Our Case Number: ABP-321776-25

An Bord Pleanála

Shane Foran
68 Gort Greine
Rahoon
Co. Galway
H91 FY6R

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

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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16 April 2025

FAO: An Bord Pleanála

Re: HA61.321776: BusConnects Galway: Dublin Road Development, Galway

Description: The scheme is 3.9km long starting from Wellpark in the west to the junction of Doughiska Road in the east and involves the provision of bus lanes and cycling facilities and junction rearrangements.

To whom it may concern

I wish to make observations on the above planning application. My main concern is with the correct management of cycle traffic and foot traffic. Overall the design and concept of the scheme is very welcome. In particular, I would like to note that this scheme marked an occasion on which the non-statutory consultation resulted in significant improvements. The removal of the Skerritt Roundabout is of strategic significance for active travel in Galway City. The following observations are meant by way of seeking improvements and not as any challenge to the overall concept of the scheme.

Background

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. In my view the designation of Galway as a TEN-T urban node creates a duty to manage active travel infrastructure in an exemplary manner according to latest best practices.

Galway as a Cycling City

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.

Observations

These observations are based on this drawing file on the scheme website.

> https://innovision.s3.eu-west-1.amazonaws.com/Galway_BC/Magazines/General+Arrangement/files/downloads/OSR%20Appendix%20A%20-%20General%20Arrangment%20Drawings%20P04.pdf

The significance of the proposed "cyclops" arrangement at the Skerritt Junction.

In my view a significant improvement to the original plans is the proposed use of a cyclops traffic signal arrangement at the Skerritt Junction.

> There is a paper here explaining the concept of the cyclops junction
> https://www.jctconsultancy.co.uk/Symposium/Symposium2018/PapersForDownload/CYCLOPS%20Creating%20Protected%20Junctions%20-%20Richard%20Butler%20Jonathan%20Salter%20Dave%20Stevens%20TFGM.pdf

In a cyclops arrangement cycle traffic is brought through the junction outside rather than inside the pedestrian crossings in an "external orbital system". From the source above this is claimed to have certain advantages.

> "1. All cycle-traffic conflicts can be signalised
> 2. Cycle phases can run simultaneously during an 'all red to traffic' stage
> 3. Cycle / cycle conflicts are simple, intuitive and need not be signalised
> 4. Cyclists can make fully protected 2-phase- right-turns (subject to signal staging and timings, this may be achieved in one movement or with little delay)
> 5. Controlled cycle and pedestrian phases need not conflict and can run simultaneously
> 6. Accommodating multiple origins/destinations is more straightforward"

The same source notes that

- Cyclists can filter left onto and off the orbital route without signal control
- Controlled pedestrian phases are shorter and closer to desire lines

It will be my general argument that this design pattern would also be beneficial at other locations on the scheme.

General Principles: Continuous footways and cycle tracks

It should be a general principle that at priority junctions and property entrances any footways or cycle tracks are continuous and do not change levels to accommodate motor vehicle movements. That is there should be no "dishing" of the footway or cycle track at the properties. The kerbing should slope to footway/cycle track height to allow vehicle access. See Dutch "inritblokken" or "inritbanden" type kerbing where the kerb has a slope that raises to the height of the footway/cycle track.

https://struykverwoinfra.nl/inritbanden.html

For a discussion of Dutch type road entrance practice and continuous footways/cycle tracks please see here.

https://therantyhighwayman.blogspot.com/2017/09/ive-seen-things-you-people-wouldnt_23.html

Figure: Dutch type entry/exit kerbing or "inritblokken" (Utrecht) a short ramp reaches the height of the cycle track/foot way rather than the cycle track being dipped. It is made clear to entering and exiting drivers that this is a space where walking and cycling have priority

Bus stops (General)

