

The Secretary
An Bord Pleanála
(Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1

18th December 2018

Re: Galway N6 Motorway Ring Road.

Dear Sir,

In contributing here my own personal comments on the proposals put before Bord Pleanála, I am conscious of particular beliefs in the value and necessity of future proofing, as an approach to proper planning and sustainable development. I like to envisage a city where all planning looks to the future ensuring that the decisions taken today do not compromise but rather will have lasting benefit for future generations. I am of the view that although it is not easy, it is important that all those who live, work and invest in cities come together and shape solutions for the benefit of their citizens and their future's.

My personal goal is to see the development of Galway as a city where all policies, plans and processes are future proofed, inclusive and participatory with good urban land use planning together with well connected regional development which balances priorities between those who live here, and those who daily commute in and out of the city.

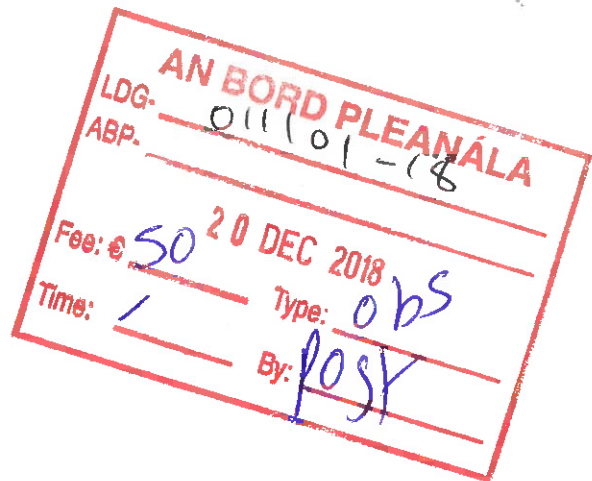
We should be developing a city of universal accessibility where people can easily access all services and facilities. A city with a pedestrian-friendly, cycling friendly, disability friendly and child friendly infrastructure. A city where healthy choices are easy to make and are supported by sustainable development and responsible decision making .

As a recently retired taxi driver in Galway (30 years service) I recognise that following a car-centered approach based on prioritising 'flow' for motor vehicles results in roads designs and roads management practices that are hostile for vulnerable roads users and have the net effect of increasing motor traffic. I note that documents such as the National Cycle Policy Framework, the Design Manual for Urban Roads and Streets and the NTA Permeability Best Practice Guide seek to address inappropriate and unsuitable roads management and town planning practices.

Transport, sustainable regional development and future proofing

I propose that;

- Regarding the N6 Galway City Transport Project, other, more sustainable options must be considered particularly in the context of the obligations under the Climate Action and Low Carbon Development Act 2015. I am concerned that the N6 Galway City Transport Project will be an ineffective strategy and have



concerns for the individual families who stand to be rendered homeless in losing their family homes, while long standing communities and habitats will be negatively affected. There is well-founded concern that the proposed strategy will undermine efforts to promote alternative modes of transport and, if successful, will reinforce unsustainable travel patterns. I consider that in building this road government will be in danger of contravening this legislation and may itself contribute to increased levels of harmful emissions. I would urge additional research be undertaken on the need to decarbonise and provide more energy efficient public transport as an option.

Buchanan & Partners LUT Strategy, published in 1999 first envisaged the development of a Bypass around Galway City. At the same time, advising the development of greater urban housing opportunities for towns and villages within the 40km study target area around Galway City.

The subsequent County Development Plan 2002 saw continue, the virtually unfettered spread of new one-off housing throughout the region that is heavily influenced by Galway City's attractiveness for job creation. The growth of the Medical Device and other FDI led sectors, lack of available affordable housing in the city, and higher priced housing in the town has led to a flight to the country with a consequently unsustainable dependence on car commuting, since Buchanan virtually ignored the need to develop any required public transport options!

Meanwhile, Galway City Council has failed miserably to build the amount of appropriate high-density housing in city suburbs so as to keep pace with housing demand. While it has been said widely that the failure to build adequate public transport infrastructure in the city, was a deliberate policy designed to support business demand for a Bypass!

