



An
Coimisiún
Pleanála

**Oral Hearing
Memorandum
PL 61.PA0033**

To: Stephen Rhys Thomas, ADP
From: Liam Bowe, SPI
Re: Galway Harbour Extension
Applicant: Galway Harbour Company
Date: 12th November 2025

Site Location and Description

The application site with a stated area of 85.39 ha is located in Galway Harbour in Galway City. The development area generally comprises of 3 areas:

- Galway Harbour Extension (82.89 ha)
- Galway Harbour Enterprise Park Road & Services Upgrade (1.21 ha)
- Lough Atalia Road & Services Upgrade (1.29 ha)

The Galway Harbour Extension (GHE) area of development consisting of 82.89 ha is broken down as follows:

- Land development area (28.07 ha)
- Breakwaters and Revetment area (3.04 ha)
- Dredged Area (46.48 ha)
- Working Area (Dredge/ Marine Construction) (5.30 ha)

The land development/ redevelopment area of 28.07 ha comprises of:

- Land to be reclaimed from Sea (23.89 ha)
- Existing Galway Harbour Enterprise Park land to be redeveloped (4.18 ha)

The existing port facility is located at the heart of Galway City. The main commercial dock is located between the River Corrib and Lough Atalia on the northern shore of Galway Bay. The commercial dock is less than half a kilometre from Eyre Square in the centre of the city. The existing port straddles on both sides of the channel linking Lough Atalia to Galway Bay.

Galway Bay at its widest point is approximately 60 kilometres wide and is over 70 kilometres long. The inner part of the bay, where the harbour is situated, does not generally exceed 10 metres in depth. There are two islands in the vicinity of the approach to the Harbour, Mutton Island to the west and Hare Island to the east. Both islands are c.1 km from the mainland. Mutton Island is linked to the mainland via a causeway and a WWTP serving the city is situated on the Island. Hare Island is uninhabited. Mutton Island and Hare Island provide a natural shelter to the approach to the harbour. The seabed between the islands and the mainland incorporates very shallow depths.

Galway Harbour is a designated Special Area of Conservation, Special Protection Area and is a proposed Natural Heritage Area.

Proposed Development

Planning permission is sought for an extension to Galway Harbour at Renmore and Townparks Townlands, Galway. The proposal can be summarised as follows:

- 660m of quay berth to -14.9m O.D. depth
- Port development serviced by a channel to -10.9m O.D.
- A 400m turning circle to -10.9m O.D.
- 28.07 ha of land development.
- 660m of sheltered quays including breakwater.
- Western Marina with 216 No. berths.
- Fishing Pier

- Nautical Centre Slipway
- Freight rail link to enable freight and cargo to be efficiently transported to and from the GHE to allow positive road traffic and environmental benefits.

As noted above, the land area to be developed is 28.07 ha. This will provide the following land use area breakdowns in yards, quays, open space etc:

- Commercial Port back up Yard Areas (6.45 ha)
- Commercial Quay Areas (1.72 ha)
- Harbour Company Warehouse Yards (1.53 ha)
- Future Oil and Bitumen Yard Areas (1.86 ha)
- ESB, Security Yard & Fire Water Storage Area (1.08 ha)
- Marina Boat Yard, Quay and Village Area (1.83 ha)
- Fishing Pier and Yard Area (0.55 ha)
- Roads and Access Area (3.97 ha)
- Rail Line and Embankment Area (2.20 ha)
- Nautical Yard & Slipway Area (0.82 ha)
- Passenger Terminal Yard Area (0.34 ha)
- Landscaped Area (5.44 ha)
- Wave Wall Area (0.28 ha)

It will also allow for:

- Parklands and landscaping areas,
- Renmore Promenade, and
- Marina Promenade.

Relevant Planning History

ABP-321697-25: 30 no. offshore wind turbine generators with gravity based fixed-bottom foundations and all associated work located off the coast of Co. Galway and Co. Clare.

P.A. Reg. Ref. 21316: Permission granted to GHC for the partial demolition of the 1st, 2nd, 3rd and 4th storey of the existing Ice House building whilst retaining and upgrading the ground floor, ground floor entrance and existing ESB substation within.

P.A. Reg. Ref. 20331: Permission granted for amendments to approved telecommunication development (P.A. Reg. Ref. 20/50).

