found elsewhere in Northern Europe is the combination cycling with train travel. The use of bicycles increases the potential catchment area around train stations and it is possible to store large numbers of bicycles without the land take needed if passengers were arriving at the stations by car. In Germany and the Netherland the train companies are themselves also significant operators in the bicycle hire market.

In Ireland, the 2009 *National Cycle Policy Framework* specifically advocated the inclusion of cycling in the multi-modal trip chain with public transport particularly trains. Objective 8.1 "Safe Routes to Stations" stated a requirement for local authorities to provide safe cycling routes to train stations and for the provision of adequate cycle parking arrangements. These objectives for multimodal transport have been restated in both the Irish Climate Action Plans in the EU "Declaration on Cycling".

At section 15.2.4.2 “Major Public Transport Infrastructure Programme” the *Climate Action Plan 2024* states:

“Public transport projects will ensure quality active travel access and cycle parking for passengers, and avail of opportunities that public transport infrastructure projects present for providing new or improved active travel infrastructure.”

In April 2024 the European Parliament, the Council and the European Commission adopted the *European Declaration on Cycling* setting out a list of principles to boost cycling across Europe. The declaration states:

(10) Cycling is also a key enabler of sustainable tourism and contributes to connectivity within and between rural and urban areas, especially in combination with trains, buses and other modes to create multimodal mobility services. It brings tangible benefits to the local economy, in particular to SMEs.

The Bridge Street/George Street corridor is effectively the only way for bicycle users to reach the train station from the main body of Gort town north of the Gort River. The proposed Gort Public Realm scheme removes road space from bicycle users on this corridor and objectively creates avoidable conflicts with motor traffic. This has the implied effect of impairing cycling access to the train station.

Conclusion

In my view the current *Gort Town Centre Public Realm Enhancement* proposals are deeply flawed and in conflict with the applicant’s duty of consistency with the Climate Action and Low Carbon Development (Amendment) Act 2021 and the associated Climate Action Plans. The amount of through traffic using the main roads of Gort is substantial and makes the current proposals unsupportable. A necessary prerequisite for a scheme of the type proposed, mixing motor traffic and cycles in narrow lanes, would be the removal of through traffic via a town bypass.

Without this, the proposed use of traffic lanes of 3.2m width arguably represents worst practice for mixed traffic conditions and heavy traffic. The implication is the creation of avoidable conflicts between people using bicycles and moving motor vehicles. The 3.2 m dimension is within the so called critical width where some car drivers feel able to pass people on bicycles without leaving adequate space. It is also a dimension which does not allow buses, HGVs or vans to pass bicycle users without leaving the lane.

The implication is that when there is oncoming traffic bicycle users will in effect be acting as moving road blocks or mobile traffic calming devices. This can be expected to be an intimidating and uncomfortable experience for people on bikes. In addition the same space restrictions suggest that when traffic queues form, cyclists will no

longer have room to maintain progress by filtering on the left. The proposed roundabout is likely to generate traffic queues at peak hours such as school travel times.

Any scheme for Gort needs to take account of the traffic volumes and the implications of these for bicycle users using the same roads. Here the principles are clearly stated in long standing design guidance going back to the 1990s. Above certain thresholds for traffic speed and volume, separate cycling facilities are required if cycling is to be considered a reasonable option for a wide mix of users. Under current guidance that threshold is 400 pcu at peak hours.

In Gort those thresholds are significantly exceeded at several key locations. In Gort there is also objectively enough road width for the provision of cycling facilities. There are competing demands on that space such as for car parking but it would seem that alternative locations are available and it is also possible that much of the existing (extensive) car parking provision in Gort is under subscribed.

Given the fundamental flaws identified, the *Gort Town Centre Public Realm Enhancement Project* should be rejected. In the alternative, the commission should order its revision to a form consistent with requirements of the climate action plans and the *2023 Cycle Design Manual*. The issues raised in these observations are well established in the applicable design literature and non-controversial. However if they require further exploration then an oral hearing may be necessary and I would be happy to attend if needed.

