Our Case Number: ABP-318220-23

An Coimisiún Pleanála

An Taisce
Galway Association - Planning Committee
26 Manor Avenue
Kingston
Co. Galway
H91C98X

Date: 13 August 2025

Re: N6 Galway City Ring Road
Galway.

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent letter in relation to the above mentioned proposed road development. The contents of your letter have been noted.

If you have any queries in relation to this matter please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

pp
Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

An Taisce

The National Trust for Ireland
Galway Association – Planning Committee

An Coimisiún Pleanála

64 Marlborough Street,

Dublin 1, D01 V902

31 July 2025

Case reference: **HA07.318220**

Description: **N6 Galway City Ring Road**

A Chara

The Planning Committee of An Taisce's Galway Association, hereinafter referred to as An Taisce, makes the following observations on the RFI Response, submitted by Galway County Council, the applicant, on 14th April 2025 to An Coimisiún Pleanála.

Before outlining the details of its submission, An Taisce notes that the RFI Response is stated to be based on the Climate Action Plan 2024. The Government has published a Climate Action Plan 2025 which was approved on 15 April 2025. An Taisce submits therefore that the applicant should provide an updated RFI Response against the Climate Action Plan 2025 before a decision is made by An Coimisiún Pleanála.

An Taisce makes this submission under four headings, as follows:

- Compatibility of the N6 Galway City Ring Road with the Climate Action Plan 2025.
- Compatibility of the Galway Transport Strategy and the Galway City and County Councils' Local Authority Climate Action Plans with the Climate Action Plan 2025.
- The N6 Galway City Ring Road will not be an effective solution to congestion in the Galway Metropolitan Area.
- The absence of a Galway Metropolitan Area Transport Strategy.

Firstly, however, we wish to provide the following crucial and relevant context on Ireland's emissions reduction obligations and the current state of progress towards compliance.

Carbon emissions in Ireland are subject to two sets of legal obligations:

- At national level - compliance with carbon budgets and corresponding sectoral emissions ceilings as per the Climate Action and Low Carbon Development Act 2015 (as amended) (hereafter referred to as the Climate Act) and its requirement to reduce national emissions in line with Ireland's fair share of global emissions; and
- At EU level - a 42% reduction in national Emission Sharing Regulation (ESR) emissions by 2030 based on a 2005 baseline.

Focusing on the Climate Act, on-time compliance with all carbon budget and sectoral ceiling tonnages is legally binding.

In the absence of immediate course correction and urgent measures, both the Climate Change Advisory Council and the Environmental Protection Agency (EPA) project a failure to comply with Carbon Budget 1 (2021-2025) and most of its sectoral ceilings and indeed with Carbon Budget 2 (2026-2030) as well. Per the Climate Act, any overshoot of a carbon budget must be carried forward into the next budget period, thereby reducing that budget. The EPA's latest emissions report (https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-greenhouse-gas-emissions-projections-2024-2055.php), published in May 2025, projects that Carbon Budget 1 for 2021-2025 (set at 295 Mt CO_2eq) will be exceeded by 8-12 Mt CO_2eq. Therefore, Carbon Budget 2 for the 2026-2030 period (currently set at 200 Mt CO2eq) will have to be reduced by the amount of that overshoot of Carbon Budget 1. The EPA report also projects that Carbon Budget 2 will be exceeded by 77-114 Mt CO_2eq (with carryover from Budget 1) and that the sectoral ceiling for electricity will be exceeded in Budget 2 as well. Even if full carbon budgets and sectoral ceiling compliance was achieved, each subsequent budget and its associated ceilings will become increasingly more stringent. However, the exceedances will mean future budgets will be **even more** restricted.

Ultimately, compliance with the obligations of the Climate Act means that all development must now take place within the constraints of our emissions reduction requirements. To comply with the constraints of the legally binding carbon budgets, carbon emissions associated with activities of a particular sector must add up to a figure within the relevant sectoral ceiling. Given the currently projected exceedances for Carbon Budgets 1 and 2 and their sectoral ceilings, budget and sectoral ceiling compliance must mean cutting back on current projected emitting activities as well as not adding further new emitting activities.

Compatibility of the N6 Galway City Ring Road with the 2025 Climate Action Plan

It is confirmed in 1. Introduction to the Part IV of 2025 RFI Response that:

"The conclusion of the EIA Assessment, i.e. with and without the proposed Project only, is that the proposed Project when considered in isolation is expected to have a permanent moderate adverse residual effect on climate during over its lifecycle following implementation of construction phase mitigation."

