

An Bórd Pleanála Strategic Infrastructure Division 64 Marlborough Street Dublin D01 V902

18th December 2018

AN BORD PLEANÁLA LDG-010979-16

Dear sir/madam,

N6 Galway City Ring Road

Galway Chamber supports the plans outlined for the N6 Galway City Ring Road as submitted to your office in October by Galway County Council.

Please find attached Galway Chamber's submission in support of the proposal.

Please also find enclosed a cheque in the amount of €50 to cover the fee for this submission.

I would be grateful if you would confirm receipt in due course.

Yours faithfully

Dave Hickey

President, Galway Chamber of Commerce

Galway Chamber

Galway City Ring Road Galway Chamber of Commerce Submission to An Bord Pleanála



Submission prepared by:

Galway Chamber of Commerce,
Commerce House,
Merchants Rd,
Galway City.

OVERVIEW

The Galway Chamber of Commerce welcomes the opportunity to make this submission to An Bord Pleanála on the proposed N6 Galway City Ring Road. We represent approximately 400 businesses, which employ approximately 20,000 people. We are strongly in support of this project which we view as the key for unlocking the economic prosperity of Galway city and the western region. The proposed scheme is part of the solution to Galway's congestion problem and a critical piece of infrastructure that can give effect to improvements in transport sustainability outlined in the Galway Transport Strategy.

Our submission has been prepared to:

- Highlight the vision for development of Galway city and county, as set out in national, regional and local policy, and the critical importance of delivery of the N6 Galway City Ring Road in achieving it;
- The strong dependency of our economy on improved connectivity within the city and region;
- Outline the constraints to economic growth highlighted by our members; and
- Highlight the potential economic, environmental and social benefits of the scheme for our city and region.

The Galway Chamber of Commerce is certain that the N6 Galway City Ring Road will have enormous benefits for Galway's economy. Our businesses strive to maximise the potential of Galway City and County, and the Ring Road is an enabler in that respect. Our submission is structured as follows:

- Section 1 provides some background on the Galway Chamber, who we are, what we do and the significance of the proposed N6 Galway City Ring Road to our members;
- Section 2 provides some insight into Galway City Futures. We summarise the overwhelming policy support for the N6 Galway City Ring Road at all levels; from EU, to national, to regional and local policy and we identify the significant economic potential that the N6 Galway City Ring Road can unlock, removing barriers to future growth;
- Section 3 highlights the benefits to the N6 Galway City Ring Road set out in the Cost Benefit
 Analysis (CBA) which supported the construction of the road. We argue that the CBA undertaken
 was conservative in the measurement of benefits: there are a wider set of facilitated benefits that
 we identify, and urge to be taken into account when making a decision on planning permission for
 the N6 Galway City Ring Road; and
- Section 4 provides a summary of our position.

The Galway Chamber of Commerce proposes that delivery of the N6 Galway City Ring Road will:

- Complete the full implementation of the Galway Transport Strategy, which has a transformative vision of transport and sustainable mobility in Galway;
- Sustain and facilitate the economic growth of Galway city and region;
- Strengthen our tourism sector which, although performing well, is threatened by poor connectivity across the region;
- Benefit all other employment sectors, through decreasing transportation costs and enabling access to the businesses within the city;
- Deliver additional benefits not currently accounted for in the Cost Benefit Analysis undertaken to support this project;
- Enhance the liveability of the city, through its urban regeneration capacity with the potential of improving the quality of urban realm in the city; and
- Enable regional development of County Galway and enable balanced development to counteract the over-development on the east coast of Ireland.

1.0 BACKGROUND

Galway Chamber of Commerce has been in existence for over two hundred years and currently has around 400 members employing approximately 20,000 people in the region. Our members are represented in all significant business sectors in the city, county and environs. Our membership covers all strata of business size – from sole traders to companies employing thousands of people. We are proud of the work we have carried out on behalf of our members and for Galway over many years, supporting the growth and competitiveness of both city and county.

Our singular collective vision is to make Galway the model in Ireland for inclusive innovation and economic growth. Our strategic priorities are ambitious because we want to deliver outcomes for the businesses and people of Galway. Our primary goals are to:

- 1. Promote and grow quality jobs for all;
- 2. Cultivate dynamic, resilient communities across the county of Galway; and
- 3. Improve the quality of life for all.

Galway Chamber is increasing its focus on interventions which will develop our competitive advantages, attract new businesses and investment, and grow a skilled workforce that supports high-value jobs which create prosperity. In summary, we aim to deliver increased well-being for Galway, on the back of meaningful and productive economic activity.

We achieve our goals through business advocacy, collaboration, driving and supporting innovation, as well as providing leadership in strategic matters. Our remit includes acting as an agent of change in respect of the expansion and enhancement of the city's infrastructure. Past projects we initiated include Galway Airport, the Galway Technology Centre and the Galway City Innovation District each of which fulfilled a vital infrastructural need at the time. We have taken Galway's message overseas to the UK, Asia and beyond with our publication 'Why Galway?' aimed at attracting Foreign Direct Investment to Galway.