- An exploration must be made into the development of a Light Rail Network as a viable alternative be undertaken, including mini bus feeders and park and ride facilities, that will serve the people of Galway now and into the future;

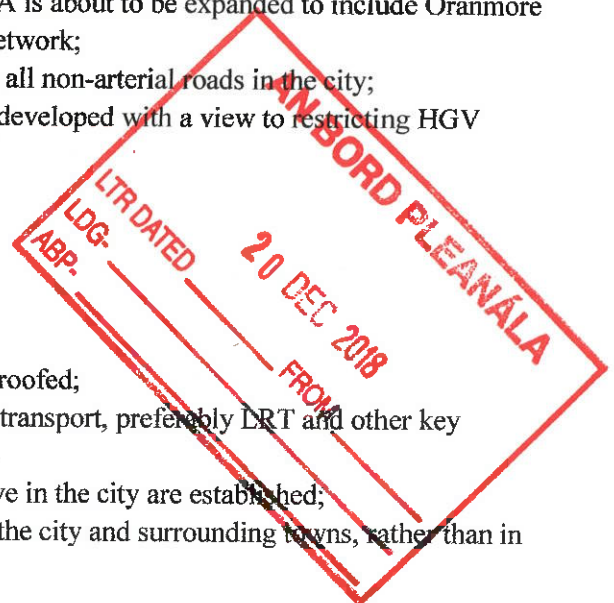
Galway City's Metropolitan Area, according to the NWRDA is about to be expanded to include Oranmore and Barna. Ideal for the development of a city-wide LRT network;

- Speed limits of 30km/h or lower are the default option for all non-arterial roads in the city;
- A Heavy Goods Vehicle (HGV) Management Strategy is developed with a view to restricting HGV movement to designated roads at designated times;

Universal accessibility and land use planning

I propose that;

- All future land use planning is accessibility and equality proofed;
- Future development is mixed-use and orientated to public transport, preferably LRT and other key facilities especially for schools and workplaces;
- Mechanisms and approaches for incentivising people to live in the city are established;
- Higher density residential development is concentrated in the city and surrounding towns, rather than in the form of one-off housing and continuing urban sprawl;



- All new streets and buildings are designed at the human scale and allow for safe and comfortable access for all people, including those with visual, mobility and other impairments;

THE EIA DIRECTIVE

That the following considerations apply:

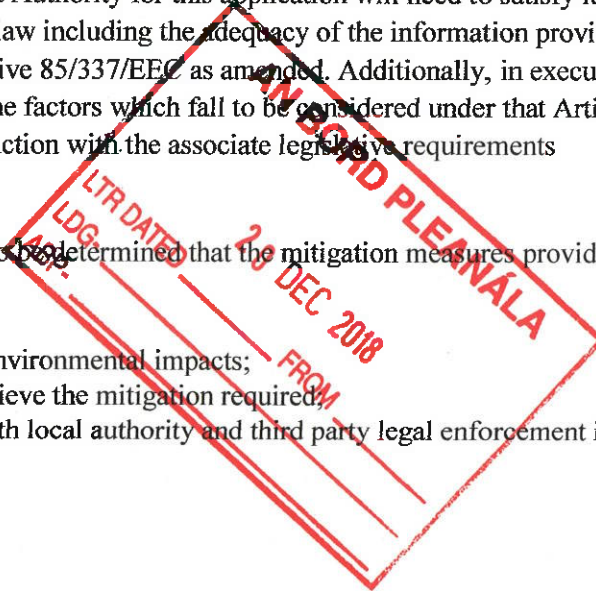
1. There is a legal onus on consent bodies including An Bord Pleanála to apply the EIA Directive, to ensure that:
 - i). The direct and indirect impacts of the project are identified and mitigated by the applicant in the EIAR and appropriate alternatives considered.
 - ii). Any information deficiency by the applicant in the EIAR is remedied by an information request.
 - iii). That the Board consider any consent for the project as proposed by the applicant or a variation or amendment of the project, only when it can be demonstrated that the direct and indirect impacts have been identified and any significant adverse effects mitigated.
2. That in the case of a transport generating project such as the subject proposal, that the Board assess the direct and indirect impact of the project and the adequacy of the mitigation measures proposed on:
 - Government Policy as defined in Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009-2020;
 - Traffic generation
 - Traffic congestion;
 - Air pollution;
 - Greenhouse Gas (“GHG”) Emissions;
 - Cumulative impact with a general rise in traffic generation

If adverse impacts cannot be mitigated then consent therefore cannot be allowed.

