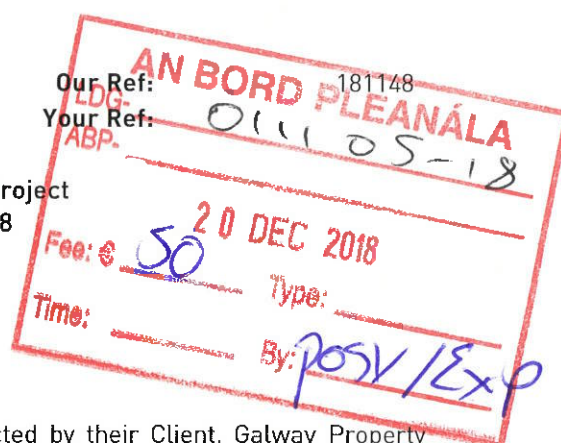


An Bord Pleanála
(Strategic Infrastructures Division)
64 Marlborough Street
Dublin 1
D01 V902

Date: 18th December 2018

Re: N6 Galway Ring Road Project
Reference PL07.302848



Dear Sir/Madam,

McCarthy Keville O'Sullivan Ltd ('MKO') have been instructed by their Client, Galway Property Management to prepare a submission to the consultation on the N6 Galway Ring Road planning application (ref: PL07.302848) which is currently with An Bord Pleanála ('the Board') for determination.

Our Client acts as management agents for properties at Rosán Glas, Rahoon, comprising 225 units which is a predominantly residential area, with one shop, two creches and one Montessori. Approximately 174 of these units are thought to be directly affected by the proposals.

Our Client has requested that we raise a number of concerns regarding the proposed N6 Ring Road project. The concerns relate in the main to the impact the proposed scheme will have on residents' day-to-day living in access/transport terms however there are other aspects of the application which residents consider have not been adequately addressed through the application and which they strongly object to.

This submission will therefore address the following topics:

- Access/traffic
- Residential amenity
- Attenuation/drainage
- Visual impacts

The principle of the proposed development is not disputed, however there is concern that the impacts during both the construction and operational phase may adversely impact residents and their residential amenity. While it is fully accepted that there is support for the project at various levels of the planning hierarchy and indeed across a broad range of strategies and plans, those same documents also strive to ensure protection, adequate mitigation and indeed betterment for those directly affected by such projects. The Guidelines for Planning Authorities on Sustainable

Residential Development in Urban Areas [2009] aim to deliver *"a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience"*. It is not unreasonable to seek the same of new developments which interact with existing residential areas. The design principles of connectivity, permeability, sustainability, safety, legibility and sense of place are all considered to apply.

It is noted that during the consideration of alternative routes (as set out in Chapter 4 of the Environmental Impact Assessment Report (EIAR)) the line of the N59 Link Road South was moved away from Bothar Stiofán and closer to Bothar Diarmuidá *"to take account of residentially zoned lands and to minimise impacts to residential properties and communities"*. In consideration of the Letteragh Junction Area the EIAR notes that some rerouting took place to achieve *"a more appropriate connection point"*, with the reasons for this being:

- *"Eliminates the conflict between direct accesses from existing homes and traffic accessing the proposed road development"*
- *Minimises impacts on homes on Bóthar Stiofáin*
- *Separates heavy goods vehicles accessing the Galway West Retail Park from the local movements and vulnerable road users directly accessing onto Bóthar Stiofáin"*

Our client is keen to understand why a similar approach cannot be taken to the route of the N59 Link Road South where it runs in close proximity to Bothar Diarmuidá and the residential areas east of that, as the same reasoning set out above could be found to apply.

