

Our Case Number: ABP-318220-23



**An
Coimisiún
Pleanála**

Shane Foran
68 Gort Greine
Rahoon
Co. Galway
H91 FY6R

Date: 31 July 2025

Re: N6 Galway City Ring Road
Galway.

Dear Sir / Madam,

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

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

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

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

HA06

Shane Foran
68 Gort Greine
Rahoon
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087 9935993

29 July 2025

FAO: An Coimisiún Pleanála

Re: Case reference: HA07.318220 Reactivated case, Old Number ABP-302848-18

N6 Galway City Ring Road Further Information 2025

To whom it may concern

I wish to make an observation on the above planning application in response to the notice of publication of significant further information submitted by the applicant. These observations are based on a limited review of the documents provided under the request for further information and are made under pressure for time. Since the previous hearing there have been significant changes in the legal and policy environment. These changes are of a nature that the N6 Ring Road proposals should be rejected or at the very least a new oral hearing into the scheme is needed.

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Introduction

I have been an advocate for sustainable travel in Galway and in Ireland for over 25 years and for many years I served as a community representative on the Transport and on the Planning Strategic Policy Committees of Galway City Council. I also advocate for the systemic construction of town bypasses as a means of removing

through traffic from our urban centres. In my view the focus on motorway construction, as an alternative to town bypasses, in Ireland over the last two decades has been an expensive mistake much of which had little strategic merit. On the matter of town bypasses I make an exception however for Galway city. Galway city does not have a problem with through traffic. The amount of traffic arriving at Galway that is travelling elsewhere is trivial.

It is claimed that the N6 Ring Road is needed to relieve congestion. The traffic problems experienced in Galway are not due to it being on a through route for other traffic. Instead in my opinion, much of the traffic congestion problems in Galway are an artificial creation that can be attributed to decades of mismanagement of the city's roads infrastructure and to self-defeating planning practices. In my view, the level of car dependency experienced in Galway is the direct product of the previous and current conduct of roads management in the city. In my view the solution to mismanagement of roads infrastructure is not to throw more roads at it. This is particularly the case when the manner of the proposed new road development is likely to reinforce rather than mitigate existing problems with roads management.

In Galway there is a demonstrable pattern of the Galway City Council executive and their consultants operating in apparent avoidance of both state and European policy on sustainable transport and, in some cases, in objective opposition to those policies. This includes conduct in apparent opposition to reports and guidance, both national and local, on how those sustainable transport policies should be implemented. A prominent example of this pattern of apparent avoidance of state and EU policy on sustainable transport is the *Galway Transport Strategy* which is claimed to support the N6 Ring Road project.

Changes to the operating environment

Since the original submission of this scheme key changes have occurred in the operating environment.

1. Galway has been designated as an urban node for the purposes of the EU TEN-T regulations.
2. The Climate Change Act has created a requirement of consistency with the Climate Action Plans.

Galway as a TEN-T Urban Node

In 2024, Galway city was confirmed as an urban node for the purpose of the European Union TEN-T regulations and appears in the annex of TEN-T EU cities. Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, ("2024 TEN-T Regulations") requires that during infrastructure planning for designated urban nodes, Member States shall give due consideration to the promotion of active travel modes including the integration of active travel modes

with other transport infrastructure and the requirement for a 'do no significant harm' assessment based on the latest available guidance and best practice. I will provide an appendix with relevant sections of the TEN-T regulations.

Climate Action and Low Carbon Development (Amendment) Act 2021

The 2021 Act introduced a significant change to the standard to be applied by relevant public bodies to that of consistency with the relevant Climate Action Plans. The 2023 Climate Plan as adopted in December 2022 calls for high quality active travel infrastructure and states a necessity of significantly improving the attractiveness, capacity and frequency of public transport services – such as the Galway public bike scheme. The plan names as a key supporting element the prioritisation and reallocation of existing road space towards public transport and active travel. The climate action plans include objectives on school travel by sustainable means and promoting shared mobility such as public bikes. The Climate Action Plan 2024 was approved by Government on 21 May 2024. The 2024 Climate Action Plan continues themes contained in its predecessors. The Climate Action Plan 2024 states that providing for school journeys by active travel is a priority and implies that all public infrastructure projects should have regard for this aim. On Page 225 the 2024 Climate Action Plan states actions around shared mobility and bike share schemes. 127. Under “15.5 Actions” in the 2024 Climate Action Plan there are measures and actions that specifically refer to expanding the bike sharing scheme in Galway.

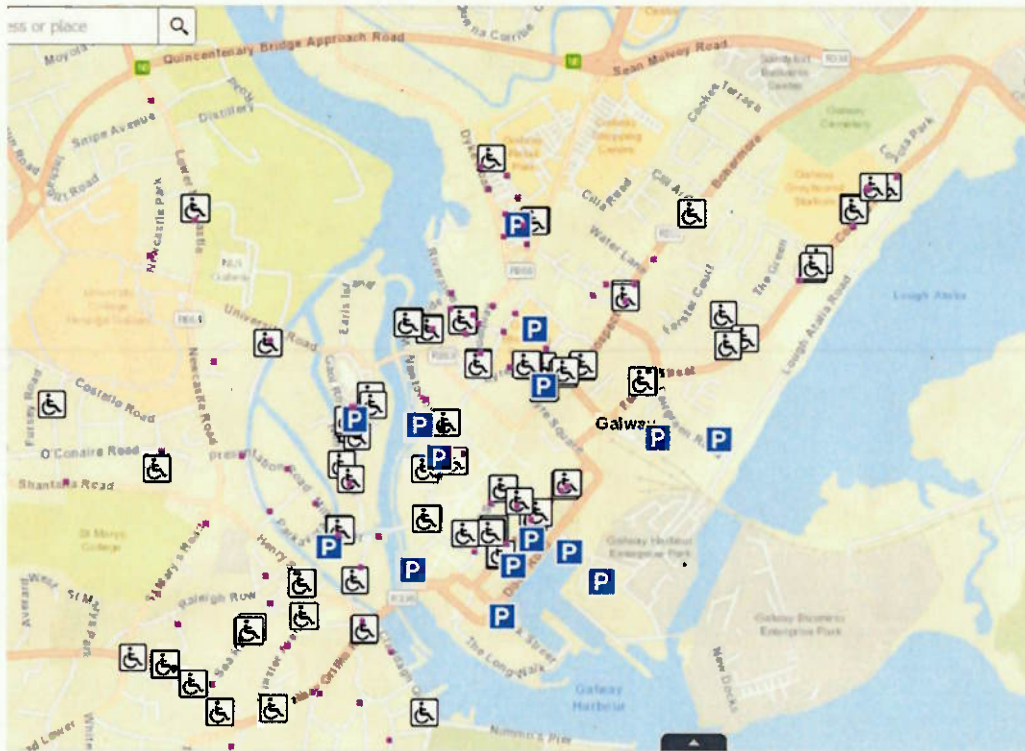
Elements of the current *Galway Transport Strategy* and associated schemes sit in direct opposition to these purposes of the TEN-T regulations and these elements of the Climate Action Plans.