Transport has featured as a priority issue for Galway Chamber for over 15 years. Problems with our transport network, increased congestion, lack of connectivity and increased transportation costs for businesses operating in and out of Galway warranted the establishment of a Transport Committee within the Chamber. Over the years, we have continued our efforts to address traffic congestion in the city, recognising the negative impact that this congestion can have on the economic growth of the region. We have undertaken surveys to comprehensively to understand transport patterns, including a broad transport survey in 2014; an analysis of travel to the city business parks in 2016, assessing the opportunity for additional public transport for workers. We are committed to working with all stakeholders to solve the transport problems in Galway city and region, including reducing car dependence and encouraging active modes of transport. Our members are delivering viable transport solutions, including staggering/adjusting shift patterns in some companies to relieve peak-hour congestion.

On the basis of our continued involvement with local stakeholders in trying to resolve the city's transport issues, the Chamber has prepared this submission which reflects the views of many of our members.

Over twenty years of planning have gone into this proposed scheme — this is a once in a lifetime chance to deliver on the potential of our city.

We hope that An Bord Pleanála will consider our submission, we would be happy to also make a presentation at the 2019 oral hearing.

2.0 GALWAY CITY – VISION FOR FUTURE DEVELOPMENT

The vision and blueprint for Galway city is set out in various strategic documents and plans. A consistent and clear message is emerging through these policy documents: Galway's traffic problem is inhibiting the sustainable development of the growing city, while putting additional pressure on rural settlements and towns throughout the county. Concerted action including infrastructure investment is required to facilitate the growth of the city. Without labouring too much on the various planning documents, we highlight some salient insights of relevance to the proposed N6 Galway City Ring Road, from the following policies:

- The European Commission's Trans-European Transport Network (TenT) N6 is part of this strategic network;
- National Planning Framework;
- West Regional Authority: Regional Planning Guidelines;
- Galway County Development Plan;
- · Galway City Development Plan; and
- Galway Transport Strategy.

Trans-European Transport Network (TEN-T)

The European Commission's Trans-European Transport Network (TEN-T) is a Europe-wide policy directed toward improving the transport network throughout Europe. The ultimate objective is to close gaps, improve cohesion, remove bottlenecks and eliminate technical barriers that exist within EU transport networks.

Article 4(a)(i) of TEN-T Regulation, (EU) No 1315/2013, highlights the objective of the regulation as "Cohesion through - accessibility and connectivity of all regions of the Union, including remote, outermost, insular, peripheral and mountainous regions, as well as sparsely populated areas"; while Article 4(b)(i) states that an objective is "efficiency through the removal of bottlenecks and the bridging of missing links, both within transport infrastructures and at connecting points between these, within Member States' territories and between them"; and Article 10(1)(a) is of particular relevance to Connemara and the west of Galway, stating general priority is given to "ensuring enhanced accessibility and connectivity for all regions of the Union while taking into consideration the specific case of islands, isolated networks and sparsely populated, remote and outermost regions".

The proposed N6 Galway City Ring Road is part of the strategic TEN-T network, particularly because it is recognised that it will improve linkages between west and east Galway, the former being one of Europe's outermost and remote areas. TEN-T recognises that the scheme will improve connections between the western region and the wider internal market within the EU. Social and economic disadvantages of the Gaeltacht areas will also be addressed as a result of the scheme.

National Planning Framework

Project Ireland 2040: The National Planning Framework (NPF) stresses the importance of regional cities, including Galway, growing by at least 50 per cent to counter-balance the Greater Dublin Area's dominance of economic activity.

The population growth projections for Galway, outlined in the Framework, are for a 50-60 per cent increase by 2040, or an additional 40,000 to 45,000 people in Galway city alone. This projected growth requires accompanying investment in transport networks, particularly given the attempt to concentrate that growth in core cities and centres.

The NPF envisages Galway city expanding its role as the economic engine of the West and to do this it must continue to attract foreign direct investment (FDI) as well as expanding its local enterprise culture.

Anticipated future demand from FDI companies is predominantly in urban locations for the Information Technology, Financial Technology, Shared Services, Global Services and Creative industries. On a national scale, the NPF recognises that more balanced growth also means more concentrated growth in the five cities of Dublin, Cork, Limerick, Galway and Waterford. These five cities are targeted for 50 per cent of overall national growth between them, to 2040. While there are a number of opportunity sites within Galway city to accommodate this growth – efficient and sustainable transport access will be crucial to unlocking them for development.

The 'Atlantic Economic Corridor' has been recognised in the NPF and also in the Western Regional Authority's Regional Planning Guidelines, as an important contributor to future development of the Western seaboard, one of the most isolated parts of the EU. Again, transport connectivity will play a vital role in ensuring this vision for Galway can be achieved.

