



EIAR ADDENDUM APPENDIX 15-3A

**ADDENDUM STAGE 1 ROAD
SAFETY AUDIT**

ADDENDUM STAGE 1 ROAD SAFETY AUDIT

Item 1.7 raised by the Commission states the following;

“The details outlined on material assets in your response to submissions including the management of HGV trips on the L-61461, swept path analysis, new temporary access roads access and egress restrictions, and items raised 1.1, 1.2, 1.4 & 1.5 above should be included in an updated Road Safety Audit for the construction stage. This should be outlined by way of an addendum to the EIAR.”

Following a discussion with the independent Road Safety Auditors (Traffico Ltd) it was considered that rather than update the existing Road Safety Audit, each of the issues raised may be addressed separately as part of the addendum. Similar to the format of a Road Safety Audit the response to the safety issues raised in the submissions and by the Commission are prepared by the Applicant, with a further comment provided by the Road Safety Auditors. The issues and the responses are set out below

Issue 1 – Updated Audit to respond to Item 1.1 raised by the Commission - The N83 / L-61461 junction layout as outlined in submitted plans, the traffic management plan and in your response to submissions do not appear to be consistent with the existing onsite arrangement. The existing junction layout appears to display restricted sightlines in both northerly and southerly directions onto the N83. Given the application details submitted to date and the existing junction layout, consultation should take place with the planning authority in order to clarify the status of the existing junction layout.

Applicants Response – The 2 different junction layouts are discussed in detail in the **Responses to ABP Issues Report**, including Figures FI1 to FI4 in Appendix 15-5 of the Report. In summary the previous layout at the N83 / L-61461 junction included the STOP line of the minor arm of the junction being located adjacent to the carriageway edge, as opposed to the nearside edge of the hard shoulder, which permitted the full 3.0m x 215m visibility splays required for a 100 kph speed limit to be available. The junction layout has since been revised to include the relocation of the STOP line to be in line with the nearside of the hard shoulder. The recently implemented changes to the junction markings have been implemented without any alterations to the boundary walls running parallel to the N83, and as a result, there are significant restrictions to the visibility splays for drivers accessing the N83 from the L61461, as are shown in Figure FI4 of the in Appendix 15-5 of the Report. Measured from a minimum setback of 2.4m as permitted as a relaxation in TII Guidelines, as a result of the boundary walls now constraining visibility splays, a maximum of 35m is available to the north, and 20m to the south.

The recent design changes at the N83 / L61461 junction were designed and implemented by a Local Authority Roads Design Office on behalf of TII. The design of the changes including any implications relating to road safety are therefore the responsibility of these organisations. No design changes are proposed at this location as part of the Proposed Project. Temporary traffic management measures proposed during the various stages of the construction are discussed under Issue 1.2.2 of this report above.

Auditor Comment – I have reviewed ABP’s item 1.7, the Designer’s response and the road drawings which have been revised following the issue of our road safety audit.

All items raised in the road safety audit appear to have been suitably addressed within the revised site layout drawings.

In my opinion, the design changes fall under the heading of ‘design development’ and are unlikely to pose any further road safety risks (other than those raised within our audit).

On this basis, I do not see any need to revisit or update the road safety audit.



Martin Deegan

Road Safety Audit Team Leader - Traffico

Issue 2 – Updated Audit to respond to Item 1.2 raised by the Commission - You are requested to submit a revised site layout plan at an appropriate scale indicating clear sightline triangles at the required standard including at the N83 / L-61461 junction. This shall clearly dimension the extent of proposed boundary walls to be set back adjoining the L61461 and adjoining the N83. Sightlines at all entrances and junctions should meet required standards.

Applicants Response – As set out above, there are no design changes proposed at the N83 / L-61461 junction as part of the Proposed Project.

Auditor Comment – Refer to our response to Issue 1 herein.

Issue 3 – Updated Audit to respond to Item 1.4 raised by the Commission - Site layout plans should be revised to clearly detail the width of L-61461 and its proposed widened areas, at an increased scale, taking into account the width of 2 number passing HGVs.

Applicants Response – It is considered that the proposed road widening and passing opportunities, as set out in Figure FI6 of the Appendix 15-6 of the **Report** and discussed in detail under Issue 5 below provide adequate passing opportunities for all vehicle types to pass. The onsite safety will be significantly enhanced with the implementation of the proposed complimentary traffic management measures, including supervision and co-ordination provided by site staff and warning signs.