Claims regarding a need for a new river crossing: Car parking provision

The applicants' response documents cite the provision of an additional river crossing as a justification for the proposed new road. In my view before adding a new crossing this question needs to be asked: “Why is existing traffic crossing the river and are all those vehicular river crossing movements really necessary?” Galway is divided in two by the river Corrib and a large number of people live on the western side. The old core of the city and much of the retail and office spaces are concentrated on the east bank of the Corrib. However, these services remain within walking distance of a large part of the city on the west side of the Corrib.

If an observer looks at a map of publicly accessible car-parking provision (surface or multi-story) then a curious pattern is seen. While there is a large population on the west side of the Corrib, city-centre car parking provision is overwhelmingly concentrated on the east side of the river. The city council's own GIS unit provides a publicly accessible map of car parking distribution in the city centre.

<https://galwaycityco.maps.arcgis.com/apps/webappviewer/index.html?id=be18932640994d04afe0cec522743695>



There are only two municipal surface car parks on the west bank serving the city centre; the Cathedral (161 spaces) and Mill Street (82 spaces). Both of these are comparatively limited. Adjacent to the west of the Corrib there are no multi-story car parks or other concentrations of public parking whether publicly or privately operated. What this means is that people who drive into the city from the west to use city-centre based services are actively encouraged to cross the river and drive through or around the old core of the city to find car parking.

Therefore a component of the traffic crossing the river is an artificial creation of the manner in which Galway City Council has planned the car parking arrangements for the city centre. It seems to me that an obvious intervention to reduce pressure on the existing river crossings is to provide drivers with parking opportunities on the same side of the river as their point of origin and within walking distance of city centre services. I am not aware of any proposals of this nature for the west side of Galway city centre. Instead we are told a new motorway and additional bridge is needed.

Claims regarding a need for a new river crossing: Secondary school locations

A map of secondary schools in the city shows a similar but opposite pattern to car parking provision. The GTS Technical Report has a map of educational facilities (Figure 8.1 on page 154). I have adapted it below with the secondary schools circled for emphasis. While there is a large population on the east side of the river most of the secondary schools (7 out of 10) are located on west side of the river. This creates a requirement for many pupils to cross the river to get to school. This suggests that some of the traffic problems could be fixed by finding better ways to distribute secondary schools. The current requirement for many secondary students to cross the river should also be interpreted in the light of an established pattern (discussed below) of the city executive making cycling access through the city centre more difficult and inconvenient.

During school term, it is likely that a non-trivial proportion of vehicles crossing the Corrib at peak hours are engaged in escort to education journeys (Galway traffic is remarkably different during the school holidays). I think it is open question how many of these journeys are genuinely divertible to the proposed ring road. If the schools remain in the same places and if it remains inconvenient, uncomfortable and avoidably hazardous for children to walk or cycle to those places then I struggle to see how this traffic could go elsewhere.



Claims regarding reducing the numbers of HGVs

In "Part IV of 2025 RFI Response" and Chapter 6 "Traffic Assessment and Cross Section" of the updated Ring Road EIAR the authors make reference to reducing the number of HGVs accessing parts of the city. It appears this is being offered as a justification for the proposed ring road in part based on the claim that this will provide a safer and more attractive environment for walking and cycling. Taken at face value, an uninformed observer might see this as a plausible argument.

However, there are awkward facts missing from these documents. Galway City Council is one of the co-sponsors of the N6 Ring Road project. They are also the only share holder in the Galway Harbour Company. In this role they are supporting another project that is also in planning: Galway Harbour Redevelopment (An Bord Pleanála reference PA0033). I have found no reference to the harbour project in those sections of the response documents reviewed so far.

Under planning application PA003, the harbour board and the city council propose to generate significant HGV traffic through the city centre and peripheral approach roads. This includes both construction traffic and predicted cargo increases when the harbour expansion is finished. Notwithstanding that there is already a corridor set aside along the existing railway, the city council and harbour board do not propose to develop any new roads links to the harbour area to serve this HGV traffic.

In the EIS for the proposed harbour expansion Section 4.5.2.21 (Construction Machinery) sets out predicted movements of heavy Construction Vehicles HCVs during construction. Including in Stage 1 - 300 HCV movements per day for 9 months, during Stage 2 – 100 HCV movements per day for 6 months, during Stage 3 100 HCV movements per day for 6 months. Figures given in Table 4.5.3 (Principle Quantities for Construction) suggest the movement of 1,114,650cu.m of material from local quarries through city roads that also function as cycling and walking routes and school routes. According to the Galway City Council manager's report

“ on an average weekday there are 376 HGV movements on Lough Atalia Road. During the AM peak hour there were 41 HGV movements through the Lough Atalia / College Road junction and during the PM peak hour there were 15 HGV movements. During the operation of the development it is expected that there will be 40 HGV movements generated during the AM peak hour and 22 HGV movements during the PM peak hour. This equates to an increase of HGV movements of 102% and 147% during the AM and PM peak hour respectively. This potential increase in the number of HGVs will result in the significant shortening of the lifespan of existing roads.”