Access/Traffic

An Bord Pleanála is requested to take full cognisance of the impacts that the implementation of the Ring Road will directly have on residents of Rosán Glas. In particular, the line of the new Link Road which cuts into the southern end of Bothar Diarmuidá is not supported. Residents of Rosán Glas utilise Bothar Diarmuidá/Rahoon Road/Gort na mBro to gain access to their homes. Residents of Rosán Glas currently have 2 no points of access onto Bothar Diarmuidá. A small proportion of the Rosán Glas development utilises an exit to the Rahoon Road only. In addition, it is worth noting that Cnoic an Oir, Sliabh Rioga and Culgharraí have the option to egress onto Bothar Diarmuidá via Bun a'Chnoic also. Bothar Diarmuidá therefore currently handles a significant amount of residential traffic and in theory could also handle more, given the zoning of land for residential to the north.

The proposal effectively makes Bothar Diarmuidá an internal local access road and means residents in the southern part of the estate will now have to travel north to the new junction to get onto the main road network; effectively doubling their journey time. Consequently, signalised junctions in the area of the Rosán Glas development will not *"facilitate the efficient movement of all road users"*. There are no traffic lights or similar which currently control the movement of traffic from these residential areas onto Bothar Diarmuidá, or from there onto the Rahoon Road. Under the proposals signals will be introduced where Bothar Diarmuidá meets the Rahoon Road. There is concern that traffic seeking to access the new Link Road from other residential areas of Cnoic an Oir, Sliabh Rioga and Culgharraí will result in severe congestion in the estate roads of Rosán Glas. There is also concern of access on to the Link Road at the proposed Bothar Diarmuidá junction; the junction on an internal road meeting a main link road is likely to suffer delays. Residents are therefore seeking a form of control to ensure this does not happen, and further investigation as to potential 'rat-running' east-west through the existing residential areas.

Several residential units currently have direct access to Bothar Diarmuidá, which currently functions as a main route to the wider road network. The introduction of the new road will prohibit this direct access. Pedestrian/cycle movements also appear to be hindered, with no option shown for connectivity across the 'local' Bothar Diarmuidá to the new Link Road. Again, in a similar vein to the omission of a bus lane here this is considered an error and should be corrected prior to any planning permission being granted. It is without doubt that residents and future residents in this area will seek to connect to the new road on foot and provision should be made for this to be done safely, as part of the overall design at this stage.

No97 Rosán Glas (Henchy's Daybreak local shop) has particular concerns that the alignment of the new road which segregates local estate traffic from the main road network will impact negatively on its trade.

It is noted that several publications relied upon in the planning application and Environmental Impact Assessment Report (EIAR) provide support for more sustainable travel movements and connectivity, and indeed for the Ring Road project itself. These also however provide for protection of residential amenity and safe and sustainable travel movements of pedestrians and cyclists. The Smarter Travel – A Sustainable Transport Future (2009) policy framework states *"Safe and comfortable travel is also a key element of a good quality of life. The issue is not to restrict travel and transport but to facilitate smarter ways of meeting these needs."* Amongst its stated goals is to *"Improve quality of life and accessibility to transport for all..."* The document sets out 49 no actions to identify its key goals. Table 2.1 of Chapter 2 of the EIAR considers the proposal against these actions. In respect of Action 23 which the Chapter identifies as Supportive, we would contend that signalised junctions in the area of the Rosán Glas development will not *"facilitate the efficient movement of all road users"*, rather it will force some residents into longer journey times to access the new road link.

The N6 Ring Road project is identified in The Galway Transport Strategy (GTS) (2016), which states that the proposed road *"will assist with the removal of traffic congestion from within Galway City and its environs by transferring existing and future traffic from the existing road network to the new road infrastructure. Therefore, journey times will reduce and journey time certainty will increase for both public transport and private vehicle users."* The GTS goes on to promote the existing road space being reallocated for cyclists, pedestrians and to allow a reconfiguration of the public transport network. The City Plan specifically discusses the integration of land use and transportation through Policy 3.2: Land Use and Transportation. Efforts to reduce congestion are supported. However, this cannot be to the detriment of existing residents who will see increases in their journey times, lack of connectivity and safe movements to and in the vicinity of the new road, and who under the current proposals are not being given the opportunity to make use of additional public transport with no bus lane proposed. Potential desire lines for pedestrians at the southern end of Rosán Glas closest to Ragoon Road appear to have no direct access to the footpath on the new road and equally no easy access to the existing bus route on Ragoon Road. This is in direct conflict with City Plan Policy 3.6: Cycling and Walking. Furthermore, it is noted that it is a key proposal of the Galway Transport Strategy to *"rationalise [the] bus route network and increase service frequencies"* however nothing pertaining to such is programmed for the new Link Road.

