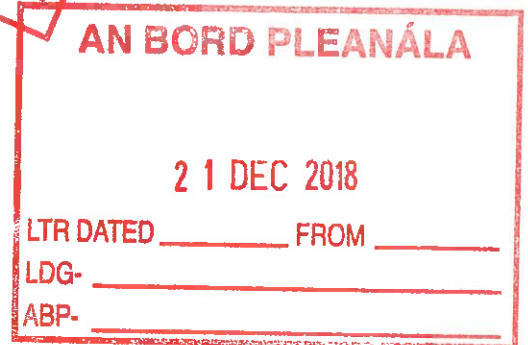


12 York Road
Rathmines
Dublin 6

Friday, 21 December 2018

An Bord Pleanála (Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1,
D01 V902

Re: N6 GALWAY CITY RING ROAD 2018



Dear Sir/Madam,

This document is a response to the application by Galway County Council on its own behalf and on behalf of Galway City Council under section 51(2) of the Roads Act, 1993 (as amended by section 9(1)(e)(i) of the Roads Act 2007) to An Bord Pleanála for approval in relation to the proposed N6 Galway City Ring Road.

I recommend that the application be refused for the following reasons:

1. The applicants have failed to adequately demonstrate the necessity for the proposed ring road in that it has not taken sufficient regard to the impact that sustainable and active would have on the prevailing traffic issues;
2. The proposed ring road runs through the curtilage of a National Monument, Menlo Castle, and will irreparable damage the setting of the castle;
3. The proposed road breaches Ireland's legally binding commitments to reduce greenhouse gas emissions and its commitments under the 2015 Paris Agreement of the United Nations Framework Convention on Climate Change

Introduction

In 2015 in an article celebrating 50 years of the modern planning system in Ireland, Mary Hughes, president of the Irish Planning Institute said that *"Proper planning can conserve the environment, deliver infrastructure, secure economic development, create a sense of place and engage communities"*.¹ The current proposals for the Galway City Transport Project fail on three, if not four, of these objectives.

¹ <https://www.independent.ie/irish-news/future-proof/proper-planning-improves-everyones-quality-of-life-31039155.html>

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The proposed transport solution for Galway City cannot be looked at in isolation but must be seen in the context of previous proposals, reports and studies. The project acknowledges the origins of the now abandoned Galway Outer Bypass project in the 1999 Galway Transportation and Planning Study. In the 20 years from 1996 to 2016 Galway City saw an increase in population of 39% and an increase in number of households of 72%. This increase has taken place predominantly in low-density suburban or rural areas (See Fig. 1). By any measure this is a significant transformation of the city – when you factor in a similar increase in population in the Galway County area it is no exaggeration to say that the context of the 1999 study is fundamentally and radically altered. And yet the solution arrived at in 1999 has not been reassessed in any meaningful way in the intervening years.

The failure of the Galway Outer Bypass project to meet EU standards for Special Areas of Conservation, and its subsequent abandonment, is perhaps a blessing in disguise as it now affords us the opportunity to take a step back and re-evaluate the root causes of the problems that face the city. In doing so we can hope to develop a solution that more appropriately responds to the current conditions and that avails of the most advance thinking on urban planning and development.