Observation: 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

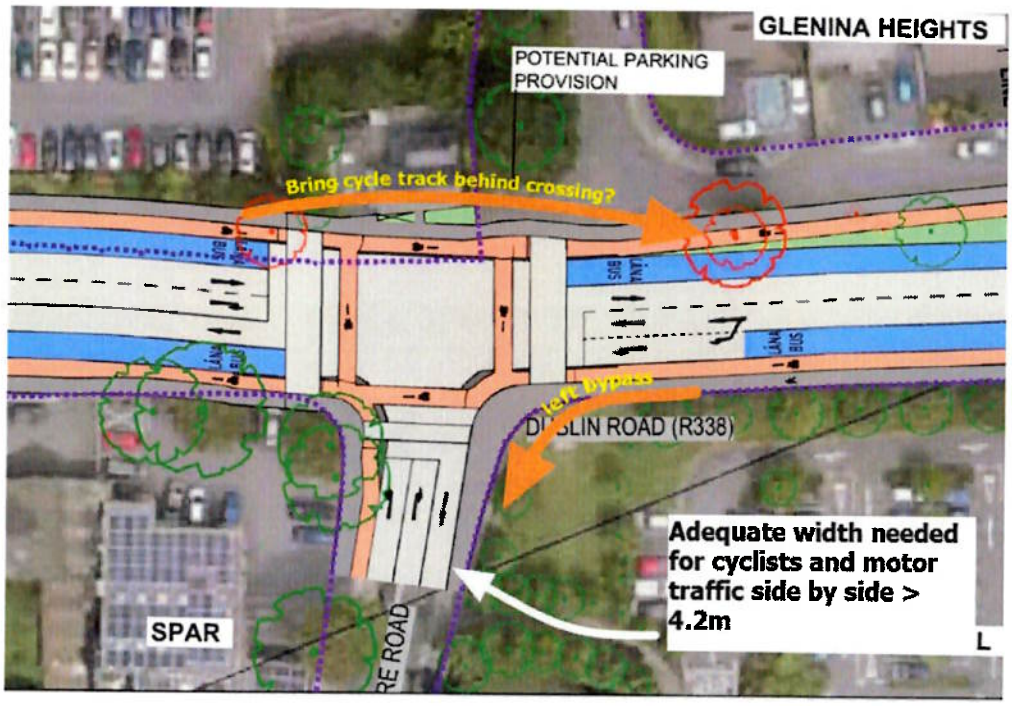
Observations on Specific Locations

Location: Renmore Park

Observation: A continuous footway/cycle track treatment is needed across the mouth of the junction.

Location: Junction of R338 Dublin Road and Renmore Road (Duggan's Shop)

Observation: The house facing Duggans shop on northside of the junction should be given a dedicated parking/driveway arrangement within Glenina heights. Consideration should be given to a cyclops type arrangement 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.



Location: Renmore Road to Michael Collins Rd junctions.

Observation: The cross section C-C given in the drawings shows the cycle-track width as 1.75m this should be widened to 2m.

Location: Property entrances on the south side of Dublin Road opposite Galwegians and Flannery's Hotel.

Observation: There should be no "dishing" of the footway or cycle track at the properties. The kerbing should be sloped to allow vehicle access continuous footways/cycle tracks.

Location: Belmont/Ballyloughane Road Junction (ATU)

Consideration should be given to making the Belmont junction into a cyclops layout with a direct link into the ATU campus. 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. This would also help to reduce the use of the roads within Renmore as a rat run for drivers trying to avoid queues on the Dublin Road. Consideration should be given to making the eastbound arm flashing amber for motor traffic turning into Belmont.