That is not compatible with achieving national climate objectives in the Climate Action Plan 2025.

In the Executive Summary to Part IV of 2025 RFI Response the following outcomes are falsely claimed to be *"aligned with CAP24"*:

- *"A 16% reduction in total kilometres travelled in 2030, when compared to the BAU scenario."*

The target in CAP24 (and CAP25) is a 20% reduction, not 16%.

- *"A 43% reduction in carbon emissions from transport within the area of influence of the proposed N6 GCRR in 2030, when compared to 2018 levels."*

The target in CAP24 (and CAP25) is a 50% reduction, not 43%.

In Section 5.1.5.3 CAP Do Something Demand Management Measures, the last sentence reads as follows:

> *"The CAP23 and CAP24 modelling work also assumed there would be no sale of combustion engines from the end of 2029, and so that assumption has also been used in the modelling undertaken for the purposes of this report. This is as per the 2030 KPI, set out in CAP23 and CAP24, which targets all new car registrations to be electric vehicles."*

This sentence must be read in the context of footnote 109 to Table 15.5 – Key Metrics to Deliver Abatement in Transport in CAP24:

> *"109 Private car EV targets are kept under ongoing review and may be subject to recalculation on a regular basis."*

There is no definite commitment to achieve this particular KPI – it is being *"kept under ongoing review and may be subject to recalculation on a regular basis."*

According to an article dated 30-06-2023 by the Directorate General for Communication of the European Parliament, the EU has decided that *"from 2035, all new cars that come on the market cannot emit any CO2. This is to ensure that by 2050."* The European Commission reaffirmed this in March of this year.

It is most unlikely that Ireland will be allowed to go on a solo run among the EU 27 and ban the sale of vehicles with combustion engines from the end of 2029. This means that this measure will not contribute the abatement predicted to achieve the CAP25 targets for 2030 and beyond.

According to the SIMI, EV sales fell by 23.6% in 2024 compared to 2023. In the first half of 2025 registration of EVs was up by 23,6% relative to 2024 but still less than in the first half of 2023. According to the Climate Change Advisory Committee Annual Review 2025 – Transport, the total stock of BEVs at the end of 2024 was 72,640, representing just 3.05% of the total passenger car fleet in 2024. [Climate Change Advisory Council's Annual Review 2025: Transport]. The rate of uptake of Battery EVs (BEVs) is not sufficient to achieve the 30% share of the total car fleet by 2030, 845,000 private EVs, nor 100% of private vehicle registrations to be BEVs after 2029 relied upon in the Part IV of the RFI Response.

Inputting 30% of total car fleet to be BEVs and 100% of private vehicle registrations to be BEVs after 2029 in *"the modelling undertaken for the purposes of this report"* [Part IV of the RFI Response] will have produced results which will not be achieved.

In Section 5.2.1 Emissions Reduction it is claimed that:

> *"The results of the assessment indicate that the delivery of the proposed N6 GCRR as an integral part of the GTS, as well as other national level measures as set out in CAP24, contributes significantly to the achievement of this national level target, whilst also catering for an approx., 30% increase in the population level across the metropolitan area by 2030, versus 2016 levels."*

Contributing significantly is not equal to achieving the CAP25 target! It is the implementation of Demand Management Measures in CAP25 that will contribute significantly to achieving the CAP24 targets, not the delivery of the N6 GCRR. See Plate 5.5. If the N6 GCRR is constructed between now and 2030 the significant emissions associated with its construction will actually

be detrimental to achieving the CAP25 Target of 50% reduction in emissions by 2030 as set out in CAP25 and the LACAPs.

The outcomes are not consistent with the targets in Galway County Council's and Galway City Council's adopted Local Authority Climate Action Plans.

It is claimed that the proposed N6 GCRR *"will also facilitate significant increases in sustainable transport trips and modal share."* This claim is not supported by Section 5.2.3 Improved Mode Share in which *"the impact of the delivery of the proposed N6 GCRR in the context of CAP24"* is considered and the results have been presented in Plate 5.5.

"In the BAU scenarios (without the implementation of CAP Measures) (the first two bars in the graph), the car mode share (blue bars) within the metropolitan area in the without proposed N6 GCRR scenarios is 52.6% and without the inclusion of the proposed N6 GCRR is 54.6%.