The Board in executing its function as a Competent Authority for this application will need to satisfy itself on its regard to the application of national and EU law including the adequacy of the information provided to it in accordance with Article 5 of the EIA Directive 85/337/EEC as amended. Additionally, in executing Article 3 under that Directive - the assessment of the factors which fall to be considered under that Article necessarily involves proper consideration in conjunction with the associate legislative requirements pertaining to those factors.

If a consent determination is being made, it needs to be determined that the mitigation measures provided by the developer and/or added by the Board:

- Are the quantum required to mitigate the environmental impacts;
- Are clearly identified and quantified to achieve the mitigation required;
- Are subject to clear conditions allowing both local authority and third party legal enforcement if



compliance is not achieved.

Since the EIA Directive came into force the Board has determined major traffic generating developments through the appeal process. More particularly since the Board was given the functions of determining Motorway schemes the Board has been responsible for assessing and conditioning the mitigation measures required under the EIA Directive.

Transport generated GHGs are rising at 3% annually and congestion, air pollution and car dependent and car based sprawl worsening.

I would cite the example of the permission recently given in Barna, supported by the Board, which is for a 200 house development which contained no reference to potential negative traffic impacts for drivers commuting into Galway. No reference was made to public transport insufficiency at this location.

At the same time there has been a systemic failure to attach traffic management conditions to new roads, and modal shift requirements and parking availability curtailment on new developments.

These considerations would form the basis of Judicial Review proceedings on any consent granted without adverse impacts being either addressed or mitigated.

Both individually and cumulatively planning decisions have failed to mitigate continuing climate emission air pollution and congestion. The cost is incurred on society at large and the future.

There are mounting legal actions internationally against Governments, including in Ireland, Regional or City Authorities and consent bodies in relation to inadequate climate and air pollution action.

THE ENVIRONMENTAL IMPACT ASSESSMENT REPORT

APPROPRIATE ASSESSMENT ISSUE

CONCLUSIONS

I suggest the proposal to construct an N6 Ring Road contravenes Department of Transport 'Smarter Travel: A Sustainable Transport Future: A New Transport Policy for Ireland 2009-2020' and other Government policies stated in this submission.

In addition:

- the proposal has an individual and cumulative impact on climate, principally because of continued unsustainable private motorised traffic generation;
- the proposal has an individual and cumulative impact on air quality, with unacceptable levels of diesel particle pollution;
- This 650m project represents very poor Value for Money and is no solution to Galway Citys traffic gridlock;
- POWSCAR surveys indicate only 3% of traffic actually require to bypass the city, while 20% of

- traffic is generated by drivers moving within the city itself;
- the proposal would perpetuate current unsustainable levels of traffic;
 - the proposal perpetuates and reinforces existing unsustainable car commute use and;
 - the proposal would result in the continued undesirable polluting surface drainage running from tyre and hydro carbon pollution into surface drainage streams and watercourses.

Please acknowledge this submission and advise me on any decision made.

I attach required 50 euro fee.

I also attach as an example, in a single page aerial view, typical of current one-off housing along the coast road west of Galway City. The whole of Galway City is surrounded by such development, which Frank McDonald former Irish Times correspondent has referred to as '*Measles Planning*'!

Also a copy of *Regional Spatial and Economic Strategy* proposals, a map of the extended Metropolitan Area of Galway City, which sets out by how much the city's physical area is to be extended without any published plan or public discussion as to where housing development is to be located, other than at the existing conflicted Ardaun LAP!

