Our Case Number: ABP-318220-23

An Coimisiún Pleanála

Enda McGovern
20 Abbey Glen
Athenry
Co. Galway
H65 EK65

Date: 13 August 2025

Re: N6 Galway City Ring Road
Galway.

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed road development. Please accept this letter as a receipt for the fee of €50 that you have paid.

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,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

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Observations to An Coimisiún Pleanála on

"THE SUBMISSION BY GALWAY COUNTY COUNCIL TO AN BORD PLEANÁLA (now called An Coimisiún Pleanála) OF SIGNIFICANT ADDITIONAL DATA IN RELATION TO CASE REFERENCE NUMBER **ABP-318220**"

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31st July 2025

Personal Background:

I believe it is important to provide some background to this submission. I worked for 2 years in construction after graduating with my Civil Engineering degree in 1985. Thereafter, in graduating with an MBA, I worked in London for CRH in a commercial capacity. In 1994, I decided to move into a teaching role in Higher Education and joined Brunel University. Over a period I completed my Ph.D in 2020 on the topic of climate change, the Thesis title was

"The Role and Influence of Social Marketing in the Evolution of the Environmental Citizen".

This work examined how society could be persuaded to change their behavior given the arrival of an increasing '*risk society*', primarily due to changing climate patterns caused by climate change. As you can imagine, after now some 30 years in passing, this risk has increased exponentially and will continue to do so at speed in the coming years, not decades. We are all faced with changing weather patterns, and those becoming more destructive with each passing year. In 1999, at the end of Chapter 2 in this work, I could not have described the current situation in 2025 any better:

> "The capacity or willingness of mankind to adapt their lifestyle so as to take into account predicted environmental hazards, and thereafter to contribute wherever possible towards a reduction of same, has yet to be seriously confronted. But as Durning (1992) concludes it is the survival of the planet that is at stake:
>
> *"If the life supporting ecosystems of the planet are to survive for future generations, the consumer society will have to dramatically curtail its use of resources" (Durning 1992: 25)"*

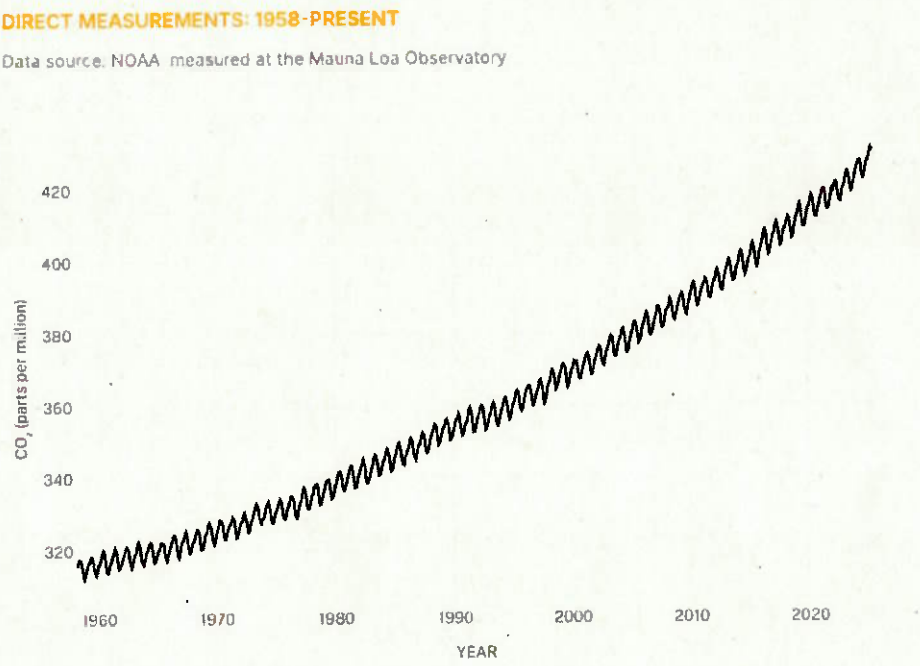
On the basis of Durning's quote, I implore you to refuse the continued development of the N6 Galway City Ring Road for the sake of our children and of future generations to come.

Submission Overview

The N6 Galway City Ring Road plans are being re-examined mainly due to the national climate targets not being considered in the 2018 submission. And yet they are still not being fully considered in the new submission. I imagine many other submissions will address this detail and I will leave this argument to them.