Following the inclusion of the CAP24 measures, however, the car mode share reduces by approximately 25% to only 29.6% in the CAP DS without proposed N6 GCRR scenarios (third bar of graph), inclusion of the proposed N6 GCRR in this scenario, with the CAP measures (fourth bar in graph), effectively results in no change in this car mode share (29.7%), thus giving an equivalent significant reduction in car mode share."

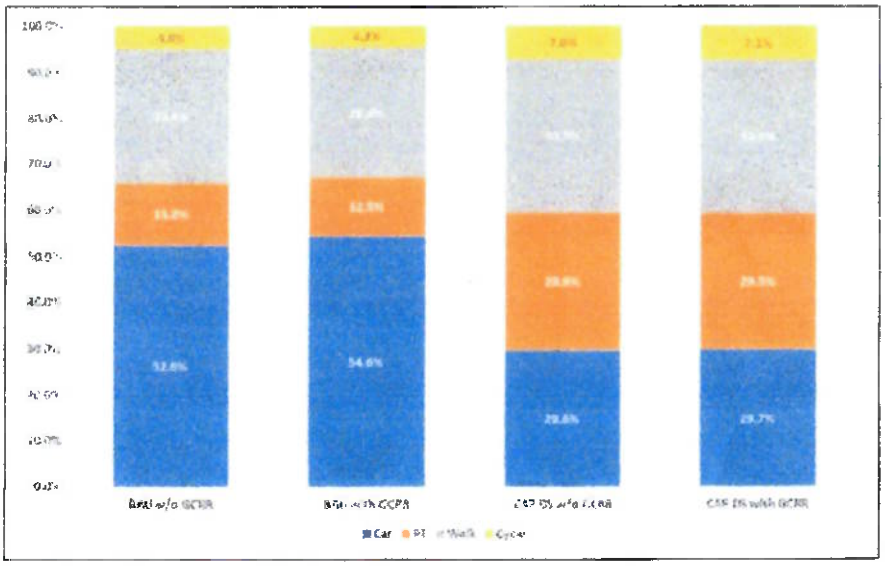


Plate 5.5 Mode Share Results, BAU vs CAP (with and without N6 GCRR)

The inclusion of the proposed N6 GCRR would contribute to an increase in car mode share from 52.6% to 54.6% if the CAP measures are not implemented. This implies that the N6 GCRR would induce demand, which is to be expected.

The implementation of the CAP25 demand management measures, set out in Section 5.1.5.3 results in a signification reduction in car mode share with or without the proposed N6 GCRR.

In Section 5.2.4 Demand for the GCRR with Demand Management Measures the impact of demand management measures on the Annual Average Daily Traffic (AADT) crossing the River Corrib is considered – See Table 5.2. Demand management measures reduce the AADT across the River Corrib by 24% in 2030 with the N6 GCRR in place

It would seem sensible to implement the CAP25 demand management measures as soon as possible which would:

- Achieve significant modal shift to more sustainable transport modes,
- Achieve the CAP25 targets, and
- Reduce congestion.

In Section 6.8.3.4 Mode Shift of the Updated EIAR the following Mode Shares are predicted:

Table 6.28 AM 2046 Mode Share Percentages

Option	% Car	% Public Transport	% Walk	% Cycle
Do-Minimum	**50.1%**	**15.1%**	**29.8%**	**5.0%**
Do-Something	**52.0%**	**14.3%**	**29.2%**	**4.6%**

Table 6.29 PM 2046 Mode Share Percentages

Option	% Car	% Public Transport	% Walk	% Cycle
Do-Minimum	**57.6%**	**12.9%**	**25.1%**	**4.4%**
Do-Something	**59.5%**	**11.8%**	**24.6%**	**4.1%**

It is clear from Tables 6.28 and 6.29 that the Do-Something option actually results in an increase in car mode share and a reduction in sustainable transport mode shares, in both AM and PM, in 2046 compared to the Do-Minimum option.

For comparison purposes the following table includes mode shares from the figure in Plate 5.5:

Scenario	% Car	% Public Transport	% Walk	% Cycle
BAU w/o GCRR	52.6%	13.2%	29.4%	4.8%
BAU with GCRR	54.6%	12.5%	28.6%	4.3%
CAP DS w/o GCRR	29.6%	29.9%	33.5%	7.0%
CAP DS with GCRR	29.7%	29.5%	33.6%	7.1%

The availability of the GCRR in the 'Business as Usual' (BAU) scenario would actually result in a small increase in car mode share and small reductions in sustainable travel modes. This would be contrary to the objectives of CAP25.