Northern and Western Regional Assembly

The Northern and Western Regional Assembly has formally adopted a draft of the region's first ever Spatial and Economic Strategy. The draft Strategy highlights that landscape and dislocation from centres of scale presents challenges to the West's connectivity. The Strategy recognises that an attractive, effective transport infrastructure system is a key factor in attracting (and retaining) skilled labour to the region, both in terms of the overall amenity of public spaces but also the ease with which people can get around for leisure, education and work purposes.

It is acknowledged that the Northern and Western Region is highly dependent on the private car for travel to work and education, with approximately 70 per cent of the population having commuted by car, according to Census 2016 data. This reflects low levels of alternative suitable transport modes available, and the dispersed and low population densities of the north and west region.

Galway city has a significant commuter population, reflecting the important regional economic role of the city and demonstrates that people are willing to travel long distances to access education and employment in Galway city owing to the quality and range of job opportunities available. It also indicates the synergies that exist between the city and its hinterland.

The Draft Strategy highlights the significant gaps in the quality of the transport network in the west region, requiring prioritised investment. Peripheral and island communities are disadvantaged, given their lack of connectivity, and transport is recognised as having a major impact on the quality of life, the level of community interaction and the economic prosperity and environmental quality of a region.

The N6 Galway City Ring Road is included as one of the strategic road improvement projects to be delivered within the next decade, necessary to unlock development opportunities and also for rural areas to ensure access to critical services such as education, healthcare and employment. The Strategy also recognises that climate change represents a significant challenge for Galway city and the reduction in its carbon footprint must be embedded through the delivery of sustainable land use patterns and sustainable transportation initiatives, such as the Galway Transport Strategy.

Galway County Development Plan

The Galway County Development Plan 2015-2021 also identifies the need to relieve congestion, to provide a better connection from all parts of the county to the trans-national network and to improve safety levels on all public roads. It advocates access for all, in an integrated manner, with a better choice of transport options for Galway County. Galway City and Galway County Councils developed the Galway Metropolitan Smarter Travel Area Action Plan 2010-2015, dovetailing with the Smarter Travel national policy and sets out to transform the travel and transport in the area of Galway City and its hinterland. The proposed N6 Galway City Ring Road aligns with these policies and is seen as necessary to resolve the restrictive transport patterns.

Galway City Development Plan

The Galway City Development Plan sets out the policies to guide development of Galway city to 2023. The plan acknowledges the significant pressures on the existing transport network, highlighting that 90 per cent of those commuting into the city for work travel by car and that this gives rise to "significant congestion on the road network which seriously impacts on the economy and the experience of the urban environment". As such, the plan outlines the need to support and facilitate the integration of land use and transportation. This will improve the overall economic well-being of the city and to ensure the movement of people and goods in a manner that is safe and provides ease of access for all, enhances quality of life and minimises environmental impact.

Galway Transport Strategy

The Galway Transport Strategy (GTS) sets out a blueprint for future development of the Galway transport network. A range of actions are proposed for delivery covering infrastructural, operational and policy elements. These consolidated proposals are intended to provide Galway city and its environs with a clear implementation framework for the next 20 years and will be used to secure funding to deliver projects in a phased manner, based on priority needs. Current congestion levels in Galway city are restricting maximum impact of the Smarter Travel National policy, particularly for short commutes. A key aspect of delivery of the GTS is delivery of the N6 Galway City Ring Road (GCRR). The scheme will increase opportunities for re-allocation of road space for use by pedestrians, buses and cyclists.

The GTS outlines a range of proposed measures for active travel, public transport and general traffic in Galway. Some of the key proposals are:

- A public transport corridor through the city centre with public transport only allowed on the Salmon Weir Bridge, Eglington Street and College Road (Figure 1);
- Localised city centre traffic management and public realm proposals (Figure 2);
- An outer orbital route (N6 GCRR) to enhance resilience of the GTS;
- Rationalise the bus route network and increase service frequencies; and
- Provision for Park and Ride.

The GTS outlines that the long-term solution to the issues experienced in Galway includes the delivery of the Galway City Ring Road. In the interim improvements to and the provision of new and bus, cycling and walking infrastructure together with demand management tools are seen as crucial in tackling congestion and supporting sustainable travel solutions.

CONCLUSION

The vision for future development of Galway city as set out in adopted national, regional and local policy sets out a clear and significant plan for growth of the city. However, this vision cannot be delivered without delivery of the N6 Galway City Ring Road which will facilitate delivery of sustainable mobility measures as proposed in the Galway Transport Strategy. Delivery of the N6 Galway City Ring Road is therefore a vital enabler, not just for sustainable mobility, but for sustaining and growing the local economy.

Galway Chamber is aware of the wider implications of construction of this scheme. We are not supporting the construction of 18km of a new road to encourage higher car dependency. We believe that this scheme combined with the Galway Transport Strategy has transformative potential for Galway city and that it will enable delivery of the vision of our city.



