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An Bord Pleanála (Strategic Infrastructure Division)  
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20<sup>th</sup>. December 2018

<b>AN BORD PLEANÁLA</b>	
LDG-	011083-18
ABP-	
21 DEC 2018	
Fee: €	50-
Type:	Cheque
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### N6 Galway City Ring Road 2018

Dear Sir/Madam,

This submission is made on behalf of Mr. Brian Walsh, 115 Rósan Glas, Old Ráhoon Road, Galway City and is accompanied by a cheque for the €50 submission fee.

The submission concerns the N59 Link Road South, specifically the Bóthar Diarmuida section (ch 1+750 to ch 2+ 200). The matters raised concern the following:-

- the likely effects on the environment of the proposed road development and
- the implications of the proposed road development for proper planning and sustainable development.

The evaluation is based on a site visit on the 18<sup>th</sup> December and an on-line review of relevant volumes on the N6 website and 2016 Census of Population of data.

We contend that likely effects on the environment have not been adequately assessed and that the road as proposed would not be in accordance with proper planning and sustainable development. This submission first describes the affected area under consideration, assesses likely effects and then the implications for proper planning and sustainable development. The term 'affected area', demarcated in Figure 1 is used throughout the text to refer to the area which is the subject of this submission.

### 1. The affected area and the proposal

Bóthar Diarmuida is a 410m cul-de-sac serving approximately 266 dwellings, on the north side of the Ráhoon Road in Ráhoon (Figs. 1, 2 and). Three main housing groups are accessed by separate roads which connect to Bóthar Diarmuida. These are Bun a Chnoic, Rosán Glas north, and Rosán Glas south. The housing was built in the early years of the century, the last phase completed in 2005.

The proposal involves building a new road beside Bóthar Diarmuida, except at its southern end where the new road will replace the existing road. There will be a new signalized junction mid-way along Bóthar Diarmuida to access the new road. The current proposed alignment only emerged in the latest design iteration. In previous drafts the road reserve was located further west.