The implementation of CAP25 demand management measures would, however, result in a very significant reduction in car mode share, a very significant increase in Public Transport mode share and significant increase in both walking and cycling mode shares which would be compatible with CAP25.

In Chapter 3 of the 2018 EIAR, the need for the proposed road development is stated to *"arise directly from the necessity to address the very serious transport issues facing Galway City and its environs. A transport solution has been developed, and the proposed road development forms an essential part of this solution."*

Source: https://www.n6galwaycityringroad.ie/sites/default/files/media/N6%20EIAR%20-%20Chapter%203%20Need%20for%20the%20Proposed%20Road%20Development.pdf

The stated primary objective of the proposed N6 Galway City Ring Road is therefore to create additional road infrastructure in the Galway Metropolitan Area, not to reduce transport emissions and therefore not to support the objectives of the Climate Action Plan 2025.

Specifically, Section 14 (Transport) of Climate Action Plan 2025 sets out the progress to date in achieving the emission reduction objectives and the key targets:

Trajectory: *"64.1% of the first sectoral carbon budget was expended in the period 2021-2023. While this level could be consistent with the sector being compliant with its carbon budget to 2025, an annual 12.4% decrease would be required in 2024 and 2025 to stay within the first carbon budget."*

Key targets: *"Key targets include:*

- *a 20% reduction in total vehicle kilometres travelled relative to business-as usual,*
- *a 50% reduction in fuel usage, and*
- *significant increases to sustainable transport trips and modal share."*

Predicted Emissions from the Construction Phase

In Table 17.7 Construction and Maintenance Stage Greenhouse Gas Emissions of the Updated EIAR, the total associated emissions over the construction period are stated as being 126,332 tonnes CO_2eq.

That is a 17% reduction on the carbon emissions for the construction phase of 152,067 tonnes CO_2eq set out in the Statement of Evidence of Sinead Whyte, Arup at the Oral hearing on 20 February 2020. Table 4 from the Statement of Evidence is set out below.

Table 4: Carbon Emissions for the construction phase of the proposed road development

Construction Phase	Carbon Emissions (CO_2e Tonnes) (EIAR)	Revised Carbon Emissions (CO_2e Tonnes)
Year 1	150,000 worse case year	38,240
Year 2		52,254
Year 3		61,393
Total	275,000	152,067

To put the figure of 126,322 tonnes of CO_2eq in context, it would be the equivalent to the emissions from the construction of 3,828 detached houses. This is arrived at using the figure of approximately 33 tonnes of CO_2eq generated by the construction of a detached house. This figure is used in Section 17.5.2.2 of the Updated EIAR.

As Carbon Budgets are fixed, if the building of the N6 GCRR would account for total emissions over the construction period of 126,332 tonnes CO_2eq, it would be necessary to balance this by an equivalent reduction somewhere else. That could mean having to forego the building of a very significant number of very badly needed homes to address the housing crisis.

Predicted emissions from the operation of the proposed scheme

In Table 17.8 the difference between operational phase CO_2eq emissions between the Do-Minimum (DM) Scenario compared to the Do-Something (DS) Scenario is provided for the Opening Year (2031) and Design Year (2046), namely 498,381 tonnes of CO_2eq in 2031 and 126,054 tonnes of CO_2eq in 2046. The assumptions behind a reduction between 2031 and 2046 are not stated. Table 17.8 is reproduced below:

Table 17.8 Predicted Change in CO_2eq Emissions in 2031 and 2046 relative to Ireland's Climate Commitments

Year	Predicted DM Annual Emissions (tonnes/yr)	Predicted DS Annual Emissions (tonnes/yr)	Change DM to DS (tonnes/yr)	% Change DM to DS	% Change in CO_2eq relative to the 2030 Transport Budget
2031	493,796	498,381	4,584	0.93	0.0764
2046	125,392	126,054	662	0.53	N/A

An Taisce notes that the figure for Predicted DS Annual Emissions in 2031 of 498,381 tonnes of CO_2eq in Table 17.8, arising from the operation of the proposed road development, appears to be extraordinarily high. By comparison, the 2018 Baseline Emissions from the transport sector in County Galway entirely included in the Galway County Council's LACAP 2024-2029 is lower at 478,000 tonnes CO_2eq. It is 5.6 times higher than the 2018 Baseline Emissions from the transport sector in Galway city included in Galway City Council's LACAP 2024-2029 which is 88,290 tonnes of CO_2eq. The applicant must be asked to verify, and if necessary correct, the numbers included in the Updated EIAR.

