Our Case Number: ABP-318217-23

An Coimisiún Pleanála

Galway City Harriers Athletic Club
c/o Niall Murphy
11 McBride Avenue
Mervue
Co. Galway

Date: 31 July 2025

Re: N6 Galway City Ring Road Motorway Scheme 2018 and Protected Road Scheme 2018 Galway.

Dear Sir / Madam,

An Coimisiún Pleanála has received your submission in relation to the above-mentioned road scheme and will take it into consideration in its determination of the matter.

The Commission will revert to you in due course in respect of this matter. If you have any queries in the meantime please contact the undersigned officer of the Commission.

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

MS02

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64 Marlborough Street
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Lauren Griffin

From: Lauren Griffin
Sent: Thursday, 31 July 2025 13:10
To: nmurphy@panelsoft.com
Subject: RE: Observations ON Galway City Ring Road ref 318217

A Chara,

The Commission acknowledges receipt of your email; official correspondence will issue in due course.

Kind regards,

Lauren

From: Niall Murphy <nmurphy@panelsoft.com>
Sent: Tuesday, 29 July 2025 22:02
To: LAPS <laps@pleanala.ie>; SIDS <sids@pleanala.ie>
Subject: Observations ON Galway City Ring Road ref 318217

Our club's original observation was when this project was originally submitted in 2018. Document available at https://www.pleanala.ie/publicaccess/Submissions/302848/ABP-302848-18%20-%20Submission%20-%20Galway%20City%20Harriers.pdf

I attach our submission in response to the latest request for observations on planning reference 318217.

regards,

Niall Murphy, on behalf of Galway City Harriers Athletic Club

On 29/07/2025 15:57, LAPS wrote:

> Hi Niall,
>
> If you have submitted an observation before, we can accept further submissions via email.
>
> Kind regards,
>
> Lauren

From: Niall Murphy <nmurphy@panelsoft.com>
Sent: Monday 28 July 2025 22:22
To: SIDS <sids@pleanala.ie>
Subject: online observations and a fee

It is my understanding that if someone has subitted an observation on the original planning application then they do not have to pay a fee when submitting to ACP. But the web site does not give an option to state a reference to the original observation. And so there is no way to proceed without paying the fee. Does this mean that if you are entitled to observe, but ae not required to pay then the obseration has to be sent in by post?

The specific case I am interested in is the Galway City Ring Road and part of the notice in the City Tribune is below, but my question above applies to any observation I think.

4. No fee is required to make an objection or submission for landowners or others with a legal interest in land in the N6 Galway City Ring Road Protected Road Scheme 2018 and/or the N6 Galway City Ring Road Motorway Scheme 2018 or those parties/individuals who have already made a valid written submission to the Board (now called An Coimisiún Pleanála) regarding the application for the N6 Galway City Ring Road (Case Reference ABP-302885-18.

regards,

Niall Murphy

Submission 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-318217-23"

Observation from Galway City Harriers Athletic Club

27 July 2025

Contributors:

Brian Bruton (GCH Board Member), Michelle Van Kampen, Niall Murphy, Ruth Molloy

Correspondence Address: Seamus Lynch, GCH Secretary, Poulnabanny, Athenry,Co.Galway H65 D253

Original Submission to planning reference 302848 made by GCH is available on-line at https://www.pleanala.ie/publicaccess/Submissions/302848/ABP-302848-18%20-%20Submission%20-%20Galway%20City%20Harriers.pdf

Introduction and Summary

While we acknowledge that the main reason for the reactivation of this planning decision is on climate grounds there is significant overlap between the climate impact of the road and the adverse impact of the road. We also maintain that the objections raised by our club at the 2020 Oral Hearing remain valid, and they are reproduced in updated form to correspond to the updated documentation from Galway County Council submitted in April 2025

Clearly the N6 Galway City Ring Road is a major project, but this submission focuses on the University of Galway Sports grounds at Dangan and immediately surrounding area as that is where the majority of Galway City Harriers (GCH) athletics activities takes place. We are making the case that the road, during construction and after, will have a detrimental impact on our club's activities and to the use of University of Galway Sports grounds for other sports and outdoor activities.

The key points which will be made in this document are

- Over 5,000 people use the university sports facilities on a weekly basis participating many sports or just walking in the outdoors. This will increase if the Bish school is relocated nearby.
- Air pollution levels in an area used by a wide variety of sports people will be heavily impacted bringing NO2 pollution levels well above WHO guidelines
- Biodiversity loss in this area will have an impact on the nature value and therefore the climate resilience of the area.
- The GCRR will have a major impact on the sports amenity of the area.
- Higher levels of air pollution and noise, and the loss of one of Galway's protected views, will make it a far less appealing and less healthy place to exercise.
- Sports are not just about physical exercise. Many use the trails to be closer to nature and further from the noise and traffic of the city.

- Access restrictions during construction will mean that sports clubs will have to relocate training and events. In some cases alternative venues may be impossible to find leading to higher dropout rates of athletes.

The following issues raised at the Oral Hearing in 2020 have not been addressed in the updated submission from Galway County Council

- Conflicting statements in the plans about access during construction means that our club and others do not know how much access will be possible during construction.
- NO2 pollution predictions showed a dramatic increase in NO2 levels near Dangan in the 2018 submission. The increase is now described as negligible in the 2025 submission. There is no justification given for the new projections and the new numbers lack credibility.

Galway City Harriers Athletic Club

Galway City Harriers consists of a juvenile section and a senior section with over 800 members. In 2024, Galway City Harriers was the largest athletics club outside Dublin and is typically one of the largest in the country. This is a remarkable achievement for a city the size of Galway. It reflects the demand for a running club in the area and the attraction of the facilities available.

As a sport, running is inclusive across ages, gender and ability. Being a non-contact sport many can continue it into later years, and we have equal male and female participation in juvenile and adult sections. We have competitive amputees and offer coaching/assistance for those with neurodiverse needs and visual impairment. It is a very broad church.