Figure 1: Proposed Inner City Access Network, including bus priority route

Figure 2: Proposed city centre public realm improvements



3.0 GALWAY'S REGIONAL ECONOMY

3.1 Current Economic Performance

Galway is a vibrant, diverse city. As the largest urban centre in the West, it is also a key driver of economic development and competitiveness in the region and the city has the potential to drive growth at a national level. Galway has a strong local economy with complementary business sectors, including manufacturing industry, R&D, technology, tourism, retail and distribution, education, healthcare, and services that include financial, cultural, construction and professional.

Galway is a dynamic centre of excellence and a thriving international industrial hub for medical technology/medical device and information-communication-technology (ICT) companies and is seen as one of five global hubs in the Medical Technology sector, in a market worth €95billion annually in the EU.

Galway also has an international reputation in data analytics, within the global market for business analytics estimated at approximately \$34 billion. The clustering of such high-value industries in Galway holds great potential for future development of the city, county and the west. Galway Chamber continues to promote, strengthen and facilitate the growth of these sectors, and wishes to protect against any barriers to the ease of doing business in Galway city and county.

Tourism is also a critical driver of the local economy with over 1.67 million overseas people visiting Galway City in 2017 and spending close to €600 million. In addition, the West (Galway, Mayo and Roscommon) are popular for Irish visitors – with 1.6 million domestic visitors, contributing an additional €353 million to the economy of the West. It is estimated that 12-14 per cent of Galway businesses are involved in tourism, accounting for between 10-12 per cent of employment¹.

The quarterly 'Business Barometer' undertaken by Galway Chamber gauges the mood, current state, investment intentions and economic outlook of its members. The most recent 'Barometer' indicates a positive overall outlook for all businesses (Figure 3). Optimism was greater for city centre businesses than those in other locations. Of note is the strong optimism for the Medical Technology, ICT, Manufacturing and Logistics sectors in Galway. These are companies with a global competitive advantage, exceptionally high export growth who contribute high value-added to the regional economy and are an important key sector to the Galway economy.

¹ Galway to 2025: Preparing a Tourism Strategy for Galway. Fáilte Ireland: 2017 Topline Tourism Performance by region.

20
10
All Businesses
City Centre
Other Locations
Professional Services
Retail, Food and Tourism
Medical Technology,
Manuracturing and
Logistics

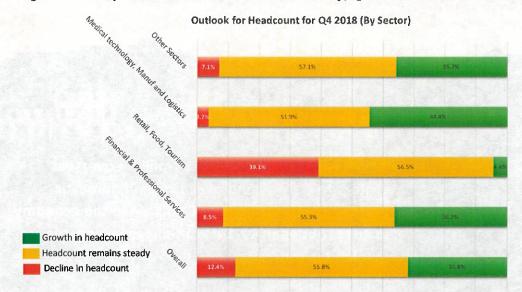
Other Sectors

30)

40)

Figure 3: Business Sentiment among Galway Chamber members, Quarters 2 and 3 20182

In terms of staff numbers, the majority of our members reported a steady level of growth with a notable 40 per cent of city centre businesses planning to expand in the fourth quarter of 2018. In particular, there were expansion intentions in the Medical technology, technology and manufacturing sectors with 44 per cent of those businesses stated they are looking to increase their headcount. Overall, across all sectors, 31 per cent of businesses were in expansion mode (Figure 4).



10.0%

Figure 4: Galway Chamber Business Barometer Survey, Quarters 2 and 3 2018

These survey results point to buoyant and optimistic business activity amongst the Chamber's members, summarised below.

40.0%

50.0%

60.0%

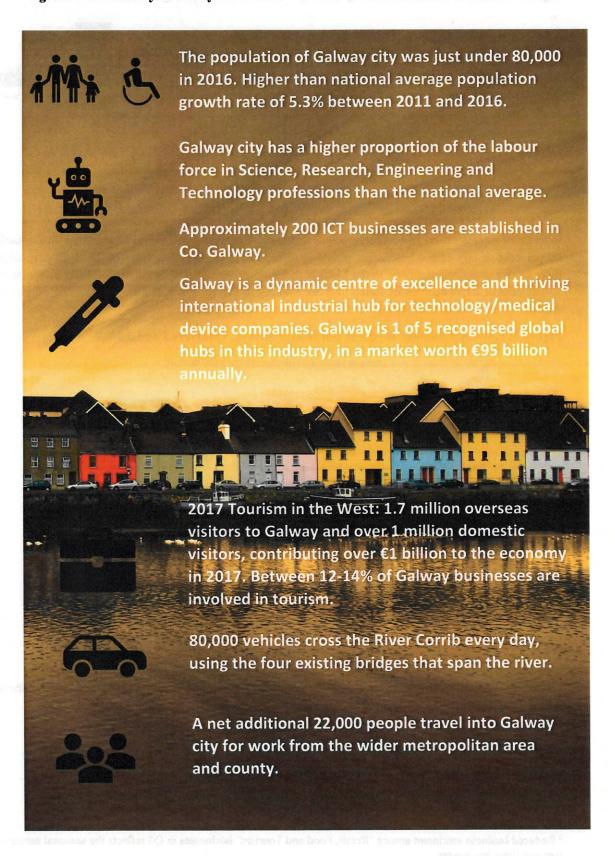
70.09

80.0%

100.0%

² Reduced business sentiment among 'Retail, Food and Tourism' businesses in Q3 reflects the seasonal nature of some of these businesses