Residents of Rosán Glas will face congestion, longer journey times and increased use of private vehicles in all likelihood. The current plans do little to facilitate or encourage more sustainable means of movement. Ultimately, the needs of vehicular road users should not overtake those of existing residents. Chapter 6 of the EIAR states *"the proposed road development will provide benefits to existing and new public transport services and walking and cycling routes on the adjoining local and regional road network... Therefore, there are no residual negative traffic impacts anticipated."* The detail of the impacts on the daily lives of residents in proximity to the N59 Link Road has not been addressed sufficiently and the assertion that improvement or betterment equates only to walking/cycling is neither sufficient nor realistic. Our Client contends that the measure of 'no residual traffic impacts' as concluded at Section 6.8 of Chapter 6, is not accepted.

It is considered that the application has not taken into consideration to a sufficient extent the future zoning of land around the Ring Road. The development programmed in the vicinity of the Road project will lead to increased demand for access and connectivity, however the N59 Link Road does not strive to provide for such and is therefore not adequately future-proofed. Indeed, the modal

shift noted in the EIAR could be increased if provision was made for bus lanes on what is viewed as a key route.

The junction capacity assessment undertaken (s6.3.5 of Chapter 6 refers) did not include assessment of the junction of Bothar Diarmuida and Ragoon Road, albeit the junction of Ragoon Road with the Seamus Quirke Road was included, and the junction noted as being overcapacity. The junction strategy includes to serve existing travel demand by all modes and promote a mobility that is efficient and safe. The journey time analysis (s6.6.3.1 of Chapter 6 refers) illustrates that across all scenarios route 6 – the Ragoon Road – experiences negative impacts. The Chapter acknowledges that *"A small number of routes show negligible or minor impacts, with increases in journey times of less than 120 seconds across the entire route. These increases are caused by the additional of new signalised junctions, requiring traffic to slow down where previously it was not necessary."* This is precisely the issue our Client has with the entrances to Rosán Glas. While network-wide improvements may be highlighted on paper, in reality for residents' delays will be encountered and the efficiency of their travel movements affected. This is not adequately reflected in the Chapter.

During the construction stage, it is self-evident that some disruption to normal vehicular movements will take place. The duration of the construction activities is given as 9-12 months with the N59 Link Road falling into Phase 1 – N6 Coolagh to N59 Letteragh Junction. Bothar Diarmuida is noted as a primary haul route, however no compounds are proposed; our Client welcomes this. Typical working hours during the construction phase are:

- 0700 1900 Monday – Friday
- 0700 1600 Saturday

These are considered acceptable to our Client, and we urge the Board to impose a suitable planning condition in this regard. It is noted that the contract documents and construction noise and vibration management plan will clearly specify hours of work and a designated noise liaison officer will be appointed.

Construction impacts are likely to be experienced most in the vicinity of these properties and therefore the implementation of the mitigation measures and detailed Construction Environmental Management Plan (CEMP) is paramount for these residents. The aim to *"ensure the minimum possible disturbance to local residents and existing traffic"* is welcomed. The range of mitigation measures as included in the EIAR is also welcomed, however we would urge the Board to consider the mitigation in detail and apply further controls through the use of planning conditions to ensure the safety and amenity of residents is protected to the same degree as that of road users. This relates also to the CEMP and the associated contractor's agreement and actions to be put in place.