Galway City Harriers' home is the Regional Sports Centre at Dangan. GCH organise approximately 700 training sessions annually and circa 300 of these use the Dangan sports campus including the affected pitches and running trails. Since the 1990s, this facility has been developed along with the University of Galway and although it is referred to as the University of Galway facility throughout the documentation, it is so much more than that. It is a fantastic sports campus that, as well as being used by University of Galway clubs, has been used by almost every sport in Galway at some point over the last 30 years.

The 400m, international standard tartan running track is made of a synthetic material that means it can be used in all types of weather, something very important in Ireland. It has all the throwing and jumping facilities required for an international standard track. There is a large shed for storage of equipment, and access to toilets and changing rooms in the nearby Pavilion.

Due to the inclement weather for much of the year in Galway, weekly indoor training sessions are held for the younger athletes in the Pavilion. The senior athletes have at times tried to book the Pavilion for sessions, but such is the demand that it is not possible to find a slot, as is the case with most indoor spaces in Galway city. The toilets, changing rooms and meeting room in the Pavilion are also used by the club.

Cross-country and long-distance training need more space than the track can provide, so juveniles and seniors make use of the pitches and the 2 miles of trails, both hilly and flat, that wind through the Dangan recreational area. Some of the trails are around pitches, some go through the many wooded areas, and one broad track runs beside the river. The surfaces are perfect for running – not hard like concrete.

Having these three different types of facilities: track, outdoor trails and indoor space, at the same location, is an incredibly valuable asset that is available in few places in Ireland. It's one of the reasons that Galway City Harriers is such a successful club.

Our athletes consistently do well at county, provincial and national-level competitions. But arguably the club's most significant impact is on the fitness level and quality of life of its members. The club is a supportive, inclusive community of young and old, from all walks of life and all levels of ability.

During Construction

What would happen during the construction of the River Corrib Bridge? The proposed construction duration is 18-24 months. As well as the training that takes place, as I've already detailed, the track is used for a number of county and provincial championships each year. Here is a list of what was held there in 2024/'25 season:

- Connaught Paralympic Championships (50 Participants)
- Galway County Juvenile Athletics Championships (700 Participants)
- Connaught Track and Field Championships (500 Participants)
- Galway Combined Event (50 Participants)
- Galway City Schools
- Galway County Primary Schools
- Senior County track and field championships – 3 days
- Connaught Track and field events- 3 days
- The Goal Mile on Christmas day
- Connacht secondary school championships

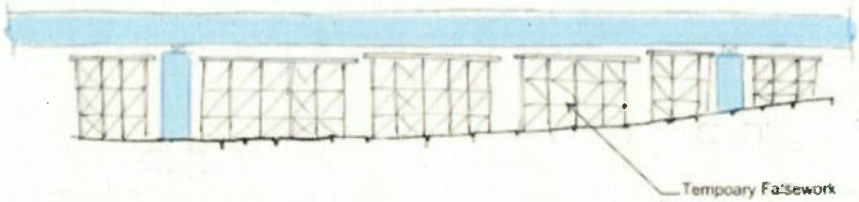
For many of these events, athletes and their families travel to Galway from all over the county or all over the province. Some of these events run over two days on the weekend, with visitors staying overnight in hotels or other accommodation. For many families, their annual calendar revolves around the progression of county, provincial and national competition. The facilities at Dangan are an intrinsic part of these events.

I refer to Appendix D: River Corrib Bridge Constructability Examination. It states the following:

"Drawing GCOB-3000-D-104 contained in Appendix A.15.1 of the EIA Report shows the locations where access for the university through the development boundary must be maintained for the duration of the construction phase. These mitigation measures have been agreed in consultation with NUIG and other relevant parties."

This suggests that access will be maintained for the entirety of the construction period. Given the size of the structure that would be put in place, this seems difficult to imagine. Figure 2.6 shows the framework involved in construction of the bridge – there is now way that access will be maintained under such a structure. Also, it is not clear exactly what 'access for NUIG' means. Just staff and students? Clubs that use the facilities? Members of the public?

Figure 2.6: Temporary falsework



And looking at further documentation, I also refer to ABP Ref. ABP-302848-18 and ABP-302885-18, STATEMENT of Evidence Responses to Population (Human Beings/Socio-economics) Objection/Submissions by Craig Bullock (PhD), we find this statement:

"There are significant general amenity impacts on the NUIG Sporting Campus resulting from bridge construction works due to the non-availability of some pitches and facilities as well as effects on amenity use of the River Corrib walkway."

So while one document says access will be maintained throughout, another talks about significant impacts and non-availability. The whole issue of access to the different areas of the site is very unclear. Will users have access to the Pavilion, a building being partially demolished? It seems unlikely. As long as the toilets in the Pavilion are inaccessible, the club cannot use the track. It is also unclear which 'relevant parties' are referred to in the documentation that have been consulted regarding mitigation measures. GCH use these facilities almost daily, yet have not been consulted. Nor have any other sports clubs that use the facilities, or the students of the University of Galway.

Another factor regarding access is parking facilities. At the moment the upper carpark at Dangan is inaccessible to the public during the day as it is completely occupied by vehicles belonging to construction workers at the Westwood site nearby. Have the parking needs of the construction workers on-site been considered? If they are going to use the existing car parks, will there be sufficient spaces for the people using the sporting facilities.

Currently there are 113 car parking spaces and one bus space in the upper car park, 49 car spaces and 4 bus spaces in the lower car park, and, unofficially, room for about 100 cars in the areas beside the hockey pitch. Access to all of these is via one very narrow road off the N59, which is not wide enough for two cars in some places. When sporting fixtures coincide, these car parks are sometimes completely saturated, creating traffic chaos.

Even off peak, the N59 is often affected by cars turning into and out of that narrow access road. I refer to Appendix A.7.1, Figure 2.2, which shows the site access. The resolution of this image is inadequate and the text in the legend is not legible. It seems that there will be a new access road for construction vehicles, but we would like to know whether this will also be for construction workers and their vehicles. We're also concerned what effect the comings and goings of heavy vehicles and machinery, so close to the existing access road, will have on that access, which is already inadequate.

