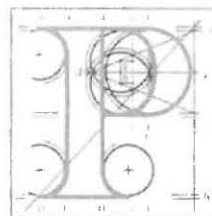


**Our Case Number:** PA0033



**An  
Bord  
Pleanála**

Shane Foran  
68 Gort Greine  
Rahoon  
Co. Galway  
H91 FY6R

**Date:** 07 February 2025

**Re:** Galway Harbour Extension  
Renmore and Townparks Townlands, Galway

Dear Sir / Madam,

An Bord 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime 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,

Lauren Griffin  
Executive Officer  
Direct Line: 01-8737244

PA04

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

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



## Planning Appeal Online Observation

Online Reference  
NPA-OBS-004261

### Online Observation Details

Contact Name  
Shane Foran

Lodgement Date  
06/02/2025 14:02:45

Case Number / Description  
PA0033

### Payment Details

Payment Method  
Online Payment

Cardholder Name  
Shane Foran

Payment Amount  
€50.00

### Processing Section

S.131 Consideration Required

Yes — See attached 131 Form

N/A — Invalid

Signed

EO

Date

### Fee Refund Requisition

Please Arrange a Refund of Fee of

€ 5

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

Yes  No

Request Emailed to Senior Executive Officer for Approval

Yes  No

Signed

EO

Date

### Finance Section

Payment Reference

ch\_3QpVfFB1CW0EN5FC12nw07zd

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

File With

**SECTION 131 FORM**

Appeal No

ABP—

Defer Re O/H

Having considered the contents of the submission dated/received from \_\_\_\_\_ I recommend that section 131 of the Planning and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

Section 131 not to be invoked at this stage.

Section 131 to be invoked — allow 2/4 weeks for reply.

Signed

EO

Date

Signed

SEO/SAO

Date

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

BP

Signed

EO

Date

Signed

AA

Date

Shane Foran  
68 Gort Greine  
Rahoon  
Co. Galway  
H91 FY6R  
087 9935993

6 February 2025

FAO: An Bord Pleanála

**Re: PA0033: Renmore and Townparks Townlands, Galway**

**Galway Harbour Redevelopment – Further information 2024**

To whom it may concern

I wish to make an observation on the above planning application in response to the notice of publication of significant further information submitted by the applicant. Since the previous hearing there have been significant changes in the legal and policy environment. These changes are of a nature that a new oral hearing into the scheme is needed.

### **1. Changes to the operating environment**

Since the original submission of this scheme several changes have occurred in the operating environment.

1. Galway City Council is now the sole shareholder in the Galway Harbour Company.
2. Galway has been designated as an urban node for the purposes of the EU TEN-T regulations.
3. The Climate Change Act has created a requirement of consistency with the Climate Action Plans.
4. The executive of Galway City Council have attempted to permanently ban cycling through the old core of the city. These changes have the effect of requiring cycle traffic to use the Lough Atalia/Bothar Na Long/Dock Road Corridor to reach the Wolfe Tone Bridge - a key crossing of the river Corrib. There are no cycling facilities for most of the length of Lough Atalia notwithstanding the objective availability of space.
5. The attempted city centre cycling ban also reinforces the role of the Lough Atalia/Bothar Na Long/Dock Road/Wolfe Tone Bridge corridor as a cycling route for children accessing the secondary schools which in Galway are mainly (7/10) located on the western side of the river Corrib.
6. Lough Atalia has been designated as an element of EuroVelo 1 an international cycling route of a type specifically mentioned in the TEN-T regulations.

7. Under *BusConnects Cross City Link* the city executive propose to ban cycling access from the north to the Educate Together Secondary School Campus at Newtownsmith. If implemented this will have the effect of making the Lough Atalia/Bothar Na Long/Dock Road Corridor an alternative cycling route to the school campus.
8. In 2017, new public bike stations were constructed at Lough Atalia and Glenina (Bons Secours). Lough Atalia Road is now a link road to other bike share stations such as Fair Green Road (Train Station), New Dock Street and Merchants Road.

In my view these changes have the effect of reinforcing the importance of previously stated concerns regarding identified adverse impacts for vulnerable roads users, particularly for cycle traffic, as a result of the proposed manner of construction and operation of the scheme.