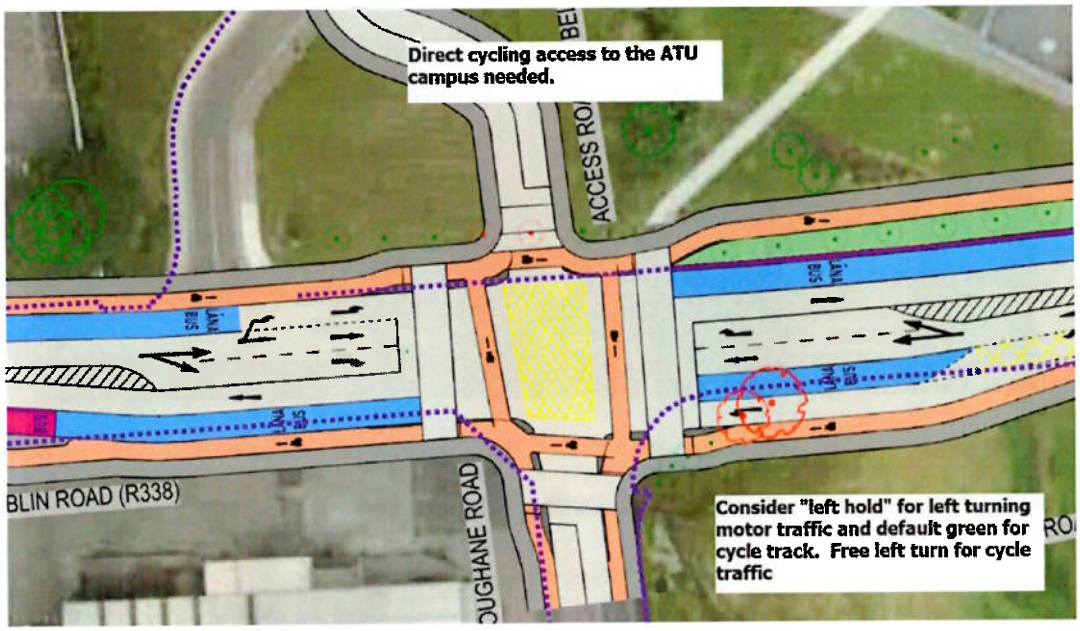
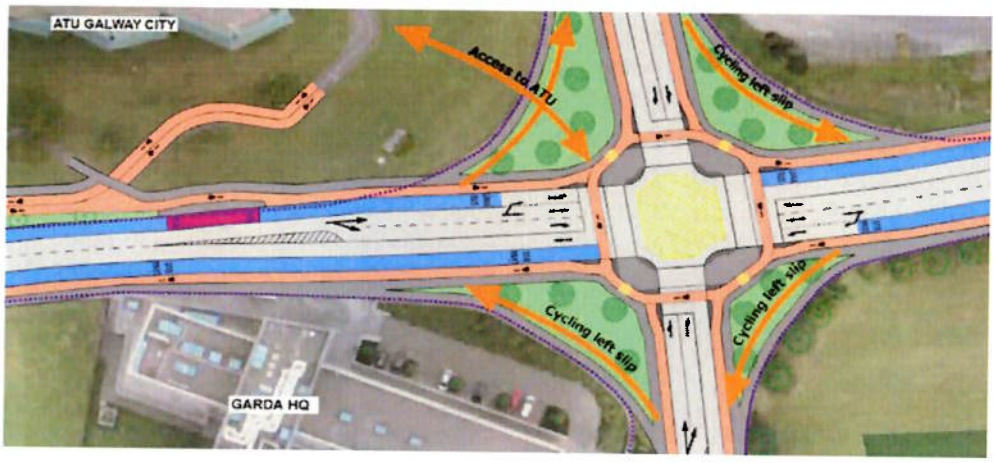


Figure: Screengrab from Google street view showing the current access arrangements at the ATU campus beside the Belmont Housing development.

Location: Skerritt Roundabout

The proposed cyclops junction at the current Skerritt Roundabout is welcome.



