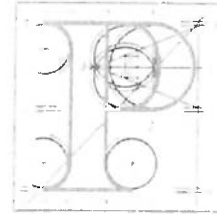


**Our Case Number:** ABP-321776-25



An  
Bord  
Pleanála

Galway City Community Network CLG  
Westside Community Resource Centre  
Seamus Quirke Road  
Co. Galway

**Date:** 17 April 2025

**Re:** BusConnects Galway: Dublin Road Development  
R338 Dublin Road, Galway City.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

Yours faithfully,



Lauren Griffin  
Executive Officer  
Direct Line: 01-8737244

HA02A

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
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<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



## **Galway City Community Network CLG**

**Address:** Westside Community Resource Centre  
Seamus Quirke Road, Galway  
**Phone:** +353 (0) 87 9326467 / (0) 87 4328489  
**Email:** [info@galwaycitycommunitynetwork.ie](mailto:info@galwaycitycommunitynetwork.ie)  
**Website:** [www.galwaycitycommunitynetwork.ie](http://www.galwaycitycommunitynetwork.ie)

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## **Galway City Community Network, The Public Participation Network in Galway City**

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## **GCCN Submission to An Bord Pleanála Bus Connects Galway: Dublin Road**

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**April 2025**



## Preface

Established in 2014, **Galway City Community Network (GCCN)** is the Public Participation Network in Galway City. It represents groups and organisations in the community, voluntary and environmental sectors in Galway City. The twin objectives that GCCN pursues are to:

- Advance the values of sustainability, equality, culture, community, empowerment, and inclusivity and embed these in the policies, programmes and practice of local government, state organisations, national government, and civil society.
- Develop and implement progressive models of and approaches to representation, participation, and engagement for civil society in informing and shaping policy development and implementation.

## Context

Firstly, GCCN wishes to take this opportunity to thank the NTA and Galway City Council for the design of the Bus Connects Dublin Road Project. GCCN members felt that much of their input was included in the design where possible and this is most welcome. GCCN members feel that the redesign of this route will be a transformational project for Galway City, given its notoriety for traffic congestion and inadequate public transport. It should be noted that this submission is the original document that was submitted to the NTA in 2023. A further consultation with GCCN members took place in April 2025 for comments and observations to An Bord Pleanála.

GCCN welcomes the opportunity to make this submission on the proposed Galway City Council Bus Connects Galway: Dublin Road, made after consulting with GCCN members and on the basis of one workshop with members of the appropriate GCCN linkage groups including Planning and Transport, Access for All and the Disability Federation of Ireland and further online consultation over the four-week period. GCCN welcome the bus connects proposals as a long overdue opportunity to make meaningful provision on a key corridor into the city.

## GCCN Policy and Positions

In developing this submission, GCCN has drawn on its Policies and Positions document, the relevant sections of which stated:

- GCCN policy on transport is based on a Hierarchy of Road Users in the following order:
  1. Pedestrians and people with disabilities
  2. Cyclists
  3. Public transport and
  4. Private motor transport.
- GCCN believes that all projects, initiatives, policies, programmes, and services in Galway City should be universally accessible enabling the full and equal participation of all people, regardless of disability, age, literacy, or linguistic considerations.
- GCCN endorses the European Charter of Pedestrian Rights and the Road Danger Reduction Charter.

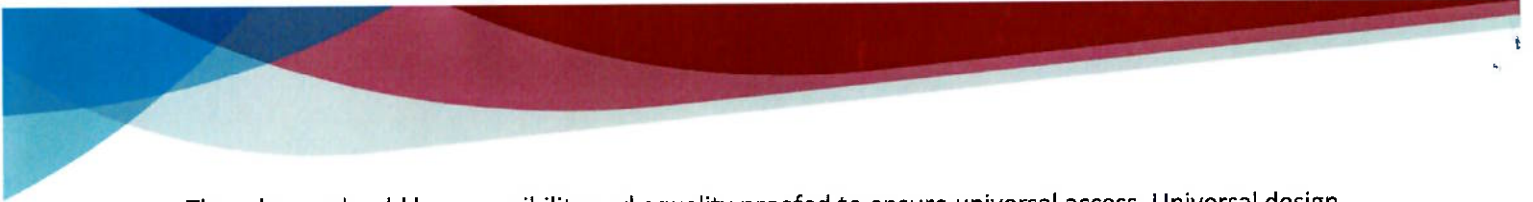
- GCCN notes that documents such as the National Cycle Policy Framework, the Design Manual for Urban Roads, and Streets and the NTA Permeability Best Practice Guide seek to address inappropriate and unsuitable roads management and town planning practices. The network endorses the overall approach advocated in these documents.
- Speed limits of 30km/h or lower are the default option for all non-arterial roads in the city.
- Roundabouts be replaced with signalised crossings and in the short term raised table zebra crossings be established on all entries and exits recognising that the challenges and risks that current roundabout designs impose on vulnerable users are a barrier to pedestrian and cyclist mobility.
- Future development is mixed-use and orientated to public transport and other key facilities especially schools and workplaces.
- Safe travelling routes to amenities and recreational grounds are provided including for example, bike routes away from traffic, pedestrian crossings, traffic calming systems, lowering of speed limits, and addressing 'rat-runs'.
- Safe areas are established in residential areas which; favour pedestrians and children's play areas over traffic, have speed limits of walking speed and separate roads with access for bicycles, buses, and pedestrians from those open to motor vehicles.
- An inventory database of habitats, fauna and flora using the Galway City Habitats Inventory 2006 as a baseline is established monitored and regularly updated with the addition of a status/risk assessment element.