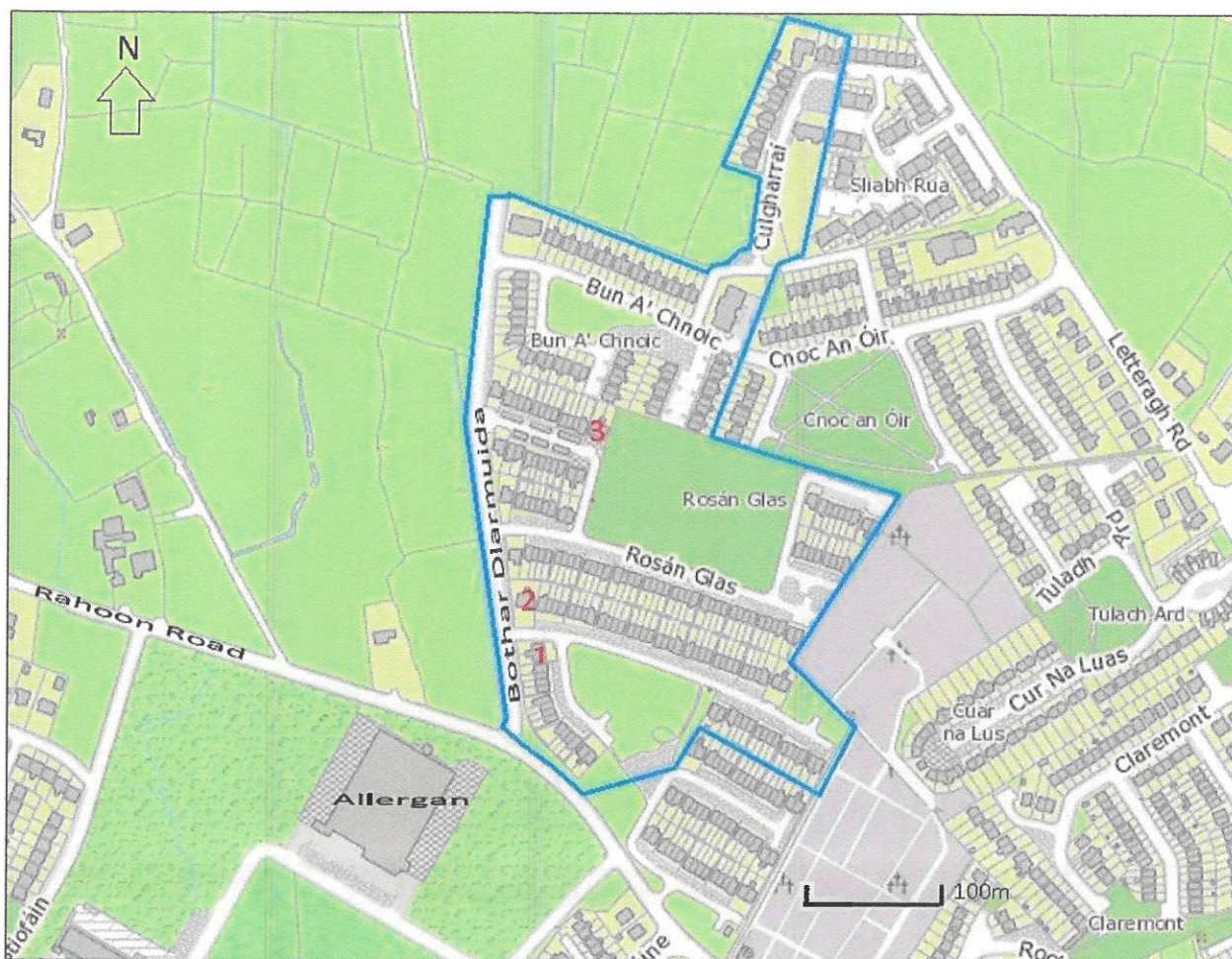


Fig 1 The affected area. The blue line encloses the residential area accessed via Bóthar Diarmuida. The red numbers identify local facilities (1 and 3 are childcare facilities, 2 is 'Henchys Daybreak', a local convenience store)



Fig 2 Bóthar Diarmuida looking north with farmland on the west side and housing estates on the east side

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Fig 3. Part of Rosán Glas, a well established residential area

## 2. Environmental Impact

The affected area is an established, low density suburban area of approximately 266 dwellings. Of the 266, 27 would directly abut the combined road reserve, either backing onto it or at right angles to it. The relevant impacts can be summarised under two headings:-

- access to local services and facilities, and
- traffic-related noise, air and visual pollution.

### Access to local services and facilities

Galway city is a car-dependent city, and no parts more so than its outer suburbs. Most journeys from home in the Galway suburbs are by car. This is because there are very few services and facilities or employment centres within walking distance of home and accessible public transport is very limited. There are, for instance, no schools, health facilities, churches or community facilities within walking distance of the affected area. In 2016 54% of residents in Ragoon commuted to work or school by car or other vehicle, while only 11% walked and 5% used public transport.<sup>1</sup>

The dominance of the car is reflected in the car ownership data. The affected area closely corresponds to three small census areas defined by the CSO. The table below summarises car ownership in those areas. Less than 10% of households do not own a car, a much lower percentage than either Galway city as a whole or in the state.

<sup>1</sup> EIAR, Table 18.11 derived from 2016 Census of Population.

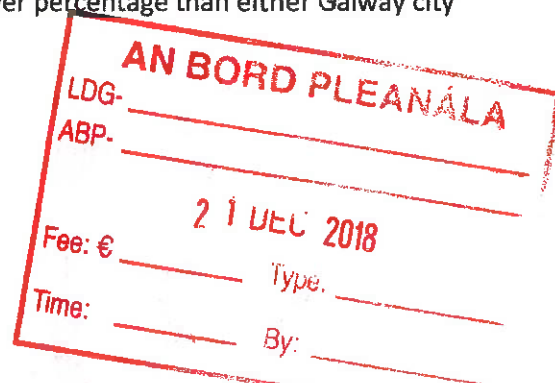


Table 1. Car ownership levels (% of households) in the affected area compared with the city as a whole and state  
Source: AIRO analysis of 2016 Census of Population

Census area	1 car	2 or more cars	0 cars
068015008	55	34	9
068015007	33	55	8
068015003	39	48	10
Galway City	42	29	22
The State	41	41	15

In my opinion chapter 18 of the EIA is seriously deficient in respect of its assessment of the affected area. It states (18.3.3) that 'the proposed development is intended to provide improved connectivity to the national road network for communities on the western side of the River Corrib.' It states under 18.5.4.4 that the N59 South Link Road will connect to the Western Distributor Road via Millars Road in Gort na Bro Road. As a result there will be additional traffic on this road.....' But there is no specific reference to impacts, adverse or otherwise, on the affected area.