The values given in the manager's report suggest 81 HGV movements in the AM peak and 37 in the PM peak.

In the harbour expansion EIS, section 13.3.3.3 (Proposed Freight Generated by Galway Harbour Development) states.

“It is predicted by 2035 that the proposed Galway harbour capacity will be increased to circa 1.932m tonnes per year, or approximately 5,300 tonnes per day. Thus, 9 No. 600 tonne payload freight trains per day for 365 days a year would be required to fully service the proposed freight requirement via rail alone. However we believe rail freight services will likely be a fraction of the new tonnage and specifically a newly won specific product.”

It would seem even the harbour project consultants are of the view that the vast majority of freight distribution from the expanded harbour will continue to be by HGV. It seems the near future for a small university city and TEN-T urban node will involve HGVs moving up to 5,300 tonnes of cargo a day on city centre roads shared with children and adults walking and cycling to school or work.

In my view the following should be noted by the Planning Commission. In the N6 Ring Road proposals the developers are claiming that the ring road is justified to reduce HGV movements in the city centre. It is claimed that this will improve the walking and cycling environment. At the same time, one of those developers (Galway City Council) is actively pursuing a project that will significantly and permanently increase HGV movements through the city centre and approaching roads.

An informed observer might reasonably ask if there is a genuine desire to reduce HGV movements through the city, and improve the walking and cycling environment, then why is it that neither the N6 Ring Road proposals nor the harbour redevelopment proposals include a new road link serving the harbour? I would note that the construction of the port tunnel in Dublin is credited with significantly improving the walking and cycling environment in Dublin city centre.

Walking as transport in Galway

Parts of Galway already have significant levels of walking for transport – Galwegians do not have a “cultural” problem with walking. In other parts of the city walking has been made difficult and inconvenient. In Knocknacarra for example a pattern of impermeable cul-de-sacs and dead ends has been created that impose artificially long walking distances. Similarly at traffic lights across the city there is a pattern of managing the signal sequences in a manner that creates avoidable and unnecessary delays for people on foot. This previous city council practice of making walking difficult and inconvenient also creates difficulties for promoting public transport. It also feeds directly into avoidable school escort journeys.

Walking speeds are fixed. If the ring road proposals improve car journey times at locations where walking has artificially been made difficult and inconvenient then this will act to encourage and reward private car use as an alternative to walking. Therefore before the N6 Ring Road can be justified the city council should be required to implement a credible program to improve walking distances and times.

Spending vast sums of money on a ring road will do nothing to reduce walking distances (and delay) due to poor planning. What is needed is a program of works to remediate the ill-effects of poor planning. This will require measures to make direct walking routes available such as by demolishing walls or adjacent properties at strategic locations along the boundaries of current cul-de-sacs. This could include measures to improve the allocation of time to walking at traffic signals and to locate crossing points at pedestrian desire lines.

Galway as a cycling city

The Ring Road documents make reference to low levels of cycling in Galway. In 2023, a survey was commissioned by the NTA to establish local walking, wheeling and cycling data. This included an independent survey of 1,103 residents aged 16 or above in the Galway Metropolitan Area. The survey was representative of all residents, not just those who walk, wheel or cycle. That survey found that 20% of respondents used a bicycle once a week. Extrapolating this from the census figures for the adult population of Galway city (68,789) suggests a population of 13,757 regular bicycle users. These bicycle users were also found to be evenly distributed across all income groups.

The Small Area Statistics data for travel behaviour at <https://saps.active-travel-counts.ie/> also indicate that Galway city has districts with the highest levels of cycling participation (as main form of transport) outside Dublin. In Galway, the highest cycling participation levels are found in the following electoral areas: Rockbarton (12.6%), Salthill (11.6%), Taylors Hill (11%), Claddagh (10.5%). These are all districts west of the Corrib River. They are also parts of the city that have almost no cycling facilities.

It is my argument that for many Galwegians there is no inherent cultural or social class obstacles for cycling. In my view the best explanation for low levels of cycling in some parts of the city is the manner of roads management. That is to say it is my argument that in Galway cycling is being artificially suppressed by the manner of the conduct of the city's roads department - this includes various measures in the *Galway Transport Strategy*.

Conduct in apparent opposition to, or avoidance of, standard multi-modal transport measures by the Galway City Council executive.

In sustainable transport planning the concept of multi-modal transport is well-established. A format found elsewhere in Northern Europe is the combination cycling with train travel. The use of bicycles increases the potential catchment area around train stations and it is possible to store large numbers of bicycles without the land take needed if passengers were arriving at the stations by car. In Germany and the Netherland the train companies are themselves also significant operators in the bicycle hire market.

In Ireland, the 2009 *National Cycle Policy Framework* specifically advocated the inclusion of cycling in the multi-modal trip chain with public transport particularly trains. Objective 8.1 "Safe Routes to Stations" stated a requirement for local authorities to provide safe cycling routes to train stations and for the provision of adequate cycle parking arrangements. Objective 8.9 "Bikes and Ferries / Ports" dealt with the integration of cycling with ports and ferry services. These objectives for

multimodal transport have been restated in both the Irish Climate Action Plans in the EU “Declaration on Cycling” and in the EU TEN-T regulations.

At section 15.2.4.2 “Major Public Transport Infrastructure Programme” the *Climate Action Plan 2024* states:

“Public transport projects will ensure quality active travel access and cycle parking for passengers, and avail of opportunities that public transport infrastructure projects present for providing new or improved active travel infrastructure.”

In April 2024 the European Parliament, the Council and the European Commission adopted the *European Declaration on Cycling* setting out a list of principles to boost cycling across Europe. This states:

(10) Cycling is also a key enabler of sustainable tourism and contributes to connectivity within and between rural and urban areas, especially in combination with trains, buses and other modes to create multimodal mobility services. It brings tangible benefits to the local economy, in particular to SMEs.