Figure 5: The Galway Economy



3.2 Threats to the Economy

The ability of the west of Ireland to offer an alternative development corridor to the east coast is critically constrained by mobility and connectivity issues. Galway's transport system has not kept pace with population and economic growth. The burgeoning growth in the east coast corridor of Ireland is contributing to regional divergence.³

The projected concentration of population growth in Galway 'City Region' will add to the existing pressure on our transport system. Galway is already reported as the worst city in Ireland for traffic congestion. An international study showed that drivers in Galway spend an average of 44 hours each year in traffic during rush hour. In comparison, Dublin drivers spend 31 hours in rush hour congestion, Cork 25 hours and Sligo 20 hours⁴.

Businesses are attracted to the western region for myriad reasons. Galway has distinctive characteristics that positively influence the investment decisions of many local and global enterprises, ranging from: place-based strategic positioning; to people-based skill, experience and education drawcards; to distinctive culture-based and ways-of-doing-business factors. However, traffic congestion and lack of connectivity are real encroachments on Galway's brand. We are at risk of losing our competitive edge as a choice for businesses seeking to locate in the west of Ireland, due to traffic and connectivity issues. We do not want our brand to be associated with 'bad traffic problems'. This is bad for the business of Galway Chamber members, and for the people of Galway who may miss out on employment opportunities.

Congestion is costly: the value of time lost to road users as a result of aggravated congestion is measured as the value put on saving travel time. This could be for in-work travel, which is a direct cost to business in terms of lost productivity, travel to work which is a cost to the employee and is a significant factor in peak congestion times and also to non-work travel, impinging on quality of life and opportunity cost of that time. At a minimum, and using very conservative assumptions, congestion is costing Galway commuters an estimated €17.5million per annum, based on the value of time spent commuting.⁵

The full and hidden cost of congestion in Galway is much higher, including higher transport costs, lost productivity time, a deadweight associated with increased vehicle operating costs, environmental costs, reputational damage and overall impact on well-being. Aggravated congestion leads to an increase in the cost of doing business, given the reduction of the relative attractiveness of the area as an option to locate a business⁶.

The cost of congestion and the issue of inefficient transport in Galway is a theme of which our members are very conscious. Examination of our members' attitudes to business enablers reveals the key challenges they are facing. Through our 'Business Barometer', our members were asked to indicate the extent to which a set of issues impact adversely on their business. Again, transport and traffic featured as the greatest impact, with traffic congestion having the greatest adverse impact and parking in the city being third in terms of negative impact, (Figure 6).

³ ESRI, 2018. Prospects for Irish Regions and Counties: Scenarios and Implications. Edgar L.W. Morgenroth.

⁴ Inrix (2017) Global Traffic Scorecard. The 'big data' traffic firm Inrix uses phone, vehicle tracking and GPS data to estimate the speed at which traffic moves in cities around the world. We acknowledge that there are methodological problems with all benchmarking travel time index measures (due to consistency in methodology and the need to account for a range of unique parameters that characterise each city under study), but we considered these figures useful because they are based on actual traffic data

⁵ This is based on a figure of 45,000 people who commute into Galway (2016 census data) multiplied by the lower bound value of time spent travelling €8.94 per hour (DTTaS, Common Appraisal Framework) multiplied by the average number of hours in congestion per annum, 44 (INRIX Global Traffic Scorecard, 2017).

⁶ Department of Transport, Tourism and Sport. 2017. The Costs of Congestion. An analysis of the Greater Dublin Area. EFEU Research Report July 2017.

Recruitment of staff

66.67%

Recruitment of staff

66.67%

Parking in Galway city or suburbs

62.73%

Local business costs

59.09%

Availability of residential accommodation

49.54%

Retention of staff

49.09%

Urban landscape, including cleanliness

40.00%

Availability of broadband

37.96%

Availability of office/business space

34.87%

Figure 6. Issues which have a somewhat negative or very negative impact on business

With regards tourism, our members view the N6 Galway City Ring Road as the single greatest measure that could most positively impact the industry in our region. In a question within our member survey, the N6 Galway City Ring Road ranked first in a broad list of measures that could improve tourism. In fact, each of the top five measures were transport related which highlights the need not just to deliver the Ring Road but also the supporting the Galway Transport Strategy (Figure 7).