The change in emissions from DM to DS Scenarios of +4,584 tonnes/year CO_2eq in 2031 and +662 tonnes/year CO_2eq in 2046 are remarkably small when compared to the predicted emissions as a result of the operation of scheme submitted previously by the applicant. The predicted change in emissions from the operation of the proposed scheme in the various submissions by the applicant from 2018 to 2025 are outlined in the following table.

Predicted change in emissions from the operation of the proposed scheme in the various submissions by the applicant from 2018 to 2025

Source	Year	Percentage of EVs in the car fleet	Total change in emissions as result of the operation of the proposed scheme (DM to DS)
Table 16.39 in the Original EIAR, 28 September 2018	2024		+26,059
	2039		+35,776
Table 5, Appendix A.8.3 Air Sensitivity Analysis, to the Response to RFI 30 Aug 2019	2039		+55,783
	2039		+54,402
Evidence of Sinéad Whyte, Arup, at the Oral Hearing 20/02/2020 – Updated Table 5 and Table 6	2039		+45,627
	2039	22%	+37,214
	2039	32%	+33,435
Updated EIAR Section 17. Climate, 28/03/2025	2031	30%	+4,584
	2046	30%	+662

An Taisce submits that An Coimisiún Pleanála must seek a comprehensive explanation from the applicant for the remarkably low increase in the predicted CO_2eq emissions included in the Updated EIAR compared to the predictions included in previous submissions by the applicant.

An Taisce requests that the applicant be asked to provide (by way of a Further Information Request from An Coimisiún Pleanála) a numerical analysis of each of the assumptions made that 498,381 tonnes of CO_2eq in 2031 would reduce to 126,054 tonnes of CO_2eq in 2046. Without such an explanation, An Taisce suggests it cannot be known how realistic these assumptions are and whether they can be relied upon for the purposes of assessing the proposed development.

A series of mitigation measures have been incorporated into the construction design with the goal of reducing the embodied carbon associated with the construction phase of the Project. These measures include:

- The prediction made that the construction phase would generate 126,322 tonnes of CO_2eq, assumes that concrete would be made using a proportion of granulated blast furnace slag (GGBS). This measure is claimed to have estimated saving of c.1,034 tonnes of CO_2eq in the current design (50% of cement as GGBS) of the Project.

An Taisce suggests that, given scale of the proposed development, that the applicant be asked (by way of a Further Information Request) what volumes of GGBS can currently be sourced annually within Ireland, versus what volumes would be needed in the construction phase.

As regards greenhouse gas emissions during the operational phase, there is no detail as to what assumptions were made to achieve a reduction from 498,381 tonnes of CO_2eq, in the DS scenario 2031 to 126,054 tonnes of CO_2eq in 2046.

An Taisce suggests that, given the significance of the claimed reductions, that the applicant be asked (by way of a Further Information Request) as to what are the 2024 baseline details for tonnes equivalent of CO_2eq, as well as detailed information with sources used of each assumption made upon including its numerical contribution to the overall reductions.

Questions which An Taisce sees as being unanswered include whether the Do-Minimum (DM) scenario or Do-Something (DS) scenarios include assumptions about emissions generated by (a) private vehicles versus public transport, (b) use of petrol vehicles, diesel vehicles, hybrid vehicles and electric-only vehicles, and (c) cycling and walking versus private vehicles/ public transport.

One stated assumption in Section 17 is that there would be carbon emissions reductions through the implementation of a speed limit of 100km/hr which is less than the 120km/hr that usually applies to motorway schemes. The applicant doesn't have the authority to set speed limits on national roads.

An Taisce submits that claiming emission reductions for something not done (reducing the speed limit on the N6 Galway City Ring Road from 120 km/hr to 100km/hr) is flawed logic as such reductions would arise from national policies on speed limits rather than design considerations.

Regardless of what clarity is provided by the Request for Information which An Taisce submits be provided by the applicant, the applicant has stated that the proposed N6 Ring Road will generate 493,796 tonnes of CO_2eq in 2031. (Table 17.8)

The 2018 Baseline Emissions Inventory in Galway City Councils LACAP includes a figure of 88,290 tonnes CO_2eq for transport emissions. The predicted DS Annual Emissions of 498,381 tonnes of CO_2eq in Table 17.8 is 5.6 times that figure.