**Figure:** On the left a screengrab from Google satellite view showing Lough Atalia Road and the green verge along the shore. There are no cycling facilities for most of the length of Lough Atalia road. The scheme proposes to concentrate the generated HGV traffic at Lough Atalia. On the right a road sign on Lough Atalia Road showing that this is part of Eurovelo 1, the Atlantic Coast Cycling Route, and a route of a type that is specifically mentioned in the TEN-T regulations. Eurovelo cycle-traffic is directed from here into the hostile Dock Road/Merchants Road Gyratory system.



**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 application of this cycling ban has the effect of reinforcing the role of the Lough Atalia/Bothar Na Long/Dock Road corridor as a key route for cycle traffic crossing the river Corrib – such as children attending the secondary schools concentrated on the west side of the river.

#### The ownership of the Harbour Board

The proposals imply adverse impacts for vulnerable road users associated with the proposed use of city roads as haulage routes for HGV construction traffic. This includes traffic delivering fill for the extensive proposed land reclamation. The change in ownership of the Harbour Board means that this is now a project where the developer and sponsor is also the roads authority. The developer therefore now has the power to intervene directly to implement mitigating measures throughout the city. This includes the power to develop alternative roads links to the harbour lands.

### Galway as a TEN-T Urban Node

In 2024, Galway city was confirmed as an urban node for the purpose of the European Union TEN-T regulations and appears in the annex of TEN-T EU cities. Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, (“2024 TEN-T Regulations”) requires that during infrastructure planning for designated urban nodes, Member States shall give due consideration to the promotion of active travel modes including the integration of active travel modes with other transport infrastructure and the requirement for a ‘do no significant harm’ assessment based on the latest available guidance and best practice. The proposed manner of construction and operation of the harbour expansion scheme sits in direct opposition to these purposes of the TEN-T regulations.

At paragraph 9, Article 3 of the 2024 TEN-T regulations directly references the EuroVelo routes: : (9) *In the implementation of projects of common interest, due consideration should be given to the particular circumstances of the individual project concerned. Where possible, synergies with other policies should be exploited, for instance [...] as well as with tourism aspects by including, within civil engineering structures such as bridges or tunnels, bicycle infrastructure for cycling paths, including the EuroVelo routes [...]*

### 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 2023 Climate Plan as adopted in December 2022 calls for high quality active travel infrastructure and states a necessity of significantly improving the attractiveness, capacity and frequency of public transport services – such as the Galway public bike scheme which has stations along or adjacent to the Lough Atalia/Bothar Na Long/Dock Road corridor. 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. On Page 225 the 2024 Climate Action Plan states actions around shared mobility and bike share schemes. 127. Under “15.5 Actions” in the 2024 Climate Action Plan there are measures and actions that specifically refer to expanding the bike sharing scheme in Galway. The current proposed manner of construction and operation of the harbour expansion scheme sits in direct opposition to these elements of the climate action plans.

### **Galway as a Cycling City**

In 2023, a survey was commissioned by the NTA to establish local walking, wheeling and cycling data. This included an independent survey of 1,103 residents aged 16 or above in the Galway Metropolitan Area. The survey was representative of all residents, not just those who walk, wheel or cycle. That survey found that 20% of respondents used a bicycle once a week. Extrapolating this from the census figures for the adult population of Galway city (68,789) suggests a population of 13,757 regular bicycle users.

### **How the proposed development contributes to the problem of HGVs in the city.**

The development as proposed will result in an increase in HGV movements in Galway city during and after construction. The proposed manner of construction and operation of the development is clearly in fundamental opposition to the purpose of the TEN-T regulations and the Climate Action Plans.

Section 4.5.2.21 (Construction Machinery) of the EIS sets out predicted movements of heavy Construction Vehicles HCVs during construction. Including in Stage 1 - 300 HCV movements per day for 9 months, during Stage 2 – 100 HCV movements per day for 6 months, during Stage 3 100 HCV movements per day for 6 months. Figures given in Table 4.5.3 (Principle Quantities for Construction) suggest the movement of 1,114,650cu.m of material from local quarries through city roads that also function as cycling and walking routes and school routes. According to the Galway City Council manager's report

“ on an average weekday there are 376 HGV movements on Lough Atalia Road. During the AM peak hour there were 41 HGV movements through the Lough Atalia / College Road junction and during the PM peak hour there were 15 HGV movements. During the operation of the development it is expected that there will be 40 HGV movements generated during the AM peak hour and 22 HGV movements during the PM peak hour. This equates to an increase of HGV movements of 102% and 147% during the AM and PM peak hour respectively. This potential increase in the number of HGVs will result in the significant shortening of the lifespan of existing roads.”