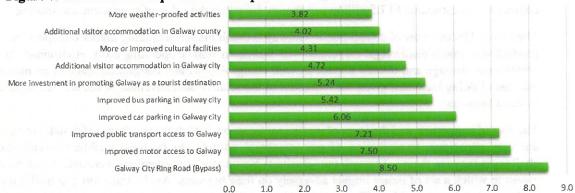


Figure 7. Factors that are perceived to improve tourism businesses

Traffic congestion and transport issues are clearly a considerable impediment to business operations in Galway. Galway Chamber members are currently facing significant transportation challenges. The benefits presented by the N6 Galway City Ring Road combined with the Galway Transport Strategy in addressing these challenges is presented in the following section.

4.0 BENEFITS OF THE N6 GALWAY CITY RING ROAD

Transport matters greatly to the Galway business community. Completion of the N6 Galway City Ring Road will proffer a range of opportunities to the businesses and people of Galway. The following sections summarise our perception of the benefits of the scheme within the following categories:

- Economic and business impacts;
- · Regional impacts;
- Environmental impacts;
- Urban renewal impacts; and
- Health and safety impacts.

The 'Do Nothing Scenario' is not an Option for Galway

The Chamber appreciates that the progression of the N6 Galway City Ring Road to the current phase in the planning process has been long and contentious, requiring trade-offs and engagement with communities impacted by the scheme.

We acknowledge the opposition to the proposed road, but also agree with the overwhelming evidence presented throughout the planning documents that a 'Do Nothing' scenario is not an option.

The current transport issues in Galway are costing Galway communities and businesses money, in terms of lost productivity; efficiency losses due to uncertain and delayed travel time; reduction in quality of life due to congestion and safety risks associated with sharing transport corridors.

There is an opportunity cost to the west – inhibiting regional development and disadvantaging people to the west of County Galway. Our city simply cannot grow to the levels anticipated in policy documents without an additional bridge crossing, without a functioning bus network or without reasonable alternatives to private car use.

A 'Do Nothing' option will jeopardise the natural growth path of the businesses and key sectors that have chosen to locate in Galway over the last decade. It would choke the movement of people within Galway city, and prevent connectivity from east to the west of the county and inhibit the smarter transport policies being pursued.

Not pursuing development of the N6 Galway City Ring Road is simply not an option for our communities and local economy.

4.1 Economic and Business Impacts

We understand that Galway people and businesses currently face costs of congestion and lost opportunities due to an inefficient transport system. These were explored in the Cost Benefit Analysis (CBA) for the proposed N6 Galway City Ring Road. The study provides a strong economic case for proceeding with the N6 Galway City Ring Road, with a range of benefits to cost ratio between 3.3 and 4.17 (for low to high growth assumptions). That can be interpreted as: for every Euro invested in the N6GCRR, we can expect benefits in the range of between €3.30 and €4.17. Generally, if the forecast benefits for the proposed public investment exceed the estimated costs, then the investment can be considered worthwhile. In general, the Benefits to Cost ratio (BCR) indicates the likely Value for Money of the proposal. Values of BCR greater than 2 are considered high value for money. Therefore, the analysis shows that the N6 Galway City Ring Road offers a solution to Galway's congestion problem, first and foremost.

The headline indicators for the benefits explored in the CBA are shown in Figure 8, with values in Euro shown for the medium growth scenario (depicted in red) given in italics. The range of total Present Value Benefits of completing the N6 Galway City Ring Road is estimated between €1.494 billion and €1.887 billion, calculated for the thirty years of assessment.⁷ The bulk of these benefits are realised by 'Consumer Users' (47 per cent of benefits), which includes commuters. 'Business users' accrue 20 per cent of the total benefit which includes a productivity gain for businesses that face extra transport costs due to traffic. The residual benefits account for a third of the total benefits, or 32 per cent indicating that the road will have a use value beyond the 30-year assessment timeframe. The other transport related benefits – carbon, fiscal and safety benefits - are comparatively negligible (although not zero) by comparison to these first three categories of benefits, indicating a displacement effect rather than a significant change.

The sensitivities of different businesses to congestion varies, given the flexibility they have in their operations. Some companies have already been able to alter their operations to avoid peak hour traffic, through delaying or expediting activities. Specific business location will determine the extent of effects, and accessibility issues are significant for city centre businesses. The impacts can be significant for the transport and logistics of companies who are constrained by congestion.

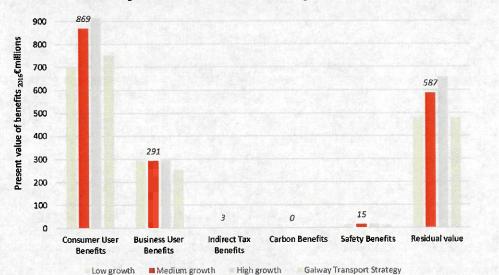


Figure 8. Value of Traffic Improvement Benefits of the Proposed N6 Galway City Ring Road

Source: N6 Cost Benefit Analysis Report, March 2018

With regards the CBA outputs, we argue that there are additional benefits to the N6GCRR that were not explored in the CBA, relating to regional and facilitated effects, rather than the narrow focus on traffic related benefits that the study explored.