### Submission to the Bus Connects Dublin Road Plan

GCCN's transport policy is based on a Hierarchy of Road Users in the following order: Pedestrians and people with disabilities, Cyclists, Public transport, and Private motor transport. The road design and road management practices in both schemes should reflect this hierarchy of road users by prioritising the safety of more vulnerable road users. This should align with universal design principles and ensure universal accessibility enabling the full and equal participation of all people, regardless of disability or age. All plans should be accessibility and equality proofed to ensure accessibility for all road users including people with disabilities, older people, and children.

It is also GCCN's position that consultation on plans that have an impact on a wide variety of road users should be meaningful. GCCN recommends that all plans should be accessibility and equality proofed with the expertise of people with lived experience to ensure accessibility for all road users including people with disabilities, older people, and children. It is GCCN'S position that the consultation process took inadequate account of community views given the very short consultation period of 4 weeks. GCCN requests an extended consultation period to ensure that this planned infrastructure development considers the views of the relevant community groups, that it is in line with universal design principles, considers the safety of all road users, facilitates active forms of transport, and has a positive impact on the development of Galway City.

### Universal Design



The scheme should be accessibility and equality proofed to ensure universal access. Universal design standards ensure accessibility for all road users including people with disabilities, older people, and children. The scheme should include measures to ensure the safety of vulnerable road users. Pedestrians with disabilities need to be able to access and cross the road safely to access amenities on both sides of the road. Also, attention needs to be paid to where signage is placed to prevent signs from obstructing pedestrians, particularly people with disabilities.

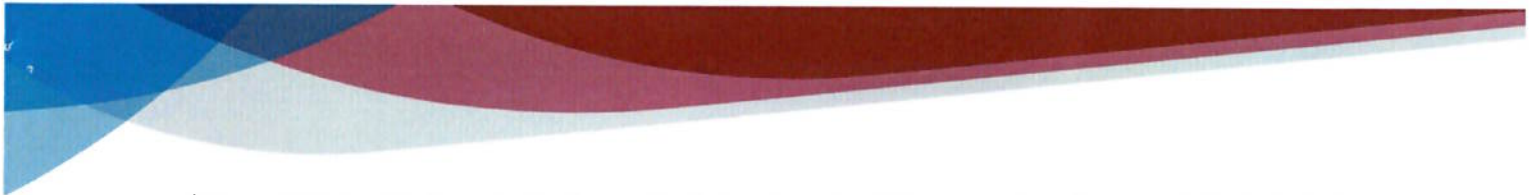
These measures will make the Dublin Road and its surrounds a more liveable place which is more accessible for active transport options. GCCN welcomes the focus of the scheme to prioritise public transport and walking along its length. GCCN recommends careful balancing of this issue with the requirements of universal design to ensure that the hierarchy of road users is maintained, yet active modes of transport that will support the goal of decarbonisation are promoted in Galway City.

### **Set Back, Length of Bus Stops and Speed Limits.**

This corridor is the most intense public transport route into the city and carries the vast majority of interurban routes. The location outside the ATU effectively serves as an eastern bus station on the approach to the city. It is also an on-demand stop for inter-city bus services. There are also local private bus services to the county towns (Tuam, Loughrea etc) that use these stops. According to the drawings there is only one stop in each direction. The location is used by several of the existing local city bus routes. It should be recognised in the proposal that a significant number of private bus services also use this route, and this must also be taken in consideration in the design and layout of the bus stops to avoid obstructions in times of heavy traffic. This implies that at busy times some buses will be stopping on the cycle tracks or else stopping outside the cycle tracks and allowing passengers to step down directly onto the cycle track. Its location also means there is demand for use as a waiting area by car drivers waiting to pick up arriving bus passengers. This creates the possibility that the cycle tracks on either side of the location will become temporary car-parks. In our view the high demand for buses pulling in and out and for bus users crossing the road there is a need for a 30km/h speed at this location. This reduced speed limit should be reflected in the design of the location. The 30km/h zone should also include the junction at Belmont where the crossing has a specific role as a route to the schools in Renmore.

The emerging preferred design shows all bus stops within the planned bus lanes. The consequences of this design would be that each bus, taxi etc would be delayed at each bus stop until the bus ahead of them has discharged passengers and taken on new passengers. This is obvious at ATU where passengers unload baggage. This would degrade the usefulness of the bus lanes in terms of creating a modal shift to public transport. The current design therefore would not support the objectives of the Climate Action Plan. GCCN requests that all bus stops should be set back/ recessed from the planned bus lanes. Where land is available, consideration should be given to recessing the bus stops further in from the carriageway - provided this can be done without altering the floating bus stop type layout. At ATU just one bus stop is shown on both sides of the road even though this is a bus stop for both city bus services and non-stop intercity/ commuter buses. GCCN'S position is that there should be three bus stops at these locations on both sides instead of one bus stop and all should be set back





from the bus lane. This again would support the objectives of the Climate Action Plan by contributing to a modal shift to public transport.