In the 2024 EU TEN-T regulations support for active travel and multimodal transport are stated at various locations. I provide an appendix setting out relevant sections of the regulations.

As will be discussed below in relation to the *Bus Connects Cross City Link* proposals, it is the position of the Galway City Council executive and their consultants (Arup) that the location of the main transport interchanges (train station and private coach station) and some of the connecting roads, are not considered part of any nominated cycle network for the city. They take the same position with regard to various locations that have public bike stations.

Galway is a northern European TEN-T urban node and university city. In that city the local authority and national transport agency are arguing in writing in the planning files for *BusConnects Cross City Link* that they do not deem roads containing or linking the city's train station, private coach station, the harbour or various public bike stations to be on their designated cycle network. Therefore, these agencies in their planning application indicate that they did not assess the impact of their proposals for any cycling level of service on these affected roads. They base this position on the content of the 2016 *Galway Transport Strategy*.

In my view that mainstream transport planners elsewhere in Northern Europe would likely find this position bizarre. In my view this content of the *Galway Transport Strategy* and its interpretation by Galway City Council executive and their consultants is in direct opposition to the purpose of the Climate Action Plans and the TEN-T regulations. There is a discrepancy between the city and county council claiming that a new ring road is needed to deal with traffic congestion and for them

at the same time to be working in objective opposition to, or avoidance of, standard models of multi-modal transport provision.

Conduct inconsistent with a claimed intent to improve sustainable transport.

There is a long standing pattern of the Galway City Council executive claiming to wish to promote active travel while at the same time acting in objective opposition to state policy and established best practice on active travel. The *Galway Transport Strategy* is an example of this in written form. There are various examples of recent schemes or proposed schemes that create, or imply the creation of, additional access problems for bicycle users in Galway. There is an apparent pattern of the council executive proposing cycling facilities at limited locations on the periphery of the city and at the same time making cycling access more difficult on other roads and in the city centre.

- In February 2021, acting in defiance of long standing state policy, Galway City Council, imposed new one-way street restrictions that closed down Flood St, Cross Street and Middle Street as an access route for cycle-traffic coming from the Wolfe Tone Bridge. The districts west of Wolfe Tone Bridge are an area of the city that historically has had among the highest levels of cycling participation. The result of the 2021 traffic rearrangements is that all cycle-traffic coming from the Wolfe Tone Bridge direction to access the city centre must now use Merchants Road, part of a multilane gyratory system.
- During the pandemic when other local authorities were implementing “pop-up” cycling infrastructure, the Galway City Council executive erected signage creating a permanent ban on cycling through the medieval core of the city. (The applicants did not implement any temporary cycling infrastructure on any main roads during the pandemic). RUS 055 “No Cycles” signs appeared around the core of Galway City. The signs have a legal effect of creating a permanent ban on cycling even though the same routes remain open to motor vehicles at certain times of the day. The 2019 Traffic Signs Manual states “It is strongly recommended that this sign should only be used where a separate cycle route has been specifically provided”. In Galway City no other routes were provided and the applicants have since made cycling access to other streets more difficult.
- Radharc na Mara National School ‘School Zone’: This scheme was proposed for Mervue on the east side of Galway City. The proposed design includes narrowing a roadway to 5.5m and constructing three engineered pinch points (termed “chicanes” in the drawing) where the road will be locally narrowed to a single lane of 3.5m. This design would place people on bicycles, including children, in avoidable conflicts with motor vehicles and is contrary to long established best practice regarding the design of roads used by cyclists.

- Ballyloughane Road & Renmore Avenue Active Travel Scheme: This proposed scheme was described as incorporating so called “school zone” proposals and also as an element in a so called “Galway Cycle Network”. Although described as part of a “Galway Cycle Network” there was no formal or informal provision for cycling apparent in the drawings either in the form of cycling facilities or improved road widths. In fact, the designers proposed measures that would objectively remove road space from cycle-traffic by narrowing the carriageway from 7.3m to 6m. The dimensions given in the drawings suggest that road space was to be removed from cyclists for much of the length of the scheme.
- In addition the designers proposed a series of engineered pinch points again in conflict with long standing guidance, which would have an effect of creating avoidable conflicts between cyclists, including child cyclists and oncoming traffic. The scheme was rejected by the elected city council.
- Clybaun Road Active Travel Scheme: The dimensions given in the drawings for this proposed scheme suggest that road space is to be removed from cyclists for much of the length of the scheme. The proposed design includes narrowing the roadway to 6m. The design suggests the use of people on bicycles as mobile traffic calming devices.
- Raleigh Row School Street: This location had been the site of a successful school travel initiative without any engineering works. The council executive then proposed a program of engineering works. Although the road is nominally one-way the council executive was already in possession of traffic counts showing that equal numbers of cyclists were using Raleigh Row and Palmyra Avenue in both directions. Acting in defiance of long standing state policy, the council executive made no attempt to regularise the existing cycling situation at the site. In fact the works adopted involved carriageway narrowing and kerb build outs that removed road space from contra-flow cyclists in a manner that appears to make conflict with motor traffic more likely. The council had used €530,000 of Safe Route to School funding to achieve an end result where half the cycling journeys at the site were outside the law. Including children cycling to and from school.

BusConnects Cross City Link.

The *BusConnects Cross City Link* proposals are one of the most egregious examples of the city council executive acting in apparent opposition to long standing sustainable transport policy and in a manner that implies strong negative implications for cycling access to the city. It also provides a comprehensive example of the negative implications of the *Galway Transport Strategy* for sustainable travel in Galway. This scheme was approved under planning reference HA61.314597 but is currently the subject of a High Court challenge under H JR 2024 1448. Under the Cross City Link proposals Galway City Council propose to reengineer various roads through Galway

city centre. Via a system of bus gates they are to function as shared bus/cycle roads for parts of the day. They will reopen to general traffic off-peak.

