



**The West Regional Authority**

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18/02/2014

The Strategic Infrastructure Division,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

**Re: Application to An Bord Pleanála in respect of Strategic Infrastructure Development from Galway Harbour Company for an Extension to Galway Harbour**

**Application Number: PL61.PA0033**

Dear Sir/Madam,

Please find enclosed herewith a submission on behalf of the West Regional Authority in relation to the Strategic Infrastructure Development application for the Galway Harbour Extension, Galway City.

I would be grateful if you would acknowledge receipt of this submission.

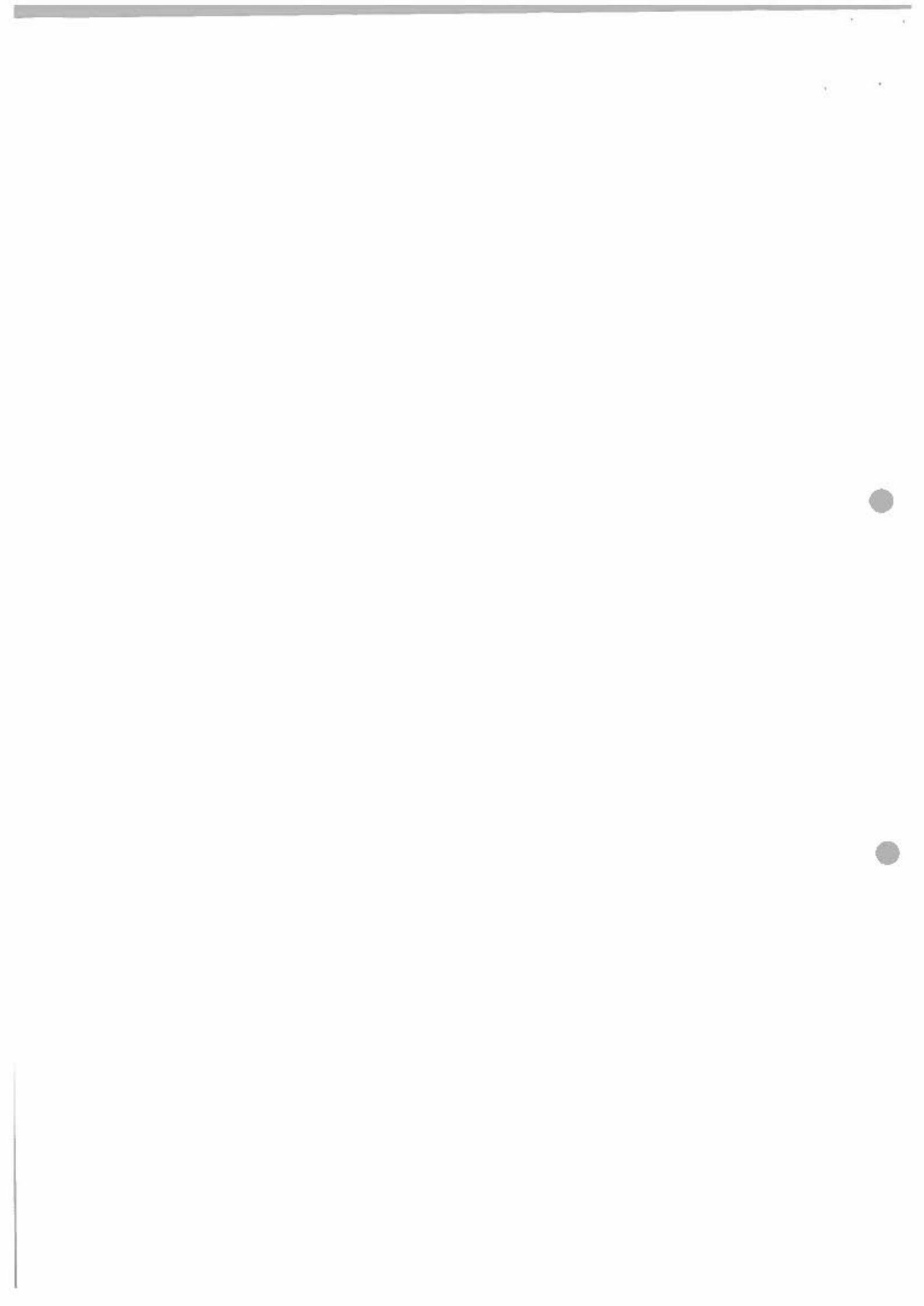
Mise le meas,

Mark O'Donnell,  
Director,  
West Regional Authority.