### **Cycle lanes between Doughiska Road and the Coast Road**

The emerging preferred design shows a shared cycle/ pedestrian path on the south side of the Dublin Road between Doughiska Road and the Coast Road. Preserving the existing trees on both sides of the road between Doughiska Road and the entrance to Merlin Park Hospital is important in terms of conserving biodiversity. If achieving this biodiversity objective requires a cycle lane inside the trees on the South side of the road, then that should be incorporated into the design. This is made more important by the likelihood that there will be a cycle path on the coast road for the emerging preferred route of the Athlone to Galway Greenway Project (see below).

### **Connection with emerging preferred route for Athlone to Galway Greenway Project**

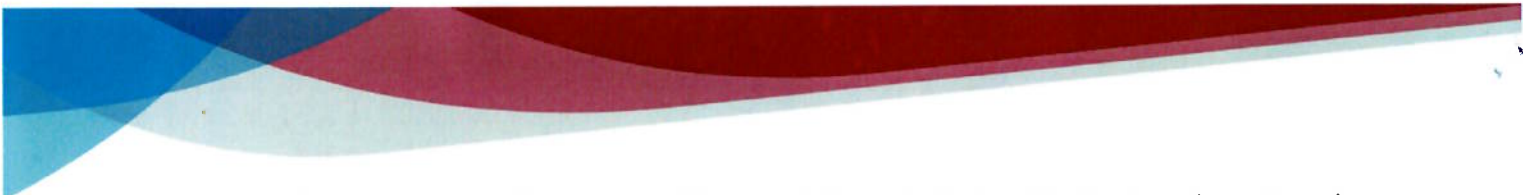
To fulfil the objective of maximizing the objectives of the Climate Action Plan, there should be a cycle path connection between the Dublin Road BusConnects Project and the emerging preferred route for Athlone to Galway Greenway. The most likely way to do this is through a cycle path on the coast road. GCCN proposes that the Dublin Road BusConnects Project should, when brought before An Bord Pleanála, include a binding commitment by the National Transport Authority to connect it to the emerging preferred route for the Athlone to Galway Greenway.

### **Connection with the Martin Roundabout Project**

To fulfil the objective of maximizing the objectives of the Climate Action Plan, the outgoing bus lane should continue to the new traffic lights at the Martin Roundabout which is currently being reconstructed to traffic lights. This is needed for the 404 bus which serves Galway Clinic and Oranmore. There should also be an incoming bus lane from those lights to the proposed incoming new bus lane starting at Doughiska Road. These changes are needed to maximize the value of the Dublin Road BusConnects Project to a modal shift to public transport. An Taisce submits that the Dublin Road BusConnects Project should, when brought before An Bord Pleanála, include a binding commitment by Galway City Council to create these bus lanes at the Martin Roundabout.

### **Merlin Park South Woods and Merlin Park Meadows**

GCCN wishes to highlight the very high ecological importance of the South Meadows and South Woods, as recognised in the decision by An Bord Pleanála to overturn a proposal to build on the South Meadow. While GCCN recognises the importance of improving public transport infrastructure on the Dublin Road, we submit that all construction works must be contained within the footprint of the finished project. We note that no detail has been made available as to how the new outgoing bus lane, cycle lane and path would be constructed. GCCN submits that because of the very high ecological importance of the South Meadows, a detailed construction plan should be brought before An Bord Pleanála which confirms and explains that no construction activity/ storage of equipment/



intrusion for any reason would happen outside of the finished footprint of the bus lanes/ cycle lanes/ path. During construction phase the area must be protected from building debris runoff and plant equipment and screened to ensure no impact. It should be noted that these meadows are considered of very high European importance<sup>1</sup>, and every effort should be made to protect them during construction. A previous refusal order<sup>2</sup> from An Bord Pleanála highlights the nature of the site and its biodiversity value.

GCCN requests that all efforts must be made to ensure access to meadows from the cycle lane is limited, so the meadows and woodland habitats do not become a place where people cycle off road and use the meadows and other woodland habitats as a short-cut to access hospital or others surround areas. This protection must be carefully considered whether it is fencing or planting schemes. Any planting schemes should be native to the woodland. For example, not beech which is not native and should not impact on meadows by creating shadow or affecting the plant diversity of the meadows. The project should be considerate of run off from water on cycle lane which may impact on the meadows and change habitat. Lighting must be to a minimum which would impact on bat species using woodland habitats and other nocturnal species such as Owls and moths.

#### **Mitigation of Ecological impact of BusConnects Dublin Road Project**

There is an established mammal link between Unclyn and Antin Woods and the South Woods. To minimize the level of road kills on the Dublin Road there should be access pipes/underpasses under the Dublin Road for mammals plus a high-level access wire for Red Squirrels on poles between trees on both sides of the Dublin Road. The Skerritt Roundabout at ATU contains large numbers of Pyramid Orchids and Bee Orchids. GCCN submits that all of these orchids should be identified and relocated to an appropriate alternative location before construction work on the Skerritt Roundabout begins.