The scheme documents indicate that many of these roads are to have footpath widening mainly through the removal of roadway space currently used by cycle traffic. Many of the proposed modifications give cause for concern due to lane widths that are unsuitable for mixed traffic. University Road-3m, Francis St. 3.5m-3.8m, Eglinton St.-3.25m, Eyre Square-3.5-3.8m Forster St. 3m and College Road 3m. Some roads that are to remain open to general traffic also show substandard widths Bothar Bhreandain Ui Eithir 3.25-3.5m. A desktop review conducted as part of the planning process [¹] suggests there is scope at various places for more spacious traffic lanes or even cycling facilities while keeping footway provision to a good standard (2m). On University Road cyclists and buses are to be mixed in 3m traffic lanes with a bus predicted every 2 minutes [²]. The use of 3m lanes implies that when the oncoming lanes are occupied, buses will be restricted to cycling speed.

Under the Cross City Link proposals, the city council executive apparently proposes one-way restrictions that will effectively ban cycling access to a city centre secondary school campus from the north. The same measures will have the effect of rendering a newly constructed cycling and walking bridge pointless for cycling from west to east. It will also cut off another public bike station from the north.

At the same time under the Cross City Link proposals the city council executive propose that various roads are to have traffic increases without any mitigation proposed for the cyclists already using the same roads. This is in direct defiance of long-standing design guidance which links provisions for cycling directly to traffic volumes. Roads that are experience increases in peak hour traffic include Lough Atalia Road and Bothar Na Long (Eurovelo 1) which are to experience increases of over 1,000 vehicles an hour at peak times. Various roads around and serving the university, Newcastle Road, St Mary's Road, Seamus Quirke Road are to experience increases in peak hour traffic. Fair Green Road and Bothar Na mBan, roads serving the city train station and therefore a key cycling route under longstanding national policy, are also to experience peak hour traffic increases, in the case of Fair Green Road by over 400%.

The national climate action plans advocate the promotion of alternatives to the private car and specifically refer to mobility services, such as bike-share schemes. Galway already has a public bike share scheme but it is struggling, partly in my view, as a result of the failure of the city executive to implement the infrastructural measures that were supposed to support it. The *BusConnects Cross-City Link* proposals can be expected to have further negative impacts for the bike share scheme. The applicants have specifically declined to consider either cycling impacts

¹ Foran, S. 2022 *Observation Regarding: Case reference: HA61.314597 University Road to Dublin Road, Galway City*

² Galway City Council - An Bord Pleanala (2022) *Minutes from pre planning meeting 13-January 2022* See: <https://www.pleanala.ie/en-ie/case/314597>

or cycling provisions on key routes affected by the scheme that also include, or directly connect, bike share stations. Here the list of streets is extensive New Dock St., Merchants Road, Dock Road Bothar Na Long, Fair Green Road, Bothar Na mBan, Bothar Ui Eithir, Prospect Hill and Lough Atalia Rd.

It is the stated position of the Galway City Council executive and their consultants that they are not required to consider negative impacts for cycling access for certain roads serving the train station, bus station and public bike stations. This is on the grounds that these roads are not part of any designated cycling network in the *Galway Transport Strategy*. In my view people with a background in mainstream European transport planning would consider this position to be bizarre.

The credibility of the 2016 *Galway Transport Strategy*

The N6 Ring Road applicants have attempted to create the impression that the *Galway Transport Strategy* (GTS) supports active travel. The GTS was produced by the same consultants as the ring road proposals (Arup) and published and adopted in 2016. In my view the content of the final GTS is remarkable for its failure to reflect various items that by then were established state policy under the 2011 *National Cycle Policy* framework. The text of the GTS does acknowledge the existence of the 2011 *National Cycle Policy Framework*. The GTS Technical Report contains a two-page summary of the NCPF so the authors cannot be said to be unaware of its existence. The GTS Technical report also includes a three page summary of *Galway City and Environs Walking and Cycling Strategy* and states that some measures in the strategy have been implemented and claims that the remainder are included in the GTS where appropriate. However on closer reading there are curious omissions from the GTS.

The published GTS contains no discussion of the issue of one-way streets in Galway as a barrier to cycling. There are no proposals for contra-flow cycling on any one-way streets in the city. This might be viewed as remarkable since at the time the then applicable *City Development Plan* had a specific objective on restoring two-way access for cycle-traffic on one-way streets. In the *National Cycle Policy Framework*, “contra-flow cycle lanes on one-way streets” and “making two-way streets for cyclists” were specific items in the Hierarchy of Solutions. The recently adopted *Walking and Cycling Strategy* had proposal with design drawings for a contraflow cycle lane at Newtownsmith. Similar measures were proposed in the 2011 Jacobs report on public bike share in the regional cities (the existence of this national report is not mentioned at all in the GTS).

In the GTS, not only is then existing contra-flow cycle lane proposal for Newtownsmith not mentioned, but Newtownsmith is not listed as a component in the proposed “cycle network”. However, the GTS does include a proposal to make Newtownsmith one-way going north. On page 73 as one of the measures in a “Cross-City Link” proposal the GTS includes “Creating a clockwise one-way loop around Woodquay, Mary Street, Newtownsmith and St. Vincent’s Avenue;” (This would

involve reversing the direction on Mary St.) In effect the GTS turns a key aspect of state policy on cycling promotion upside down.

The text of the GTS summary of the NCPF contains two references to the objectives on integrating cycling and public transport. However, the proposed “cycle network” in the GTS does not include Fairgreen Road, Bóthar Uí Eithir, Bóthar na mBan or Prospect Hill. These are all key access routes for both the city’s train station and the private coach station. Fairgreen Road is effectively the only route available to access the train station by bicycle (the station only has an exit onto Eyre Square operated by barriers). This is another key aspect of state policy on cycling promotion being inverted in the GTS.