Auditor Comment – Refer to our response to Issue 1 herein.

Issue 4 – Updated Audit to respond to Item 1.5 raised by the Commission - The site layout plans should be revised to detail existing junction layouts at the N83 – local roads.

Applicants Response – There are no design changes to the N83 / L-61461 junction proposed as part of the Proposed Project. The revised junction layout recently implemented by TII is the responsibility of Galway County Council and TII. As the Applicant is not responsible for the recent changes and no further changes are proposed we have no further comment on this issue.

Auditor Comment – Refer to our response to Issue 1 herein.

Issues 5 – Updated Audit relating to the details outlined on material assets in your response to submissions including the management of HGV trips on the L61461, swept path analysis, new temporary access roads access and egress restrictions.

Applicants Response – The above issues were raised as part of a Submission prepared by the Roads and Transportation Section of Galway County Council and relate to concerns in relation to the carrying capacity and safety of the road network. The main concerns raised related to the following:

- Safety concerns relating to speed on N83, the multiplicity of entrances on N83, the impact on visibility splays at the N83 / L61461 junction
- Deficiencies in RSA relating to HGV's requirements to use both lanes on N83 and lack of consideration for N83 / L-61461 junction
- Concerns about road widening and facilitation of HGV movements at some locations
- Proposal would endanger public safety by reason of traffic hazard and would contravene DM Standard 28

While we have not seen the internal report received from the Roads & Transportation section of Galway County Council, the key concerns stated in the planner's report based on a combination of issues raised under Section 16. Carrying Capacity and Safety of Road Network, and 18.1 Report from the Roads & Transport Engineer are set out below.

GCC Topic Heading - Safety concerns relating to speed on N83, the multiplicity of entrances on N83, the impact on visibility splays at the N83 / L61461 junction

GCC issue 1 - Significant safety concerns are raised regarding traffic safety aspect of the proposed development. The Road Section note that having regard to road speed travelled by users (100 kph speed limit) and the multiplicity of other permitted entrances opening onto the N83 within close vicinity of the new proposed development construction vehicular entrance, the existing local tertiary (L-61461) access point onto the N83 will be deemed to be impaired owing to the restricted visibility due to the new temporary road link for construction vehicles on the N83.

Applicants response - Speed limit on the N83 – It is acknowledged that the existing speed limit on this section of the N83 in the proximity of the junction with the L-61461 is 100 kph. Should the Proposed Project proceed, in order to assist with providing the safest environment for background and development generated traffic on the N83 and the L-61461, an important element of the traffic management measures that should be considered, would be a temporary reduction of the speed limit on this section of the N83 from 100 kph to 60 kph. This would be a temporary measure for the duration of the construction phase only. It is also acknowledged that this would require to be implemented by Galway Council and approved by TII, but it remains a proposed component of the TMP proposed for the construction phase of the proposed project.

Auditor Comment – Refer to our response to Issue 1 herein.

GCC issue 2 - Further to the above the applicant has not satisfactorily demonstrated that the N83 / L61461 junction has sufficient sightlines in both northerly and southerly directions to support this level of usage.

Applicants response - The appropriate response to this issue raised by GCC is the responses provided to Items 1.1 and 1.2 of the **FI Response Document**. Rather than repeating these please refer to these responses in that report.

Auditor Comment – Refer to our response to Issue 1 herein.

GCC issues 3 - It is considered the remedial works required to provide the aforementioned visibility sightlines from the temporary entrance of the site would constitute removal of trees / vegetation, in conjunction with generating overlapping visibility splays between the multiplicity of adjacent entrances.

Applicants response - As set out in the response to GCC issue 2 above, it is not proposed to undertake any additional works at the N83 / L61461 junction as provided to ABP Items 1.1 and 1.2 of the **FI Response Document**.

With respect to GCC's comment regarding "overlapping visibility splays between the multiplicity of adjacent entrances" the following points are made;

- There are no visibility splays required at the proposed left turn access onto the proposed temporary link road proposed between the N83 and the L-61461 for the construction period. This is because it is not intended that there will be an access onto the N83 at this location, but will provide for deliveries turning left off the N83 travelling to the site only. It is mentioned in the EIAR that the cement mixers exiting the site on the 7 days that the turbine foundations are poured may exit the site onto the N83 via the temporary link road. While it was intended that this would be done using temporary traffic management measures for the 7 days, including flagmen and signs, based on the assessment provided in Section 1.2.2 above, it is not considered this to be necessary, and this is now not being proposed.
- In the case that the comment regarding "overlapping visibility splays between the multiplicity of adjacent entrances" is in relation to the potential for development generated HGV vehicles turning left into the temporary link to impact on the visibility splay for traffic exiting the existing L-61461, it is noted that existing northbound traffic on the N83 travelling in the left turn lane currently has significantly greater impact on visibility splays for this traffic. It is also noted that with the current location of the stop line on the L-61461 approach to the junction, recently set back by TII to the nearside

of the hardshoulder, visibility for traffic accessing the N83 looking south is restricted to 20m, which is does not reach the proposed temporary left turn lane.