In short, given the sheer size of the Corrib River Bridge, we can only assume that access to the facilities during construction would be severely impacted if not closed off entirely. This is not clarified in the documentation and GCH has not been consulted, nor any other users.

If access would be lost or limited for any length of time, an alternative running track, running trails, pitches and indoor facilities would be needed by the club. These simply do not exist in Galway. The effect this would have on GCH members and their families, and athletics in the county of Galway, is immeasurable. We aren't sure if the club could survive an extended period without access to facilities.

While a number of the issues raised by GCH and Galway Athletics Board and at the oral hearing in 2020 received responses in the Inspectors Report (Feb 2020 ABP-302885-18 & ABP-302848-18, Appendix 4 page 118 and page 125) , there was no comment in that report on the issue of access during construction which remains the biggest threat to the club.

Post-Construction – into the future.

At Dangan, the motorway will be a raised bridge from the river until just west of the pavilion. Figure 5.1.07 of the Proposed Road Development Plan Layout, this shows the exact location of the bridge. It would go directly over where Pitch no. 8 now is, through the woods, over the existing path and the rugby training pitch. Those two pitches will no longer exist, although it's not clear what will be put in their place. Along this stretch there will be five viaduct support structures.

The report talks about vegetation clearance, but for structures of this size to be put in place, I'd imagine extensive earth moving will also be required. This will permanently alter the nature of the trails. The mix of gentle slopes, flat paths and hills that are currently in place, so perfect for cross country training and the like, could be gone forever. The Environmental Impact Assessment Report states clearly that there would be a profound negative impact on the area.

Appendix A. 12.2 provides a photomontage of views of the Corrib River Bridge, however we put it to you that these are quite misleading. These are constructed with no regard whatsoever to what changes to the vegetation and landscape will be made. If we could insert a massive bridge into an existing recreational amenity without moving so much as a blade of grass, as shown in these photos, that would be great. But as we all know, this is not based on reality. Figure 1.14.3 shows the view from the side of the track. According to this, the bridge will not be visible at all. This is assuming that not a single tree between the track and the river will be moved. Clearly this is not possible. And as you can see from the photo, this is a well-established, mature woodland. It would take decades if not longer to replace trees of this size.

In short, the landscape and visual character of the area will be utterly changed for the purposes of trail running, and not for the better.

Another impact is that of noise pollution. I refer to the Statement of Evidence from the 2020 Oral hearing from Jennifer Harmon, AWN Consulting, which states the following:

"This submission includes a report prepared by Allegro Acoustics on the potential impact of the proposed road development on the playing pitches of the NUIG sporting campus. The report suggest that operational noise levels would lead to communication issues during training sessions and games at the sporting pitch areas."

The Statement of Evidence goes on to explain that the noise levels, provided noise mitigation measure are put in place, will be between 50 and 60 decibels across the site. At the track, it would be 57-58 decibels. The WHO Guidelines for Community Noise set a level of 55 dB for outdoor amenity areas. The Statement suggests the WHO Guidelines are not relevant because it is "not set on the basis of playing pitches and

sporting areas". Surely playing pitches and sporting areas are an outdoor amenity area, so I believe this rebuttal should be discounted.

Also from the Statement of Evidence:

"4.7.11 The range of noise levels calculated across the sports pitches are typical of a suburban environment and would not preclude the use of any of the pitches to be used for training and competitive games."

To support this, a list of existing sportsgrounds is given (Table 4.7.2), with their noise levels. As you can see, the sportsgrounds are listed along with their adjacent roads. This misses the point that the Dangan sportsground does not have a road beside it, that's what makes it so special. Unlike the sportsgrounds used for comparison, Dangan is not in a suburban zone, and it is not built up. No offence to Galwegians Rugby Club, but using a pitch that's practically on top of the Dublin Road is setting a pretty low bar.

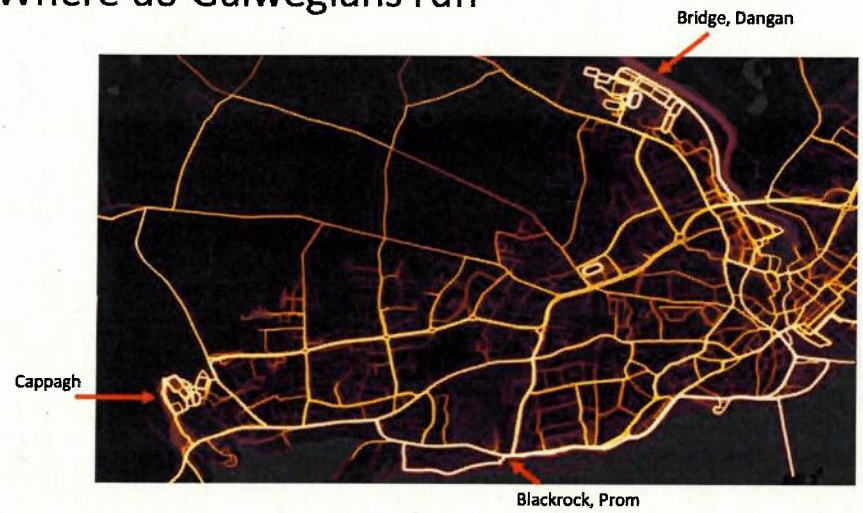
In conclusion, Does Galway have a traffic problem? Yes. Is the solution to build a new road through the regional sports centre? No. If we can't come up with something more innovative than building roads and putting more cars on them, then the future of this country is indeed grim.

The very future of Galway City Harriers, such a vital and positive part of the fabric of this city, would be jeopardised by this bypass. And many other clubs and residents of Galway would also suffer the negative impacts.