The values given in the manager's report suggest 81 HGV movements in the AM peak and 37 in the PM peak.

### **Haulage routes**

In the EIS, drawing 2139-2180 and chapter 13.4.5.3 describe the proposed haulage routes (HGV Routes) for construction material. The developers propose to bring construction material into the city from a range of directions passing through various city districts on the west, north-west, north-east and east. All this traffic then converges on Lough Atalia Road. To restate Lough Atalia is now officially an element in an international cycling route (Eurovelo 1), and a station location and link for the city public bike scheme. Recent traffic rearrangements by the city executive

reinforce Lough Atalia as a cycling route for cycle traffic crossing the river Corrib via Wolf Tone Bridge including schoolchildren.

The haulage route drawings are incomplete and potentially misleading. On the north-west of the city, due to the banned right-turn at Newcastle, HGVs trying to leave the city via the N59 will have to use the Thomas Hynes road (the only other alternative is via the core of the city at Dominick St). This will involve using the roundabout adjacent to the University and the University hospital. Likewise the text of the EIS refers to Wellpark Road although this is not shown in the drawings. Wellpark road becomes Monivea Road and includes a school and a campus of GMIT. Some of the routes that are to receive this HGV traffic such as Sean Mulvoy Road are already hostile for cycling notwithstanding that they are difficult to avoid if trying to reach key destinations and a key river crossing.

There are various places along, or adjacent to, the proposed haulage routes that are obvious destinations for vulnerable roads users. This makes these roads unsuitable as routes for heavy construction traffic:

East:

- Moneenageisha GRETB School (Wellpark Road)
- Eye Cinema/Wellpark Retail Park
- Atlantic Technical University (formerly GMIT) (R338 Old Dublin Rd)
- Bon Secour's Hospital
- Holy Trinity and St Michaels National Schools (Mervue)
- Gaelscoil Dara (Renmore)
- Brothers of Charity Service (Wellpark)
- St Francis National School - N84 (Headford Road)
- Church of the Resurrection - N84 (Ballinfoyle)

West

- University of Galway -> Junction of N6/N59 – the N59 (Thomas Hyne's Road) and all along the Seamus Quirke Road/Bishop O'Donnell road corridor
- Shantalla National School (School Bhríde) Seamus Quirke Road
- Galway Educate Together School - N59 (Thomas Hyne's Road)
- St Joesph's Special National School - N59 (Thomas Hyne's Road)

#### **Future HGV movements associated with the operation of the harbour.**

In the EIS, section 13.3.3.3 (Proposed Freight Generated by Galway Harbour Development) states.

“It is predicted by 2035 that the proposed Galway harbour capacity will be increased to circa 1.932m tonnes per year, or approximately 5,300 tonnes per day. Thus, 9 No. 600 tonne payload freight trains per day for 365 days a year would be required to fully service the proposed freight requirement via

rail alone. However we believe rail freight services will likely be a fraction of the new tonnage and specifically a newly won specific product.”

It would seem even the consultants are of the view that the vast majority of freight distribution from the expanded harbour will continue to be by HGV. It seems the near future for a small university city and TEN-T urban node will involve HGVs moving up to 5,300 tonnes of cargo a day on roads shared with children and adults walking and cycling to school or work.

**Statement of the problem: The impact of HGV traffic on the safety and amenity of roads for human beings - cyclists and pedestrians.**

### **Collision risk**

It has long being recognised that Heavy Goods Vehicles creates serious safety issues for vulnerable road users. The 2009 *National Cycle Policy Framework* (NCPF) set out a “Hierarchy of Solutions” to be followed in creating a cycling (and by extension walking) friendly environment. In this hierarchy, reducing HGVs comes within the top measure.

“Measure 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.”