General Amenity/Residential Amenity

Chapter 18 of the EIAR: Human Beings, Population and Human Health defines amenity as follows:

Amenity:

- Journey amenity: Impacts on journey amenity arising from pedestrian/cyclist proximity to traffic, volume of traffic, frequency of congestion, pedestrian and cycle facilities, noise, air quality and changes in the visual environment (as discussed in respective chapters of this EIAR) as they relate to the pleasantness of the environment for walking, cycling or driving*
- General amenity: Impacts due to any effect that the proposed road development may have on residential quality of life, amenity or recreation facilities due to the same factors together with changes in environmental quality or facilities for amenity*

Chapter 18 also considers the area in which the N59 Link Road North and South is to be constructed, to be *"largely rural"* in nature. This is not strictly the case, with large residential areas existing to the south, and more planned per the residential zoning of lands in the current City Plan. To state

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that there will be “*minimum impact*” on local traffic is considered to underestimate the actual impacts on residents in this location.

The proposal is expected to impact on the residential amenity of existing residents, their day-to-day living, access/movement, air quality, pollution encountered and noise.

Lighting

As a result of the new lighting to be implemented with the new Ring Road, there is real concern that the number of lighting columns and associated lux, together with additional traffic, could impact negatively on the residential amenity of residents of Rosán Glas, where closest to the new road. In addition, as Bothar Diarmuida currently has lighting columns, additional lighting together with additional traffic will undoubtedly have an impact on the residential amenity of adjacent houses. The Galway City Development Plan notes that not just excessive levels of light but also poorly design lighting can affect quality of life and that “*there is a need to strike a balance between the desire for illumination and security with the control of light pollution.*” Associated policy 9.11 states “*Ensure the design of external lighting minimises the incidence of light pollution, glare and spillage into the surrounding environment and has due regard to the visual and residential amenities of surrounding areas.*” It is requested the Board have regard to this specific policy provision.

The CEMP which is included as an appendix to the EIAR states “*construction activities will be undertaken during daylight hours for all construction stages.*” This directly conflicts with the statement “*it will be necessary to work overtime (including weekends) and night shifts at certain critical stages during the project.*” These stages have not been highlighted and we urge the Board to seek full clarification on this point. Should construction activities also be undertaken during night-time hours, sufficient lighting is likely to be required which undoubtedly will be in excess of normal street lighting.

While the CEMP includes a communications strategy which is supported, it is paramount that the contents of such and direction to contractors on site is clear with no ambiguity from the outset. The CEMP states that the contractor will be required to interact with the community and while supported, this is pointless if clarity does not exist from the outset for all parties concerned.

Noise

The City Development Plan calls for the design of development to incorporate “*measures to minimise noise levels... and reduce the emission and intrusion of any noise or vibration which might adversely impact on residential amenities, where appropriate.*” (Policy 9.10). Baseline noise survey data was gathered as part of the EIA process from February 2016 to August 2017. The EIAR is dated September 2018 and it is not clear why a gap of almost a year in survey data exists. The noise monitoring locations in the vicinity of our Client’s land interests are number R8a, at 6 Bun a’Chnoic and R8b at 161 Rosán Glas. It is noted that the monitoring did not take place at the units closest to the new Bothar Diarmuida/Link Road junction nor at the creches and Montessori at Rosán Glas. As the EIAR identifies children as ‘vulnerable groups’ the finding of the EIAR (Chapter 18) that “*no negative human health impacts are predicted as a result of noise emissions*”, is considered premature in the absence of noise monitoring at the Montessori school being carried out.

Chapter 17 of the EIAR, Noise and Vibration states “*At survey location 8a an Lden value of 45dB(A) was derived. Noise levels at this location were influenced mainly by intermittent passing vehicles entering the estate along Bóthar Diarmuida and bird song.*” This location borders open countryside and is where the current road terminates. It is suggested that there are other more representative locations which could have been used in the monitoring process. Also “*At location 8b passing traffic was noted to be significantly more frequent and the monitoring location closer to the road side.*” This alludes to a known short-coming in the monitoring location R8a. Our Clients reserve the right to comment further on this matter.

It is held that monitoring should have taken place in locations likely to be impacted more by the development. In that vein, the submission is considered deficient in its current form.