Auditor Comment – Refer to our response to Issue 1 herein.

GCC Topic Heading - Deficiencies in RSA relating to HGV's requirements to use both lanes on N83 and lack of consideration for N83 / L-61461 junction

GCC issues 4 - Furthermore, concerns are also raised with regards to deficiencies in the Road Safety Audit in terms of consideration of swept path analysis which simulates HGV requirements to use both lanes on the N83, and ignores completely consideration of the junction of the L-61461 and the N83 and is deficient in this regard.

Applicants response - The swept path requirements for the abnormal loads carrying the blade and the tower sections of the turbine are shown at the proposed temporary access off the N83 in Figures 15-13 and 15-14 of the EIAR respectively. While the figures show that the vehicles transporting the blade will require the blade tip to extend into the southbound lane of the N83, the delivery of all abnormal loads will be made to the site with an escort provided by An Garda Siochana, (as detailed throughout the EIAR and first referenced in Section 15.1.4.1.) and the haulage company, that will provide transient traffic management measures for the convoys (1 per night on 22 nights) along the turbine delivery route.

The swept path for a standard large articulated HGV making a right turning movement from the L-61461 onto the N83 is shown in Figure 15-15 of the EIAR. This movement is as per an existing situation for vehicles exiting the L-61461 onto the N83 and does not show a vehicle travelling on both lanes of the N83. It is noted that no additional HGV movements making the left turn onto the N83 at this location will be generated by the Proposed Project.

With respect to the N83 / L-61461 junction in general, it is acknowledged that the frequency of traffic movements will increase through this junction during the construction of the Proposed Project, as is detailed in EIAR with further details set out in Section 1.2.2 above. As all inbound HGVs will use the proposed temporary access off the N83 it is forecast that a maximum of 3 additional HGV movements in one hour will exit the L-61461 onto the N83 at this location on the 227 days that general construction will take place. In mitigation, these movements will be made, with the co-operation of Galway County Council and TII, in a tightly controlled traffic managed environment, with the additional HGV movements released through the existing narrow 70m section of the L-61461 by flagmen that will be in place at either end.

It is our view that the above points do not represent deficiencies in the Road Safety Audit but are simply not issues that raised concern for the Audit Team, for the reasons described above.

Auditor Comment – Refer to our response to Issue 1 herein.

GCC Topic Heading - Concerns about road widening and facilitation of HGV movements at some locations

GCC issues 5 - *Difficulty in achieving road widening is also highlighted as a concern. From a site visit the proposed widening of the road to facilitate simultaneous HGV/ Truck/ Tractor & Trailer contra flow movements will be difficult to achieve in some locations.*

Applicants response - This issue is considered in detail in the additional information provided for the TMP included in section 1.2.2 above.

Auditor Comment – Refer to our response to Issue 1 herein.



GCC Topic Heading - Proposal would endanger public safety by reason of traffic hazard and would contravene DM Standard 28

***GCC issues 6** - If permitted as proposed, the development would endanger public safety by reason of traffic hazard, obstruction of road users, or otherwise, would contravene materially in safeguarding the capacity and safety of roads and DM Standard 28 contained in the Galway County Development Plan 2022-2028 and therefore would be contrary to the proper planning and sustainable development of the area.*

Applicants response - Based on the information provided in Section 15 of the EIAR, the Stage 1 Road Safety Audit, the FIR Document, the **Stand Alone N83 / L-61461 / L-61461 Traffic and Transport Assessment**), and this **EIAR Addendum Report**, the Applicant respectfully disputes this statement. Each of the points raised by Galway County Council have been carefully considered and robustly addressed and it is demonstrated that each point raised has either already been addressed in the EIAR submitted with the application, or has been addressed in the responses set out in the additional documents listed.

Auditor Comment - Refer to our response to Issue 1 herein.