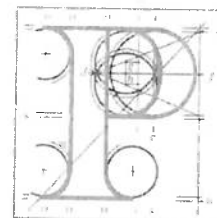


Our Case Number: ABP-321776-25



An
Bord
Pleanála

Liam O'Reilly, Yvonne O'Reilly, Emily O'Reilly
21 Woodhaven
Merlin Park
Galway City

Date: 25 March 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

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

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Planning Appeal Online Observation

Online Reference
NPA-OBS-004380

Online Observation Details

Contact Name
Liam O Reilly

Lodgement Date
20/03/2025 20:56:52

Case Number / Description
Bus Connect Galway,Dublin Road Development,Bus Corridor Scheme.

Payment Details

Payment Method
Online Payment

Cardholder Name
liam reilly

Payment Amount
€50.00

Processing Section

S.131 Consideration Required

☐ Yes — See attached 131 Form

☐ N/A — Invalid

Signed

EO

Date

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3R4q92B1CW0EN5FC1RK1IKo2

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

An Bord Pleanála (Strategic Infrastructure Division),
64 Marlborough Street,
Dublin 1, D01 V902

20th March 2025

Bus Connects Galway, Dublin Road Development, Bus Corridor Scheme

SUBMISSION

Dear Sir,

As a long-term resident of Woodhaven (approx. 30 years), I wish to express serious concern regarding the proposed bus corridor and its potential negative effects on Woodhaven, both direct and indirect. The proposed bus corridor has the potential to sever the Woodhaven community and has potential significant negative impacts on all residents. The purported benefits to overall bus average speeds and journey times are not considered satisfactory justification for the significant degree of impact on Woodhaven and the surrounding area.

Bus Connect plans for the area were initially proposed in early 2019. Since then, we have actively engaged with the National Transportation Authority (NTA) but with limited success. Over the intervening four years, the community has found the consultation process to be frustrating and protracted, with little meaningful engagement from the Project Team with the core issues we have repeatedly identified.

We are aware that many residents, particularly our elderly population, have encountered significant challenges during the consultation process, particularly due to the frequently being conducted online, even after the lifting of COVID-19 restrictions. The technical nature of the online documents has hindered the many residents from comprehending the full extent of the scheme and from rigorously undertaking their own objective assessment of the proposals and their effects.

In our opinion, the plans continue to unnecessarily burden our community and surrounding roads while offering minimal benefits in terms of improved public transport accessibility locally. The needs of residents and businesses and the communities they serve do not in our opinion appear to have been given sufficient weight or consideration in the formulation of the proposed scheme as have been presented for the Board's consideration.

We have frequently sought updates on the plans as they have developed but our reasonable requests have regularly been ignored and concerns disregarded. This lack of meaningful engagement with the community and failure of the consultation process has contributed to the numerous objections raised by local communities.

We are grateful of the opportunity to engage with An Bord Pleanála and we outline the primary concerns as they pertain to our community and respectfully seek that the Board consider same in determining the current scheme under consideration. Having considered our submission we ask that the Board consider the inclusion of conditions or amendments to the scheme as might be considered appropriate or necessary.

1. Woodhaven Entrance: Safety and Accessibility Concerns

The proposed changes will make it extremely difficult for residents to safely enter and exit Woodhaven for the following reasons.

- **Egressing Woodhaven towards Galway City:** Under the current proposals Woodhaven is to continue to operate as a simple priority junction, however vehicular access to the public road from Woodhaven will become difficult in that drivers will be required to cross a pedestrian footpath, a bicycle lane and a bus lane before crossing the eastbound lane of traffic to enter the city bound lane. For a simple priority junction, the proposed regime introduces a significant level of complexity into the decision-making process and the decision on what gaps in the various streams coincide and provide a safe opportunity for vehicular traffic to leave Woodhaven. The proposed layout is likely to give rise to significant delays to Woodhaven traffic, so much the so that driver frustration will give rise to acceptance of inappropriate gaps which will in turn give rise to serious traffic hazard and endangerment of public safety by reason of traffic hazard. The proposed junction is considered to present an overly complex and hazardous scenario for all users of the road locally.
- **Entering Woodhaven (Right Turn):** Given the heavy flows of traffic coming from the city, particularly in the afternoon and evening it is very likely that traffic will be required to wait to turn right into Woodhaven as drivers will have to wait for the stream of cars, and the stream of buses and cyclists to clear whilst also being mindful of pedestrians crossing. Especially at peak times city-bound traffic will build up behind a right turning vehicle. The proposed arrangement is considered substandard and likely to give rise to serious traffic hazard for all users of the Woodhaven access junction.
- **Increased Speeds:** The Dublin Road outside Woodhaven is currently subject to an urban speed limit of 50 km/h which is considered appropriate to the location and