Along the new Link Road the noise levels will be Lden 56-57dBA in 2024, an increase from 45dBA. It is noted that a 10dBA increase is the equivalent of twice the loudness. Therefore, the noise at location R8a will double for those living there. While it is acknowledged that mitigation is proposed in the form of a low noise road surface being used, our Client seeks further monitoring to be conditioned as part of any consent issued.

Air

Air quality monitoring was also carried out, with one monitoring location at the northern end of Bun a'Chnoic (R19). Further investigation is required, however it could be questioned as to why there was not one closer to the BD/Rahoon Road interchange.

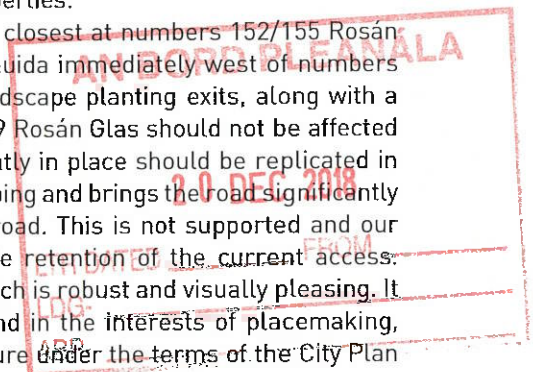
Attenuation/Drainage

There are two attenuation basins proposed on the western side of the Bothar Diarmuida/Rahoon Road junction. Under the proposals shown the two basins are subject to a cut and fill exercise and are to be fenced. While our client would prefer to see an underground feature here, the use of fencing for safety purposes at the SUDS basin is supported. The location of the basins on an important junction and being visible from a range of locations in the area, is believed to merit a stronger design approach. The Summary of Mitigation Measures states: *"Certain areas along the length of the proposed road development have been set aside for drainage requirements/pollution control/attenuation. Where proposed these will be securely fenced and planted with locally appropriate hedgerows, shrubs and/or screen planting located along the proposed development boundary to minimise any visual impact from off road areas. However, it is noted that these features also offer the potential to provide for improved landscape diversity and habitat."* This is supported and our Client would welcome a stronger design approach to these basins than is frequently seen around other road networks in the country. The policy provisions of the Galway City Plan (Policy 9.8) and overall best practice is for such features to include a scheme of maintenance for the long term. This has been included in the EIAR and is welcomed.

Visual Impacts

Our Client is concerned that the temporary and indeed lasting visual impacts of the new road have not been fully considered with reference to the Rosán Glas residential area. During the construction process there will inevitably be visual impacts in terms of construction traffic and the construction process itself. The Landscape and Visual Impact chapter of the EIAR considers such impacts. The majority of visual receptors for the scheme are residential properties.

There is cut programmed for a stretch of the new road and is closest at numbers 152/155 Rosán Glas. The Link Road is to align with the existing Bothar Diarmuida immediately west of numbers 155/157/159 Rosán Glas where currently well-established landscape planting exists, along with a stone-wall. The existing boundary wall at numbers 155/157/159 Rosán Glas should not be affected by the proposals, and the form and type of landscaping currently in place should be replicated in this area. The current proposals remove this section of landscaping and brings the road significantly closer to the private residences than the line of the existing road. This is not supported and our client would welcome further investigation as to the possible retention of the current access. Landscaping currently exists on the Bothar Diarmuida road which is robust and visually pleasing. It is considered that this should be echoed on the Link Road and in the interests of placemaking, considering how this area is programmed to develop in the future under the terms of the City Plan zoning.



It is respectfully requested that An Bord Pleanála take on-board the concerns expressed in this submission.. Our Client requests that the Board consider carefully the contents of this submission with regard to the impacts on the daily lives of the residents of Rosán Glas, and impose suitable conditions on the project as appropriate.

Yours sincerely,

Meabhann P. Crowe
Meabhann Crowe, MRTPI

c.c Mr. J. Gaffney, Galway Property Management

