Our Case Number: ABP-318217-23

An Coimisiún Pleanála

Galway Green Party
c/o Niall Murphy
16 Ard na Mara
Salthill
Galway
H91 AP8F

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

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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-318217-23"

Submission from Galway Green Party

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28 July 2025

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.

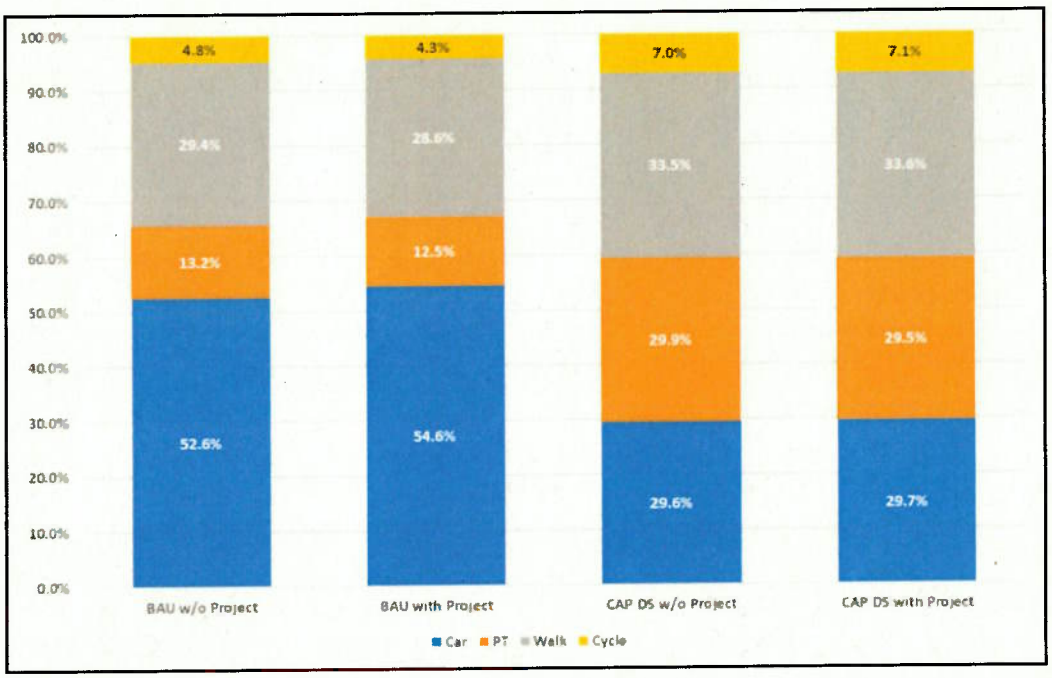

Plate 6.21 Mode Share Comparison - Impact of Project

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.