The target in Galway City Council LACAP is to reduce emissions by 51% by 2030. If that reduction is applied pro rata to transport emissions it would mean reducing transport emissions to 43,262 tonnes CO_2eq by 2030. The predicted DS Annual Emissions of 498,381 tonnes of CO_2eq in Table 17.8 is 11.5 times that figure.

It is clear from the above that the predicted greenhouse gas emissions from the proposed N6 Galway City Ring Road are enormous.

An Taisce submits that 498,381 tonnes of CO_2eq predicted to be generated by the proposed N6 Galway City Ring Road in 2031 is not compatible with and does not support the achievement of the Key Targets in Climate Action Plan 2025, which include: *"20% reduction in total vehicle kilometres travelled relative to business-as usual, 50% reduction in fuel usage, and significant increases to sustainable transport trips and modal share."*

Climate Act Obligations on Relevant Bodies

We would highlight that Section 15(1) of the Climate Action and Low Carbon Development Act 2015 (as amended) places obligations on relevant bodies, including An Coimisiún Pleanála in this case:

> *"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—*
>
> *(a) the most recent approved climate action plan,*
>
> *(b) the most recent approved national long term climate action strategy,*
>
> *(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,*
>
> *(d) the furtherance of the national climate objective, and*
>
> *(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State."*

The Climate Action Plans are bound by the carbon budgets and sectoral ceilings, therefore, per s.15(1) of the Climate Act as amended in 2021, it is submitted that An Coimisiún Pleanála as a relevant body is also bound to perform their planning decision making functions in a manner consistent with the budgets and sectoral ceilings.

Compatibility of the Galway City Climate Action Plan and the Galway Transport Strategy with the 2025 Climate Action Plan

Section 14 (Transport) of CAP25 sets out the scale of challenge for the transport section to achieve the national emission reduction targets:

Trajectory: *"64.1% of the first sectoral carbon budget was expended in the period 2021-2023. While this level could be consistent with the sector being compliant with its carbon budget to 2025, an annual 12.4% decrease would be required in 2024 and 2025 to stay within the first carbon budget."*

Key Targets: *"Key targets include:*

- *20% reduction in total vehicle kilometres travelled relative to business-as usual,*
- *50% reduction in fuel usage, and*
- *significant increases to sustainable transport trips and modal share."*

The Galway City Council Local Authority Climate Action Plan 2024-2029 has as its stated aims to create a low carbon and climate resilient city, by delivering and promoting best practice in climate action, at the local level. The vision for the plan is to be a climate resilient, biodiversity rich, environmentally sustainable and carbon neutral city by no later than the end of 2050.

The plan includes a commitment by Galway City Council to reduce its emissions by 51% versus a 2018 baseline by 2030.

The plan lists as an action to support the development of greater accessibility, modal shift and active travel throughout Galway City through implementation of work programmes and Galway Transport Strategy (GTS). Such measures are not quantified in the plan in terms of emissions in tonnes $C0_2eq$ and supporting the development of those measures is, however, not the same as accepting responsibility for achieving any measurable reductions in emissions.

The 2016 Galway Transport Strategy was written many years before any of the Climate Action Plans were published. It cannot therefore claim to be aligned with the Climate Action Plan 2025.

The N6 Galway City Ring Road is included as one of several projects included in the Galway Transport Strategy, including radial bus priority measures, higher frequency bus services, active travel measures - cycling, walking, etc.

None of these projects, including the N6 Galway City Ring Road, have any stated emission reduction potential. The Galway Transport Strategy has no stated measurable goals for emission reductions. When a route selection analysis was undertaken which led to the preferred route of the N6 Galway City Ring Road, all possible routes were required to commence at Briarhill and end at the R336 west of Bearna. Road infrastructure solely for the purpose of creating a new river crossing or improving access to Parkmore Business Park were not assessed. The route selection process was based on a criterion of reducing emissions in the city centre rather than in Galway Metropolitan Area.

In conclusion, An Taisce submits that the Galway Transport Strategy cannot be stated to be a significant effort by the applicant to achieving the goals of the Climate Action Plan 2025.

The N6 Galway City Ring Road will not be an effective solution to congestion in the Galway Metropolitan Area

The Department of Transport published a paper in May 2025 – The Economic Cost of Congestion in the Regional Cities 2022-2040.

It concludes that *"additional road infrastructure may reduce congestion temporarily; however, demand will eventually overtake the capacity of this infrastructure"*. Below are sections from the paper that predict a bleak outlook for Galway. The costs given are at 2016 prices which are now entirely out of date.