The one data point I would stress is the unit of measurement for the concentration of carbon dioxide in the atmosphere, described as parts per million (ppm). Carbon dioxide (CO_2) is an important heat-trapping gas, also known as a greenhouse gas, that comes from the extraction and burning of fossil fuels (such as coal, oil, and natural gas), from wildfires, and natural

processes like volcanic eruptions. Many scientific and government experts agree that 350ppm is a 'safe' level of carbon dioxide to be in place for the world to exist in harmony with climate and nature. And, when Greta Thunberg was born in 2003, that level was measured @ 375ppm. The latest average daily measurement, collected on July 31st, 2025, at the Mauna Loa Observatory in Hawaii was measured @ 425.21ppm, see visual. This is the primary data point that one needs to know to realize that humanity is in trouble. A concentration of atmospheric carbon at this level is very concerning as it significantly exceeds pre-industrial levels and is a prime contributor to global warming and climate change. And, while it is meant to be coming down, it is actually still rising because of the lack of change in human behavior, such as purchasing electric cars, installing solar panels, building more wind farms, flying less, eating less red meat, to name a few! The World Meteorological Organization (WMO) forecasts that annual temperatures between 2025 and 2029 will likely be between 1.2°C and 1.9°C higher than pre-industrial levels (1850-1900).



This Submission will focus on three key areas.

1. *The Concept of 'Induced Demand'*
2. Adopting a Precautionary Approach to Climate Change in Planning Applications
3. *The Construction Site and Resulting Motorway will be Devastating for Nature*

1.0. The Concept of 'Induced Demand'

There is significant evidence in research that building new roads often increases the desire for drivers to make new journeys—a phenomenon known as '*induced demand*'. Goodwin (2016) reviewed numerous UK transport schemes, finding that a typical road expansion induces **10% more traffic in the short term** and up to **20% more in the long term** on average, with some individual projects exhibiting double those proportions during peak periods

And the consequences from same can:

a) **Reduced Congestion (Initially):**
    a. New roads or expanded roadways initially reduce travel times.
    b. This makes driving more attractive and the necessary stimuli for the car to be used more often.
b) **Behavioral Response:**
    a. People who previously avoided certain trips due to traffic may now decide to drive.
    b. Other travelers may be encouraged to switch from public transit or carpooling to solo driving.
    c. People may move farther away from the destination, to possibly live as it may be more affordable knowing the drive is now easier.
c) **Long-Term Effects:**
d) Over time, the original extra capacity begins to fill up.
e) Congestion often returns to previous levels or worse.
f) The road essentially "creates" new traffic by encouraging more driving.
g) Improved roads spur relocation and new developments, leading to further travel demand increase

But the Irish transport system has always promoted car ownership and use. A 2022 OECD Report, titled '***Redesigning Ireland's Transport for Net Zero: Towards Systems that Work for People and the Planet***' confirmed 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 wellbeing. As we pass through 2025, it is evident that there have been no significant efforts to reduce this thinking, 'build more roads' is the primary calling of the engineering and political communities to satisfy short term consumer demand. And the Galway Ring Road is a prime example.

One observation is that the Irish transport system fosters growing car use and emissions by design, rendering it unfit to enable the State to meet its greenhouse gas reduction goals while improving wellbeing. "*Growing car use in Ireland is largely determined by car-dependent transport and urban systems, organised around increased mobility and characterized by three unsustainable dynamics: induced car demand, urban sprawl, and the sustainable modes low-attractiveness trap,*" the report states.

Building roads is not a long-term solution to congestion unless it's paired with demand management (like congestion pricing), better public transit options, or land-use planning. And this has been an evident weakness in all consideration of the Galway Ring Road. Yes, small improvements are being made to the public bus system, with clear evidence of contentment among certain passengers on the improved routes and timetables now on offer. However there has been minimal investment to cater for other options aside from building more roads. For example, while increasing the frequency of trains on the Galway-Dublin train service, the line between Galway and Athlone continues to be single-track, meaning trains traveling in both directions must reach certain stations to order to bypass each other. The severe restrictions that this causes on expanding timetables to allow for more scheduling options is obvious.

Are we really serious about solving the transport problem with a public transport system that is more akin to 1946 than it is to 2025? Yes, the speed of trains has increased but the number of bottlenecks in the system has remained since the conception of the railway infrastructure. While Irish Rail is developing plans to increase the number of trains and platform capacity, especially at Ceannt Station in Galway, utilizing a single line railway track is simple a massive deterrent to any significant growth in passenger numbers travelling by train. And this is especially true for local timetables as they are severely inhibited by limited access to the track. The first public commuter single track railway system is Ireland launched in 1834 and ran between Dublin and Dun Laoghaire. And, now in 2025, the Galway to Athlone line is still single track!! Can anyone please explain the logic in attempting to build a modern day transport infrastructure that only focuses on one mode of transport: car use!

Other large Irish road projects, such as the M50, have provided ample evidence of 'induced demand' in play. As Frank McDonald, Environment Editor of the Irish Times, reported in late 2004, "*Even after an investment exceeding €800 million in new interchanges and extra traffic lanes, Dublin's M50 motorway will remain congested, an environmental impact statement (EIS) on the 'upgrade' concedes*". The EIS goes on to state that "*It is accepted that to protect the benefits of the scheme, it will be necessary in the future to implement specific demand management measures to control the level of traffic growth on the motorway*". And we would know that as the first introduction of Motorway Toll roads, introduced on the West Link Bridge between Blanchardstown and Tallaght. Between the 2008 State Buy out and early 2025, motorists have paid nearly €2.2 billion in M50 tolls.