#### **Access to Merlin Park Hospital**

GCCN welcomes the intention to install traffic lights at the current entrance to Merlin Park Hospital opposite Supermacs/ The Merlin Bar, these should be capable of override by ambulances emerging from Merlin Park on blue light. GCCN requests that there should be no plans made to facilitate a new road entrance to Merlin Park Hospital at the Murrough Drive/ Eddies Takeaway traffic lights. The hospital campus is a potential source and destination for cycle traffic and potentially the main route towards the city from Doughty/Castle Park. Consideration should be given to formal cycling arrangements into and out of the campus. Cyclists should have a junction left bypass into the campus and some means to get past queueing motor vehicles to turn right for the city. On the south side of the junction the signals for the cycle track on the transverse arm should remain green or flashing amber unless the pedestrian crossings are in use.

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<sup>1</sup> From the Irish Wildlife Manual No. 102, Annex Grasslands:

"Annex I habitats are habitats of European importance which are listed under Annex I of the EU Habitats Directive (92/43/EEC)"

<sup>2</sup> Board Order: ABP-302511-18



## Bus Shelters

For each designated bus stop/ bus stops at ATU, GCCN proposes that there should be a bus shelter set back from the path which shelters people waiting there from the wind and rain. The current bus shelters on both side of the Dublin Road at ATU are, we submit, inadequate and what is needed at all bus stops are the bus shelters on the north side of Eyre Square in Galway City. The proposals for floating bus stops are welcome. The stops should be arranged to reduce potential conflicts between bus passengers and people using the cycle tracks. On the Seamus Quirke Road short relatively unobtrusive sections of guard rail are used to direct bus passengers towards the cycle track crossing point. The design allows both parties to see each other and negotiate any potential conflicts. This design should be replicated here. The location of formal crossing points across the cycle tracks should be legible to the visually impaired. Tramline or corduroy paving on any cycling surfaces should be avoided as it represents a hazard.

## Traffic Lights and Pedestrian Crossings

There is valid concern that in Galway pedestrian crossings are often more about managing people on foot for the benefit of traffic than facilitating walking. The recent Kirwan junction rearrangements are viewed as having removed time from people on foot and on bicycles in order to facilitate cars. Significant delays have been imposed on people who walk or cycle. People must have enough time to cross the road particularly at locations where younger or older people are trying to cross.

GCCN expresses concern about the location of push buttons on pedestrian and toucan crossings at other locations in the city. The poles should not be so close to the edge of the main roadway that people waiting to cross are in an exposed position. Where push buttons are intended for bicycle users, they should be accessible to people using cargo bikes. The turning radius at junctions and traffic signals with cycling facilities should be feasible for cargo bikes.

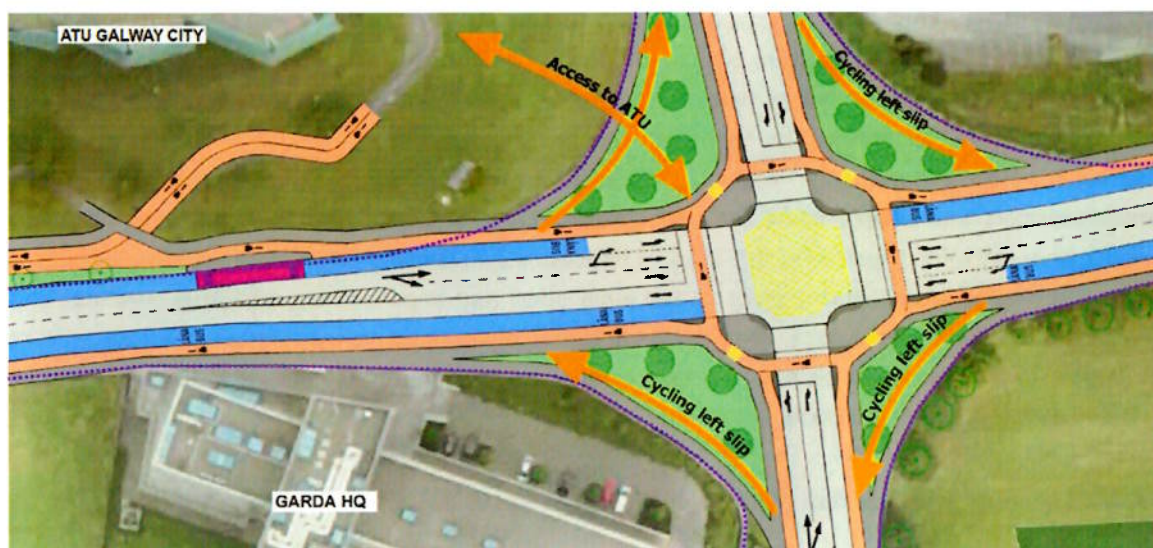
## Cyclops junction at Skerrit

GCCN welcomes the proposed Cyclops style junction at the Skerrit Roundabout. Similar arrangements should be considered at other junctions. It is noteworthy that the cyclops arrangement provides larger turning radii for bikes and that there is scope for all green phases for non-motorised traffic. The locations of foot crossings of the cycle tracks at the cyclops junctions should be legible for the visually impaired.