P.A. Reg. Ref. 14272: Permission granted to GHC for a bulk store (1,625m²).

P.A. Reg. Ref. 14226: Permission granted for a storage shed.

P.A. Reg. Ref. 173: Permission granted an extension of duration on P.A. Reg. Ref. No. 11/113 for the construction of a bitumen storage facility (two number 9,330m³ bitumen storage tanks (30m diameter and height above ground to eaves is 11.7m)).

P.A. Ref. 2560296: Application by the Land Development Agency for a proposed mixed-use development of 356 no. residential apartments, a creche, 2 no. café/restaurants, and 1 no. retail unit.

Context

On 25th September 2015, having completed an appropriate assessment of the Galway Harbour Extension, the Board decided that approval of the proposed development could not be considered under Article 6(3) of the Habitats Directive given that a significant adverse impact of the integrity of Galway Bay SAC would occur. Galway Harbour Company (GHC) was therefore invited in accordance with Section 37(F)(1) of the Planning & Development Act, 2000 (as amended) ('the Planning Act') to confirm that it wished the project to be considered under Article 6(4) (IROPI) of the Habitats Directive. If so, the Board required proposals from GHC for compensatory measures to address the impacts on the integrity of Galway Bay SAC identified in the findings of the appropriate assessment.

GHC submitted a final report entitled 'Proposed Compensatory Measures' to the Board on 26th April 2019 with a separate addendum to the Natura Impact Statement (NIS) to include the consideration of the compensatory measures. The Board concluded that the chosen site at Tawin Island was deemed to be suitable to provide effective compensatory measures for the loss of habitat associated with the proposed expansion of Galway Harbour. Consequently, the Board prepared a Statement of Case and submitted to the Minister on 24th March 2021 in accordance with the provisions of Section 177AA(2) of the Planning Act in support of planning consent being given for imperative reasons of overriding public interest (IROPI) and compensatory measures.

On 27th February 2024, Minister Darragh O'Brien T.D. notified the Board pursuant to Section 177AB(3) of the Planning and Development Act, 2000 (as amended) of his opinion that the compensatory measures proposed are sufficient to ensure that the overall coherence of the Natura 2000 is protected. Minister O'Brien advised that under Section 177AB(5) of the Act he was obliged to inform the European Commission of the compensatory measures and to forward them a copy of the statement of case for imperative reasons of overriding public interest (IROPI).

Following a meeting of the Board held on 28th June 2024 the Board decided to defer consideration of the case and to issue a notice under Section 37F(1)(a) of the Planning and Development Act, 2000 (as amended) to the applicant as follows:

Having regard to the passage of time since the application was submitted to An Bord Pleanála, the applicant is requested to provide to the Board any updated information and any other relevant information which you may wish the Board to consider in its determination of the application. This information may include, in particular, any updates in relation to the Environmental Impact Statement.

In response to this, the applicant (GHC) submitted an Addendum Environmental Impact Statement (EIS) and Natura Impact Statement (NIS) and associated materials to the Board on 27th September 2024.

The various folders submitted with the further information are set out below:

- Cover Letter
- EIS Addendum Volume 1 – Main EIS Chapters (Folder 1)
- EIS Addendum Volume 2 – Appendices Part 1 of 2 (Folder 2)
- EIS Addendum Volume 2 – Appendices Part 2 of 2 (Folder 3)
- NIS Addendum and Appendices (Folder 4)

Following a further meeting of the Board held on 6th November 2024, the Board decided to make this information available for inspection and to invite further submissions or observations for a period of six weeks. The closing date for such submissions was 7th February 2025 and 22 submissions were received.

Third Party Observations

8 no. third party observations have been received and are summarised within Appendix 1 of this memo, one of which has requested an Oral Hearing. In relation to the content of the observations it is of note that many issues raised are common to all of the submissions. For example, 5 no. expressed their support for the development of the port and associated socio-economic benefits for the city and the region. The other 3 no. are concerned about impacts on the ecology of the area and the compensatory measures, aspects of pedestrian/ cyclist safety, traffic management during the construction and operation phases, and 2 no. of these consider Shannon-Foynes Port to be best placed to service the development of offshore renewable energy off the west coast.