It should be noted that the costs and benefits for the Galway Transport Strategy Scenario were modelled (column on the right hand side of bar chart) as a test for sensitivity. The benefits of this scenario are lower than the medium growth scenario. It should be noted however that the Galway Transport Strategy Scenario does not include any benefits from the proposed Public Transport elements of the Galway Transport Strategy – which conceivably would have significantly higher environmental and safety benefits due to modal shift from private car mode share. This traffic decongestion will facilitate or induce a range of positive impacts for Galway businesses which are not captured in this assessment.

⁷ Note this is for the 30-year calculated lifetime of the project, with residual values extending for another 30 years. In total the assessment period was from 2024 to 2084

Other wider direct impacts of changing traffic patterns resulting from the proposed N6 Galway City Ring Road, include:

- Facilitated environmental impacts when the measures within the Galway Transport Strategy are implemented;
- Agglomeration and employment density impacts, given the link between higher employment density and higher productivity;
- Urban renewal and potential for transformation of areas of the city centre; and
- Health and safety impacts, which will be realised with the implementation of the Galway Transport Strategy.

Decongesting the city from traffic enables firms to guarantee product delivery and services, thereby improving the ease of doing business. Business reliability is a competitive advantage for firms. The profitability of small business operators can be severely impacted with the unproductive time spent in congestion. Inefficiencies such as clients or staff turning up late due to congestion contributes to unproductive workplaces and loss of profitability.

4.2 Regional Impacts

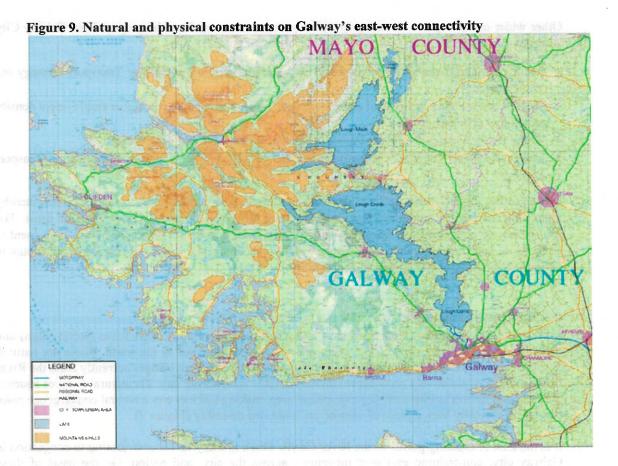
Galway city is physically constrained as it is divided east-west by the short River Corrib (6km) and locked between Lough Corrib to the north and Galway Bay/the sea to the south. These are natural, physical boundaries that constrain movement and transport links. Four bridges currently cross the River Corrib, which cumulatively carry approximately 80,000 vehicles per day. The natural features squeeze our transport networks into a small geographical area, making Galway city a natural convergence point that has historically been a place of commerce, trade and assembly (Figure 9).

It is the lack of crossing points of the River Corrib which is a key factor contributing to congestion in Galway city, constraining east/west movement across the city, and region. On the basis of these constraints with long journey times and delays, Connemara and the rural west of Galway have become isolated within the region. These areas face prolonged social and economic disadvantage, confirmed by the 2016 Pobal HP Deprivation Index. The proposed N6 Galway City Ring Road will alleviate delays to east-west traffic movements and improve the mobility and connectivity of the businesses located to the west.

Considerable development effort, through EU structural fund support, Údarás na Gaeltachta and IDA foreign direct investment have successfully resulted in the location of high value firms in Connemara and the west. However, connectivity is crucial for these businesses, to get their product to market and to sustain their workforce.

As outlined previously, tourism is clearly a very important industry for our region providing significant employment. However, tourism can also be used to redress the social and economic under-development of rural Galway, and indeed the western region. Connemara has extensive cultural and natural heritage value, and significant tourism potential. It is recognised as the centre for the Wild Atlantic Way, with Galway city and Clifden promoted as key hotspots. The international branding of the Wild Atlantic Way is relatively recent – since 2014 – and the marketing campaign will result in increased visitor numbers to Connemara as an area marketed for its 'great escape' and 'wilderness' experience: yet access inevitably requires visitors traversing through Galway city.

Tourism is one of the many economic sectors that would benefit from the proposed N6 Galway City Ring Road, and is one sector where benefits will accrue, beyond the user benefits calculated in the transport specific CBA.



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Environmental Impacts

As noted in Figure 8, the CBA of the proposed N6 Galway City Ring Road showed very marginal environmental impacts as a result of its completion. On closer reading of the assessment, we realise that the scenario modelling *did not* take into account the transport modal switch envisioned in the Galway Transport Strategy (GTS), which would result in significant vehicle km saved, improved air quality and noise reduction.