GCCN would like clarity around phasing of the lights. The understanding is that it is assumed in UK practice that cyclists will have enough green time for a right turn in one phase. GCCN proposes that left slip lanes are needed for cyclists on all quadrants as otherwise a proportion of cyclists will use the footpaths to take the shortest path. GCCN suggest that a new access point is needed into the ATU campus as if there is no access here then a likely outcome is that cyclists coming from the south will



cross at the Skerrit and cycle in the wrong direction along the cycle track north of the road. There is also the potential for a diagonal crossing running northwest/southeast to new access with all green for foot and cycle traffic.



## Observations on Specific Locations

### Brothers of Charity Entrance/Exit

GCCN requests that consideration is given to combining the pedestrian crossing at the inbound bus stop into a signalised entry exit to the Woodlands (Brother of Charity Campus) and closing the other entry exit closer to the Moneenageisha junction.

### Impact of proposed Graveyard

GCCN asks that the impact of the proposed graveyard<sup>3</sup> between Wellpark Grove and the Connacht Hotel should be considered.

### Junction at Renmore Park

GCCN suggests that a continuous footway treatment is needed across the mouth of the junction at Renmore Park. GCCN members have observed perceived risks for cycle traffic at this junction. GCCN request that consider that it should be left in left out only with no right turns permitted off the Dublin Road.

### The Junction of R338 Dublin Road and Renmore Road

GCCN proposes that the house facing Duggan's shop on northside of the junction of junction of R338 Dublin Road and Renmore Road should be given a dedicated parking/driveway arrangement within

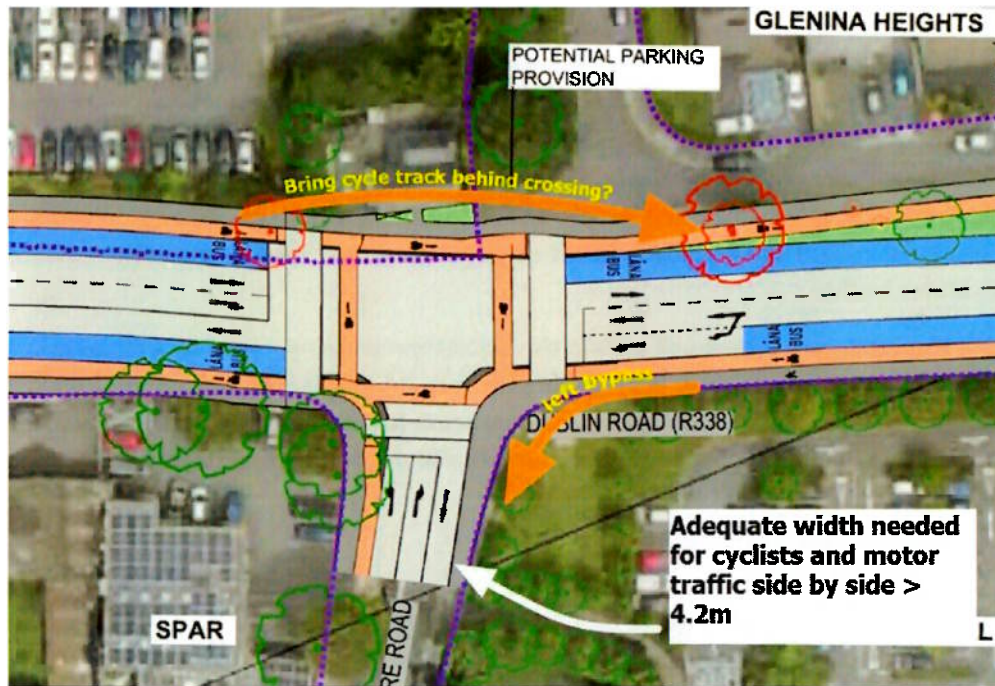
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<sup>3</sup> <https://connachttribune.ie/plans-moving-forward-for-cemetery-at-renmore/>

Glenina heights. Consideration should be given to swapping the footway and cycle track through the junction on the northside, so the cycle track by-passes the junction and pedestrian crossings. Alternatively, the cycle traffic on the crossing arm should have a green signal even when main arms are red, unless there are people on foot using the crossing. Adequate width is needed for cyclists entering Renmore Road from the R338. The junction arrangements should also allow cyclists to bypass the lights to turn left unless there are people on foot using the crossings. Renmore Road is a route to two schools. Adequate width is needed on the entry to Renmore Road so that cyclists do not get squeezed by motor traffic.

Consider bringing the outbound cycle track behind the pedestrian crossing - such as a floating bus stop/cyclops junction arrangement. There is a natural cycling route running north from this junction along the boundary of the Connacht Hotel and the recreational lands at Mervue. A formal cycling connection should be provided into Glenina Heights this will also provide for cyclists turning left into Micheal Collins Road.





### **Junction of R338 and Michael Collins Rd**

There should be no “dishing” of the footway or cycle track at the property entrances on southside of Dublin Road at Galwegians. The kerbing should be sloped to allow vehicle access. See Dutch “inritbanden” type kerbing where the kerb has a slope that raises to the height of the cycle track.