Prescribed Bodies

Submissions have been received from 14 no. prescribed bodies, which are summarised hereunder:

An Taisce

- Contends that the response of the applicant does not appear to have adequately considered the significant changes under:
 - The Paris Agreement
 - The Effort Sharing Regulation
 - National Energy and Climate Plan 2021-2030 (NECP)
 - Climate Action and Low Carbon Development Acts 2015-2021
 - Galway City Local Authority Climate Action Plan 2024-2029
 - The High Court decision on Coolglass Wind Farm case
 - The National Planning Framework 2018 and, in particular, NPO 40
 - Policy Statement on the Facilitation of Offshore Renewable Energy in Commercial Ports in Ireland (December 2021)
 - National Ports Policy Review
- Highlights the Shannon-Foynes jetty expansion and logistics park, which was co-funded by the EU's Connecting Europe Facility (CEF).

- Highlights the €100m project to be built at Ringaskiddy, Co. Cork to support offshore renewable energy development.
- Highlights the suitability of the deepwater quay at Ros an Mhíl, Co. Galway as an offshore servicing site.
- Highlights Belfast Harbour's existing capabilities regarding offshore wind and a further proposed £90m investment in a new deepwater quay to support floating offshore wind farms.
- Outlines the global climate reality and impending fines for Ireland from not meeting EU emissions targets.
- Contends that there is no evidence that potential sea level rise has been factored into the proposed development since the original application.
- Demonstrate how the storm surge during Storm Éowyn was in the order of 2.75m above the astronomical tide and express concern that the finish floor levels of all proposed buildings provides a freeboard of 295mm (and not the 800mm suggested in the EIS) if the same surge were to occur at highest tide.
- Highlights that the applicant has not looked forward a century to consider decommissioning.
- Requests the Board to seek the applicant to review impacts of storm surges of the height that occurred during Storm Éowyn and how the proposed development might cause deflection of storm surge waters to other areas.
- Contends that the Tier 1 Ports of Cork and Shannon-Foynes and the major fisheries ports of Ros an Mhíl and Killybegs may be better placed to service any need to support the development of offshore renewables off the west coast.
- State that a rail connection to Galway Harbour is not included in Iarnród Éireann's Rail Freight 2040 Strategy.
- Acknowledges that the Port of Galway is included in the TEN-T network since July 2024 as a 'comprehensive port' but highlights that both the Port of Cork and Shannon-Foynes Port have a higher designation as a 'core maritime port'.

- Outlines how the embodied carbon in the proposed development represents 0.366% of Ireland's 2026-2030 carbon budget and 0.3% of the Sectoral Emissions Ceiling for industry for the same period.
- Contends that the construction of 982 houses and 1,624 apartments would have to be abandoned to compensate for embodied carbon in the GHE in order to meet targets in the CAP.
- Contends that the applicant has failed to consider Iarnród Éireann's Rail Freight 2040 Strategy in the EIS Addendum.
- Claims that the operational stage emissions of 10.3ktCO_{2e} would be 4.3% of the target emissions for Galway City under the LACAP 2024-2030, which is 72% more than stated in the further information submitted to the Board.
- Outlines deficiencies in the 2022 and 2023 AERs submitted by Uisce Éireann to the EPA and highlights deficiencies in the wastewater and storm water networks referenced in Uisce Éireann's Drainage Area Plan for the Galway agglomeration.
- Contends that the NIS needs to be reviewed to take into account that there is no prospect of a rail link to the proposed development in the foreseeable future.
- Advises about the negative effects associated with cruise tourism.
- Contends that the proposed areas for Compensatory Measures should already be conserved within the Galway Bay Complex SAC.
- Submits that the four objectives of the Intertidal Management Plan are vague and unmeasurable and seeks the provision for more specific measurable metrics for each of the objectives (includes suggestions).
- Submits that the grant of planning permission should be made conditional on the achievement of specific metrics for each objective over the lifetime of the proposed development.
- Submits that the grant of planning permission should be made conditional on the purchase, within a set timeframe, of the 17.79 ha of intertidal habitat at Mweeloon and the 0.844 ha of stony bank at Twain West.

- Contends that the appropriate decision would be to refuse permission for the proposed development on the grounds outlined, including that it would be premature pending permission being granted for an appropriate flood relief scheme for Galway City.

Commission for Railway Regulation

- Request consultation to ensure no increased risks associated with railway trespass during or post construction.
- Draw attention to construction guidelines to be adhered to for the safe operation of the railway line.
- The party undertaking works should consult Iarnród Éireann about road-rail interfaces on access routes that may have increased flow or abnormal loads.