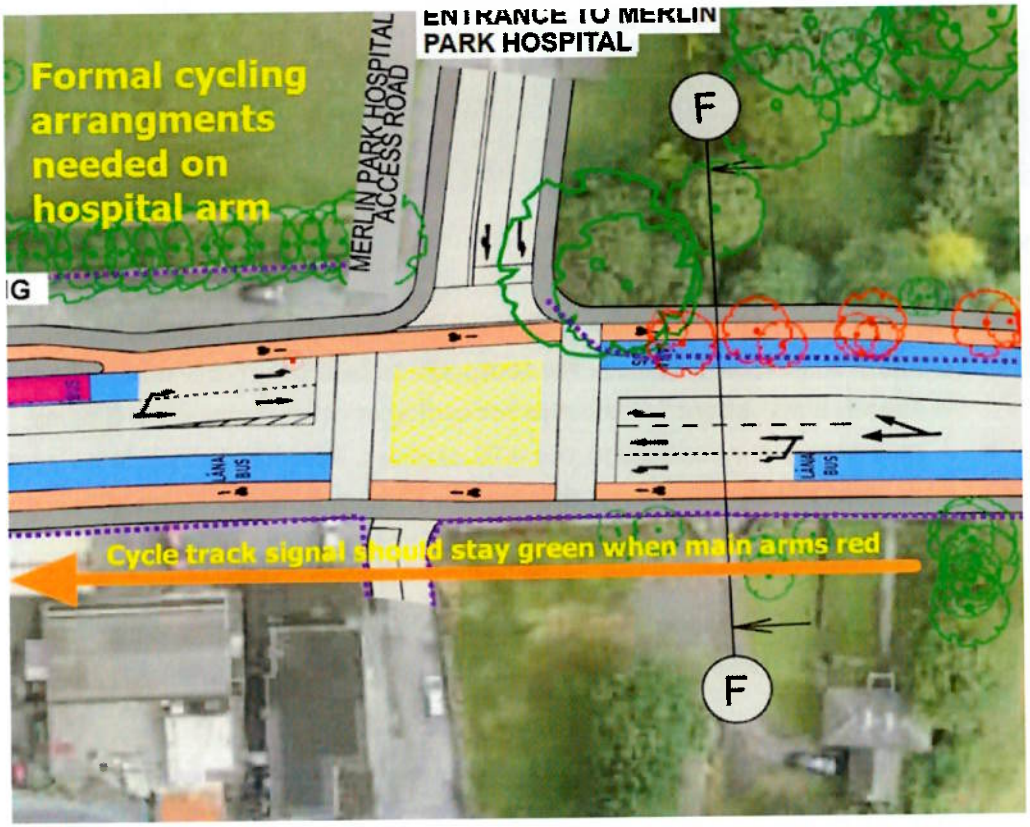
Observations.

- Left slip lanes are needed for cyclists on all quadrants. Reason: Otherwise a proportion of cyclists will use the footpaths to take the shortest path. There is already a precedent for left slips for cycling at other locations in Galway.
- A new access is needed into the ATU campus: Reason: If there is no access here then a likely outcome is that cyclists coming from the south will cross at the Skerritt and cycle in the wrong direction along the cycle track north of the road.
- Observation: Possible potential for a diagonal crossing running northwest/southeast to new access with all green for foot and cycle traffic.

Figure: Screengrab from Google street view showing a left slip arrangement for cycle traffic at the junction of the Tuam Road and Bothar Na dTreabh.

Location: Merlin Park Entrance

The signalisation of the Merlin Park entrance is very welcome and is something local community members have sought for years. The hospital campus is a potential source and destination for cycle traffic and potentially the main route towards the city from Doughiska/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 for cycle traffic unless the pedestrian crossings are in use.



Location: South side of Merlin park junction

Route to Lios An Uisce/Gleann Na Ri
There is 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. Consider if this could be tied in with the Merlin junction in some way?