### **Road section from Renmore Road to Galwegians**

The cross sections show 1.75m for the cycle track, GCCN suggests that this should be widened to 2m.

### **Belmont junction**

Consideration should be given to making the Belmont junction into a Cyclops layout with a direct link into the ATU campus. Formal cycling access is needed to and from the ATU campus at this location as GCCN is of the opinion that the current arrangement is unsafe for both pedestrians and cyclists. On the westbound arm consideration should be given to a hold-the-left arrangement on the R338 with a default green for westbound cycle traffic. Consideration should be given to making the eastbound arm flashing amber for motor traffic turning into Belmont.







### **Woodhaven Entrance**

It is the view of GCCN that cyclists could be travelling at speed downhill. Sightlines need to be checked to the right for traffic exiting Woodhaven.

### **Merlin Hospital Access Road**

GCCN suggests that a cycling walking cut through is needed to car park area west of the hospital entrance instead of expecting left turning cycle traffic to use lights.

### **Merlin Bar/Supermacs**

GCCN requests that footpaths should be continuous without dished kerbs. Use Dutch type ramps for vehicle crossing the footpath zone.

### **Route to Lios An Uisce/Gleann Na Ri**

There is also a traffic free lane away from the Dublin Road that is the natural walking and cycling route to and from Galway Crystal/Lios An Uisce/Gleann Na Ri. GCCN asks that consideration is given to this becoming tied in with the Merlin junction.

### **Galway Crystal Junction:**

GCCN requests that consideration is given to the conversion of this junction to a Cyclops Junction.

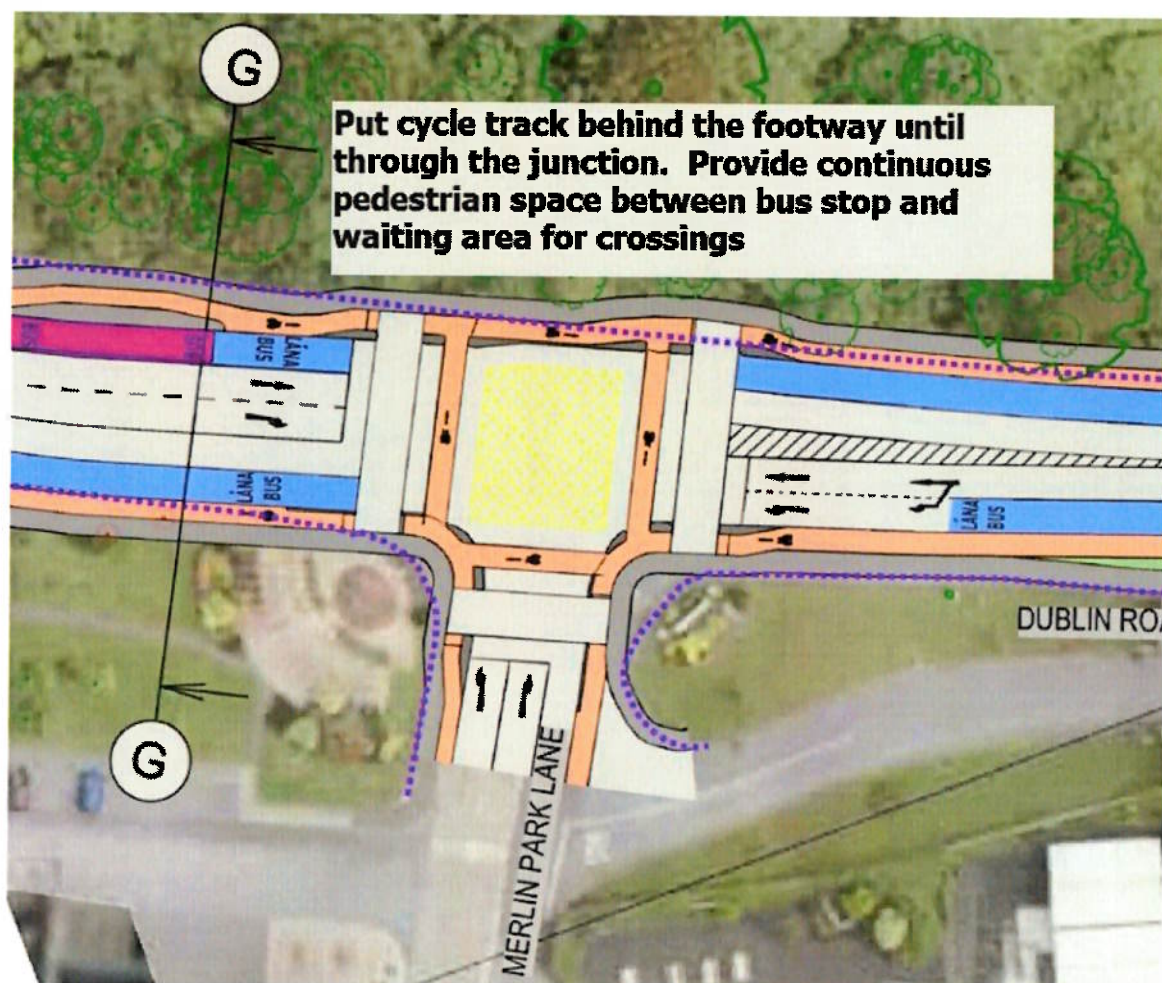
### ***Northside***

Observation: The floating bus stop/island should be continued to, and through, the traffic lights. This means that the cycle track will be on the left of the pedestrian space at the junction. This will remove conflict with the eastbound cycle traffic who will be able to keep moving regardless of the traffic signals or pedestrian crossing state

### ***Southside***

The connection along the boundary of Galway Crystal through to Rosshill road should be formalised and upgraded. This is the natural desire line for cyclists coming from, or to, the coast road or Rosshill itself. Rosshill Road is a de facto cycling route for cycle traffic coming from Oranmore, please consider tying into the track at the end cutting through the trees.