The implementation of the GTS is dependent on the proposed N6 Galway City Ring Road. If Galway is to attain significant and meaningful modal shift then the N6GCRR is required to take the pressure off the city. Congestion reduction measures can fall into two categories: temporary and virtuous. Temporary measures free up road capacity that fills up by induced demand: people adapt their behaviour to the changed circumstances. Virtuous measures start a feedback loop that encourages people to make a modal switch away from driving.

The Chamber feels that the proposed N6 Galway City Ring Road, in tandem with the investment and implementation of the Galway Transport Strategy, will make public transport and active modes of transport safer and more convenient for the city. It requires a concerted effort, and we acknowledge that the N6GCRR will not deliver a complete solution to Galway's congestion. A wide range of complementary measures — such as improving cycling infrastructure and improving bus services, introducing park and ride schemes and rural hubs — carefully balancing the needs of residents, commuters, businesses visitors and tourists is required for long-term improvements, attaining 'virtuous' decongestion.

One issue that requires addressing and may improve with the proposed N6 Galway City Ring Road is the reliability of city bus services. Bus services are currently heavily impacted by delays, with average delays on the network of up to 20 minutes relative to the schedule, during peak times. These result from limited bus priority across the city leading to reduced journey speeds and lack of journey time reliability for bus services. Reducing the reliance on the car will lead to a resilient city and resilient communities. It is at that point that transport related emissions, through the promotion of sustainable land use and transportation will be realised.

4.4 Urban Renewal Impacts

When well planned and executed, the purpose of a ring road is to eliminate through-traffic from town and city centres. The reduction in city centre traffic can have huge urban renewal potential. Accessibility, connectivity and walkability are concepts that urban planners and designers, throughout the world, are increasingly focused on. Well-functioning cities have mixed use urban zones, ensuring that city centres are lived in and offer a range of land use types. Galway's city centre streets, which are hundreds of years old, struggle to cope with the current volumes of traffic. Congestion, noise and fumes impinge on a city's functioning, and can lead to urban decay.

Galway has experience of urban renewal, with transformative traffic demand management introduced in 1998, resulting from the pedestrianisation of William Street, Shop Street, High Street and Quay Street down to the Spanish Arch. These streets are no longer just a 'passage', but a destination in themselves. The revitalisation of many derelict buildings in this area was achieved within 25 years and is an example of how a centre can change radically into a vibrant urban centre.

Reducing traffic will make development in the city more attractive and aligns with the European Regional Development Fund grant assistance for local authorities. Galway is designated as a gateway and hub town and is eligible for sustainable transport and urban regeneration assistance. We hope the city can access this scheme, and that decongestion will occur in tandem with facilitating new office space in our city centre. Lack of space is consistently quoted by business groups as a barrier to growth.

A number of key sites across the city, shown in Figure 9, have been identified for development that can be accessed using sustainable modes, will increase city centre commercial and residential density and contribute to our local tourism offer. Some of these sites have received planning permission while others are in the early stages of planning. These developments could have a transformative impact on our city, securing a sustainable future while maximising our economic potential.

4.5 Health and Safety Impacts

Alleviating congestion and switching cars away from narrow city centre streets has benefits for pedestrian and cyclists. A switch to active modes of transport can have significant health benefits, ensuring that people get the recommended level of exercise and physical activity. An estimate of the health costs of physical inactivity was approximately €1.6 billion per year for Ireland.⁸ Alleviating congestion can reduce stress levels, as time spent in traffic can increase anxiety, lead to frustration, dangerous driving and road rage.

The net safety benefits of the proposed N6 Galway City Ring Road in the CBA ranged between €14-17 million. Again, we feel this figure is completely underestimated as it does not take into account wider safety benefits that will potentially occur within Galway; nor the wider safety benefits brought about by urban renewal, walkability and general improved quality of life factors — or truly transformative placemaking effects.

⁸ This is based on applying the findings that 11 per cent of health expenditure in the UK could have been avoided if the 69 per cent of adults who do not meet the recommended levels of physical activity did so.

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Figure 10. Galway City Centre: Key Development Opportunities

5.0 SUMMATION

Although the Cost Benefit Ratio proposed for the N6 Galway City Ring Road returned a value range of between 3.3 and 4.17, indicating value for money in terms of public sector investment, we argue that the benefits are amplified when the wider economic benefits are taken into account.

Galway Chamber of Commerce supports delivery of the N6 Galway City Ring Road. We are confident that the scheme will:

- Complete the implementation of the Galway Transport Strategy, which has a transformative vision of transport and sustainable mobility in Galway;
- · Sustain and facilitate the economic growth of Galway city and region;
- Strengthen our tourism sector which, although performing well, is threatened by poor connectivity across the region;
- Benefit all other employment sectors, through decreasing transportation costs and enabling access to the businesses within the city;
- Deliver additional benefits not currently accounted for in the Cost Benefit Analysis that was undertaken to support this project;
- Enhance the liveability of the city, through its urban regeneration capacity with the potential of improving the quality of space in the city; and
- Enable regional development of County Galway and provide some balanced development that occurred on the east coast of Ireland.

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