Department of Housing, Local Government and Heritage (Nature Conservation)

- Notes the review of current legislation, guidance and Natura 2000 conservation objectives documents by the applicant and the completion of additional surveys.
- Notes that the applicant compared the studies carried out over multiple years for intertidal benthic flora, fauna, and sediments and only small variations were seen in abundance and community types.
- Agrees that the conclusions reached in the original NIS and Addendum/Errata remain valid for Lough Atalia and Renmore Lough following further field surveys.
- Notes that there have been no significant changes to intertidal habitats, including Stony Bank Habitat and Slat Marsh Habitats CM1/CM2, since the original surveys carried out.
- Notes the conclusion that the evaluation of marine and coastal habitats has not changed under the NIS Addendum 2024 and that there will be “no additional significant impact to Galway Bay SAC”.
- Agrees that the conclusion reached by the applicant is supported by the available information.

Department of Housing, Local Government and Heritage (Archaeology)

- Notes that works to lower the carriageway under the railway bridge at Lough Atalia Road have been completed as part of a separate scheme.
- Notes the addition of a pre-construction stage mitigation measure in relation to wreck site W17455.
- Conditions recommended to be attached to any approval of the proposed development in order to align the project with statutory obligations and policy objectives for the protection of the State's underwater cultural heritage.

Environmental Protection Agency (EPA)

- States that the development may require a Waste licence under the Waste Management Act, 1996 (as amended) or an Industrials Emissions licence under the EPA Act, 1992 (as amended).
- Unclear what elements of the proposed development would require a wastewater discharge licence from the EPA.
- Advise that a dumping at sea permit is required in the event of any deliberate disposal of a substance or material in the maritime area.
- State that the applicant will be required to submit an EIS to the EPA should a licence application be made.
- State that they cannot issue a Proposed Determination on a waste licence application which addresses the proposed development until a planning decision has been made.

Health and Safety Authority (HSA)

- Does not advise against the granting of planning permission on the basis that no Class 1 petroleum products are offloaded at the new jetty while a cruise ship is in the harbour.
- Advises that future development around COMAH establishments has the potential to impact on the expansion of those establishments.

Health Service Executive (HSE)

- Satisfied with the methodology used in relation to soil, hydrogeology and hydrology, and noise and vibration and recommends that construction monitoring be undertaken.
- Recommends that an odour management plan be devised and implemented.
- Content that there is adequate protection for ground and surface waters if all proposed mitigation measures are implemented.
- Recommends that a dust monitoring programme be put in place during the construction phase.
- Recommends that noise and vibration mitigation measures be put in place during the construction phase and if there are exceedances these measures should be reviewed.
- Recommends that the opportunities for health gain are maximised by the provision of walkways and cycle paths.

Inland Fisheries Ireland (IFI)

- Highlights the classification of the River Corrib under the EU Water Framework Directive as of 'good ecological status' and 'not at risk' and the need to maintain these statuses.
- Notes the legislation protection for Atlantic salmon, sea lamprey and brook lamprey under the Lough Corrib SAC designation.
- Outlines concerns in relation to impacts on diadromous fish species (Atlantic salmon, sea trout, European eel and sea lamprey), particularly on European eels and the provision of a wildlife pass at the seaward end of the proposed harbour extension.
- Concerned that juvenile fish leaving the River Corrib and adult fish returning may be impacted by underwater noise.

Maritime Area Regulatory Authority (MARA)

- Highlight the requirement for the applicant to make a maritime area consent (MAC) application before the 2nd anniversary of the date of grant of permission.

- Highlight that the MAC boundary will encompass all aspects of the proposed development within the maritime area.
- State the legislation used to determine a MAC application and the rehabilitation of the maritime area. Informs the Board to be cognisant of a decommissioning plan.
- Highlight the legislation that requires MARA to licence marine usage activities.

Northern and Western Regional Assembly

- Highlight that there are several Regional Planning Objectives (RPOs) in the RSES that are either directly or indirectly relevant (listed in Appendix I of submission) to the proposed development.
- States that the enhancement of Galway Harbour has been and continues to be supported and seen as a key strategic priority at regional level.
- Delivery of the project will significantly contribute to the future growth of Galway, the region and help achieve balanced regional growth.
- Confirm that the further information submitted reflects the current status of regional policy updates.

