



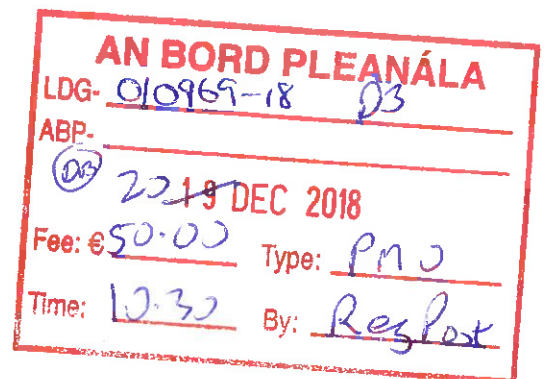
Galway City Community Network CLG  
Westside Community Resource Centre  
Seamus Quirke Road Galway  
Phone: [REDACTED]  
Email: [REDACTED]  
Website: [www.galwaycitycommunitynetwork.ie](http://www.galwaycitycommunitynetwork.ie)

**N6 Galway City Ring Road/Protected Road/Motorway Scheme**

FAO: Secretary

An Bord Pleanála

19 December 2018



A chara,

I am writing to you on behalf of the Environmental Linkage Group of Galway City Community Network, the Public Participation Network in Galway City, in relation to the N6 Galway City Ring Road/Protected Road/Motorway Scheme. I wish to submit an observation regarding the above scheme and the associated Environmental Impact Assessment Report (EIAR). I request that an oral hearing be held into the EIAR and the associated scheme. I enclose a postal order to cover the observation fee.

The Galway City Community Network (GCCN) is the network of community, voluntary and environmental organisations and groups active in Galway City. As the Public Participation Network for Galway City, GCCN is the main link through which the local authority, agencies and the state connects with the community, voluntary and environmental sectors in Galway City.

This submission is based on our adopted Policies and Positions document which is available for download from our website under Resources => Publications => Strategies and Policies

<http://galwaycitycommunitynetwork.ie/wp-content/uploads/2018/03/GCCN-Policies-Positions.pdf>

GCCN CLG Directors: Tommy Flaherty, Margaret Ó Riada, Nichola Tierney, Garry Lohan, Terrence McDonough, Derrick Hambleton, Marian Maloney

CRN: 580827

## **Sustainable Development**

GCCN is committed to working towards a sustainable environment and a society where consumption and production patterns and use of all natural resources are sustainable. A society where sustained and inclusive economic activity, social development, environmental protection, the eradication of poverty and promotion of food security are prioritised. GCCN believes in the value and necessity of future proofing as an approach to planning and development. GCCN envisages a city where all planning looks to the future ensuring that the decisions we take today do not compromise but rather will have lasting benefit for future generations. GCCN is 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 their future’.

### **General Principles: Planning, Transport and Infrastructure**

We have the following goal

The GCCN goal is 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 and well connected regional development which balances priorities between those who live here and those who commute in and out of the city. A city of universal accessibility where all people can access 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.

GCCN policy on transport is based on a Hierarchy of Road Users in the following order; 1. Pedestrians and people with disabilities, 2. cyclists, 3. Public transport and 4. private motor transport. GCCN endorses the European Charter of Pedestrian Rights and the Road Danger Reduction Charter.

GCCN recognises that following a car-centred 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. GCCN notes 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. The network endorses the overall approach advocated in these documents.

By way of the establishing the need for the Galway Ring Road we feel it would be useful for the board to consider if enough has been done to apply these existing policy documents in Galway. It might be that the application of these policies in Galway would largely remove the perceived need for this new road or, in the alternative, if these measures were applied a smaller ring road design with reduced impact might still meet the goals of the project.

## The N6 Galway City Transport Project

The GCCN has adopted into our policy document the following observations on the N6 Galway City Transport Project

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. GCCN is concerned that the N6 Galway City Transport Project will be an ineffective strategy and have concerns for the communities and habitats that will be 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. GCCN consider that in building this road, government will be in danger of contravening this legislation and may contribute to increased levels of harmful emissions. GCCN urges additional research be undertaken on the need to decarbonise and provide more energy efficient public transport as an option;

- An exploration of the development of a Light Rail Network be undertaken, including mini bus feeders and park and ride facilities, that will serve the people of Galway now and into the future;
- 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;
- Roundabouts be replaced with signalised crossings and in the short term raised table zebra crossings be established on all entries and exits recognising that the challenges and risks that current roundabout designs impose on vulnerable users are a barrier to pedestrian and cyclist mobility;
- Data collection and analysis are improved to highlight the car-dominated state of Galway transport and to identify key areas for the promotion of sustainable alternatives;
- The potential for induced traffic in the construction of new highways through and around the city is recognised;
- Green belts to prevent further urban sprawl is developed;

We feel these concerns should be explored at an oral hearing so that reassurances might be offered on these points.