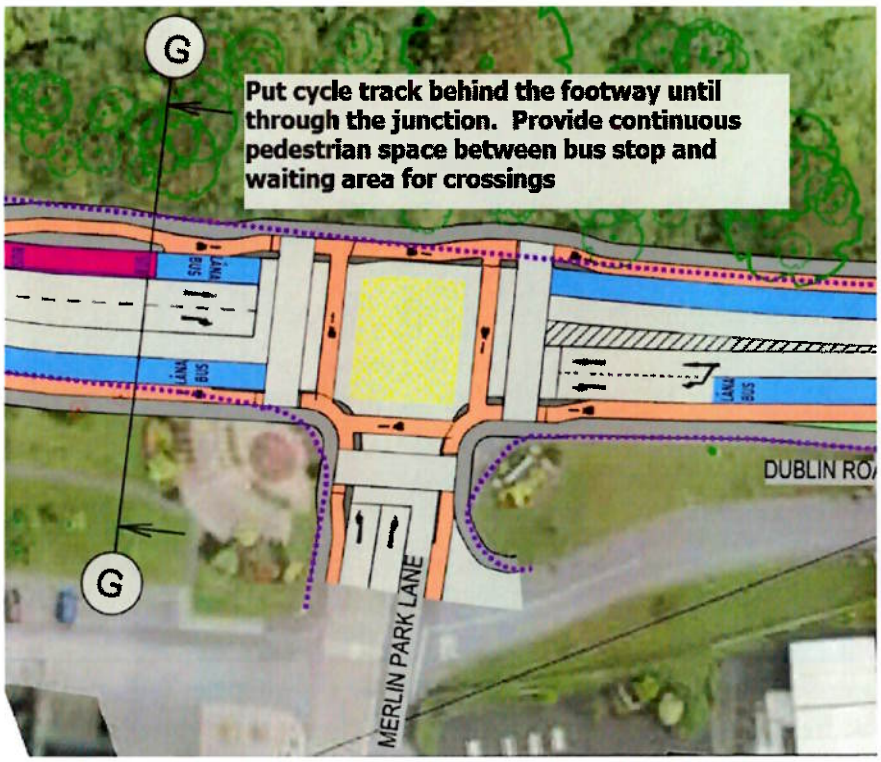
Figure: Screengrab from Google street view showing the entrance to the traffic free lane away from the Dublin road that is the natural walking and cycling route to and from Galway Crystal/Lios An Uisce/Gleann Na Ri.

Location: Galway Crystal/Merlin Lane Junction

Consider converting to a Cyclops Junction

Junction north side
Observation: The floating bus stop/island should be continued to, and through, the traffic lights. So the outbound cycle track will pass to the left of the pedestrian space at the junction. This will deconflict eastbound cycle traffic who will be able to keep moving regardless of the traffic signals or pedestrian crossing state.

In the drawings for the non-statutory consultation there was a proposal for a two-way cycle track only on one side of the road and behind the footway at this point. The current arrangement with cycle tracks on both sides is better overall but the previous arrangement behind the footway has advantages. The developer clearly already has drawings for this.



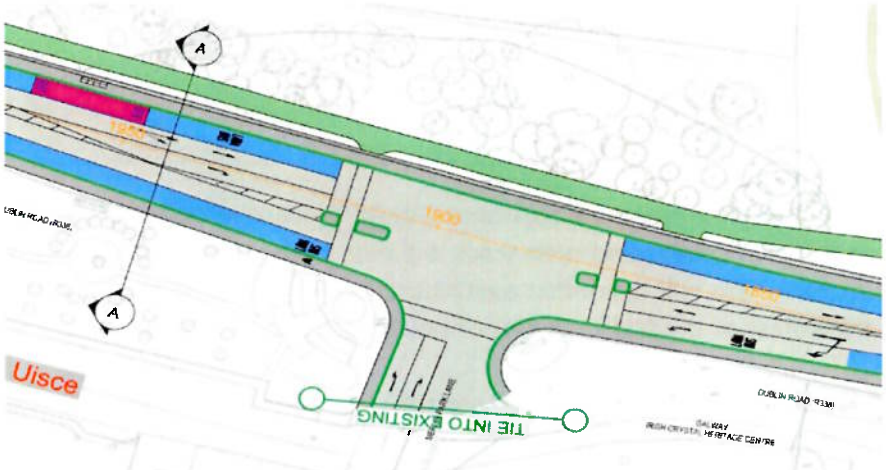


Figure: Extract from the drawings for the non-statutory consultation showing the cycle track passing behind the footpath at the Galway Crystal/Merlin Lane junction.

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.