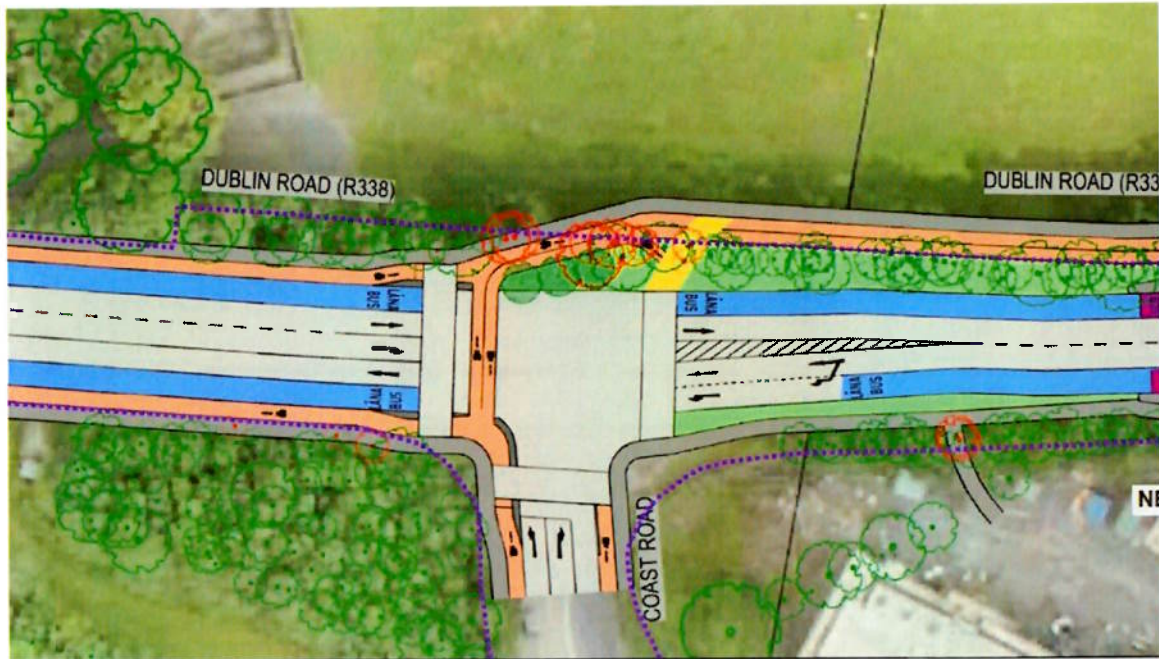


### Rosshill Park Woods

GCCN welcomes the provision of cycle facilities on both sides of the road here.

### Junction of R338 Dublin Road and Coast Road

GCCN recommends that cycling bypasses for cyclists turning left should be available on all arms. (Land does not seem to be an issue here). The design of the junction is not intuitive, and it is not clear how cyclists are supposed to access the coast road. GCCN requests that consideration be given to converting this junction to a Cyclops junction.