The GTS summary of the NCPF also acknowledges the NCPF objective for the “Creation of municipal bike systems to complement an improved PT system”. However *Appendix F: GTS Cycle Network & Infrastructure Development* does not apparently mention the then already operational public bike share scheme at all. The proposed cycle network does not include any discussion of the locations of the public bike share stations or whether any measures might be needed to improve cycling connections between them. In fact there are locations that have already have bike share stations are not part of the nominated cycle network at all such as Fairgreen Road (train station), Prospect Hill, Newtownsmith, Merchants Road and New Dock St. The GTS also fails to acknowledge the existence of the 2011 Jacobs report *Proposals for Introducing Public Bike Schemes in Regional Cities – Technical Feasibility Study* or the recommendations of that report such as two-way cycling on one-way streets and cycling access across pedestrian zones.

There are various other policy areas in which the 2016 GTS is apparently non-compliant with the NCPF. The published GTS contains no apparent mention of the negative effects of pinch points or narrow traffic lanes for cycling. Not only were these issues raised directly in submissions but they are also reflected in the *National Cycle Policy Framework* which included road narrowings and narrow traffic lanes as measures that required audit and remediation (along with one-way streets). The GTS contains no discussion of, or proposals for, 30km/h zones in Galway. There is no discussion or analysis of speeding in the city. There is also no discussion of any requirement for enforcement of speed limits in the city. There does not appear to be any general discussion of the poor treatment of cyclists by the city council at traffic signals and there is no apparent commitment to any general program to address the issue. HGV management is only discussed with regards to a core city centre zone. There is no apparent discussion of any need to limit through traffic, especially HGVs, from roads around schools.

It is also worth remarking that the NCPF specifically required that cyclists have space to keep moving and adequate separation from passing motor vehicles with or without cycle lanes. This should be contrasted with various schemes or proposed schemes under the GTS that objectively remove road space from people using bicycles. As it has turned out the GTS seems to be a blueprint for removing road capacity from cycle-traffic across the city. In the GTS cycle network proposals the

following phrase, or variations on this phrase, is the stated intervention for 35 road sections making up over 30km of roads in the city.

"Currently no facility in place. Proposal to provide traffic calming measures and signage to reduce motorised traffic speeds and advertise the presence of cyclists".

Taking the example of various Galway City Council proposals such as the Mervue Safe Routes to School Scheme, the Clybaun Road Active Travel proposals, the Renmore proposals and the *BusConnects Cross City Link* scheme it turns out that what this means is removing road capacity from cyclists and implementing measures that create avoidable conflicts between cycle-traffic and motor traffic (including children cycling to school).

Other locations that are to apparently to receive this "treatment" under the GTS include key cycling corridors into the city such as the N59 Moycullen Road, the Tuam Road, Fr Griffin Road, Whitestrand Road, Newcastle Upper and Lower and St Mary's Road. Some of these are roads that are to have significant traffic increases under *BusConnects Cross-City Link* but the applicants apparently then propose to remove road capacity from cycle-traffic at some future date in the name of "traffic calming".

If it gets funded, and is allowed to proceed according to current proposals, then much of the so called "Galway Cycle Network" found in the GTS is likely to have a strong negative impact on cycling in Galway. The implication is the sterilisation of key corridors from the perspective of cycling.

Two of the roads that are listed for this "traffic calming" treatment in the GTS require particular discussion; Cappagh Road and Ballymoneen Road in Knocknacarra. These are both roads of a mainly residential nature with housing estates fronting on to them. The predominant building pattern is impermeable cul-de-sacs. This means there are few alternatives to using either Cappagh Road or Ballymoneen Road to reach other places on foot or by bike. Under the GTS "cycle network" proposals both roads are listed for the same treatment as Renmore Avenue and Ballyloughane Road. Under the N6 Galway Ring Road proposals both roads are to have junctions with the proposed new orbital route. The N6 Ring Road scheme drawings do not propose any changes to either road as part of the ring road project. The implication is that under the guise of the "Galway Cycle Network", the NTA and City Council will remove road capacity from cyclists on both roads and then repurpose those same roads, without further modification, to feed arterial traffic to the new ring road.

It seems to me that even on paper, the proposals in the GTS are not compliant with the statement in the NCPF that cycle networks "must adhere to the five main requirements for cycling: safety; coherence; directness; comfort; attractiveness." What the various policy omissions mean is that even the theoretical "cycle network" in the GTS can be argued to disappear as it approaches the city centre. It is not a cycle network in the commonly accepted sense. To sum up, in my view, the content of the cycling components of the *Galway Transport Strategy* cannot be said to

represent the outcome of any meaningful collaboration with cycling or community interests in Galway. In my view, the GTS also shows little evidence of meaningful engagement with key official policy documents and reports on cycling promotion that should have been expected to inform its content. In my view, the cycle network proposals in the GTS are not credible and what is proposed does not conform to the commonly understood concept of a cycle network. An apparent effect of the GTS has been to justify the allocation of funds from central government to be subsequently used in a manner likely to produce effects opposed to the intent of the funding agency.

Summary

In my view much of the current traffic problems in Galway city are an artificial and avoidable result of the manner in which planning and roads management have been conducted. The amount of through traffic arriving at Galway is trivial and does not require a ring road. Before any new roads proposals are approved the city council should be required to implement a program of works to support other forms of transport such as walking, cycling and public transport. This should include provisions for multi-modal transport combining different modes. The *Galway Transport Strategy* (GTS) which is claimed to support the ring road proposals is not a credible document. The GTS has the appearance of an attempt to evade and avoid standard elements of sustainable transport planning such as combining cycling with public transport. The GTS fails to mention or implement various measures for promoting cycling access that were established in state policy and reports at the time that it was written. Given their fundamental reliance on the flawed *Galway Transport Strategy*, the N6 Ring Road proposals should be rejected.

I enclose EU50 to cover the cost of making this observation.

Yours faithfully,

Shane Foran

Appendix: Applicable elements of the 2024 TEN-T regulations

The preambles to the 2024 TEN-T regulations state a commitment to sustainable transport including active travel and to addressing transport poverty. The regulations also state a commitment to the principle of “do no harm”.