Elsewhere the National Cycle Policy Framework states:

“HGV Strategies

We will require local authorities to develop Heavy Goods Vehicle (HGV) Management Strategies for every town in the country. We will consider a ban on the movement of HGVs on routes to schools / other specific routes with mixed traffic between 08.30-09.30 and 15.00-17.00.”

Among the reasons for this emphasis on reducing HGV levels are that has long been recognised that HGVs are disproportionately involved in fatal collisions and in particular in fatal collisions involving cyclists. The presence of HGVs also results in a large reduction in the comfort and perceived safety of the shared roads environment for vulnerable road users.

- Dublin City Council have reported that of the 11 cycling fatalities that occurred in the city between 2002 – 2006, 8 of these deaths were of cyclists killed by left turning HGVs

A review of cycling deaths in London found as follows<sup>1</sup>:

“HGVs were involved in 103 of 242 (43%) of all incidents and the vehicle was making a left turn in over half of these (53%).”

“HGVs are disproportionately involved in collisions fatal to cyclists: using the data from our study, freight vehicles are approximately 24 times more likely to be involved in a fatal incident than cars, 4 times as likely as buses and 8.5 times as likely as motorcycles.”

A UK National Cycling Charity (CTC) discussion document on Goods Vehicles provides the following observations<sup>2</sup>.

“In urban areas, HGVs make up 2% of non-motorway traffic, and are involved in 24% of cyclists’ deaths.”

“In London specifically, where HGVs make up around 3.5% of traffic, almost half of the 44 cyclist fatalities between 2011-13 (inclusive) were as a result of a collision with a HGV. Of these 21, ten involved a collision with a left-turning HGV.”

“A cyclist is much more likely to die if they are in collision with a HGV than if they are in collision with a car: on average, cyclists are killed in around a fifth of serious injury collisions involving heavy goods vehicles, but in just over 2% of cyclist/car collisions.”

“Most collisions between cyclists and goods vehicles occur during lorry manoeuvres and/or at junctions. Roundabouts and left turns are a particular problem. In 2008 in London, 6 of 8 the fatalities that involved a lorry happened when it was changing lane to the left or turning left.”

Within collisions involving HGVs there is particular concern about the contribution of construction vehicles, particularly 4-axle tipper lorries. A 2013 Transport Research Laboratory Paper reviewed 16 fatal cycling collisions in London in 2011, 9 of these fatalities involved a goods vehicle and of these 7 were construction vehicles<sup>3</sup>. This is of particular concern with reference to the proposed works. It has been speculated that the over-representation of construction vehicle in cyclist deaths is due to both vehicle design issues and industry practices. One practice that is of concern is paying drivers by the load delivered rather than by hours worked.

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<sup>1</sup> Morgan A et al. Deaths of cyclists in London: trends from 1992 to 2006. Published in BMC Public Health. 2010.10:699.<http://www.biomedcentral.com/content/pdf/1471-2458-10-699.pdf>

<sup>2</sup> CTC Briefing Note: Goods Vehicles, Briefing 4Q (December 2014)

<sup>3</sup> Helman et. al Summary report: Construction logistics and cyclist safety, Project Report PPR640, Transport Research Laboratory 2013.

## **Road Surface Issues and Cycling Safety**

The city manager's report on the proposals notes: "increase in the number of HGVs will result in the significant shortening of the lifespan of existing roads". This damage inflicted on the road network by HGVs will impact on the safety of cyclists. A previous study on cycling accidents in Galway found that simple falls and collisions with roadside objects account for approximately 85% of injuries incurred while cycling (although mainly minor).<sup>4</sup> The act of swerving to avoid potholes also becomes more fraught if there are simultaneously high numbers of HGVs present.

### **HGV Noise:**

HGVs are loud, they are a source of engine noise and heavy exhaust fumes. The large axle loads create vibration which adds to the effect of the noise and the fumes. A chart given by the NRA document "Guidelines for the Treatment of Noise and Vibration in National Road Schemes 2014" gives a noise level of appx 85dB(A) for a heavy diesel lorry travelling at 40km/h and at a distance of 7m. Cyclists and pedestrians using the same roads as the construction traffic for this development may be as close as 1-3m to the HGVs. It must be assumed that a proportion of the HGVs involved will be travelling at or above the stated limit of 50km/h within the city. A chart found in the EPA document "Guidance Note in Relation to Noise for Scheduled Activities" give 85db(A) as equivalent to a very busy pub where voices must be raised to be heard. It can be assumed that on the streets of Galway this HGV noise will often be louder and be accompanied by vibration, exhaust fumes and wind generated by the vehicles passing. In my reading, I have not found any apparent discussion of this obvious impact on human beings in the EIS or in the addendum documents.