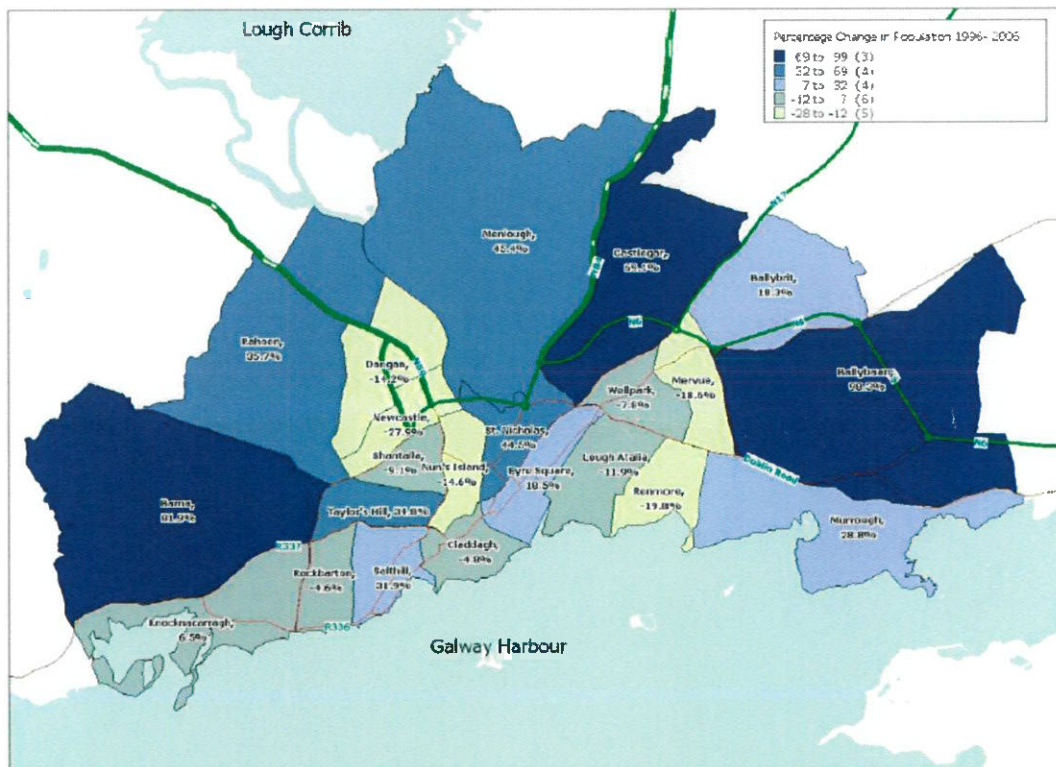
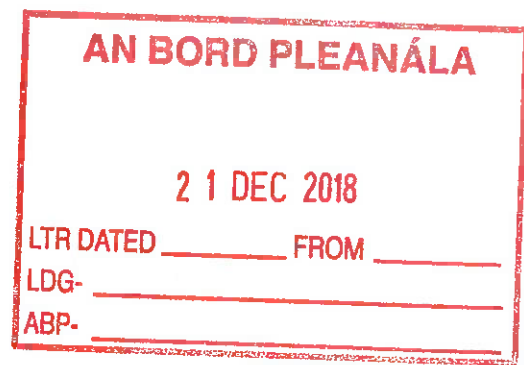


Fig. 1: Percentage increases in population 1996 – 2006: Ballybane 98.3%; Barna 81.9%; Castlegar 69.1%



The Case for the Ring Road

When the N6 Galway City Transport Project went out for public consultation in 2015 it started with the premise that “Galway has a transportation problem...” and identified the following symptoms:

- Major through routes are congested
- By-passable traffic is in conflict with internal traffic?
- Lack of accessibility to the Western Region
- Too few dedicated cycle tracks
- Inadequate transport links to access city centre
- Peak hour traffic delays
- Journey time unreliability
- Lack of bus provision and bus frequency

While many of these symptoms are incontrovertible and familiar to anyone who navigates the city regularly it is notable that there was still, at this stage in the design process, a question mark over the possibility of conflict between “by-passable” traffic and internal traffic. This issue is fundamental to the case for the ring road and without fully understanding this there can be no certainty that a bypass or ring road will have any appreciable difference on the traffic congestion. Indeed, it has been reported that Eileen McCarthy, Project Manager on the project for Arup Consulting Engineers, has stated that “*an outer bypass was not the solution to Galway’s traffic woes*”.²

Galway has suffered more than most from successive decades of poor planning decisions which have resulted in a low-density, geographically dispersed population. Outdated concepts of homogenous development zones have created a situation where the bulk of the residential development occurred on one side of the river while the employment and industrial development occurred on the other. During this period there have been many Transportation and Traffic studies carried out with recommendations for investment in public transport as follows:

- Galway Transportation & Planning Study 1999
- GTPS Integration Study 2002
- Galway Strategic Bus Study 2007
- [Galway Transportation Unit Business Plan 2008-2012](#)
- [Galway Public Transport Feasibility Study 2010](#)

² Galway Independent 11th February 2015 “*Galway Facing Civil War Over Bypass Project*”

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GTPS Integration Study 2002

Called for a "more sustainable, public transport based, quality driven approach to development within the city"

Galway Transportation Unit Business Plan 2008-2012

"Vision Statement: The Galway Transportation Unit aims to develop public transportation and other travel modes to the extent that the City will become a model for a sustainable traffic system in an urban environment."

