



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

AN BORD PLEANÁLA  
LDG- 011018-1802  
ABP- 20 DEC 2018  
Fee: € 50.00 Type: Clerk  
Time: 16.43 By: Anne

Our Ref:  
Your Ref:

Date: 20 December 2018

181214

PL07.302848

**Re: N6 Galway City Ring Road Motorway Scheme 2018 and the N6 Galway City Ring Road Protected Road Scheme 2018. Submission on behalf of Árd Na Gaoithe Residents.**

Dear Sir/Madam,

On behalf of our Client, Residents of Árd Na Gaoithe, Clybaun Road, Knocknacarra, Galway, we wish to make a submission to An Bord Pleanála on the planning application for the proposed N6 Galway City Ring Road Motorway Scheme 2018 and the N6 Galway City Ring Road Protected Road Scheme 2018 [ABP Ref: PL07.302848] which is currently with An Bord Pleanála ('the Board') for determination. This submission is being made within the timeframe for submissions [21st December 2018]. The €50 submission fee is enclosed with this letter.

Árd Na Gaoithe is a residential development comprising of 34 units on the west side of the Clybaun Road. Our Client has requested that we raise a number of concerns regarding the proposed N6 ring road. The concerns relate primarily 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 itself or indeed the pre-application consultation which has taken place.

This submission will therefore address the following topics:

- Residential Amenity
- Noise
- Access/traffic
- Lighting
- Surface Attenuation/Drainage
- Visual impacts & Landscaping
- Construction Phase

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 of Árd na Gaoithe 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.

### **Residential Amenity**

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

#### *Amenity:*

- a. 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*
- b. 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*

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. A number of these issues are addressed in this submission.

### **Noise**

Policy 9.10 'Air Quality and Noise' in the Galway City Development Plan 2017-2023 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." 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. Noise monitoring locations within the gardens of properties in the vicinity of Cappagh Road, Ballymoneen Road and Árd Na Gaoithe in Ballymoneen set back from passing traffic were measured in the range of 43 to 45Db Lden.

Chapter 17 of the EIAR, Noise and Vibration states "The highest noise level measured in this area was at monitoring location 6c which was measured at the front gate of a property along the footpath which was dominated by passing traffic. An Lden noise level of 64Db was measured at this location." This location borders open countryside. It is suggested that there are other more representative locations which could have been used in the monitoring process. 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.

It is considered that the property located at noise receptor no. 86 will be the most significantly impacted in the Árd na Gaoithe development. The calculated noise levels for noise receptor no. 86 rises from 39 to 62 dB Lden for the opening year of the road in 2024. The residual noise level for the same receptor rises from 39 to 57dB Lden for the opening year in 2024. It is noted that a 10dBA increase is the equivalent of twice the loudness. Therefore, the noise at Árd Na Gaoithe will almost double for those living there.

Noise Mitigation is proposed in the form of a Low Noise Road Surface (LNRS) to reduce noise generated at source and the use of noise barriers to reduce noise levels along the propagation path between the source (proposed road development) and the specific receivers (houses, schools, churches etc.). These screens may be constructed as earth bunds, proprietary noise barriers or a combination of both.

It is noted that a noise barrier is proposed to the north of Árd na Gaoithe. In the event that the proposed road scheme is granted permission, this submission requests that appropriate noise and mitigation proposals are implemented to protect the residential amenity of existing and future residents.

### 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 Árd Na Gaoithe. Residents of Árd Na Gaoithe utilise Clybaun Road to gain access to their homes. The Clybaun Road runs in a north-south direction, joining the Ragoon Road to the North and the Western Distributor Road to the South.

It is considered likely that residents of Árd Na Gaoithe will face congestion, longer journey times and increased use of private vehicles. 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 proposed road has not been addressed sufficiently and the assertion that there will be improvement or betterment to new public transport services and 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.

### 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 Árd Na Gaoithe, where closest to the new road. 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 'Light Pollution' seeks to *"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.

### Surface Attenuation/Drainage

There are two attenuation basins proposed to the north of Árd Na Gaoithe. Under the proposals shown the basin will be surrounded by fencing. While the safety aspect of fencing is supported, the location of the basin between two important junctions 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. Our client is also concerned about potential seepage of water into the the rear gardens of the adjoining properties. The provisions of Policy 9.8 'Sustainable Urban Drainage Systems (SUDS)' in the Galway City Development 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.

AN BORD PLEANÁLA

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### **Visual Impacts and Landscaping**

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 Árd Na Gaoithe residential area. The Landscape and Visual Impact chapter of the EIAR considers such impacts. The majority of visual receptors for the scheme are residential properties. During the initial operation stage, landscape and visual impacts will continue to arise from the physical presence and operation of the proposed road development. Significant or notable residential landscape impacts will continue to arise for properties at the crossing of local roads northwest of Galway as stated in Chapter 12- Landscape and Visual Impact. Section 12.5.1 of the EIAR notes further that *"Within this landscape, the construction associated with the proposed road development will give rise to significant and profound negative impacts in terms of disturbance to the existing landscape and visual character of the area and to properties located close to the proposed road development."*

In the event that the proposed road scheme is granted permission, this submission requests that appropriate visual impact mitigation proposals are implemented to protect the residential amenity of existing residents.

### **Construction Phase**

An overall construction period of 36 months is anticipated for the construction of this proposed road development. It is envisaged that the construction will be phased and potentially in an east to west build with the sections outlined in Section 7.4.7 of the EIAR. During the construction stage, it is self-evident that some disruption to normal vehicular movements will take place. The residents of Árd na Gaoithe will experience an increased disruption during the construction of the Phase 2 Section from the Ballymoneen Road to N59 Letteragh Junction. The duration of the construction activities is given as 9-12 months for this section of road.

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.

The Construction Environmental Management Plan (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.

It is noted that there is a potential blasting location to the north of Árd na Gaoithe. Our clients are concerned about the potential structural impact on houses in Árd na Gaoithe and request that pre and post-construction structural surveys of impacted properties be undertaken.

### **Conclusion**

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 Árd Na Gaoithe and impose suitable conditions on the project as appropriate.

Yours faithfully,

*Ciara Mc Guinness*

Ciara McGuinness, BA, MSc, MIPI,  
Planner

c.c Residents of Árd na Gaoithe