appropriate in the context of the national campaign to introduce lower speed limits. The Dublin Road locally has a poor accident record and in recent memory there have been numerous collisions, with some involving pedestrians and I know of 2 no. fatalities on this receiving section of road. We understand that the current proposals include measures to increase the speed limit to 80 km/h. This seems to be at odds with best practice in urban planning and entirely at odds with the national campaign and its related policies to reduce speeds on our roads generally so as to achieve a reduction in the number of collisions and a reduction in the severity of those that do occur. The increased speed limit has the potential to compound the road safety concerns set out above and we respectfully seek that An Bord Pleanála consider amending the proposed development to exclude this poorly conceived proposal to increase the speed limit. We can find no defensible reason for the proposal to increase the speed limit.

- **Woodhaven Access Geometry:** Woodhaven is served by a single access junction which the scheme proposes to reduce to five meters. This will give rise to significant difficulties for the swept path of vehicles entering and leaving the estate and will give rise to endangerment of public safety at a point where the demands of the various road users converge. The difficulties from the revisions proposed to the access geometry are not limited to turning traffic. The proposals include for revisions to the alignment of the boundary wall and removal of the existing splay such that the visibility sightlines will be compromised and perhaps obstructed. The details shown on the scheme drawings are indecipherable in this regard. The scheme promoters, after much convincing, have committed to rebuilding the existing historical boundary wall but more detail is needed with respect to the limited space between the public road and the internal circulation roads of the estate. Reduced sightlines at the access will give rise to serious traffic hazard, and this is all the more significant a concern when the proposed increase in the speed limit to 80 km/h is factored into the equation.
- **Proximity of Internal Crossroad:** The proposed revision to the access to Woodhaven result in a separation distance between the public road and the first internal junction which is estimated to be 6 metres which is barely more than the length of a modern family saloon or SUV. Turning traffic, particularly those leaving the houses fronting onto internal road that parallels Dublin Road will have little intervisibility with traffic entering Woodhaven from the Dublin Road. The internal crossroad is a significant point of conflict and the hazard is compounded by the reduction in intervisibility between the various vehicle manoeuvres. This is foreseeable hazard that should reasonably be addressed at the design stages and not retrospectively when after the scheme is build.

- **Pedestrian Walkway:** Currently there are segregated pedestrian walkways on both sides of the vehicular entrance to Woodhaven. With the proposed scheme the plans show these will be removed which will further endanger the safety of all residents, particularly vulnerable road users and children. From our review it appears that the needs of pedestrians and the desire lines between bus stops and other local community opportunities have not been properly considered in the formulation of the proposed scheme design.

2. Loss of Green Space and Community Impact

The proposed changes threaten to eliminate up to 90% of the green space at properties No. 20 and No. 21 Woodhaven. Access to high quality urban green space is integral for the health of urban residents and the Position Paper on Greening of Urban Environments and Public Health makes various clear recommendations, some of which are referred to below:

- Urban green space should be a priority in urban planning. All development plans that are on a village or larger level should mandatorily include provision for public access to quality green space, as both part of the development planning, and as part of the health impact assessment process.
- Public Health will advocate for green space in all responses to public consultations by public bodies that they submit.
- Spaces should be accessible and of good quality to allow people to enjoy the benefits of interaction with nature.
- Green space should be available across all socio-economic populations. In order to achieve this, there needs to be a heightened focus on protecting and developing green spaces in all areas.
- Planning at all levels must address improved access to and quality of green spaces. This includes national, regional and local development plans. International evidence, such as that from the WHO, should be used as a guideline for designing urban green spaces including:
 - Prioritising quality over quantity, with variability of green features.
 - Attention to the intended use of parks and planning according, such as planning larger parks, trails, playgrounds, resting facilities and blue spaces (water) if aiming to increase physical activity
 - Managing tree density and tidiness for observed benefits, such as feelings of wellbeing, stress relief, and decreased aggression and mental fatigue

- Ensuring pleasant aesthetics and avoiding unpleasant aesthetics such as littering, graffiti and animal waste
- Green spaces should be considered vital tools in nature-based planning for future climate needs; trees for local cooling and shade, green space for interruption of air pollution, noise and wind, and varied green spaces for public mental health and resilience.

Green spaces in urban areas can benefit health in multiple ways including improved physical health, mental health and social community health and cohesion.