The methodology used to calculate the cost of congestion is set out on pages 15 and 16. It is the same as used in *the 2023 GDA Cost of Congestion Study.* There is the following warning about the appropriateness of this methodology to the regional cities at the bottom of page 16:

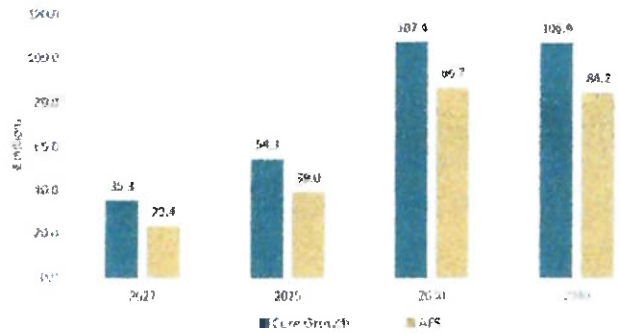
> *"short-term congestion will not be reflected in the model, potentially understating the actual cost of congestion and distorting the cost of congestion in the regional cities more than in Dublin due to the lower overall congestion levels."*

From bottom of page 22 to top of page 23

> *"Figure 14 presents the headline results of the analysis of the cost of congestion in the GMA. The results show that the cost of congestion is projected to grow from €35.3 million in 2022 to €106.9 million in 2040, which is an increase of approximately 203% in the Core Growth Scenario, while a slight decrease from €107.4 million in 2030 to €106.9 million in 2040 is expected."*

Figure 14 - Annual Cost of Congestion

Figure 14 - Annual Cost of Congestion



Also, on page 23 - The most important sentence is highlighted below:

> *"This result reflects an increase in demand as a result of population and economic growth over the period. The cost of congestion is lower for the AFS than the Core Growth Scenario, which is projected to grow from €23.4 million in 2022 to €84.2 million in 2040.*

This is an increase of approximately 261%. Under this scenario, the cost of congestion is 34% lower in 2022 at €23.4 million and 21% lower in 2040 at €84.2 million. This demonstrates that the proposed measures for demand management such as the promotion of remote and flexible working will be able to reduce the cost of congestion. The cost of congestion decreases slightly between 2030 and 2040. This result indicates that planned infrastructural developments between 2030 and 2040 could relieve some congestion in GMA. However, the overall cost increases over the period in both scenarios due to economic and population growth. While a number of provisions of sustainable modes in the GTS such as the Galway Metropolitan area bus and cycle plan and Ceannt Station redevelopment will play a role in reducing potential cost of congestion, the results show that a more proactive deployment of sustainable transport will be needed to tackle growing cost of congestion."

On pages 25: The Ring Road is assumed to in place in 2040, but congestion continues:

"In 2040, Galway outer bypass is assumed to be in place according to the GTS published in 2016. The modelled flows for 2040, illustrated in the figure above, show that the bypass will have heavy traffic flows for private vehicles although a slight decrease in cost of congestion is observed between 2020 and 2040. However, the junctions connected to the outer bypass will also experience heavy traffic flows. "

Page 26: Several statements to effect that the "bypass" will not fix the congestion problem.

"However, the junctions connected to the outer bypass will also experience heavy traffic flows. This indicates that the bypass will provide alleviation from congestion in the short term and will continue to facilitate cross city journeys throughout the period considered. However, increased transport demand will eventually result in the bypass becoming congested without further intervention. While traffic flows will become lighter and volumes in junctions will be less in 2040 in the city centre, overall congestion outside the city centre and around the metropolitan area will remain a challenge, even with planned transport provisions. Certain junctions will see reduced congestion due to improved infrastructure, while the overall level of congestion in the city will rise given the higher volume of vehicles on the road. Planned interventions are not sufficient to offset the increase in congestion in the city centre and wider metropolitan area."

"In the GMA, the cost of congestion is projected to grow overall across the period due to population and economic growth with the exception of a slight decrease expected between 2030 and 2040. A share of morning interpeak (lunchtime) will grow significantly from 14% in 2022 to 32% in 2040, indicating congestion is likely to occur throughout the day."

"Finally, the additional road infrastructure may reduce congestion temporarily; however, demand will eventually overtake the capacity of this infrastructure."

The Ring Road may temporarily reduce congestion for a very few years after it is built but by 2040, the demand will exceed its capacity.