Yours faithfully

Derrick Hambleton

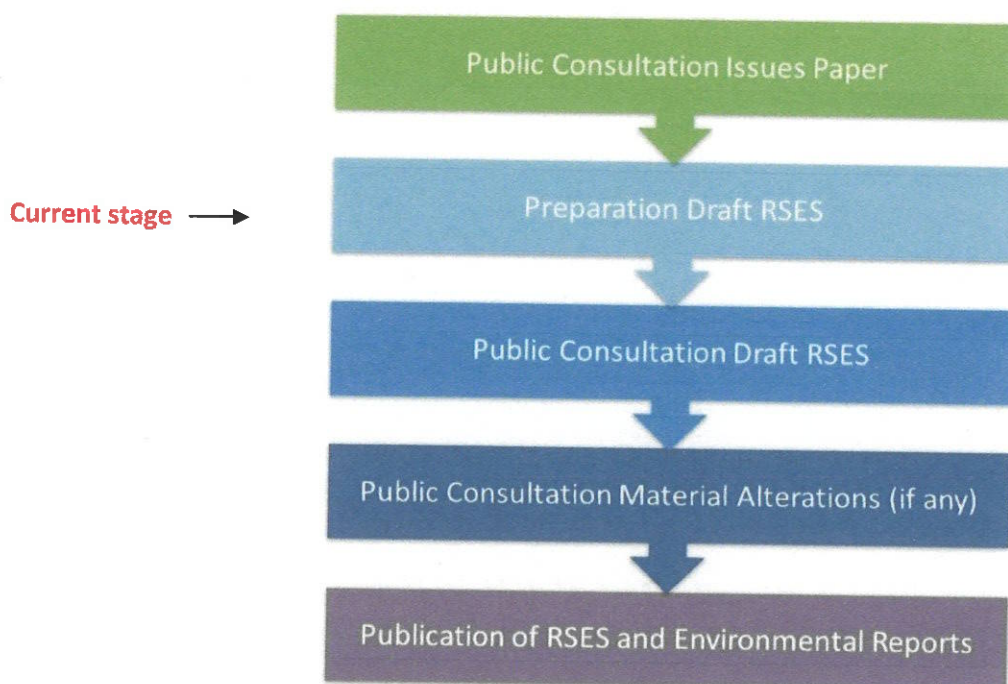
26 Manor Avenue
Kingston
Galway.





Regional Spatial and Economic Strategy

Stages in the RSES process



STAGE 1 Issues Paper –1st Consultation

Local authorities, public and private agencies, interest groups and any interested member of the public were invited to make submissions between November 2017 and February 2018. 124 submissions were received during the consultation phase. These submissions are required to be taken into consideration in the preparation of the Draft RSES. A submission was made by Galway City Council.

STAGE 2 Draft RSES – 2nd Consultation

The Assembly intends on publishing a Draft RSES and associated environmental reports by the end of September. The Draft RSES will be placed on public display for at least ten weeks during which time submissions and observations will again be invited.

STAGE 3 Material Amendments- 3rd Consultation

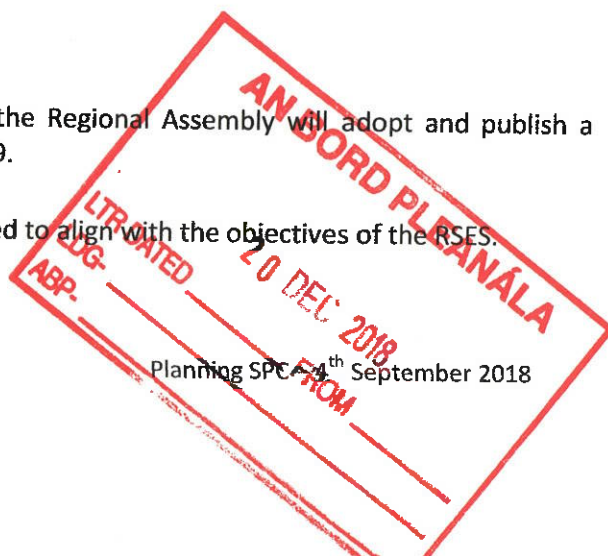
Following consideration of observations on the Draft RSES, the Regional Assembly will consider appropriate amendments and will subject the Draft and any proposed amendments to public consultation. Environmental assessments of amendments will also be undertaken.