### **Urban sprawl and proper planning and development**

GCCN Policy includes the following statements

- Green belts to prevent further urban sprawl is developed;
- All land use planning is accessibility and equality proofed;
- Future development is mixed-use and orientated to public transport and other key facilities especially 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 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 GCCN notes with concern that the Northern and Western Regional Assembly has circulated a proposal for a much expanded metropolitan footprint for Galway (Attached). This invites concern that there is an intent in some quarters to promote already unsustainable patterns of development and that the new road proposal may inadvertently reinforce this. We need assurances on how this can be avoided.

### **Safe Travel and Home Zones**

GCCN policy proposes that;

- Safe travelling routes to amenities and recreational grounds are provided including for example, bike routes away from traffic, pedestrian crossings, traffic calming systems, lowering of speed limits and addressing 'ratruns';

- Safe areas are established in residential areas which; favour pedestrians and children's play areas over traffic, have speed limits of walking speed and separate roads with access for bicycles, buses and pedestrians from those open to motor vehicles.

We note with concern that the current ring road proposals will direct arterial traffic along roads with a residential and school function. The board should review this aspect of the proposals to determine if this is a correct approach or if there are better alternatives.

#### **Compliance with best practice and state guidelines.**

As already stated GCCN endorses the European Charter of Pedestrian Rights and the Road Danger Reduction Charter. GCCN recognises that following a car-centred 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. GCCN notes that documents such as the National Cycle Policy Framework (NCPF), the Design Manual for Urban Roads and Streets (DMURS) and the NTA Permeability Best Practice Guide The network endorses the overall approach advocated in these documents.

On first consideration of the ring road proposals it is not clear that the junction designs and roads geometry are consistent with these principles or with sources such as the NCPF or DMURS. We feel this needs to be explored in more detail.

#### **Conclusion**

We request an oral hearing as the best way to explore these concerns and establish that there is no conflict between the current proposals and adopted GCCN policy.

