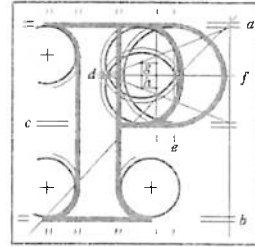


Our Case Number: PA0033



An
Bord
Pleanála

John P. Kelly
Tobin Consulting Engineers
Fairgreen House
Fairgreen Road
Galway

Date: 7th October 2019

**Re: Galway Harbour Extension
Renmore and Townparks Townlands, Galway**

Dear Sir

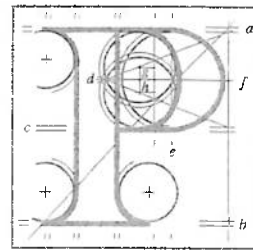
I have been asked by An Bord Pleanála to refer further to the above mentioned proposed development and in particular to compensatory measures as required under Article 6(4) of the Habitats Directive.

The Board has examined the information submitted on behalf of Galway Harbour by Tobin Consulting and Aquafact Ltd entitled 'Galway Harbour Extension – Compensatory Measures Report' and 'Addendum to Natura Impact Statement to Include Consideration of Compensatory Measures' of April 2019 and requires clarification / comments on a number of issues set out in both report. In accordance with section 37(F)(1) of the Planning and Development Act, 2000 as amended, please address the following issues.

1. There are specific concerns that the monitoring programme to be employed may not provide an effective method to measure the success of the compensatory measures. Detailed monitoring is required to test the success of the compensatory measures. It is considered that there are no clear specific objectives for the monitoring programme which set out measurable outcomes on which the success or otherwise of the proposed compensatory measures can be ascertained. The compensatory measures need to be compared against a set of established indicators and thresholds. Please provide an appropriate methodology to address this issue.



2. The applicant is requested to demonstrate that the disturbance of the perennial stony bank vegetation [1220] at Renmore is only attributed to tidal disturbances, and that no disturbance can be attributed to trampling or shingle extraction. The Board consider that disturbances to the Stony Bank could be attributed to trampling due to anthropogenic interference with recreational walker and dog walkers etc.
3. The applicant is requested to comment on the hypothesis that the expansion of the harbour under the current application will lead to increased shelter conditions which may in turn, improve the condition of the perennial vegetation of stony banks at Renmore.
4. The results of the intertidal survey at Renmore are presented in appendix 4 of the main report. It states that the surveys were undertaken between the 28th and 29th October 2015. The previous version of this Appendix issued in February 2016 states that the surveys were carried out in January 2016. Please clarify the survey dates.
5. Please provide data of sediment chemistry to support the conclusion that the difference between groups A, B and C of infaunal macrobenthos identified in Renmore using cluster analysis techniques are due to high organic loads. Please discuss this in more detail, taking into consideration other natural and anthropogenic variables that may also explain these differences, and the evidence available to support any hypotheses on the distribution of infaunal benthic species and abundance in Renmore. Further data is required to support the conclusions reached.
6. Please provide full results of particle size analysis which were undertaken as part of the survey but are not presented in the report.
7. The report also claims that during the many decades in which untreated raw sewage discharged into the River Corrib and /or via a pipe to the south of Nimmo's Pier that this has given rise to sediment with low levels of oxygen, high levels of sedimentary hydrogen sulphide and therefore reduced numbers of infaunal invertebrates. However, the survey results indicate the opposite. Sites closer to the River Corrib have the highest number of infaunal invertebrates. Please comment further on this, especially in relation to any available data on hydrogen sulphide, and the influence of other variables that may determine distribution of infaunal macrobenthos, particularly particle size of sediment.
8. Please comment upon and explain the rationale for picking the location of sampling spots at Mweeloon as indicated on figure 3.2 of appendix 8 of the Main Compensatory Measures Report.



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9. Concern is expressed that in its current form, the sampling strategy is not specific enough for the establishment of a baseline environment on which the success of future compensatory measures can be assessed. Please provide further details of a sampling strategy which will provide comprehensive data on a baseline environment on which before and after scenarios can be established, and how these will be compared.

10. The Board have concerns that the monitoring programme for the intertidal habitats has some significant methodological errors, such as samples taken at different times of the year, with five replicas taken in Tawin Island (correct for statistical analysis), and only two samples provided at Renmore (not correct). The results of the two samples are compared for analytical purposes in the report. The Board recommend that any inferred results are based on more consistent and robust data set.

The further information referred to above should be received by the Board within four weeks from the date of this notice (i.e. no later than 5:30 p.m. on 4th November 2019).

If you have any queries in relation to the matter please contact the undersigned offices of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,


Kieran Doherty
Senior Executive Officer
Direct Line:01-8737293



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