At paragraph four the 2024 preambles state: *“(4) The realisation of the trans-European transport network creates the enabling conditions in terms of infrastructure basis allowing to make all transport modes more sustainable, affordable and inclusive, to make sustainable alternatives widely available in a*

multimodal transport system and to put in place the right incentives to drive the transition, notably by ensuring a fair transition, in line with the objectives presented in the Council Recommendation of 16 June 2022 on ensuring a fair transition towards climate neutrality (5)."

At paragraph five the 2024 preambles state: (5) *The planning, development and operation of the trans-European transport network should enable sustainable forms of transport, provide for improved multimodal and interoperable transport solutions and for an enhanced intermodal integration of the entire logistic chain, [...] The development of the trans-European transport network should also enable seamless, safe and sustainable mobility of goods and persons in all their diversity [...].*

At paragraph eleven the 2024 preambles state: (11) *The trans-European transport network should contribute to the improvement of the quality of services, social conditions for transport workers and accessibility for all users, including persons with disabilities or reduced mobility and other people in situations of vulnerability, as well as to the prevention and mitigation of transport poverty. Particular attention should be given to the gender dimension to ensure equal access to services and infrastructure.*

At paragraph thirteen the 2024 preambles state: "(13) Given the evolution of the Union infrastructure needs and the decarbonisation goals, the Conclusions of the 2020 July European Council, according to which Union expenditure should be consistent with Paris Agreement objectives and the 'do no significant harm' principle, projects of common interest should be assessed in order to ensure that trans-European transport network policy is coherent with transport, environmental and climate policy objectives of the Union. Member States and other project promoters should carry out environmental assessments of plans and projects which should include, for projects for which the procurement process for an environmental impact assessment has not been initiated by the date of entry into force of this Regulation, the 'do no significant harm' assessment based on the latest available guidance and best practice."

At paragraph sixty-one the 2024 preambles state: (61) *The trans-European transport network should ensure efficient multimodality in order to allow better and more sustainable modal choices to be made for passengers and freight and in order to enable large volumes to be consolidated for transfers over long distances. Multimodal terminals should play a key role to meet that objective.*

At paragraph sixty-three the 2024 preambles state: (63) *Urban nodes play an important role on the trans-European transport network as starting point or final destination ('last mile') for passengers and freight moving on the trans-European transport network and are points of transfer within or between different transport modes. It should be ensured that capacity bottlenecks and an insufficient network connectivity within urban nodes no longer hamper multimodality along the trans-European transport network. The trans-European transport network policy should focus on promoting seamless traffic flows from, to and across urban nodes on the*

network. The local connectivity within urban nodes should be addressed by the competent local, regional or national authorities, in particular through relevant measures of their sustainable urban mobility plans (SUMP).

At paragraph sixty-six the 2024 preambles state: "(66) The promotion of active modes, particularly in urban nodes, contributes to the Union's climate goals, improves public health, reduces congestion, offers last mile solution for passengers and provides economic benefits. When planning or upgrading transport infrastructure, due account should be taken of active mode infrastructures, including walking and cycling infrastructures."

At paragraph sixty-eight the 2024 preambles state: "(68) Multimodal digital mobility services help to enhance the integration of the different transport modes by combining several transport offers into one. Their further development should contribute to nudge behaviours towards the most sustainable modes, public transport and active modes such as walking and cycling, and unlock the full benefits of 'Mobility as a Service' solutions."

Article 3 of the 2024 regulations defines an urban node as follows: (6) 'urban node' means an urban area where elements of the transport infrastructure of the trans-European transport network for passengers and freight, such as ports, including passenger terminals, airports, railway stations, bus terminals and multimodal freight terminals, located in and around the urban area are connected with other elements of that infrastructure and with the infrastructure for regional and local traffic, including infrastructure for active modes;

Article 3 of the 2024 regulations defines multi-modal as follows (8) 'multimodal transport' means the carriage of passengers or freight, or both, using two or more modes of transport;

One of the corridors that is adversely impacted by both BusConnects Cross City Link and the Harbour Redevelopment proposals is the Lough Atalia, Dock Road corridor and the associated Merchants Road one-way system which contains a section of EuroVelo 1 - an international cycling route that passes through Galway city.

At paragraph 9, Article 3 of the 2024 TEN-T regulations directly references the EuroVelo routes: : (9) In the implementation of projects of common interest, due consideration should be given to the particular circumstances of the individual project concerned. Where possible, synergies with other policies should be exploited, for instance [...] as well as with tourism aspects by including, within civil engineering structures such as bridges or tunnels, bicycle infrastructure for cycling paths, including the EuroVelo routes [...]

Article 3 of the 2024 regulations defines active modes as follows "(14) 'active mode' means the transport of people or goods, through non-motorised means, based on human physical activity, including vehicles with electric auxiliary propulsion as

referred to in Article 2(2), point (h), of Regulation (EU) No 168/2013 of the European Parliament and of the Council (29);"

Article 4 of the 2024 TEN-T regulations "Objectives of the trans-European transport network" contains sections and clauses of relevance to the treatment of active travel and in particular cycling in the *Galway Transport Strategy*.

1. The overall objective of the development of the trans-European transport network is to establish a single multimodal Union wide transport network of high quality.

2. The trans-European transport network shall strengthen the social, economic and territorial cohesion of the Union and contribute to the creation of a single European transport area which is sustainable, safe, efficient and resilient and which increases the benefits for its users and supports inclusive growth. The trans-European transport network shall demonstrate European added value by contributing to the objectives laid down in the following four categories:

(a) sustainability through:

(i) promotion of zero and low emission mobility in line with the relevant Union CO2 reduction targets;

(c) efficiency through:

(iv) optimal integration and interconnection of all transport modes, including in urban nodes;

(d) increasing the benefits for its users through:

(vii) supporting active modes of mobility by enhancing accessibility and quality of related infrastructure, thereby improving safety and health for active users of infrastructure and fostering the environmental benefits of those modes;

Article 5 of the 2024 TEN-T regulations "Resource-efficient and resilient network and environmental protection" contains sections and clauses of relevance to the treatment of active travel and in particular the peculiar treatment of cycling in the *Galway Transport Strategy*.