### **Contributing factors to the dangers posed by HGVs (Cycle facilities)**

The strong association between cycling deaths and HGVs making left-turning movements makes it extremely difficult to see cycling facilities at junctions as a solution. Indeed cycling facilities that bring cyclists up the left hand side of HGVs at junctions have the potential to increase cycling fatalities. A 1993 German study found that HGVs are almost twice as involved in collision with cyclists at junctions with cycling facilities as at junctions without them<sup>5</sup>. In the UK, cyclists have been killed or injured after getting trapped between pedestrian guard rails and HGVs, it is argued that such guard railing should be removed altogether<sup>6</sup>. In this regard it is relevant that Dock Road also has extensive guard rails.

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<sup>4</sup> Brennan, M.J. (1979) Bicycle Travel in Galway City. RS 242, An Foras Forbartha.

<sup>5</sup> Schnull R. and Alritz D., Safety of Cyclists at Urban Junctions Report 262, Bundesanstalt Fur StraBenwesen, 1993.

<sup>6</sup> CTE Briefing Note: Goods Vehicles, Briefing 4Q (December 2014)



**Figure:** Google Street View image of Dock Road. Dock Road is already perceived to be very cycling hostile. Points to note are the extensive guard rails at handle bar height and close to the roadway edge. Recent traffic rearrangements in the city, such as the city executive's attempts to permanently ban cycling in the old city core, mean that Dock Road is the only general way for westbound cycle traffic to reach the Wolf Tone Bridge - a key river Corrib crossing point - including for cycling schoolchildren. Guardrails are already a contributor to the risks of mixing HGVs with cycle traffic. If the proposed scheme results in more HGVs using Dock Road this will reinforce the problem. Galway City Council is the sole shareholder in the Galway Harbour Company. There is 20m available between the quay edge and the building line.

### **Conclusion on impacts of HGVs**

Cycle facilities may contribute to the dangers of HGVs. This is one of the reasons why the *National Cycle Policy Framework* and similar documents start with recommending HGV reduction before moving on to other measures. There are other measures such as driver training, cyclists training, additional vehicle mounted blind-spot mirrors, mirrors mounted on traffic signals and so on. None of these measures alter the essential fact that HGVs are not compatible with roads of an urban character, roads that host a range of human activities as well as travel.

Therefore in creating a sustainable urban roads environment the over-riding aim must be to eliminate HGVs to the greatest extent possible.

### **Concerns regarding the conduct of the EIS**

In my reading of the original EIS, or the further information documents, I can find no adequate assessment, acknowledgement or analysis of the established safety issues thrown up by directing large numbers of HGVs through a small university city both

during construction, and when the expanded harbour is in operation. Nor is there any apparent assessment of other impacts of such traffic such as the increased exposure of cyclists and pedestrians to the noise of heavy construction traffic in close proximity. There is detailed discussion of the effects of noise on fauna such as salmon, and marine mammals from cetaceans to grey seals. There is no apparent discussion of the effect of HGV noise, fumes or vibration on cyclists or pedestrians only a few metres away on the road or footpath.

Walking and cycling are not just forms of transport they are also part of how people see themselves, they are part of the cultural heritage of places. It is impossible to discuss cities like Amsterdam or Copenhagen without also referring to the cycling culture or the walking culture in the extensive pedestrian areas. Walking and cycling are also part of the cultural heritage of Galway. Through its promotion of HGV traffic in an urban realm this proposed scheme is clearly in opposition to this cultural heritage. This is not discussed in the EIS. It should not be forgotten that Galway has a significant tourism industry. In my view moves to push more HGV traffic into the city also represent a direct threat to the amenity and attractiveness of the city as a tourist destination.