Galway Public Transport Feasibility Study 2010

"The baseline study and consultation revealed the high level of car dependence that exists in Galway City and its surrounding area that is set against a strong public drive for change and a vision for a more sustainable moving city. The baseline findings suggest that there is scope for a change of a heart and minds towards public transport, together with an unrealised potential for walking and cycling usefully serving to extend catchment of public transport provisions. The realisation of this change however requires a set of compelling integrated measures that are assertively delivered in a coordinated and timed manner."

In light of these successive calls for investment in public transport it is surprising that the core solutions pursued by the City and County Councils over the last 20 years have focussed almost exclusively on road building as a "silver bullet" to solve the complex planning and transportation problems within the city.

In that same period, and for many years preceding, we have seen very little change in the public transport infrastructure of the city. By way of illustration, in 1919 Galway General Omnibus Company commenced a bus service of 15 minutes' frequency between Eyre Square and Salthill. The equivalent bus route today, Bus Éireann's route 401, runs at 20 minute intervals.

For over a decade we were told repeatedly by civic, political and business leaders that the N6 Outer Bypass would be the cure to all Galway's traffic ails and was a vital piece of infrastructure for the future economic development of the city. We are now told that the purpose of the ring road is to facilitate the free flow of through traffic in an east-west direction.

Chapter 3 of the Environmental Impact Assessment Report attached to the current application states that:

"The existing road network is at capacity and insufficient to cater for the current travel demand in Galway City, its environs and the Western Region. Therefore, the transport solution must address the existing road network capacity."

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This statement is based on an analysis of existing traffic movement within the city, specifically the movement of private cars. It notes:

"In total, 35% of total car trips into and around Galway City cross the River Corrib. Of this total number of cross-river trips, approximately 9% are by-passable traffic"

In other words, only 3% of the total car trips in and around Galway City are actually by-passing the city (see Fig. 2 below). In addition, 60% of all traffic movements in the city are described as short journeys within the city boundaries which are targets for a modal shift to public transport, walking and cycling.