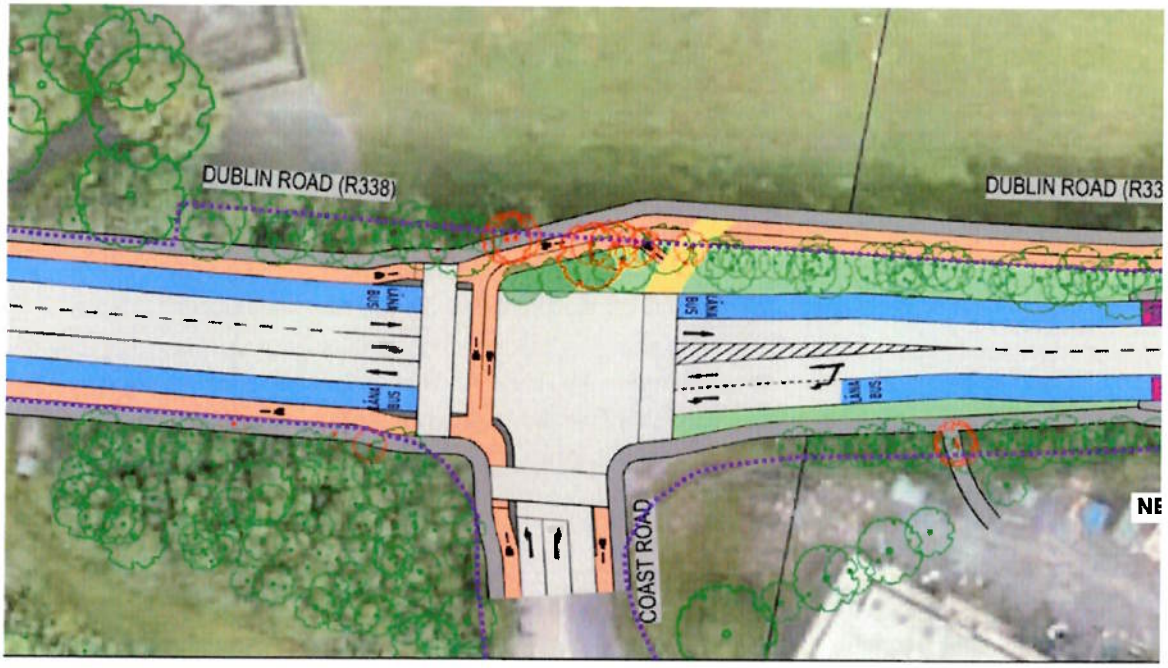
Figure: Screengrab from Google street view showing the traffic free path from the end of Rosshill road leading towards Galway Crystal

Location: Junction of R338 Dublin Road and Coast Road

Observation: Cycling bypasses for cyclists turning left should be available on all arms. (Land does not seem to be an issue here).

Observation: The design of the junction is not intuitive and it is not clear how cyclists are supposed to access the coast road to travel towards Oranmore.

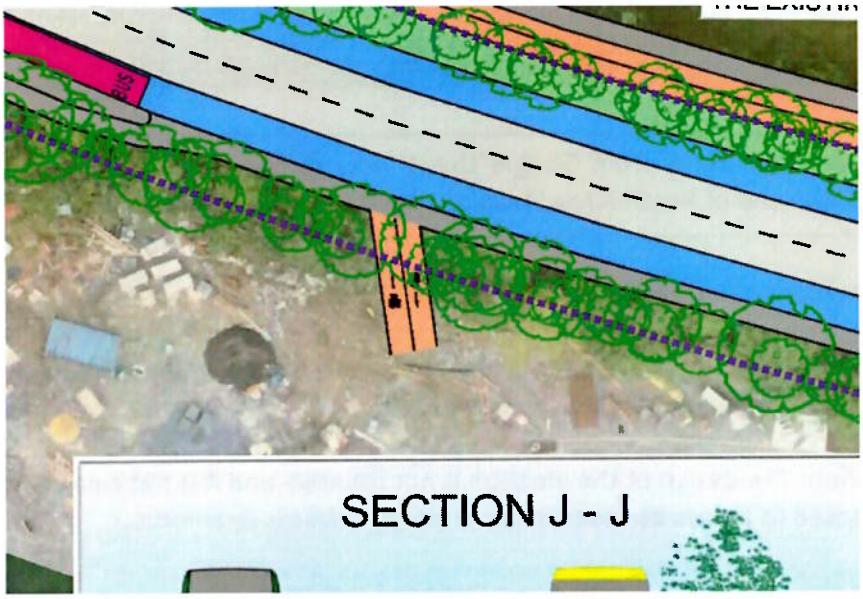
Consider converting this junction to a Cyclops junction.