I enclose EU50 to cover the cost of making this observation.

Yours faithfully,

Shane Foran

Appendix: Traffic counts provided in Appendix P - Gort-Mobility Management Plan

Figure 6.3: Junction Turning Counts (Peak Hour – Thursday 1700-1800)

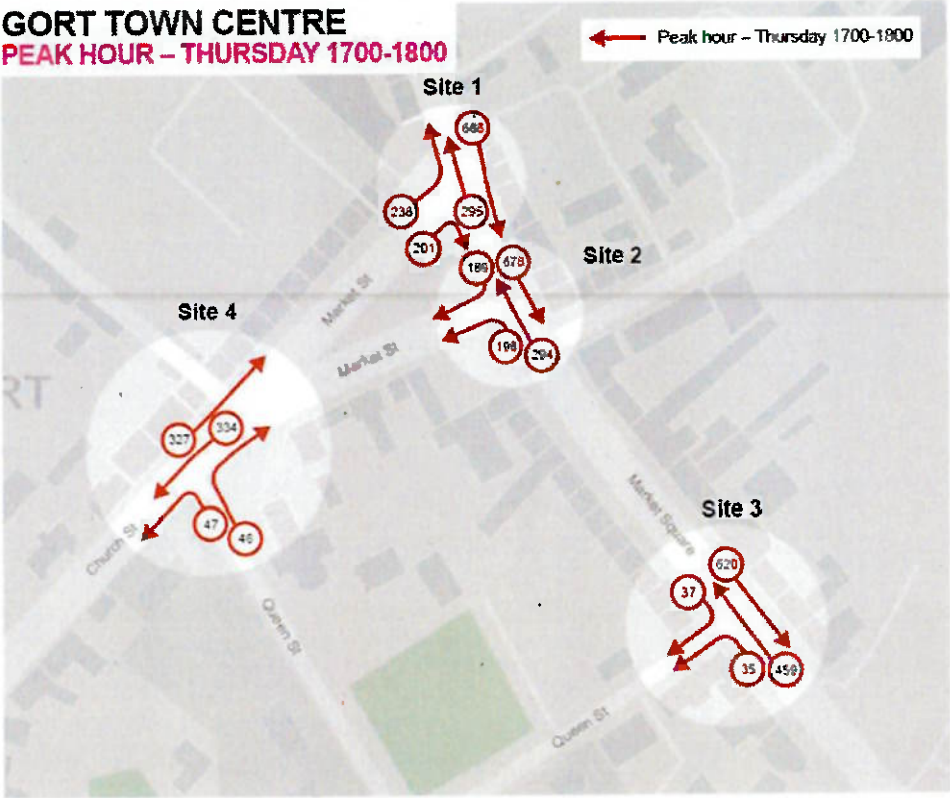


Figure 6.4: Automatic Traffic Counts



Thursday Counts Gort Centre Figure 6.3					
	Southbound	Northbound	Turning off	Turning in	Total
Site 1 North end of Market St/Crowe Street	666	295+238 (533)	n/a	238 + 201 (439)	1199
Site 2 Market Street South end	676	294	189 + 196 (385)	n/a	970
Site 3 Market Square and Queen Street	620	459	37+35 (72)		1079
Site 4 Church street	327 + 46 (373 going east)	334 + 47 (381 going west)	46	47	754
Automatic Counts Figure 6.4					
		Southbound	Northbound	Totals	
Site 1 Crowe Street near Lidl					
	AADT	3602	1322	4924	
	AM Peak	243	96	339	
	PM Peak	365	138	503	
	85th %ile	33.5	41.7		
Site 2 Church Street south end near Tubber Road					
	AADT	2681	2074	4755	
	AM Peak	181	149	330	
	PM Peak	245	180	425	
	85th %ile	40.9	45.4		
Site 3 Georges Street near R380 Loughrea Road					
	AADT	5004	5062	10066	
	AM Peak	335	376	711	
	PM Peak	493	406	899	
	85th %ile	40.1	41		

Sources

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