Plate 3.3: Travel Patterns 2012 Base Year Morning Peak Hour

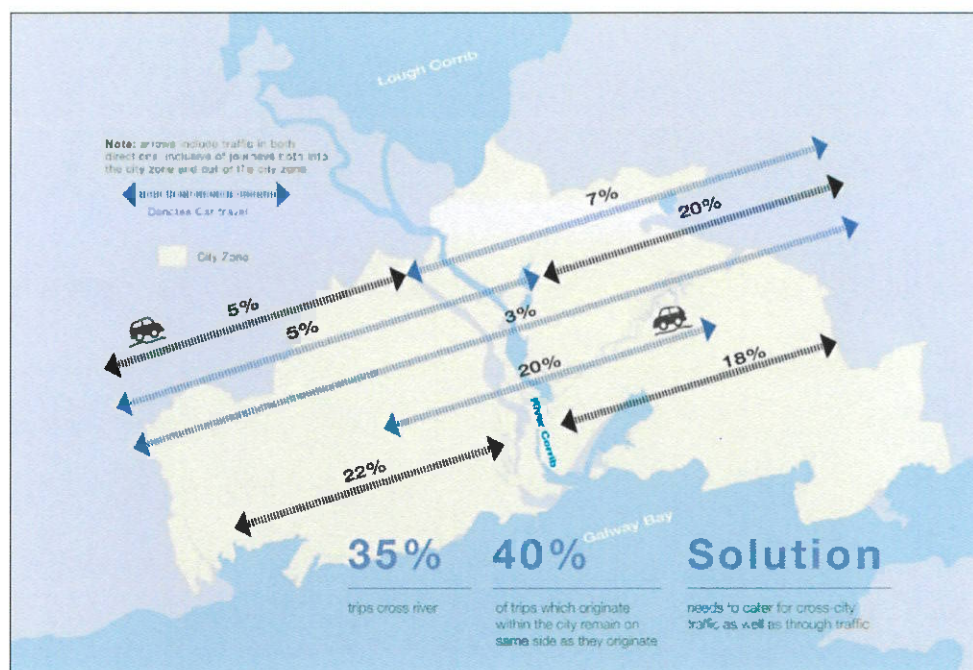


Fig. 2: Excerpt from Chapter 3 of the EIAR

Analysis of the 2011 Census figures on commuting shows that over half of the working population of Galway City commutes from within the city boundary (see Fig. 3 below). The remaining half commutes from feeder towns including Oranmore, Athenry, Bearna & Moycullen – all of which are served by public transport, either rail or bus. That 90% of those commuting from outside the city boundary travel by private car illustrates that improvements are necessary in the public transport infrastructure. It has not been demonstrated how a ring road can improve the situation for the 20,560 people commuting into the city on a daily basis. Isochronic mapping of Galway city shows that 64,500 people live within a 20 minute cycle of Eyre Square (see Fig. 4 below).³

³ <https://maps.openrouteservice.org>

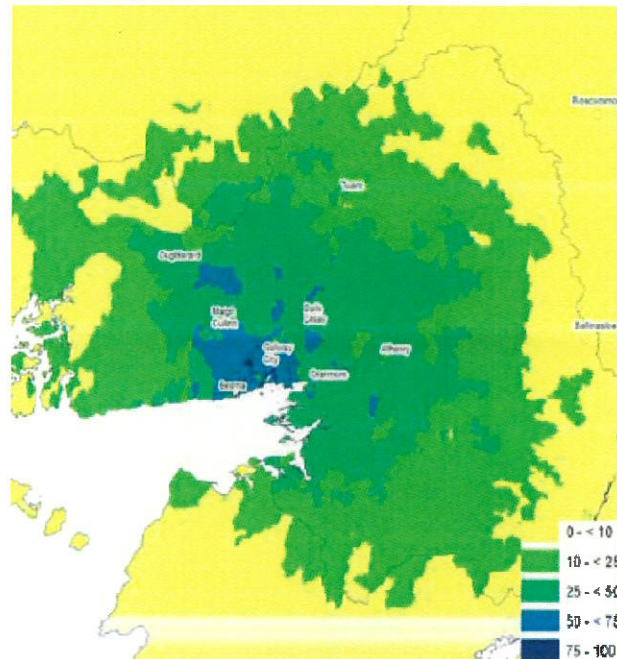
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Map 7 Percentage of commuters in each Small Area working in Galway city and suburbs



Daytime working population of Galway

After Dublin and Cork, Galway city and suburbs had the State's third largest daytime working population in 2011.

A total of 25,557 workers lived within Galway city and suburbs, of which 4,715 left the city area to work elsewhere; a further 20,560 commuted into the city and suburbs, bringing the total working population to 41,402.

Of the 20,560 persons commuting into the city 17,932 (87%) lived in Galway county, while Mayo and Clare were the places of residence for 1,098 and 457 workers respectively.

Oranmore was the main feeder town for the city (1,211), followed by Athenry (597), Beama (455) and Maigh Cuilinn (361).

The car was the main transport mode for 90 per cent of persons travelling into Galway for work. The average travel time for these commuters in 2011 was 36 minutes, while four out of every ten workers who travelled into Galway left home between 07:00 and 08:00 a.m.