The Land Development Agency (LDA)

- Express support for the Strategic Infrastructure Development as proposed by GHC.
- State that the relocation and expansion of port activity away from the Inner Harbour area of Galway Port is beneficial to unlocking the long-term regeneration potential of this strategically located city centre landbank.
- Outline the supporting policy in the NPF, RSES and City Development Plan for the regeneration of the Inner Harbour area.
- Whilst the LDA lands can function independently of the redevelopment of adjoining lands, the regeneration of the wider Inner Harbour area will benefit significantly from approval of the current application.

Transport Infrastructure Ireland (TII)

- Confirm that position remains as set out in earlier submission and has no specific observations to make in relation to the further information.

Western Development Commission (WDC)

- Express support for the proposed development of Galway Harbour as the statutory body with the remit to promote, foster and encourage economic and social development in the Western Region.
- Contend that the development will enhance the capacity of the Port of Galway to support the growth of renewable energy opportunities in the Western Region.
- Contend that the development will contribute to a resilient maritime infrastructure and enable the Region to maximise the opportunities presented by the marine economy.
- Aligns with the Climate Action Plan and National Ports Policy in supporting offshore renewable energy and sustainable economic growth.

Uisce Éireann

- Acknowledges that the applicant is seeking to extend public water and wastewater network infrastructure, alongside other basic infrastructural services, from the existing Galway Harbour Enterprise Park (GHEP) into the proposed reclaimed landbank.
- Requests the applicant to ensure the proposals for groundworks and site development, landscape works and activities to facilitate the construction of the development do not negatively impact on public infrastructure do not negatively impact on public infrastructure.
- Requests the applicant to engage with them prior to works commencing to agree any diversion measures and/or achieve separation distances meeting their standards and codes of practice.

Need for Oral Hearing

As noted above, one of the observers sought to have an Oral Hearing.

Recommendation

I have examined all of the submissions received, the GHC's response to the submissions and all of the documentation submitted with the application and I have

considered all of the foregoing in relation to the Oral Hearing checklist which is appended to this memo within Appendix 2.

Having regard to:

- The information provided by the applicant including the EIS Addendum and NIS Addendum, and
- The submissions received to date from the prescribed bodies and observers,

I do not consider that the issues arising would warrant the holding/ re-opening of an oral hearing and I submit that the documentation on file can be readily assessed by way of the written submissions. I would also submit that the convening of a further hearing would not be likely to elicit new information that would assist in the understanding or proper assessment of the proposed development. I have circulated the response from GHC to the observers, and they have been given the opportunity to comment on this response.

I therefore recommend that the oral hearing is not held/ re-opened in this instance.

Liam Bowe
Inspectorate

Appendix 1 – Third Party Observations

Dr. James McCarthy

- Highly destructive to the city marine and shoreline ecosystems, especially to the EU protected Galway Bay SAC and Galway Bay SPA. An independent study of the extent of the biodiversity impacts should be undertaken.
- Contends that ship-to-rail transport in the Shannon Estuary is a better solution for the transport of goods in the west of Ireland.
- The proposed development appears to be totally disproportionate for a city the size of Galway and he is unsure of economic gains other than those generated during construction.
- Contends that the Shannon Estuary with existing deep water facilities is the logical place for all capital investment serving the heavy shipping side of the offshore wind energy business.

Galway Bay Sailing Club

- Express their full support for the expansion of the Port of Galway.
- State that the relocation of commercial shipping activities will offer them an opportunity to further enhance the club's operations, providing safer and more efficient access to the Bay.
- Highlight that the two Volvo Ocean Races demonstrated the potential of the city and its surroundings as a hub for maritime tourism and culture.

Galway Chamber of Commerce

- State that it represents 500 members and c.28,000 employees across Galway city and county.
- Fully endorse and strongly support the plans for the redevelopment of Galway Port.
- The NPF underscores the necessity of renewable energy development and contend that Galway's strategic location can be a key contributor to this. The inclusion of Galway Port in the TEN-T network highlights its significance.

- Contend that the development will improve intermodal connectivity and will serve as a catalyst for regional economic development.