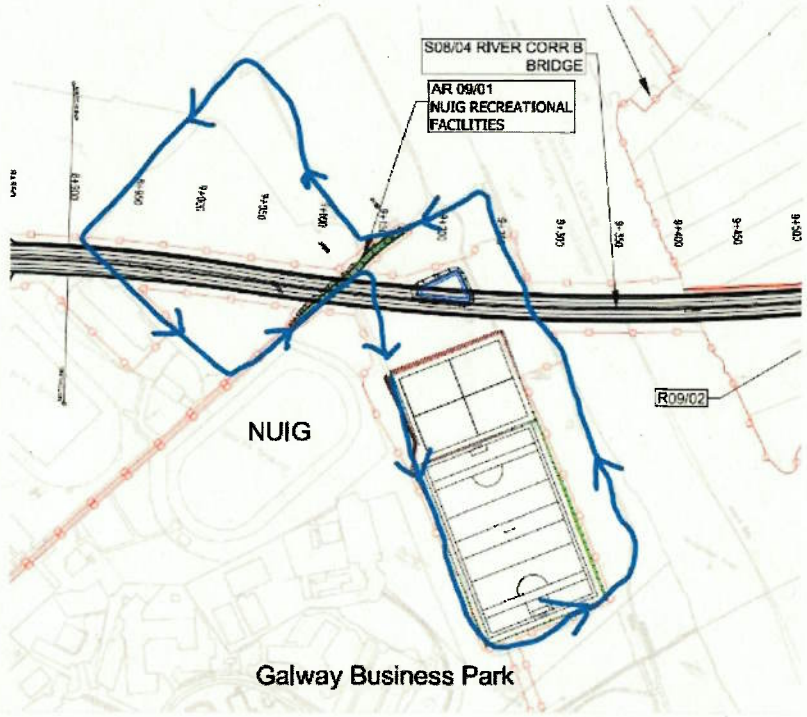
Activities at Dangan

Outside of our club there are many formal sports clubs and more casual walers making regular use of the area. It is more than just a sports facility. In the nature of use it is a park for the city. The lake provides a remove from urbanisation and a chance to feel closer to nature.

Where do Galwegians run



The Strava heatmap above shows typical runners in Galway. The three most popular locations are Dangan, Cappagh Park and the prom. This road would have a huge impact on one of those areas.



The hand drawn route above shows the typical trail run used by many of the GCH sessions. The design of the road will allow us to run under the bridge, but to give some idea of the difference between running in the open air and crossing under a road.

Now consider the picture below of the Quincentennial bridge.

And now contrast that with how the crossing point of the planned GCRR looks today as the club cool down after a run.

Health

Later sections will discuss the pollution impact and the mental health benefits of spending time in nature. The applicant will minimise the impact that the road will have on Dangan, but we need to have our eyes fully open to the health impact of reduced physical activity.

Ireland has some of the worst obesity levels in Europe, which is closely linked with the fact that we are the second most car dependent country in Europe. Getting people more active, though sports or just walking in the outdoors is part of the solution. But that depends on clubs and facilities. GCH at Dangan currently has both and has made an immeasurable contribution to health in Galway.

If the club is scattered to other facilities during construction, then we are bound to lose members, with no guarantee that they will find an alternative sporting activity. So the club and the former members both lose out. In the longer term Dangan will not be as appealing – hearing birds sing near the track will be replaced with the constant buzz of traffic. That is bound to reduce the numbers who come here.

Pollution Levels

The adverse impact of the bypass regarding air pollution will be felt at a running facility where hundreds of adults and children train each week. Let's take a look at the implications of this:

I quote from a 2015 article in Breathe (11(3): 239–242), the journal of the European Respiratory Society:

"When you are physically active, you breathe more often and take more air into your lungs than when you are inactive. If the air quality is poor, you may breathe in a larger amount of harmful pollutants.

In addition, while exercising, you are more likely to breathe through your mouth rather than your nose. Unlike the nose, the mouth is unable to filter out certain large pollutants in the air and stop them from entering the lungs. Therefore, breathing through the mouth can lead to more pollutants entering the airways. During exercise, smaller inhaled particles can get deeper into the lungs.

The more pollutants that you breathe into your lungs, the more likely you are to experience their negative health effects."

A 2018 article in the International Journal of Environmental Research and Public Health (Pasqua et al., 17;15(7)) reported that inhalation of particulate matter is significantly higher during exercise than at rest.

In short, the adverse impacts of air pollution are felt even more keenly by athletes. And what about children? A WHO report titled 'Air pollution and child health: prescribing clean air' stated that children are particularly vulnerable to the effects of air pollution since they breathe more rapidly than adults. This means they absorb more pollutants. With all of this evidence in mind, putting a motorway beside the city's prime facility for outdoor exercise is nothing short of reckless.

The current legal limit (Irish Air Quality Regulations (2022)) is 40$\mu g/m^3$. The 2025 submission states that the Irish National Clean Air Strategy commits to reaching 10$\mu g/m^3$ NO2 levels by 2040. However the data provided shows many areas on the GCRR route significantly above 10$\mu g/m^3$. If we can not maintain clean air in an area of sports and education, then we have to consider the sacrifices that we are making to deliver the GCRR.

Table 16.21 from the original submission(lodged in 2018 by Galway City Council) was moved to Appendix A16.2 (April 2025 submission).

The table below compares the two submissions and we request some justification for the figures. Traffic volumes or car size/efficiency could have changed, or a different time period was used but those factors would change both figures. Why did the gap between having the road and not having the road become so small. These are the R17 Dangan figures, but other locations have a similar pattern.

	Without GCRR	With GCRR
2018 submission	9.3μg/m^3	14.4μg/m^3
2025 submission	16.5μg/m^3	16.7μg/m^3

For R17 (at Dangan) the predicted pollution level with the GCRR is now 16.7μg/m^3. But because the prediction for the scenario where we do not build he road is changed to 16.5μg/m^3, the conclusion is that the impact is negligible. There is no justification for why the prediction in 2018 was 9μg/m^3 and now the prediction is 16.5μg/m^3.

Even if we accept that contention that Galway pollution on average will decrease with the addition of the GCRR and GTS (Galway Transport Strategy) and CAP (Climate Action Plan) measures, it still challenges belief that the areas right next to the GCRR will have almost the same pollution as they would if the road were not there.