Fig. 3: Excerpt from CSO report on Commuting in Ireland

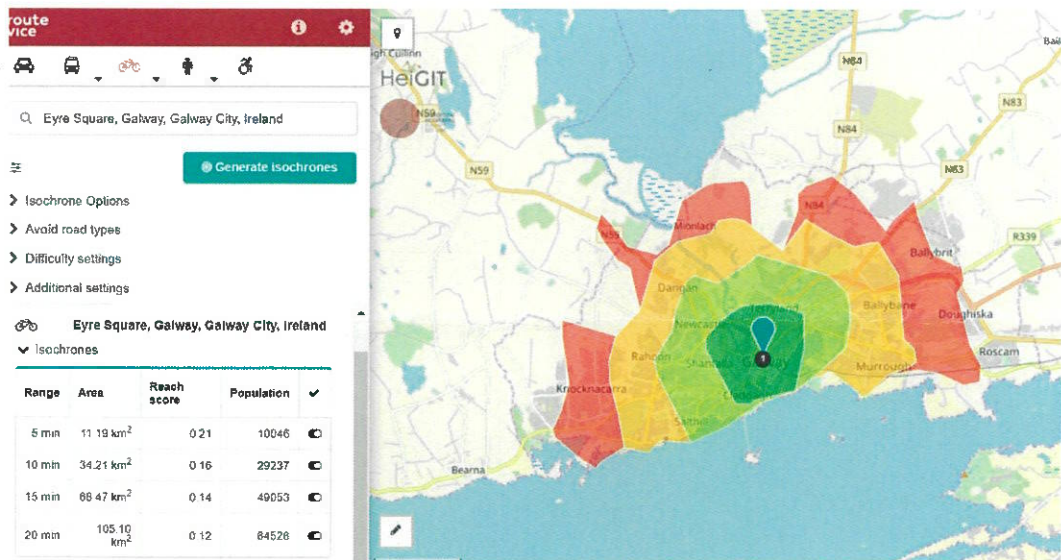
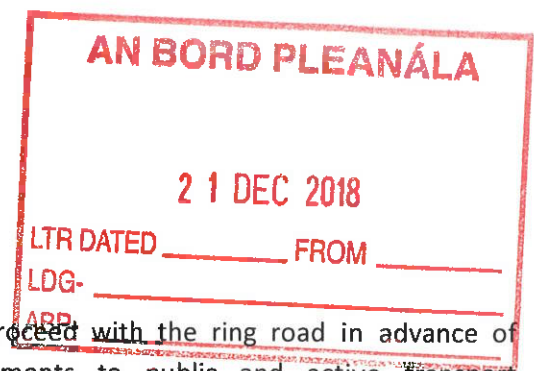


Fig. 4: Isochronic mapping of cycling distances in Galway

The evidence overwhelmingly suggests that there is an enormous untapped potential for Galway city to switch from its current predominant reliance on private cars to a multi-modal system that prioritises public transport and active travel. If such a modal shift were to be achieved, it would radically change the basis on which the case for the ring road is made. Unfortunately, we might never know if such a shift can be achieved



because the applicants have decided to proceed with the ring road in advance of implementing the much-needed improvements to public and active transport infrastructure. This is putting the car(t) before the horse. It assumes that the modal shift can only be made after the ring road is constructed. It seems to assume that existing car users will continue to use their car and that only “new” commuters will use alternate forms of transport. This is simply not borne out by international experience. For example, the city of Seattle has seen the rate of solo car commuting drop by almost 40% in the last 15 years following a significant increase in transport investment.⁴

The strategy of building the ring road before sustainable transport infrastructure also appears to ignore the well-established principle of “induced demand”. Simply put, if you build more roads, you will attract more cars.

In 1962, transportation researcher Anthony Downs suggested that U.S. cities suffered from a fundamental law of highway congestion: “This Law states that on urban commuter expressways, peak-hour traffic congestion rises to meet maximum capacity”.⁵

A 2009 paper produced in the University of Toronto titled “The Fundamental Law of Traffic Congestion” (Turner & Duranton) confirms this theory and concludes that building new urban roads results in a proportional increase in traffic. It also finds that *“the welfare gains for drivers of building more highways are well below the costs of building these highways. This conclusion follows ... from the fact that new roads do not reduce the cost of travel sufficiently”*.⁶

Simply put: More Roads = More Traffic.