At the present time residents have the benefit of convenient access by car to all the services and facilities that one would expect in a suburb. This access is via a partially improved rural road network, accessed from an uncongested junction on the Ragoon Road. The project under consideration would replace this access by an access to the road network via a signalized junction (the new Bóthar Diarmuid Road junction onto the N59 South Link Road. Residents of Rosan Glas south wishing to travel south (where most local services and facilities are located) would have to travel north on Bóthar Diarmuid, access the N59 Link Road by the new signalized junction, then double back south on the link and access the Ragoon Road or Gort na Bró roads via a signalized junction at the Ragoon Road. At the present time, this journey is simply accomplished by a left turn onto Bóthar Diarmuid and a left or right turn onto Ragoon Road, a shorter journey in terms of time and distance. The proposed change represents a significant degree of severance from local services and facilities. The EIA does not examine adverse impacts in relation to the local shop (2 in Figure 1). These include loss of business and diminished access for the local community. The extent of these adverse effects would appear greater than that affecting any other community on the route.

The chapter 18 summary (18.5.4.8) cannot apply to the affected area without significant qualification. That summary states that 'the operational phase will provide for significant, and in some cases very significant or profound positive effects on journey time, connectivity and journey amenity, affecting journeys for all purposes and benefiting people living in the city or its outskirts, businesses and visitor or tourist traffic.' The proposal as it relates to the affected area will undoubtedly have negative effects in respect of journey time, connectivity and journey amenity in respect of car journeys for all purposes to destinations in the Ragoon area. We completely disagree with the statement (page 1529) that 'no significant amenity impact at a community level is presented by the proposed N59 Link Road North and South from the proposed N59 Letteragh junction.'

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### Traffic-related noise, air and visual pollution

The proposal involves constructing a district distributor road with a projected AADT of 6172 (3% of which will be HGVs) by the 2039 Design Year (Table 6.31). The road goes through an area, 'the affected area' where there is no passing traffic at this time. The EIAR reports baseline data for two noise monitoring stations (R8a and R8b), and two noise receptors (114 and 115) and one air quality monitor (R19) in the affected area. The EIAR reports no noise or air pollution at this time but states that the impacts arising from the project would be negligible. The EIAR appears not to have taken into account an existing child care facility directly beside the link road, labelled 1 in Fig 1.

It is difficult to accept that the construction and operation of the new link road beside a housing area would not have discernable adverse impacts in an area unaffected by traffic at this time. The EIAR describes the landscape impact as 'imperceptible' (Fig 12.1.13). It is difficult to comprehend the impact of building a new road directly beside an existing road, thereby creating a substantial linear feature, as representing an 'imperceptible landscape impact'. It is difficult to accept that the building of a distributor road directly beside a residential area will not have perceptible impacts in respect of traffic-related impacts.

### **3. Proper planning and sustainable development**

The proposed alignment of the link road in the vicinity of the affected area appears to have been primarily determined by the extent of the existing built-up area, which corresponds to the zoning policy of the development plan (See Fig. 4). The area zoned for 'Enterprise, Light Industrial and Related Uses' presently comprises undeveloped farmland north of the Ragoon Road and undeveloped semi-natural scrubland south of the road, with the exception of the Allergan plant. (See Fig 1).

While there is merit, in terms of cost efficient use of urban land, in locating the link road on the boundary of the industrial and residential zonings, the precise location of the road line should also take into account other considerations. The Galway City Development Plan 2017 includes Policy 2.5 for the Outer Suburbs of the city. The policy includes the following:-

- Ensure that sustainable neighbourhoods are places where housing, streets, open spaces and local facilities come together in a coherent, integrated and attractive form,
- Ensure a balance between the reasonable protection of the residential amenities of the outer suburbs and the protection of the established character and the need to provide for sustainable residential development.

In respect of the first point the relationship between the proposed road and the existing built-up area is neither coherent, integrated nor attractive. In relation to the second point, in our opinion the road scheme does not achieve an acceptable balance.

The development plan has a number of policies for the conservation and development of open spaces in the city (Section 4.6). This road project provides an opportunity to create a distinctive open space in Ragoon, separating the zoned industrial and residential areas, adding a distinction to both areas,

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contributing to the green infrastructure of the city and playing an important role in terms of water attenuation for the link road.

In our opinion these are all valid considerations, necessitating a realignment of the link road westward, something along the lines depicted in Figure 5.