The WHO recommends that green spaces facilitate and support health through physical activity, stress reduction and improved community cohesion through social interaction. This occurs because urban green spaces are able to improve physical fitness, cognitive health and immune system function, as well as generally decrease mortality.

- Healthy weight
- Mental wellbeing
- Physical activity
- Creating 'activity-friendly' environments
- Social inclusion, cohesion and connectedness

The current planning application clearly does not take into account any of the recommendations of The Position Paper on Greening of Urban Environments and Public Health. We the residents will be greatly impacted due to a significant loss of recreational space as a direct result of the proposed scheme. This plan will have a detrimental impact on the quality of life in our community and has the potential to give rise to increased noise and air pollution from nearby traffic. Significant negative impacts are summarised below:

- Vibrations from passing vehicles potentially affecting the integrity of properties.
- Safety hazards for pedestrians, cyclists, and particularly vulnerable residents such as the elderly and disabled.
- Increased risk of accidents at the entrance, as vehicles would cross busy lanes to access the estate.
- Negative impact on mental health due to the removal of green space. Many residents use the area for recreation, and loss of this valuable amenity space has the potential to give rise to increased anxiety and depression.
- Loss of children's play area.

- Increased congestion due to the addition of traffic lights (10 sets between Galway Clinic and Duggan's Stores, a distance of 2km).
- High pollution levels due to the multiplicity of signal-controlled intersections with frequent stops giving rise to pollution levels up to 29 times higher than smooth-flowing traffic, with negative effects from pollutants and fine particulate matter impacting significantly on health and the environment especially the young and those with respiratory difficulties.
- Negative impact on community atmosphere. Heavy traffic, noise, and congestion will weaken the sense of community in Woodhaven, making the area less liveable and less attractive for families.

Several other critical matters arise with respect to the current proposed Bus Connects plans and these have the potential to have significant negative effects on the local community. Some of these significant impacts have not been properly considered. These issues include errors in the Noise and Vibration report, lack of pedestrian safety provisions, and an alarming discrepancy in how the impacts on the community have been treated in comparison to the environmental impacts on wildlife.

1. Errors in the Noise and Vibration Report

The Noise and Vibration report inaccurately states that our property is located 20 meters from the existing roadway. In reality, the correct distance is only 16 meters. More concerning, the report fails to properly account for the noise pollution that will result from the proposed plans. Our property will be situated just 9 meters from the new boundary wall. This oversight is significant, as it disregards the potential significant impacts on quality of life and health. It is crucial that this error, and many fundamental similar inaccuracies relating to distances and measurements are corrected and that the proper environmental assessments are conducted before the scheme proceeds further in the planning process. The current assessment is not considered a satisfactory basis upon which to determine the significant impacts of the development with a suitable level of scientific surety. The results of calculations and the findings of the report cannot be relied upon by An Bord Pleanála.

2. Pedestrian Safety Concerns

It is astonishing that the proposed development fails to provide a suitable pedestrian crossing from the bus stop opposite Woodhaven where a significant pedestrian demand and desire line is easily identifiable. The need for a crossing is all the more important given the significant widening of the Dublin Road and the challenges posed by having to cross eight separate

streams of traffic/user. The provision in the scheme is for Woodhaven residents to walk 200 meters to the nearest traffic lights, cross, and then retrace their steps to reach the bus stop. Bus Connects guidelines clearly state that bus stops must be within 100 meters of each other to ensure safe access for pedestrians. This basic guideline is not adhered to in this proposal, and it poses a significant safety concern. This matter is of significance as it gives rise to endangerment of public safety by reason of a foreseeable and preventable traffic hazard. This is a crucial issue that must be addressed before proceeding with the plans and we respectfully ask that An Bord Pleanála if approving the current scheme can include an amendment or requirement for this significant matter to be meaningfully addressed.

3. Disproportionate Focus on Wildlife Over Community Impact

The comparison between the assessment of impacts on human health and that of wildlife is concerning. The level of input and assessment of the potential effects of the proposed bus corridor on wildlife, such as bats and slugs seem disproportionate. While the protection of these species is important, it is highly troubling that no similar reports or assessments have been carried out to evaluate the effects of this project on our community. An eight-page report dedicated to the protection of bats emphasises their environmental significance, yet no comparable attention has been given to the human residents whose lives and well-being will be directly affected by this project. We respectfully suggest to An Bord Pleanála that a more detailed assessment of the effects of the proposed development on the severance of communities and impact on amenity of residential areas is needed and appropriate in the context of the proposed scheme which by its very nature will create significant barriers to movement between and around communities.