Similarly, if there is investment in infrastructure for active travel it will lead to an increase in usage.⁷ The city of Seville, Spain has seen an eleven-fold increase in people cycling over a short number of years following the construction of a cycling network of 120km of safe segregated cycle lanes.⁸ In the more established cycling culture of the Netherlands, the city of Utrecht has achieved a cycling modal share of 51% compared to 29% using the private car. As demonstrated by the isochrone map above, Galway’s size, along with its relatively flat topography, is ideally suited for cycling. The recent instigation of the Galway Cycle Bus has demonstrated that even the weather is not a

⁴ <https://usa.streetsblog.org/2015/02/26/the-remarkable-drop-in-car-commuting-to-downtown-seattle/>

⁵ <https://www.citylab.com/transportation/2011/10/only-hope-reducing-traffic/315/>

⁶ <https://www.economics.utoronto.ca/public/workingPapers/tecipa-370.pdf>

⁷ <https://www.cyclinguk.org/blog/tomguha/85-increase-cycling-attributable-better-infrastructure>

⁸ <https://www.theguardian.com/cities/2015/jan/28/seville-cycling-capital-southern-europe-bike-lanes>

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barrier to cycling.⁹ In fact the only impediment to cycling in Galway is the lack of safe infrastructure.

Studies have shown that improved cycle infrastructure will encourage longer travel times for cyclists and there is a high correlation between the amount of expenditure on cycle infrastructure and the distances that people are willing to travel.¹⁰ It has also been demonstrated in a study by the Cyclists Touring Club in England, that an increase in numbers of cyclists improves safety and reduces the incidence of serious accidents. It suggests that a doubling of cycling would lead to a reduction in the risks of cycling by around a third.¹¹

The insistence on progressing the ring road in advance of sustainable transport infrastructure is baffling when you consider the relative costs and timescale for delivery of these projects. A prudent use of public finances would clearly favour investing in sustainable transport solutions as a priority. Investment in sustainable transport can also be done incrementally and can adapt to changing circumstances and technological advances. Instead the applicants wish to invest in a *grand projet* that will take years to deliver and with no clear evidence that it will achieve its stated aims.

The Impact on the National Monument of Menlo Castle

Menlo Castle is a registered National Monument (Reg. No. GA082-064001). It is also listed on the National Inventory of Architectural Heritage (NIAH) (Reg. No. 30408220) with Regional Importance and is on the Record of Protected Structures of Galway City Council (Ref. 5702).¹² The listing in the NIAH notes in particular its strong visual presence in the landscape. The word “iconic” is often overused but in this case is appropriate. Menlo Castle has long been a favoured subject matter for artists and photographers and its image is used liberally in the tourism branding of the city.

The proposed route of the ring road runs directly through the historic demesne and curtilage of Menlo Castle, permanently damaging its iconic setting on the edge of the river Corrib (see Fig 5). The EIAR describes the visual impact of the ring road on the castle as “Profound”. If the recognition of the castle’s status as a National Monument, a Protected Structure and a building of Regional Architectural and Archaeological importance is to mean anything then it must surely protect it against the wholesale destruction of its setting in this manner.

⁹ <https://connachttribune.ie/new-bike-to-school-initiative-proving-a-hit-with-pupils-556/>

¹⁰ <http://www.aviewfromthecyclepath.com/2011/12/are-your-travel-distances-and-times-too.html>

¹¹ <https://www.theguardian.com/lifeandstyle/2009/may/07/cycling-safety-york-calderdale>

¹² <http://www.buildingsofireland.ie/niah/search.jsp?type=record&county=GA®no=30408220>