FINAL STAGE - Adoption of Final RSES and Environmental Reports

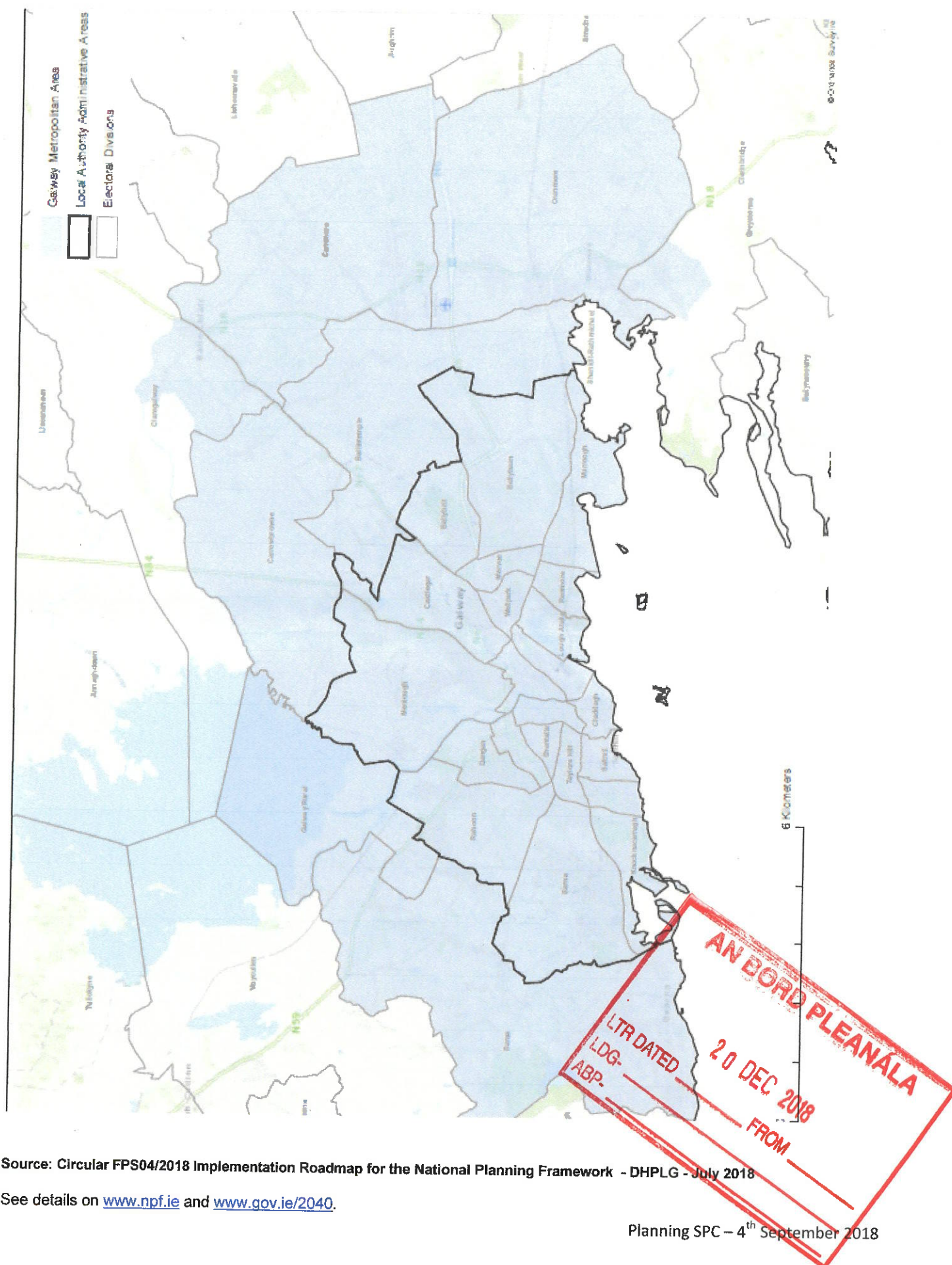
Once all of these steps have been completed, the members of the Regional Assembly will adopt and publish a Regional Spatial and Economic Strategy for the Region, in early 2019.

Once the RSES is adopted, all plans and programmes will be required to align with the objectives of the RSES.

Full details of the RSES can be found at www.nwra.ie



Galway Metropolitan Area Strategy Plan Boundary



Source: Circular FPS04/2018 Implementation Roadmap for the National Planning Framework - DHPLG - July 2018

See details on www.npf.ie and www.gov.ie/2040.

Planning SPC – 4th September 2018