2.0. Adopting a Precautionary Approach to Climate Change in Planning Applications.

The Precautionary Approach to Climate Change in Galway *refers to the principle of'taking preventive action to reduce climate risks and environmental harm, even in the face of scientific uncertainty'*—especially as it applies to Galway City and County.

This concern is clearly documented in the Strategic Flood Risk Assessment Plan 2023-2029, see copy of text below. This wording recommends that a precautionary approach to climate change needs to be adopted, see bolded below. While this specific mention of focus is on flooding, a real threat from such a huge road construction project is all applicable to all things nature driven. Such statements require the Local Authority, or the Planning appeals process, to make decisions based on *a high degree of caution* and when in receipt of increased evidence of climate events, such as increased levels of annual rainfall, are on an upward trajectory. The further evidence of climate changes in changing weather patterns is evident in every country around the world, whether it is forest fires in Turkey killing 17 people or flooding in Texas killing 108 people, including 37 children.

> '***The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009***' recommends that a **precautionary approach to climate change** is adopted due to the level of uncertainty involved in the potential effects.
>
> In this regard, the Guidelines recommends:
>
> 1. Recognising that significant changes in the flood extent may result from an increase in rainfall or tide events and accordingly adopting a cautious approach to zoning land in these potential transitional areas; including taking into account

predictive and historical indicators of flood risk, documented Council knowledge of lands, Council Engineer review and input into indicators and flood zones (local knowledge), the potential source and direction of flood paths from rivers and streams, vegetation indicative of flood risk and the locations of topographic/built features that coincide with the flood indicator related boundaries/topographical survey.

3.0. *The Construction Site and Resulting Motorway will be Devastating for Nature*

While building shorter by-passes may assume a lower level of risk, engaging a building site of the Ring Road for a length of 18km (11 miles) carries with it a huge degree of risk for the environment. Construction Projects, as large as this, can indeed raise significant concerns regarding their effects on local communities and nature, including:

Key Environmental Impacts of N6 Galway City Ring Road Construction:

a) *Habitat Destruction*
Large-scale construction will lead to the destruction of habitats for flora and fauna, especially in more sensitive ecological areas like boglands, forests, or river valleys.

b) *Fragmentation of Ecosystems*
Motorways can split ecosystems, disrupting insect movement routes and separating populations, which can reduce biodiversity over time.

c) *Water Pollution*
Runoff from construction sites can carry sediments, oils, and pollutants into nearby water bodies, possibly affecting fish life.

d) *Noise and Air Pollution*
Heavy machinery and increased traffic during and after construction introduce noise and air pollution, affecting both humans and animals.

e) Carbon Footprint
The construction and long-term use of motorways contribute significantly to greenhouse gas emissions. This is evident from all studies and yet seems to be glossed over for the Ring Road with a completely insufficient analysis presented in the submitted documentation.

f) Localized Flooding
It is impossible with a construction project of such a long length to guarantee that no possibility of localized flooding will occur given the massive change to the topography and seepage patterns always in place. After such a project, local land and houseowners owners may discover new issues that never existed before, and possibly primarily through continued changing weather patterns bringing in more rain on an annual basis. Remember a warmer atmosphere can hold more moisture in the clouds, roughly 7% more for every degree Celsius increase in temperature (Teagasc). Currently we are close to 1.5C warming in recent years, therefore enabling an extra 10% of water to be carried in storm clouds arriving over Ireland! One MUST ask how is such rainfall designed to seep away when you continue to facilitate massive areas of land to be hard surfaced with road construction. The risk of localized flooding is simply being significantly increased by giving permission for this N6 Galway City Ring Road to be built.

In conclusion, the opposition to the N6 Galway City Ring Road is rooted in significant environmental and planning concerns. This specific submission highlights that the project's re-

examination, while prompted by a failure to consider national climate targets in 2018, still falls short of fully addressing these critical issues in the new submission. A central argument is the concept of continued *'induced demand,'* where building new roads ultimately increases traffic and congestion over time, a phenomenon supported by evidence from other large Irish road projects, such as the M50. Furthermore, the submission advocates for the scientific 'precautionary principle' to climate change, emphasizing that a project of this scale will, for example, significantly increase the risk of localized flooding due to the hard surfacing of land, especially given the increased annual rainfall and warmer atmospheric conditions. Finally, the construction itself is detailed to be devastating to nature, causing habitat destruction, water and air pollution, and contributing to greenhouse gas emissions, all of which contradict the urgent need to address the rising concentration of atmospheric carbon dioxide, which has reached a concerning level of 425.21ppm

I hope this submission will help to shed light on the reasons why this application, without reservation, must be denied.

Respectfully yours

Enda McGovern