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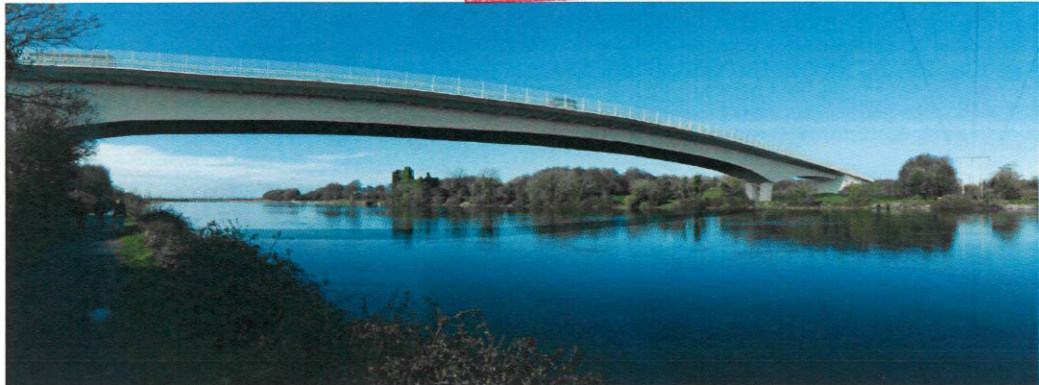
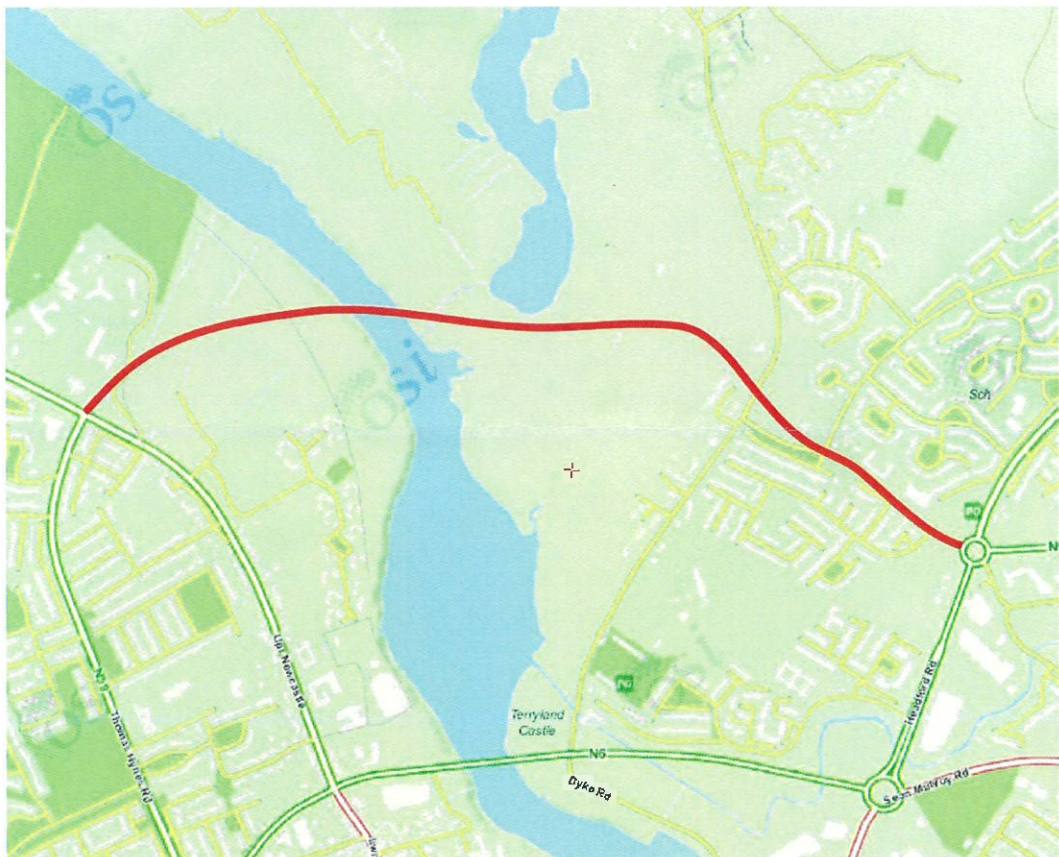
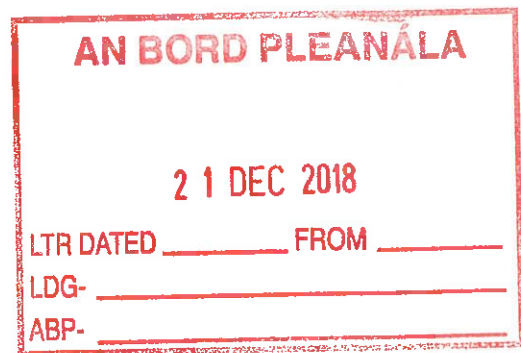