Our contention is that the increase in NO2 pollution from the 2018 submission is not at an acceptable level by national standards. We do not accept that the 2025 submission in any way resolves this by somehow predicting that without-the-road the pollution would still happen at this location.

Biodiversity

The Irish Climate Action Plan states "the link between climate change and biodiversity loss and underscores the need to safeguard biodiversity and ecosystems as a fundamental part of climate resilient development."

The nature loss in Dangan represents a climate threat and must be taken into account when assessing the overall impact of the road. The climate impact is the reason An Coimisiún Pleanála are returning to consider this application again.

Aquatic and Hydrological Considerations:

The Corrib is the largest body of water in the Republic of Ireland. Second only to Lough Neagh in the North. For the size of it, it has a relatively short river coursing a maximum of 13km from the lough to the bay. The section of the river either side of the Quincentenial Bridge is dead, silted and muddy a sad testament to cement and our idea of progress, and a prediction of what we will have near the GCRR crossing.

The section of the river just below where the planned bridge will be is one of the fastest flowing parts of

the natural river above the Weir. This river deep at the middle but either side it ranges from 1 to 2 meters where sunlight penetrates and supplies plant life for photosynthesis and supports the delicate ecosystem described in the Environmental Impact Assessment Report, Chapter 8, Section 8.3.5.20

"River Corrib main channel, from Menlo Castle to the Salmon Weir

In this section of the river, vegetation was largely confined to shallow areas along the bank and was only found in depths of < 2m; mainly as either reed swamp of Phragmites australis or Equisetum fluviatile, with some stands of Potamogeton natans and Carex rostrata. Chara rudis and some Chara virgata were common in the shallow sublittoral. Species composition was similar to, but less diverse than, the section upstream."

This is consistent with my observations; the fast flow prevents the stasis of algae resulting in high levels of oxygen in the water and concurrently there are reed and weed beds lillys and smolt nurseries to be observed. More specifically however, along this narrowed stretch of river members have observed juvenile Fresh Water Mussles.

At the 2020 oral hearing the issue of mussels in the Corrib was raised. The submission maintains the position that Margaritefera are not present in this part of the Corrib, the new 2025 submission concedes that:

"Records of mussels in the River Corrib were discussed at the oral hearing. These are most likely to be swan mussel Anodonta cygnea. This species is classified as vulnerable in the Irish Red data Book, it being found in only 29 10km squares, four of which are in County Galway, and declining. If this is a correct identification, then the population is of national importance. "

There is no further discussion and no survey was carried out so are we to assume that this vulnerable species of national importance may be damaged by construction.

Furthermore, one of our members has regularly observed leech in the river. These are not listed at all in the Environmental Impact Assessment Report. We don't know what species they are, but there are species that are protected under EU law.

Human Ecology Interface

Lets move above water now. To one of the most beautiful habitats in Galway. From the marshland, to the mixed native woodland this area supports and sustains a huge variety of plant and animal life. I have observed plants like horsetail, Marsh Bedstraw, Lilies, Orchids, Milkweed, Queen Annes lace, Lousewort, Marsh Cinquefoil, Scarlet Pimpernel, Vetch and Bogbean here.

This environment is one of only 4 options which citizens of Galway have for their outdoor pursuits the other being Terryland Forest Park, The Prom and Barna Woods. The raw fact is: countless children and adults in our City will have their only interface with nature in this area.

There is a man who walks in Dangan every day and a little robin meets him at the same place eating bread and seeds from his hand. There are children who save their left over veggie scraps to bring to the Donkeys down by the Nursery. There is the little boy with learning disabilities who shows up with his proud Dad and brother at GCH and never gives up. There are the children who come to the Pavillion where we teach Athletics to 9 to 12 year olds on a Friday night when the weather is too cruel to put them outside. They burn

off the stress of the week in there and bounce out happy to start their weekend.. These are small little snapshots of the thousands of people who run, train, strive, strain, get fit and keep alive on the pitches, paths and tracks inhaling the beautiful fresh air from this city greenbelt. The countless people who's mental and physical health has been influenced positively through their interface with this environment the beauty of the surrounding and the animals that inhabit it. Does that count for anything or are you just content to stand by and see their interface with nature destroyed.

Animal Ecology

A number of our members have observed kingfishers in this area. They are a protected species in the EU birds directive and a protected species in the wildlife acts. This short river environs is perfect for them. Why do you think the University of Galway named one of their buildings after them? Wouldn't it be nice if our children could have the magic of observing the blue and orange flit of wings through the trees here in Dangan.

Section 8.0.10 has a list of breeding bird species. By their very nature, surveys are not all-inclusive. Kingfishers are not included in the list of species observed in the survey. They are protected on Annex 1 of the EU Habitats Directive.

Point 56 in Appendix 2 of the Inspectors report (Feb 2020 ABP-302885-18 & ABP-302848-18) states that the "The bird survey work is borderline adequate for a scheme of this size". We are grateful that the bird survey work was repeated for the 2025 submission and it is vital that ACP take this new data into consideration in terms of biodiversity loss. It remains a concern that reported sightings of Kingfishers were not confirmed by these surveys.

The EIAR states that 15 buildings which support 20 bat roosts are within the proposed development boundary including Aughnacurra (PBR178) beside Dangan sportsgrounds. Of the 15 buildings 14 will be demolished plus two trees identified as roosting sites for Leislers bat Soprano Pipistrelle. Of the roosts identified in the proposed development area over 90% will be destroyed. This is not acceptable. Dust noise and light pollution during and after construction could further decimate the population. Not to mention that the pollution from the increased traffic and the loss of habitat will decimate their food source. These species are protected. What can mitigate destroying 19 out of 20 roost sites that have likely been there for centuries. This is ecocide of a species. This section of the document is pure "green gas lighting". It's like someone cut and pasted certain key sentences. Keep telling them nothing is being affected whilst basically bulldozing the whole habitat of a broad spectrum of bat species.

While any one of these possible losses can be contested, it is the accumulation of impacts on Dangan that will significantly reduce its nature value. Galway's citizens come here to be near nature and away from concrete and cars.