One of the key findings of the 2022 OECD Report "Redesigning Ireland's Transport for Net Zero: Towards Systems that Work for People and the Planet" was that: "The Irish transport system fosters growing car use and emissions by design and is thus unfit to enable the country to meet its greenhouse gas reduction goals while improving well-being. Growing car use in Ireland is largely determined by car-dependent transport and urban systems, organised around increased mobility and characterised by three unsustainable dynamics: induced car demand, urban sprawl, and the sustainable modes low-attractiveness trap." (Source: https://www.oecd.org/content/dam/oecd/en/publications/reports/2022/10/redesigning-ireland-s-transport-for-net-zero_e4149b08/b798a4c1-en.pdf)

Therefore, any proposed new national roads infrastructure must be analysed through the lens of the "induced-demand effect" for vehicle travel, whereby increases in highway capacity attract new traffic. (See for example: 'Induced demand and rebound effects in road transport': https://www.sciencedirect.com/science/article/abs/pii/S0191261510000226)

From Page 33:

"When considering population size, the cost of congestion in the GMA is the highest in 2022 at €411, indicating considerable economic impact in this area. In 2040, while the GDA's cost of congestion per population is projected to have the most significant increase among all cities, increasing by 294% to €1,047 per person, the GMA's cost of congestion is also set to increase significantly, more than doubling to €891, which is a 117% increase. The WMA, despite its smaller scale, shows a sharp increase of 238%, reaching €277 per person in 2040."

An Taisce submits that An Coimisiún Pleanála should ask the applicant to comprehensively address the findings in the Department of Transport's paper.

The Galway Metropolitan Area Transport Strategy (GMATS)

The consideration of appropriate sustainable transport solutions for the Galway Metropolitan Area should be informed by the Galway Metropolitan Area Transport Strategy, which is still in preparation.

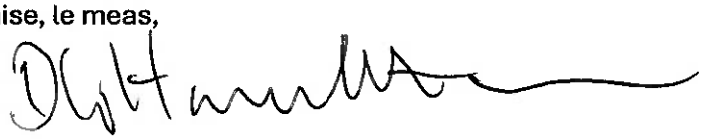
The Galway Transport Strategy, of which the N6 GCRR was a part, was adopted in 2016 and is now out of date. It was adopted long before the introduction of the first Climate Action Plan in 2019. The review of the GTS is long overdue: *"A planned evidenced based review of the GTS is due to commence in 2022 and be completed in 2023 in collaboration with Galway County Council, the National Transport Authority (NTA) and all other stakeholders."* [GCDP 2023-2029]

Metropolitan Area Transport Strategies (MATS) have been prepared for all the other regional cities - Cork in 2020, Waterford and Limerick|Shannon, both in 2022. The preparation of the Galway MATS (GMATS) has been proceeding at a snail's pace. Its preparation was suspended earlier this year pending a decision on the N6 GCRR. It would have been preferable to have completed the GMATS which could then have informed An Coimisiún Pleanála's decision on the proposed N6 GCRR.

Conclusion

In the absence of adequate further information and clarification, and a current Metropolitan Area Transport Strategy, the permission sought for the proposed road development should be refused.

Is mise, le meas,



Derrick Hambleton

on behalf of the Planning Committee of An Taisce - Galway Association

Note: Please ensure that your office sends out the acknowledgement to this submission (as required by Article 28(4) of the Planning & Development Regulations 2001 to the following address: 26 Manor Avenue, Kingston, Galway, H91 C98X.

Sources used: RFI Response (Chapter 17 of updated EIAR)

https://pdf.browsealoud.com/PDFViewer/_Desktop/viewer.aspx?file=https://pdf.browsealoud.com/StreamingProxy.ashx?url=https://www.pleanala.ie/publicaccess/FurtherInformation/318220/Galway%20City%20Ring%20Road%20RFI%20Response%202025/Part%20VI%20Updated%20EIAR/Volume%202%20Chapters/Updated%20EIAR%20Chapter%2017.pdf?r=649203182741&opts=www.pleanala.ie#langidsrc=en-gb&locale=en-gb&dom=www.pleanala.ie

Source: Climate_Action_Plan_2025_updated_cover.pdf

https://assets.gov.ie/static/documents/Climate_Action_Plan_2025_updated_cover.pdf

Source: Galway Transport Strategy | Galway City Council

https://www.galwaycity.ie/services/roads-and-transport/galway-transport-strategy

Source: Department of Transport paper – The Economic Cost of Congestion in the Regional Cities 2022-2040

https://www.gov.ie/en/department-of-transport/publications/the-economic-cost-of-congestion-in-the-regional-cities-2022-2040/