1. The trans-European transport network shall be planned, developed and operated in a resource-efficient way, and in accordance with the applicable Union and national environmental requirements, through:

(e) the optimisation of infrastructure use, in particular through efficient capacity and traffic management, fostering multimodality

and the shift towards more sustainable mobility patterns, including the development of sustainable, attractive and efficient multimodal transport services;

(f) the taking into account and the optimisation of possible synergies with other networks, in particular the trans-European energy or telecommunication networks including, where relevant, [...], as well as with cycling infrastructure, including long-distance cycle routes;

(g) the development of green, sustainable and climate resilient infrastructure, taking into account active modes, [...]

3. The environmental assessment of plans and projects shall be carried out in accordance with Council Directive 92/43/EEC (44), Directives 2000/60/EC (45), 2001/42/EC (46), 2002/49/EC (47), 2009/147/EC (48) of the European Parliament and of the Council and Directive 2011/92/EU. For those projects of common interest for which the procurement process for an environmental assessment has not yet been initiated by 18 July 2024, their compliance with the 'do no significant harm' principle should also be assessed.

Article twelve of the 2024 TEN-T regulations “General priorities for the core network, the extended core network and the comprehensive network” contains sections and clauses of relevance to the treatment of active travel and in particular the peculiar treatment of cycling in the *Galway Transport Strategy* and of users of the public bike scheme as passengers. This includes interoperability between transport modes.

1. In the development of the core network, the extended core network and the comprehensive network, general priority shall be given to measures that are necessary for:

(a) increasing the share and, where relevant, the capacity of more sustainable transport for freight and passengers, in particular with a view to reducing greenhouse gas emissions and pollution and increasing the social and economic benefits derived from transport;

(c) ensuring optimal integration of the transport modes and interoperability between transport modes, including active modes of mobility in urban areas;

(f) promoting the efficient, seamless and sustainable use of the infrastructure and, where necessary, increasing capacity;

(h) improving the quality of services and social conditions for transport workers, accessibility for all users, including persons with disabilities or reduced mobility and other people in situations of vulnerability, preventing and mitigating transport poverty;

2. In order to complement the measures set out in paragraph 1, particular consideration shall be given to measures that are necessary for:

(c) contributing to positive health and environmental effects by promoting the use of active modes of mobility through the development of corresponding infrastructure for cycling and walking;

Article thirty-two of the 2024 TEN-T regulations “Additional priorities for road infrastructure development” contains sections and clauses of relevance to the treatment of active travel and in particular the peculiar treatment of cycling in the GTS and of the users of the public bike scheme as passengers.

In the promotion of projects of common interest related to road infrastructure, and in addition to the general priorities set out in Articles 12 and 13, attention shall be given to the following:

(a) improvement and promotion of road safety, taking into account the needs of vulnerable users and road users in all their diversity, in particular persons with reduced mobility;

(d) when building or upgrading road infrastructure, ensuring the continuity and accessibility of pedestrian and cycling paths in order to promote the active modes of transport and improving, where relevant, the infrastructure for active mobility; ...

Article forty-one of the 2024 TEN-T regulations “Urban Nodes Requirements” contains sections and clauses of relevance to the treatment of active travel and in particular the peculiar treatment of cycling in the *Galway Transport Strategy*.

1. When developing the trans-European transport network in urban nodes, in order to ensure the effective functioning of the entire network without bottlenecks, Member States shall ensure: [...]

(a) (i) the adoption and monitoring of a sustainable urban mobility plan (SUMP) for each urban node that includes inter alia measures to integrate the different modes of transport and shift towards sustainable mobility, to promote efficient zero and low emission mobility including urban logistics, to reduce air and noise pollution and where appropriate, to assess the user’s accessibility to transport; and [...]

(c) by 31 December 2030, the development of multimodal passenger hubs to facilitate first and last mile connections, including the facilitation of access to public transport infrastructure and active mobility, [...]

Article forty-two of the 2024 TEN-T regulations “Additional priorities for urban nodes” contains sections and clauses of relevance to the peculiar treatment of cycling in the Galway Transport Strategy and in particular the curious position that the city’s main public transport nodes are not part of any cycling network.

In the promotion of projects of common interest related to urban nodes, and in addition to the general priorities set out in Articles 12 and 13, attention shall be given to the following:

(a) first and last mile connections between and to the access points to the trans-European transport network referred to in Article 40(1), point (b), in order to increase the performance of the trans-European transport network, such as metros or tramways;

(b) seamless interconnection between the infrastructure of the trans-European transport network and the infrastructure for regional and local sustainable transport, which may include:

(ii) for freight, urban logistic facilities to enhance the consolidation of deliveries in urban areas, such as micro-hubs and cycle logistic hubs, in particular those connected with railway and waterborne transport infrastructure;

(c) sustainable, seamless and safe interconnection of passenger transport infrastructure between rail, road, and, as appropriate, inland waterway, air, and maritime, including the integration of infrastructure for active modes, especially when building or upgrading transport infrastructure;

[...]

(g) where appropriate, increase of the modal share of public transport and of active modes through measures to orientate primarily the mobility of passengers in favour of these modes, including safe and secure infrastructure for active modes;

Cycling infrastructure is also disabled access infrastructure. In Galway a representative survey of travel behaviour among adults recorded that 11% of people with a disability use a bicycle once a week. Article 14 (5)(a) of the Traffic and Parking Regulations SI 274/1998 indicates that users of mechanically propelled wheelchairs may lawfully use cycle tracks. Article fifty of the 2024 TEN-T regulations “Accessibility for all users” sets out relevant expectations for member states.

Trans-European transport infrastructure shall allow seamless mobility and accessibility for all users, in particular:

(a) people in situations of transport poverty or vulnerability including persons with disabilities or reduced mobility; and