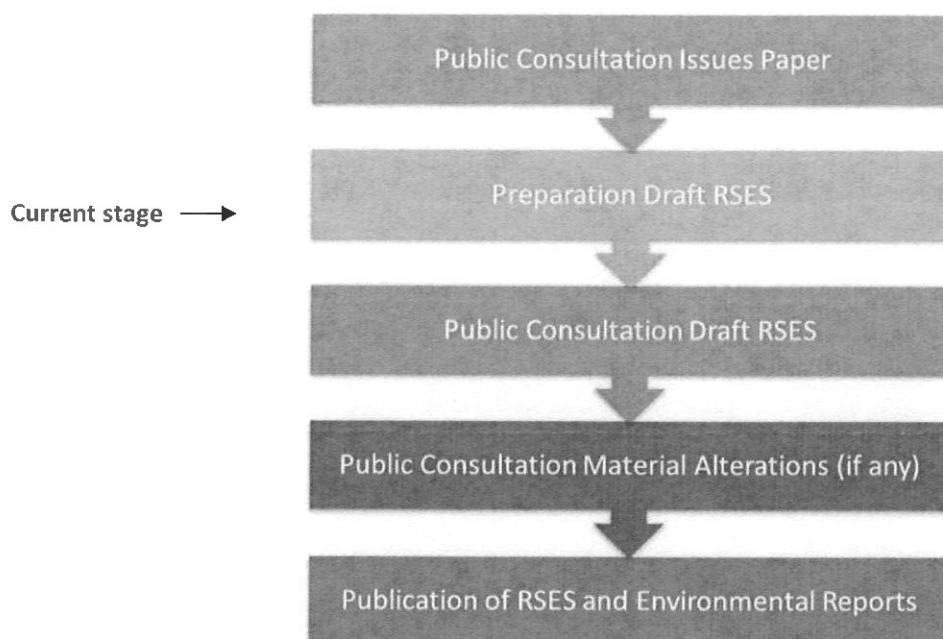
Is mise, le meas,



Shane Foran

## 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.

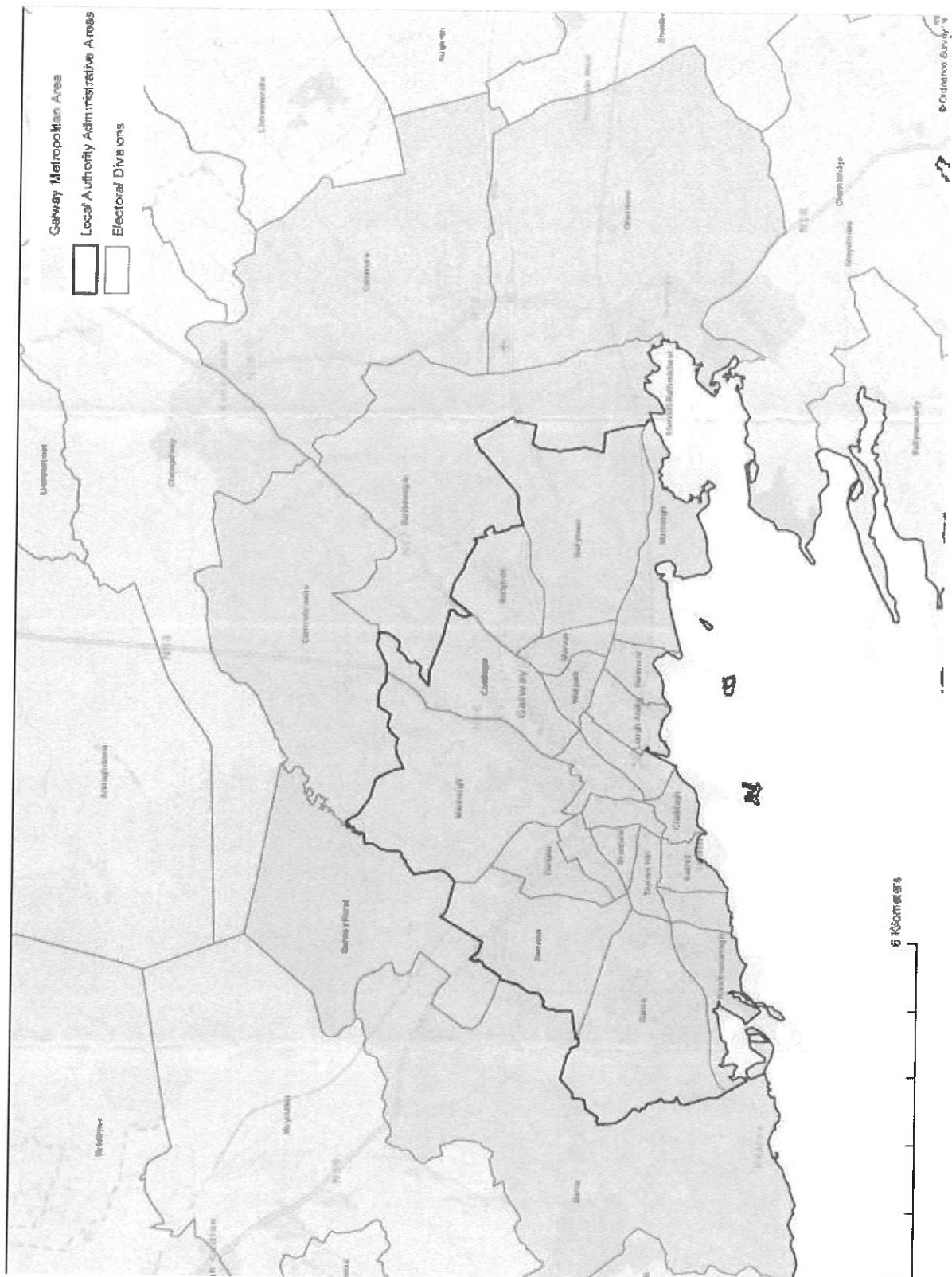
#### FINAL STAGE - Adoption of Final RSES and Environmental Reports

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](http://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](http://www.npf.ie) and [www.gov.ie/2040](http://www.gov.ie/2040).

Planning SPC – 4<sup>th</sup> September 2018