Conclusion

Options must be considered to improve traffic in the City but not at the expense of Human Health, Sports facilities and vital Recreation and Amenity lands. We ask that other options such as a Corrib Tunnel, a revised routing, e.g. GCOB 2006 crossing, or other engineering solutions to traffic be considered.

Galway City Harriers are asking that the damages described here are fully accounted for as part of the cost of proceeding with this project.

We are also asking that if the current route does proceed then GCH and other University of Galway Sports grounds users should be given certainty about access to the track and trails during construction.

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-318217-23"

Submission from Galway Green Party

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The Galway City Ring Road (GCRR) plans are being re-examined mainly due to the national climate targets not being considered in the 2018 submission. The plan, while updated does not change anything in the design. The climate damage included in the 2025 plan must remain fundamentally the same as any damage included in the 2018 plan, since there are no changes. What has changed is the updated data submitted. It is disappointing that the data is used to convince the reader that the road is expected to reduce climate damage rather than using the data to seek improvements or to make better decisions.

This observation will focus on five key areas.

1. The submission is far too liberal in combining traffic reduction and emissions reductions from areas unrelated to the road into their data.
2. Modal Shift in the city is not improved by the road
3. Pollution figures are not credible
4. This plan will lead to urban sprawl which has huge climate impact
5. ACP's obligations under climate legislation

1. Combining Projects

The Updated EIAR gives no estimate of the change in carbon pollution due to the GCRR project being completed. It does give an estimate of a 43% decrease in carbon emission compare to 2018, which is as impressive if it is to be believed. Updated EIAR section 17.9 says the road, when combined with the GTS and CAP24 will lead give an 8% reduction in GHG when compared to doing nothing. However there is no comparison given with the

scenario where all GTS and CAP24 measures are implemented, and the road is not built – which is exactly the future Galway that we in the Green Party want to see.

All of the GTS/CAP measures could be implemented independently of the road, but that option is not given much consideration. Instead we are being asked to believe that more roads will improve air quality, but internationally we see that building more roads has increased the level of pollution. There is no clear case made as to why the Galway Ring Road would be exempt from this pattern. ACP will have to decide if this kind of mathematical gymnastics is permitted, where they counteract carbon-costly projects with carbon-savings projects.

At one point in the submitted documents Galway City Council say "However, as the EIA assessment only considers the effects of the Project, it cannot account for emission reductions associated with additional commitments which will arise from the delivery of the Galway Transport Strategy (GTS) or the most recent approved climate action plan, CAP24."

But the submission actually combines those projects in all references to levels of greenhouse gas emissions. We are entitled to know what the future looks like with all other planned transport improvements in place but without the ring road, but they have not presented those figures. Can ACP be expected to make a decision on the road with the assumption that all the other measures will go ahead? Can they make a decision on the climate impact of the road if no figures are presented for a fair comparison without the road? Bundling the impact of the road with so many other measures, some of which might never happen, leaves too much uncertainty.

There is also uncertainty about the GTS itself, since it is due to be replaced by the Galway Metropolitan Area Transport Strategy (GMATS) which will not be completed until a decision is made on the road and we have no guarantee that it will contain the same measures as the GTS.

Some of the other measures are completely beyond the control of the Galway County Council or ACP. The pollution estimates use the assumption that all new cars in Ireland will be battery electric vehicles by 2030. In 2023 EVs accounted for 18% of new registrations and in 2024 that decreased to 14%. It is not realistic to suggest that we will get to 100% a few years from now. Any decision should be based on realistic estimates and not on aspirations.

Another section where figures are combined without justification is in the Updated EIAR section 17.10.1.3 forecasts an 18% decease in car kilometres when comparing BAU to the CAP DS scenario. Again the GCRR has been combined with the CAP measures and no estimate is given if we applied the CAP measures but did not build the road. In other words we have no idea whether the GCRR is predicted to increase or decrease the total car kilometres.

The crux of the comparison problem is seen most clearly in section 5.1.5.1 of Part IV of 2025 RFI Response. In this section it describes the modelling methodology and when it lists the scenarios it lists the 2018 emissions, the BAU emissions (which includes the

GCRR) and the CAP DS scenario (which include the GCRR). It was simply beyond the imagination of the modeler that a future without necessitating the building of the road was even possible, let alone considered.

Later in the same chapter, in section 5.2.4 of Part IV of 2025 RFI Response, it compares the Annual Average Daily Traffic crossing the Corrib. The comparison is between the two scenarios, both of which include the GCRR. So any conclusions drawn are only telling us whether the CAP measures work. So once again the lack of any data on the scenario without the GCRR means it is impossible to measure if it is reaching its targets in terms of traffic or emissions.

2. Modal Shift is Not Improved

There is one area where the documents compare our two possible futures of building or not building the ring road. One of the ideas proposed is that increased traffic on a ring road will increase the use of public transport, walking and cycling in the city centre. The diagram in Plate 6.21 of the submission is used to show the potential changes in those alternatives to the private car. It is clear from this graph that adding the road makes less than a 1% change to any mode of travel. But the other planned measures are capable of changing public transport share from 13.2% to 29.9% - a huge improvement which can happen with or without the road. So the idea that the road will reduce car journeys in the city centre is a myth, even by the figures presented supposedly in favour of the road.

It is also vital to reduce car ownership in order to achieve modal shift. But improving journey time by means of a ring road will only encourage car ownership.