#### **Castlegar GAA Pitch**

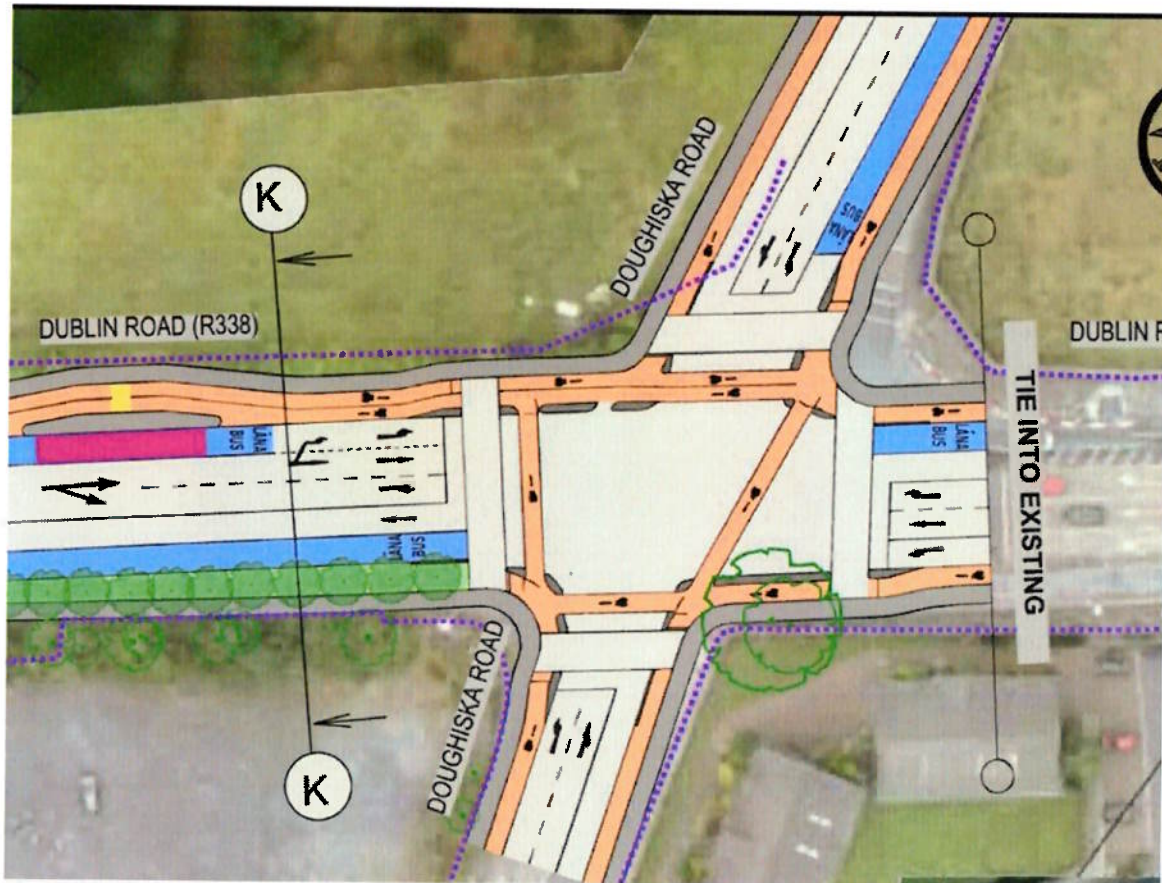
GCCN observes in the plans that cycle facilities are only shown on the north side of the road. In the plan the footway on the south side of the road is marked as "Shared Pedestrian Cycle path". The cross section shows this feature as being 1.8m. GCCN recommends that 1.8m is inadequate for a shared footway particularly for wheelchair users. This should be widened to 3m.<sup>4</sup>

#### **Junction of R338 Dublin Road and Doughiska Road**

GCCN proposes that cycling bypasses for cyclists turning left should be available on all arms. (Land does not seem to be an issue here) and consideration should be given to converting this junction to a cyclops junction.

<sup>4</sup> 2011 National Cycle Manual, NCM Shared Facilities, Page 23





### Streetlights

There is concern about the adequacy of the current street lighting arrangements. We would like reassurance regarding the number and location of streetlights particularly at obvious crossing locations. Where there is roadside vegetation or trees lighting should be located and designed so that shaded areas are minimised. The provision of lighting at sites where biodiversity should be protected should take into consideration possible adaptations to lighting provision, such as altered height, intensity of illumination, and spectral composition so as not to disturb nocturnal species, in particular bats and insects.

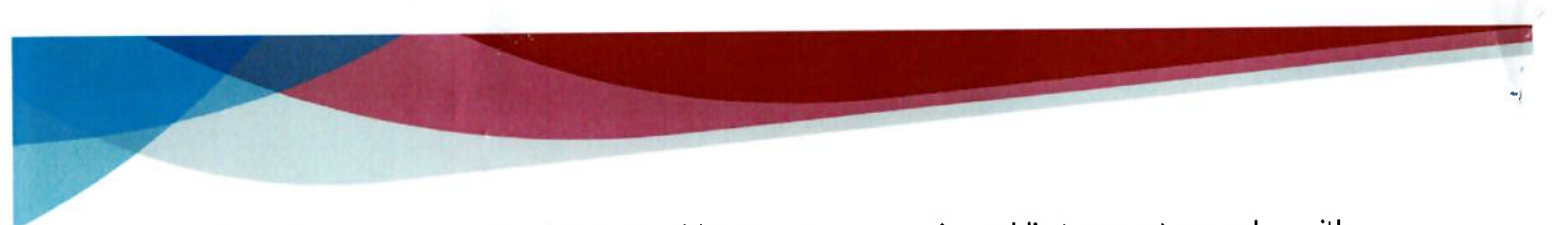
### Future proofing of Bus Connects infrastructure to accommodate light rail.

GCCN welcomes the very positive findings of the 'Galway Light Rail Transit Feasibility Study Report', prepared by AtkinsRéalis, and published by the National Transport Authority on 30 October 2024.

GCCN respectfully request that, in considering the application for permission for the Dublin Road Bus Connects scheme, An Bord Pleanála ensures that the recommendation in relation to considering the future proofing of the new bus infrastructure to enable future conversion to LRT operations included in section 8.2 Next Steps of the Feasibility Study Report, reproduced below, is fully respected.

#### "8.2. Next Steps

This report has demonstrated that LRT, in time, could be considered as a viable transport option for Galway City, with a potential capacity requirement towards the end of the strategy timeline. In the



intermediate period, consideration should be given to progressive public transport upgrades, with active consideration of futureproofing of new bus infrastructure to enable future conversion to LRT operations.”