4. Boundary Wall Reconstruction

We are deeply concerned that the plans submitted to An Bord Pleanála lack proper measurements regarding the exact boundary line on the Woodhaven side. Without clear and accurate boundary measurements, it is impossible to fully understand the scope of the project and how it will affect our properties. Furthermore, there is no timeline provided for the reconstruction of the historical boundary wall of Woodhaven. This is a significant concern, as the wall is an integral part of our community heritage and its preservation should be prioritised. We respectfully ask that An Bord Pleanála establish from the scheme promoters a timeline for this work.

5. Impact on Heritage

Woodhaven's stone boundary wall was constructed by the Blake family in the 19th century using black marble from their quarry, and it is a key feature of our community heritage. This historic wall represents a connection to our past and is an integral part of our identity. It is deeply hypocritical for the council to approve the demolition of this wall while national heritage funds are being used to preserve similar walls in other locations. The destruction of this wall would erase an important historical landmark and diminish the connection between our community and its history. We invite An Bord Pleanála to agree that the preservation of this wall should be a priority in the overall development plan.

5. Alternative Proposals

In light of the concerns raised above, I would like to offer for consideration some alternative solutions that might better address the needs of the community while improving the overall transport infrastructure:

- **New Road/Cycle Lane Adjacent to the Railway Line:** A new road or cycle lane running alongside the railway line could alleviate much of the congestion currently faced, providing a safer and more sustainable transport option for public transit and cyclists. This could improve traffic flow and reduce pressure on local roads.
- **Roundabout at the Entrance to Woodhaven/Merlin Gate:** A shared roundabout at the entrance to both Woodhaven and Merlin Gate would ensure safer access for residents, reduce congestion, and improve traffic flow. This could significantly mitigate some of the issues caused by the current design and increase overall safety for everyone in the area. Alternatively, the Woodhaven access could be converted to signal control which would also accommodate a pedestrian crossing to the proposed bus stop.
- **Pedestrian Crossing Ramps at Woodhaven/Merlin Gate Roundabout:** Installing pedestrian crossing ramps on either side of the Woodhaven/Merlin Gate roundabout would ensure safer access to both bus stops. This would address pedestrian safety concerns and ensure compliance with the required guidelines for bus stop access.
- **Roundabout at Galway Crystal:** A roundabout at Galway Crystal would improve traffic flow and reduce congestion. This could help eliminate the need for traffic lights at the hospital entrance, improving safety and overall traffic efficiency in the area.
- **Prohibited Right-Turn at Merlin Park Hospital:** Introducing a prohibition on the right turn from Merlin Park Hospital would ensure that traffic can only turn left. Drivers would have the alternative option of using the Galway Crystal roundabout to return in the

opposite direction towards the Woodhaven/Merlin Gate roundabout. This would streamline traffic flow, reduce congestion, and improve overall safety at the hospital entrance.

- **Cycle lane and pedestrian walkway:** The current plan specifies cycle lanes and footpaths to be 2 meters wide in each direction (a total of 4 meters). Due to the location of Woodhaven estate, we are recommending a reduction in width to 1.5 meters for both the cycle lane and the pedestrian lane. This measure would result in a total width reduction of 3 meters, freeing up more space for green areas for the residents. The area in question is 120 meters long (the length of the wall outside Woodhaven). This reasonable adjustment will still ensure that the reduced width still allows for safe and efficient use by both cyclists and pedestrians. The width reduction saves 3 meters, and this space can be repurposed to preserving the green space that currently enhance the quality of the residential area.

The issues we have outlined above are very serious and must be addressed before any further steps are taken with the proposed Bus Connects plans. It is essential that the city planners correct the errors regarding the Noise and Vibration report, implement appropriate pedestrian safety measures, provide a safe entrance/exit to and from Woodhaven and above all, give the community the same level of consideration and respect that has been afforded to wildlife in these plans. The current approach not only overlooks the well-being of the residents but also demonstrates an alarming lack of genuine consultation and responsiveness to the concerns of those who will be most affected by these changes.

We believe that addressing the issues we've raised will help in crafting a more effective and mutually beneficial approach. Given these circumstances, we respectfully request an oral hearing with An Bord Pleanála to ensure that residents have a fair opportunity to present our concerns. A project of this scale should not proceed without transparent and inclusive engagement with the community it directly affects.

We look forward to your response and appreciate your time and attention to this matter.

Yours Faithfully,

Liam O Reilly, Yvonne O Reilly, Emily O Reilly
21 Woodhaven, Merlin Park, Galway City. corribview12@gmail.com