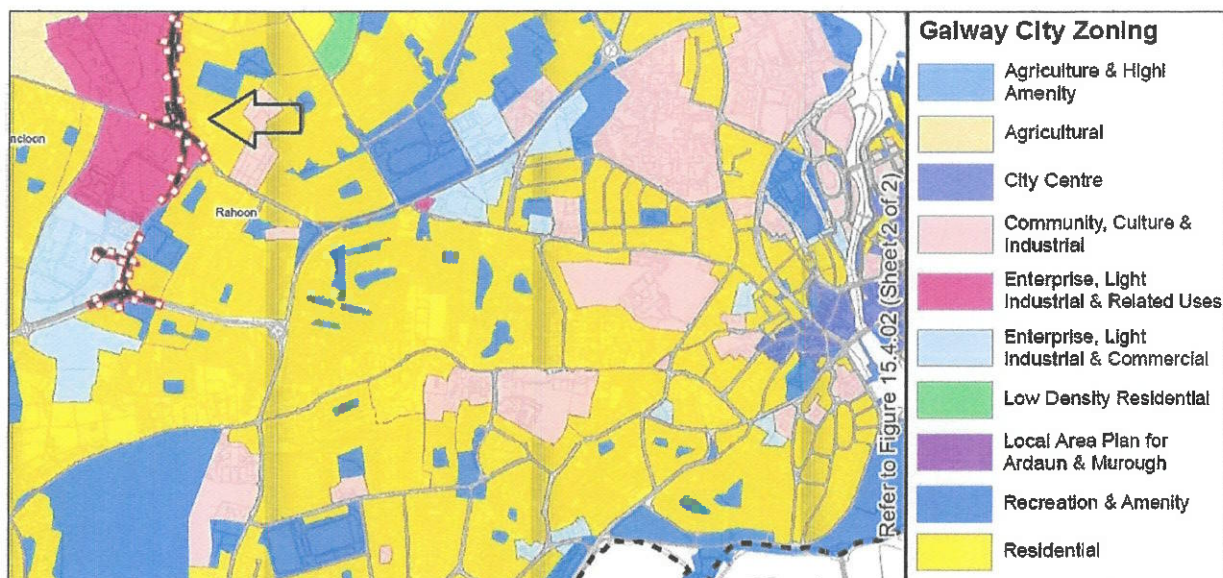


Fig 4 The Link Road and the affected area (indicated by arrow) in relation to the zoning objectives of the Galway City Development Plan. The area zoned 'Enterprise, Light Industrial and Related Uses' is mainly farmland and scrub at this time

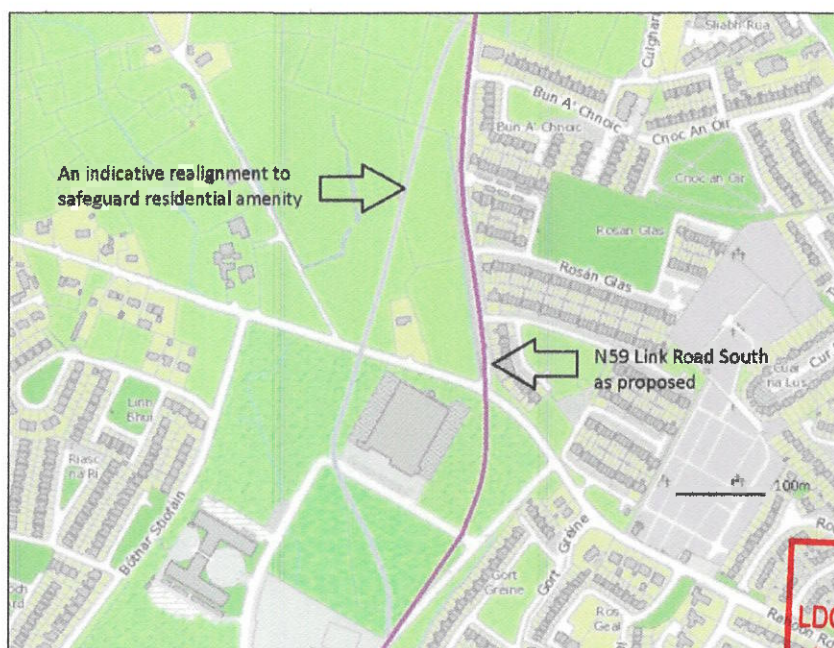


Fig 5 An indicative alignment that would safeguard the amenity of the affected area

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#### 4. Conclusion

In our opinion the N59 Link Road South will have a significant adverse effect on the community served by Bóthar Diarmuida. That adverse effect has not been adequately described in the EIAR. We believe that a localized realignment, involving a realigned route over farmland and scrubland, is required to protect the amenity of the local community and to maintain its connectivity with the wider Rahoon community. A realignment would avoid the need for a new signalized junction at Bóthar Diarmuida. In our opinion such a revision would be in the interests of proper planning and sustainable development as set out in the city development plan.

Yours faithfully,



Brendan McGrath MIPI MRTPI  
20<sup>th</sup> December 2018

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