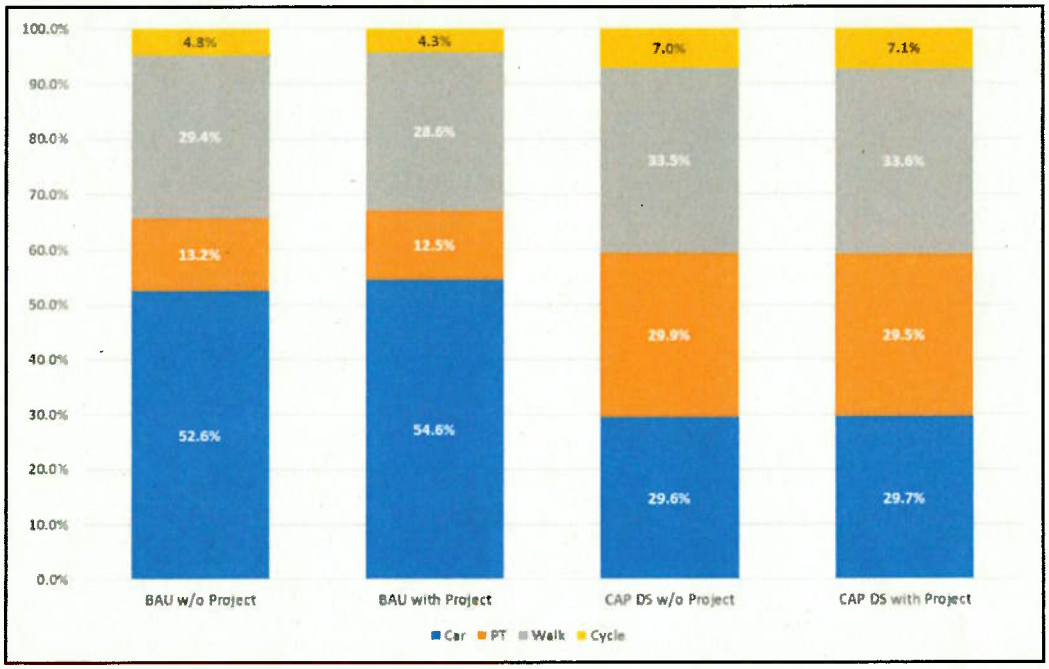

Plate 6.21 Mode Share Comparison - Impact of Project

Moving away from the statistics and on to what seems just obvious - if you build a road with no bus lane, bike lanes or footpath, then you are not encouraging those modes of travel, and suggesting otherwise is not credible.

3. Pollution Figures Not Credible

The air pollution mitigation factors include the assumption that all new cars in Ireland will be battery electric vehicles (on page 196 of Part VI Updated EIAR Chapter 22). In 2023 EV sales accounted for 18% of new registrations and in 2024 that decreased to 14%. It is simply not realistic to suggest that we will get to 100% of electric car sales a few years from now. While there are legislative steps at a European level, the earliest that petrol/diesel engine cars will be prohibited from sale is 2035 following recent changes. And that date is likely to be pushed back even further based on recent patterns on climate mitigation legislation.

Appendix A.16.3 presents the predicted NO2 concentrations on the route. At almost all locations the predicted increase in pollution is less than 1% and at worst it is 3%. It really is beyond belief that the NO2 level next to a road would basically be unchanged if the road were not present. Some of these locations are in the middle of a field in the scenario where the road is not present. NO2 levels are known to decrease dramatically in the first 200m from the road. If that were actually the case then surely there would have to be a significant difference between the predicted levels with and without the road.

In Updated EIAR Chapter 16 section 16.5.4.2 it shows in table 16.29 that the concentration of NO2 at one location at 0m from the road is 16.31$\mu g/m^3$ and only 6.3$\mu g/m^3$ if the road is not present with the difference getting smaller as the distance from the road increases. These figures match established science in the area. We would expect similar differences all along the route as described in Appendix A.16.3. But in A.16.3 there is almost no difference between building the road and not building the road. No location in Appendix A.16.3 has a level of 6.3$\mu g/m^3$ as described in table 16.29.

If Appendix A.16.3 is using some different methodology such as including the GCRR in the DM scenario or comparing measurements predicted at a 200m distance from the road or some other factor then that needs to be properly explained. Otherwise people who live or work on the route have no way of knowing from the submission how their location will be impacted.

In particular the proposed school (The 'Bish') at Dangan Lower and the Galway Clinic locations should be given more detailed analysis since those locations are where our young and our sick will suffer more from the higher air pollution emitted from the heavier traffic on this road.

It is very unbalanced to include in Updated EIAR Section 16.5.4.3, table 16.35 which lists the pollution improvements in locations where the traffic (AADT) has decreased. If such a table is to be presented then it should a more representative list of routes including the many where traffic will increase. According to Table 6.24 (in Updated EIAR Section

6.7.1.1) Roads such as Ballymoneen Rd. and Cappagh Rd. will double in traffic volume, but the predicted pollution level increase is not listed in table 16.35.

Pollution Thresholds

We would question whether the legal thresholds for pollution used throughout the Updated EIAR Chapter 16 are appropriate. The Updated EIAR states that they have had regard to the Institute of Public Health manual on Health Impact Assessment (HIA) in conducting their EIAR. The methodology used in the EIAR to determine the significance of air quality impacts on human health is not consistent with the principles and approach set out in the HIA Manual. In the EIAR, significance is defined primarily by reference to whether statutory air quality thresholds are exceeded or whether projected traffic volumes exceed specific numerical triggers. This narrow, compliance-based approach treats legal exceedances as the principal benchmark for significance, without assessing whether changes in pollutant levels—whether within or below those thresholds—might still have meaningful or unequal effects on population health.

By contrast, the HIA Manual promotes a broader and more transparent judgement of significance, which considers not only the likelihood and magnitude of health effects, but also their distribution across population groups, the vulnerability of those affected, and the potential to exacerbate existing health inequalities. It outlines that the determination of significance is not solely about remaining within environmental standards, but must also take into account the wider scientific literature, the policy context, prevailing health priorities, consultation responses, and the baseline health status of the affected population. It recognises that even modest changes in air quality can have important health implications when viewed in context—particularly for those already at greater risk due to age, underlying health conditions, or socioeconomic disadvantage.

By relying solely on threshold-based triggers and omitting this wider evaluative process, the EIAR risks underestimating the actual significance of air quality impacts on human health. This approach is not aligned with public health best practice and does not meet the standard for meaningful health impact assessment as described in the IPH Manual.