Location: Castlegar GAA Pitch

Observation: In the plans formal 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.

The south side of the road is the natural route towards ATU and the city for cycle traffic coming from a large residential area south of the Dublin Road at Roscam. The planning drawing also shows a cycle track joining this "Shared Pedestrian Cycle path" from the south.



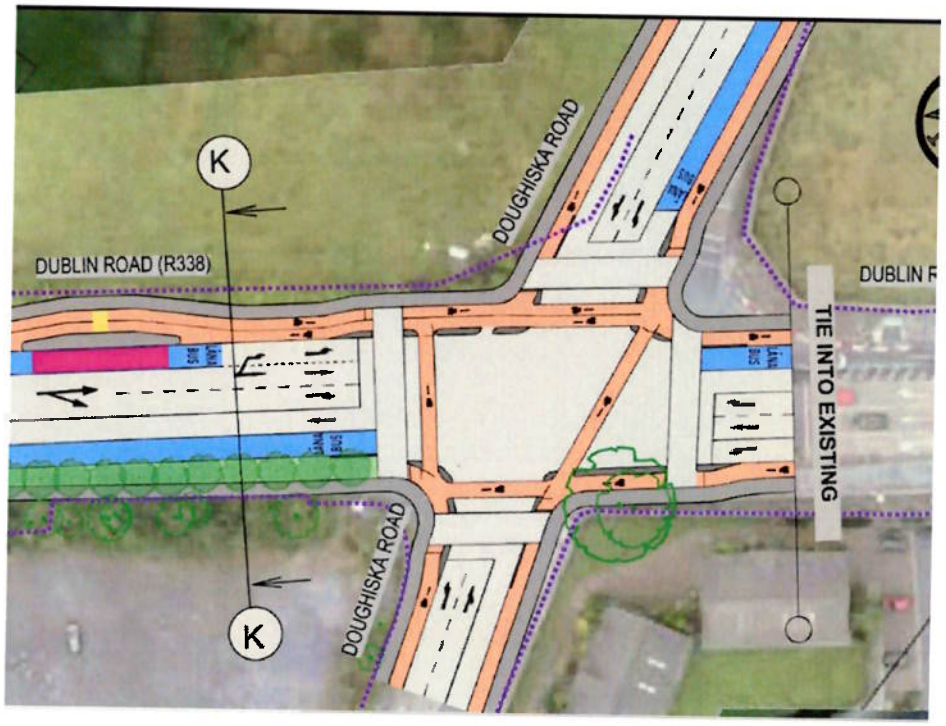
The 2011 National Cycle Manual (NCM) states that shared facilities next to traffic should have a combined width of 3m.

> NCM Shared Facilities (Page 23)
>
> 1.9.3 Shared facilities
> Shared facilities are disliked by both pedestrians and cyclists and result in reduced Quality of Service for both modes. With the exception of purpose-designed shared streets, shared facilities should be avoided in urban areas as far as possible. Where shared facilities cannot be avoided, there are a number of considerations as follows that will help both cyclists and pedestrians to be aware of the other's presence.
>
> [...]
>
> • Shared facilities next to vehicular traffic should have a minimum combined width 3.0m

Location: Junction of R338 Dublin Road and Doughiska Road

Observation: Cycling bypasses for cyclists turning left should be available on all arms. (Land does not seem to be an issue here).

Consider converting this junction to a cyclops junction. The current design suggests cycle traffic will be needlessly held at red lights even though cycling movements should be achievable without any conflict with pedestrian movements or motor traffic.



Summary

The proposals as currently conceived represent a step change in provisions for active travel in Galway. Despite this, there are opportunities for improvements to bring the scheme in line with the latest thinking on provisions for active travel. The proposed changes such as cyclops arrangements at junctions should not be onerous. With these changes this scheme could become a model for the rest of the country.

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

Yours faithfully,

Shane Foran