#### **Proposed solutions: A Galway Port 'Tunnel'**

The provision of the Dublin Port Tunnel and the associated city centre HGV ban is viewed as having transformed Dublin City Centre, and in particular the Liffey quays as a cycling and walking environment. Removing HGVs creates a better city. The lessons of Dublin need to be learned in Galway. (Dublin is not an isolated case HGV management has been a factor in creating attractive walking and cycling environments in other cities)

If this development is to proceed a necessary prerequisite is the provision of an alternative road link serving the harbour. 1999 Galway County Borough Development Plan stated that there was a 30 metre reservation along the railway line through the Eastern residential suburbs. The 2005 Galway City Development Plan included a provision for a bus corridor following the railway line and coming in from the east of the city. This corridor is stated as a specific objective as under Section 3.5 and is shown in the maps. The development of this road, as already proposed by the city council, would provide an alternative route for construction traffic. When construction is complete this road would also provide a means for heavy freight traffic to avoid the city centre.

A HGV ban for the city centre and wider HGV management strategy will be necessary parts of a viable walking and cycling strategy for Galway. The provision of an alternative route for HGVs might also enable the development of a freight redistribution centre in the harbour area. This would allow goods brought to the city by HGV to be transferred to more suitable vehicles for final delivery. A new limited access road on this route would also improve the level of service for inter-urban buses.

If the scheme goes ahead it must be based on the provision of this dedicated route, constructed as a limited-access road, and serving the port. In addition measures must be taken to prevent construction traffic from using the city to get to this new road. The easiest way to achieve this is to prohibit the use of quarries to the west or along the N84 and N17 corridors. Only quarries to the east with a clear access route that avoids the city should be used.

It should be a recognised principle that HGVs passing through the city to access the port is an unusual event to be avoided.

### **Other observations**

#### **Coastal walking and cycling route**

There is a longstanding proposal for a coast walking and cycling route incorporated into the existing promenade on the west of the city and eventually extending east and west. Provision should be made to include this in the site.

#### **Railway line path**

As proposed, this development will include works on the railway line embankment that bounds the north of the site. This embankment includes a railway line footpath that is acknowledged in city development plans as a cycling and walking route into the city. Despite this, works by CIE have significantly reduced its width and greatly reduced its attractiveness. If additional works are now to be carried out along the railway these should include the restoration and improvement of the railway line path.

#### **Bridge Archway**

The EIS drawings show the existing archway under the railway embankment being used as an “escape gateway”. This archway also ties in with a natural desire line for cycle and walking traffic between Renmore, Mervue, Wellpark and the city centre this role should also be accounted for in the design.

### **Summary**

The proposals *as currently conceived* are demonstrably unsustainable and represent a threat to the safety and amenity of the city for walking and cycling. They also represent a threat to the cultural heritage of the city and to the attractiveness of the city as a tourist destination. The proposed manner of the construction and operation of the scheme are in opposition to the purposes of the EU TEN-T regulations and the Climate Action Plans. The board should reject the scheme in its current format.

If this development is to proceed, a necessary prerequisite is the provision of alternative road links serving the harbour. The provision of the Dublin Port Tunnel and the associated city centre HGV ban has had a transforming effect on Dublin City

Centre as a cycling and walking environment. The lessons of Dublin need to be learned in Galway. On a related issue, the extensive construction traffic associated with this development could have a strong negative impact within key cycling routes in Galway city unless alternative routes are developed and stringent movement restrictions imposed.

Previous Galway city development plans have included a provision for a bus corridor following the railway line and coming in from the east of the city. (See 3.5 "Specific objectives" in the Galway City plan 2005-2011). The development of this road, as already proposed by the city council, would provide an alternative route for construction traffic. When construction is complete this road would also provide a means for heavy freight traffic to avoid the city centre. A HGV ban for the city centre will be a necessary part of a viable walking and cycling strategy for Galway. The provision of an alternative route for HGVs might also enable the development of a freight redistribution centre in the harbour area. This would allow goods brought to the city by HGV to be transferred to more suitable vehicles for final delivery.

In addition to the alternative road proposed above it may be necessary to prohibit the use of quarries to the west of the city. A prohibition on HGV movements during school travel hours 8:30 to 9:30 am and 3:00 to 5:30pm also seems sensible.

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

Yours faithfully,

Shane Foran