The current legal limit (Irish Air Quality Regulations (2022)) is 40$\mu g/m^3$. However the Irish National Clean Air Strategy commits to reaching 10$\mu g/m^3$ NO2 levels by 2040, and the World Health Organisation (WHO) regards 10$\mu g/m^3$ as the safe threshold for NO2. This is an example of the Updated EIAR meeting its legal obligations, but not taking into account the resulting health impact on the local community.

4. Urban Sprawl Will Increase

Induced demand leads to the failure of many road projects. In the case of the GCRR it will come from two specific sources. One is the extra journeys people will take because they have been facilitated by extra roads. These journeys of course increase traffic on all parts of their journey and the journey will not take place just on the new road. This happens with all new road infrastructure.

In the Updated EIAR Table 6.26 lists the contributors to induced demand. However the document fails to address the amount of urban spawl. In section 6.8.3.9 is states "With respect to the potential impacts of the Project on urban sprawl, the National Planning Framework sets a major new policy emphasis on concentrating future growth within brownfield sites in urban areas and along public transport corridors in order to promote sustainable travel patterns."

So the responsibility for urban sprawl is being left completely in the control of the NPF. There is no indication as to whether the GCRR will increase or decrease urban sprawl, so we must assume they have not factored urban sprawl into any of their traffic modelling. It is naive to think that greater access to the west of the city will not lead to increased residential development in places that will not have public transport. And for developers that sprawl will be a huge source of profit, so the pressure and lobbying to allow such zoning and planning will be intense, and some of it is bound to be successful. That will only increase further if this road is to go ahead.

All of these homes that will be built, in spite of the best intentions of the NPF, will be completely car-dependent. We will bring up an entire generation of children who can only reach their schools, shops and sports clubs by being driven there by parents. The dispersed development will be impossible to serve with efficient public transport.

We desperately need new homes in a housing crisis, but building those homes in the wrong place will only make that crisis worse. There is a finite set of developers and builders in the country and once we open up a range of green field sites west of the city, those sites will become more lucrative. At the same time, these developers will not be available to develop the homes closer to the city in the locations identified by the Galway City Development Plan. This road will provide a great opportunity for developers, at the cost of making Galway even more car dependent than it already is.

5. Damaging Consequences for Climate Change

It is ironic to read section 17.5.2.2.2 where it describes the project's resilience to climate change, such as storms, when the rest of the submission fails to describe the fact that building roads is a massive contributor to those very same storms.

The earlier 'Combining' section of this document already pointed out that the Galway County Council's submission failed to identify the climate impact of the road. So we are no wiser now than we were then the High Court decided in 2023 that ACP needed to consider the climate impact of the project. If data had been provided which showed the impact on the climate of building this road then the discussion would move to how a

decision can be made about how much climate damage we should tolerate in exchange for the propose benefits of the road. But in the absence of the data that debate can not even start.

In the Urban Sprawl section we outlined the increase in dispersed residential development which will be enabled by the road. Detached homes built far from centralized services have a far higher carbon footprint than urban homes. This will increase our carbon emissions in areas like heating and construction. Those emissions are not captured in any way by the Updated EIAR.

There is also a worrying difference between the data presented at the 2020 Oral hearing and the 2025 submission. In section 6.1.10 of "Statement of Evidence Responses to Air Quality and Carbon Emissions and Climate Change Objection/Submissions" (available at https://www.n6galwaycityringroad.ie/sites/default/files/media/GCRR_4.03_34.3.6_BoE_AQ%20and%20Climate.pdf) there is a table showing the road increasing the carbon emissions from 98,226 Tonnes/annum CO2e to 137,853 Tonnes/annum CO2e by including the road. When we compare that to Updated EIAR Chapter 1 in section 17.5.2.2.1 where we are presented with a change smaller than 1%. The design of the project has not changed so the improvement was only possible by changing how we measure and combine. But that will not reduce the actual amount of carbon emitted.

So in the absence of any projections for the difference between the plan with and the plan without the GCRR, we can only respond to the figures given in 2020 at the Oral hearing. The difference between 98,226 and 137,853 Tonnes/annum CO2e is a 38% increase and a difference of 39,627 Tonnes/annum CO2e.

While many treat our carbon targets as some kind of abstract goal, it is important to understand that it will cost lives. The exact number of lives can only be an estimate, but one research paper ('The mortality cost of carbon', R. Daniel Bressler, published in Nature Communications, available online at https://www.nature.com/articles/s41467-021-24487-w) states that adding *"4,434 Tonnes/annum CO2e in 2020 causes one excess death globally in expectation between 2020-2100"*. This is annual emission and so translates into 9 deaths in 2039 based on 39,627 Tonnes/annum CO2e. There might be slightly fewer deaths in later years if the projections for electric vehicle adoption are met, but of course could go in the other direction if traffic increases.

A similar calculation applied to the construction phase which has an estimated carbon footprint of 123,509 Tonnes CO2e (Table 17.7 in Chapter 7 of the Updated EIAR) gives a figure of 27.8 deaths.

These figures are tiny in the grand scale of the deaths due to climate change, but it is important that we acknowledge the cost of this project. Clearly the 2025 submission figures do not support the operational part of this figure because the 2025 submission says that the increase in carbon footprint is less than 1%.

Conclusion

This observation has made the case that the 2025 response from Galway County Council does not provide sufficient information on the climate impact. It also contends that the figures for other pollutants, such as NO2, do not reflect the actual increase in pollution that will occur, and which was documented in earlier submissions.

It can be only assumed that if the climate and pollution impacts were properly communicated, the impact of this project would not be acceptable to the general public.

We also contend that even if the pollution and climate concerns had been mitigated, the GCR would still fail at its primary objective which is to reduce traffic congestion in Galway city centre. The modal shift figures provided by Galway County Council show that the road will make no positive contribution to the city centre traffic.

For these reasons we urge ACP to reject the proposed GCRR and allow Galway City and County to focus on the many transport projects, including active travel and public bus and rail transport projects, which will bring far greater benefit to the citizens of Galway and the surrounding areas for the remainder of the 21st Century.