IBEC

- State that Port capacity in Galway is wholly inadequate in order for it to compete for and win new national and international business and to meet the changing needs of existing customers.
- The Port needs to be capable of accommodating 12-20,000 tonne vessels to avail of more competitive process and to reduce carbon footprint.
- The expansion of Galway Port is integral to growing overall national port capacity to meet forecasted demand within the Irish Ports Capacity Study in the highest growth scenario by 2040.
- Improved harbour facilities will act as a driver for other industries in the region, such as tourism.
- Contend that the Project aligns with the NPF, the NDP, the NMPF, the National Investment Framework for Transport, the RSES and the GCDP.
- The relocation of port operations out of the inner dock will allow for the development of a mixed-use urban quarter adjacent to the city centre.
- The GHE will serve as a key determinant of the region's future economic prosperity.

JFC Manufacturing Company

- Express full support for the proposed extension to the Port of Galway.
- Committed to continue supporting the Port's activities with its products.
- Particularly welcome the proposal to move commercial shipping from the inner tidal basin from both navigational safety and city centre revitalisation perspectives.
- Recognise the potential that this project has for creating new employment opportunities in the expanded Port.

Platform94

- Support and recognise the strategic significance of the project for Galway.

- Contends that the existing port infrastructure is no longer fit for purpose and is hindering Galway's ability to remain competitive as a commercial hub.
- The project aligns with national policies and will deliver transformative benefits to Galway.

Shane Foran

- States that there have been significant changes in the legal and policy areas since the previous oral hearing and, such is the nature of these changes, contends that a new oral hearing is needed.
- Outlines a number of changes since the original submission of the scheme including Galway City Council's (GCC) ownership of GHC, designation of Galway as an urban node under TEN-T, Climate Change Act and Climate Action Plans, changes to GCC cycling policy in the city centre, designation of Lough Atalia as an element of EuroVelo 1, BusConnects Cross City Link proposals, and new public bike stations.
- Concerned that construction and operation of the scheme will have adverse impacts for vulnerable road users, particularly for cyclists.
- Contends that GCC, being the roads authority and owner of GHC, can now develop alternative road links to the harbour.
- Contends that the proposed manner of construction and operation of the harbour extension sits in direct opposition to the promotion of integration of active travel modes with transport infrastructure required by the TEN-T regulations.
- Contends that the proposed manner of construction and operation of the harbour extension also sits in direct opposition to CAP24 regarding the provision of cycling facilities.
- The Project will result in an increase in HGV movements in Galway City during and after construction.
- Considers the proposed haulage routes to be unsuitable roads for heavy construction traffic.

- Concerned about the impact on road safety and amenity that the movement of 5,300 tonnes of freight per day by HGV will have on the city streets and road users.
- Considers that the increased HGV activity in the city will have a negative impact on walking and cycling as part of the cultural heritage of the city.
- Considers the provision of an alternative link road serving the harbour to be a prerequisite.
- Provision should be made to include a coast walking and cycling route into the scheme.
- Any additional works carried out along the railway line should include restoration works to the railway line footpath.
- Suggests that the role of existing archway under the railway embankment should be accounted for in the design proposal as a walking/ cycling link between Renmore/ Mervue/ Wellpark and the city centre.

Vincent Connell

- Compensatory measures in Mweeloon Bay takes no account of the damage caused to the livelihoods of the 12 full time fisherman who depend for their living on the shrimp pot fishery.
- Considers the eradication of *Didemnum vexillum* to be unattainable.
- GHC have no input on terrestrial farming practices on the land surrounding Mweelroon Bay.
- Highlights GHCs lack of activity in gathering marine litter to date.

Appendix 2 – Oral Hearing Check List

Oral Hearing Recommendation

File Refs: PL 61.PA0033
Project Title Galway Harbour Extension

In light of the application documentation, third party observations and response submissions received from the applicant:

1. Is there a lack of clarity or detail in the information available that would require a hearing ? No
2. Are there outstanding issues relating to the design approach or alternatives such as would merit a hearing ? No
3. Are the number of submissions / complexity of issues raised in submissions such as to require a hearing ? No
4. Are there outstanding issues relating to the justification / need for the project that would require a hearing ? No
5. Are the nature and extent of impacts on third party properties uncertain or otherwise such as to justify a hearing ? No

Recommendation

Having regard to the above and as per the attached memo:

- I recommend no further oral hearing be held.

Senior Planning Inspector: Liam Bowe
Assistant Director of Planning: Stephen Rhys Thomas