Fig. 5: Visualisation of the impact of the Ring Road on the visual setting of Menlo Castle

The route selection process failed to adequately address the potential impact of the road on the setting and other options which were considered at the earlier stages were prematurely dismissed. For example, a bridge further downstream linking the Coolough Road on the east side of the Corrib to the N59 on the west would build on the existing infrastructure and, if coupled with a sea-change in investment in sustainable transport solutions, would eliminate the need for an entirely new ring road (See Fig. 6).





Environmental Commitments

Ireland has entered legally binding commitments within the European Union and as part of the Paris Agreement to reduce greenhouse gas emissions by 20% by 2020 and by at least 40% by 2030. It is already clear that we will fail to meet the 2020 target and will face fines which have been estimated at €600m per annum – that's the approximate projected cost of the ring road every year that we do not meet the target.

The Environmental Protection Agency reported this month that transport emissions make up 20% of all greenhouse gas emissions in Ireland.¹³ It is clear that to have any hope of catching up with emissions targets by 2030 we will need to radically transform our transport system. This will mean a massive shift to sustainable transport in the form of public transport, walking and cycling. We cannot rely on a shift to electric vehicles to reduce emissions – while they produce much lower levels of emissions than standard petrol or diesel cars they are not emissions free. Any new infrastructure which encourages the growth of private car use will have a negative impact on emissions.

Any proposals for new transport infrastructure in Galway must be developed with the reduction of emissions target at the forefront of its considerations. It is clear that the proposed ring road represents a transport solution from the past and can not be considered seriously in the light of the impending risks to our climate and the Irish government's legally binding commitments to reduce greenhouse gas emissions.

Conclusions

The ring road as planned does not represent proper sustainable planning. It has not been proven that it will resolve the current traffic and transport issues in Galway city. The data available clearly demonstrates that Galway is well positioned to be a world-leader in sustainable transport:

- 60% of all traffic movements in the city are short trips within the city boundary
- Only 3% of traffic by passes the city
- A population of 64,500 lives within a 20 minute cycle trip of the city centre
- The main commuter feeder towns are already served by public transport routes which can easily be augmented to encourage modal shift from car use
- There is an appetite within the city for more sustainable transport and active travel solutions.

The construction of a ring road at a cost of €700m would be a colossal waste of money in this context and would destroy the latent potential for sustainable transport solutions in the city and county area. It would further encourage dispersed car-reliant

¹³ http://www.epa.ie/pubs/reports/air/airemissions/ghgemissions2017/Report_GHG%201990-2017%20November%202018_Website.pdf

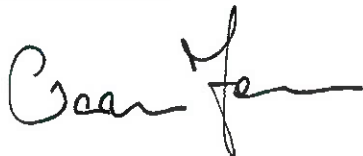
settlements and exacerbate existing issues of isolation and expensive provision of public services.

The construction of the ring road would have profound impacts on the natural, architectural and archaeological assets of Galway city. It will also cause the unnecessary destruction of many private homes and divide existing communities. The land take for the junction at the easternmost end of the ring road alone will have huge implications for the delivery of proposed sustainable residential developments in the Ardaun area.

The idea that you can solve traffic congestion by building roads has been discredited for decades and definitively debunked in the last ten years. Constructing infrastructure to cater for a mode of transport that contributes a large proportion of greenhouse gas emissions is indefensible given the threats to the global climate. The rapid technological advances currently underway in the automotive industry and in road transport, including autonomous vehicles and car-sharing will have consequences for our transport infrastructure which cannot be accurately defined at this stage and which are certainly not being considered in the current proposals.

For the reasons outlined above I recommend that the application be refused outright.

Yours faithfully



Ciarán Ferrie BSc(Arch) BArch MRIAI MIDI

