



AN BORD PLEANÁLA	
LDG-	01153-18
ABP-	
21 DEC 2018	
Fee: €	50
Type:	Case
Time:	
By:	

<http://www.friendsoftheirishenvironment.org>

An Bord Pleanála (Strategic Infrastructure Division),  
64 Marlborough Street,  
Dublin 1,  
D01 V902  
21 December 2018

Re N6 Galway City Ring Road 2018

A chairde,

We refer to the above application and wish to make the following observations on the transport and climate impact of the proposed development.

#### **Lack of consideration of alternatives**

The section on alternatives considered gives no credible or meaningful consideration to alternatives involving a significant shift of trips to walking, cycling and public transport in line with national policy. Despite the experience of cities of similar sizes across Europe successfully reducing demand for car trips in favour of walking, cycling and public transport, it is somehow implied (though not explained) that Galway is different and this sort of modal shift isn't possible.

#### **Non-compliance with national policy**

The proposal refers to national policy *Smarter Travel A Sustainable Transport Future* and its target of reducing work-related commuting by car from 65% to 45%. Logically, one would expect urban areas to make a particular contribution to this shift. Despite this policy goal, the Environmental Impact Assessment Report (EIAR) predicts that the project will lead to a transfer of modal share to car in the area of 1%. (It is not clear what geographical area this applies to.) In those circumstances the road project is clearly contrary to national policy.

#### **Non-compliance with the EIA Directive**

The analysis of greenhouse gas emissions in the EIAR is cursory and does not meet the requirements of the Environmental Impact Assessment (EIA) Directive.

The Directive requires that the EIAR include:

A description by the developer of the forecasting methods or evidence, used to identify and assess the significant effects on the environment referred to in point 4., including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

This is missing. The report simply says:

The potential impact of the proposed road development on carbon emissions was assessed using the DMRB spreadsheet as described in Section 16.2.8.1.

There is no section 16.2.8.1. On enquiring, we were informed by Galway County Council that this was a typo and should have referred to section 16.2.5.1. Section 16.2.5.1 describes the assessment method as follows:

This spreadsheet calculates annual average concentrations of NO<sub>x</sub> (for the assessment of nitrogen deposition), NO<sub>2</sub>, CO, benzene, PM<sub>10</sub> and PM<sub>2.5</sub> and was used to assess the air quality impact of the proposed road development.

We have since been assured by the Council that the spreadsheet in fact does also calculate carbon dioxide (CO<sub>2</sub>) emissions. What is clear is that the EIAR does not in any way describe the forecasting method for CO<sub>2</sub> emissions in any way, despite the requirements of the Directive. There also is no indication of the geographic area over which the change in greenhouse gas emissions due to the road has been modelled.

The report gives figures for construction related GHG emissions and then for annual emissions. Basic details have been deliberately omitted. Baseline GHG emissions for current or recent years are not supplied. Instead of supplying predicted emissions for future years with the road, and without the road, only the difference due to the road is reported. The figures omitted would enable an understanding of the percentage change in emissions resulting from the road. There is no analysis of the emissions resulting from alternatives to the road. This is contrary to the requirements of the EIA Directive.

#### **Non-compliance with international, EU and Irish law as regards climate change**

Over the last fortnight, the world heard from experts and citizens at UNFCCC COP 24 in Katowice.

Antonio Guterres:

It is hard to overstate the urgency of our situation. Even as we witness devastating climate impacts causing havoc across the world, we are still not doing enough, nor moving fast enough, to prevent irreversible and catastrophic climate disruption.

David Attenborough:

Right now, we are facing a man-made disaster of global scale. Our greatest threat in thousands of years. Climate Change. If we don't take action the collapse of our civilisations and the extinction of much of the natural world is on the horizon.

Friends of the Irish Environment is non-profit Company Limited by Guarantee and a Charity registered in Ireland.

It is a member of the European Environmental Bureau and the Irish Environmental Network.

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Trustees and Directors: Dave Johnston, Caroline Lewis, Tony Lowes, Ian Lumley, Judy Osborne

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Greta Thunberg:

In the year 2078, I will celebrate my 75<sup>th</sup> birthday. If I have children, maybe they will spend that day with me. Maybe they will ask me about you. Maybe they will ask me why you didn't do anything while there still was time to act.

Despite the inadequacies in the information supplied, and possibly in the analysis, the EIAR predicts that the proposed road will increase CO<sub>2</sub> emissions.

Ireland has committed in the United Nations Framework Convention on Climate Change and in the Paris Agreement, to avoid dangerous anthropogenic interference in the climate system and to aim to keep the global temperature increase below 1.5°C. As part of the EU's current contribution to the Paris Agreement (which is likely to be increased in order to work towards the 1.5° goal), Ireland has a target of reducing greenhouse gas emissions from the non-traded sector by 20% by 2020 and by 30% by 2030 (compared to 2005 levels). The EPA has identified that, with current policies, we will not meet either target and that the exceedance during the 2021-2030 period will be far greater than the amount for which we can buy compliance.

In circumstances where all projections are that we will exceed our 2030 target even taking all "flexibilities" into account, and there are no adopted or even proposed policies and measures which would meet the target, this proposed road project, increasing greenhouse gas emissions, is inconsistent with our 2030 non-traded sector target and therefore contrary to our EU law obligations.

The Climate Action and Low Carbon Development Act 2015 set a national objective of transition to a low carbon climate resilient and environmentally sustainable economy. This project will encourage greater use of private motor vehicles in Galway over the period up to and beyond 2050 and therefore is contrary to that objective. In evaluating this application, An Bord Pleanála is required to have regard to

- (a) the most recent approved national mitigation plan,
- (b) the most recent approved national adaptation framework and approved sectoral adaptation plans,
- (c) the furtherance of the national transition objective, and
- (d) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.

In light of the inadequacies in the Environmental Impact Assessment Report, and the gravity of the impact of this road proposal on the possibilities for a sustainable transport future for Galway, we believe an oral hearing should be held into this application.

Sincerely yours,

Tony Lowes,  
Director

[€50 participation fee enclosed]

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