**The West Regional Authority**

Galway City and the Administrative counties of Galway, Mayo and Roscommon





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18/02/2014

**Re: West Regional Authority Regional Planning Guidelines 2010 – 2022 for the West Region - Submission Report to An Bord Pleanála**

**Application to:** An Bord Pleanála Strategic Infrastructure Division under Section 37(E) of the Planning and Development Act 2000, as amended.

**Applicants:** Galway Harbour Company, Harbour Office, New Docks, Galway.

The following submission is made in respect of letter dated 9<sup>th</sup> January, 2014 received from Mr. John P. Kelly, Tobin Consulting Engineer. Submissions or observations were requested in relation to the likely effects on the environment of the proposed development, the implications of the proposed development for proper planning and sustainable development; and the likely significant effects of the proposed development on a European Site.

#### **Proposed Development**

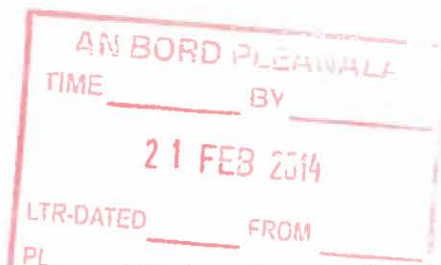
Galway Harbour Company is applying to An Bord Pleanála for a ten year planning permission for the proposed extension to Galway Harbour on 27 ha of reclaimed land including breakwaters and revetments. It is proposed to dredge over an area of 46.5 ha for approach channels, turning areas and berthage. Associated with this work it is also proposed to upgrade roads and services including Lough Atalia Road and Lough Atalia Road Bridge and provide a rail link within Galway Harbour Enterprise Park.

The proposed development will include the relocation of the majority of the existing harbour-related activities and businesses to the new deep water berths, quays, jetties and yards to be located at the harbour extension. The development includes:-

- 660 metres of commercial quays
- Yardage and storage areas
- Facilities for cruise liner passengers
- Port-related buildings
- Helicopter pad
- Fishing pier and yard
- Nautical centre boat yard
- 216 berth marina
- Wave protection walls
- Twin rail track to connect to Galway/ Dublin rail line
- Oil and bitumen transfer pipelines
- Landscaping, amenity areas and public promenade

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An Environmental Impact Statement and a Natura Impact Statement were prepared as part of the application, though parts of the proposed development will also require a waste licence, wastewater discharge licence and foreshore licence or lease.

The area is part owned by Galway Harbour Company, Department of the Environment, Community and Local Government (Foreshore Unit), Galway City Council and CIE/ Iarnród Éireann. There are also three lease holders. The site is located adjacent to and south of the existing Galway Harbour Enterprise Park and covers 85.39ha. Zonings in the Galway City Development Plan identify the area as 'City Centre uses', 'Enterprise, Industrial and Related Uses', 'Recreational and Amenity Uses', 'No Zoning' and 'Galway Bay Foreshore and Sea Bed'.

The stated objective of the harbour extension is to provide a facility which will serve existing and future long term needs over a minimum 30 year period. The Environmental Impact Statement (EIS) Non-Technical Summary states that the Harbour Company has been operating under constraints due to restricted access (via a gated harbour dependent on tides), due to limited permissible vessel capacity (i.e. uneconomic vessel sizes), limitations due to a shallow channel, limited port draught (distance between the water line and base of the hull) and other dimensions, inadequate quay length and limited berthage.

The proposed development seeks to allow for sufficient quay length to accommodate freight, cruise, offshore servicing and operational requirements, sufficient draft for access to each berth at all tide levels, sufficient capacity to accommodate freight vessels with a 20,000 tonnes capacity, land to support ancillary facilities, addressing existing SEVESO issues through the construction of petroleum and bitumen terminals and transfer pipelines to existing tank farms which will replace current unloading operations within the existing harbour/ city centre area.

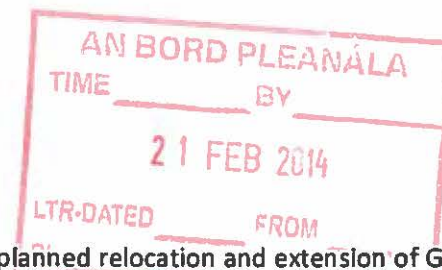
The planning report which accompanies discusses the importance of ports and sea shipping in the globally movement of imports and exports and identifies a significant inland hinterland for Galway Harbour encompassing the West Region and extending into the Border, Mid-West and Midlands Regions. It discusses its strategic policy context referring to modal shift, competitiveness, accessibility and sustainable development.

It is stated that the proposed extension to the harbour will address the constraints and provide improved infrastructure to consolidate existing business, develop new business and services, provide for the international cruise liner business and facilitate the economic growth of the region.

The proposed development is largely in an area which is designated as a candidate Special Area of Conservation (cSAC), Special Protection Area (SPA) and proposed Natural Heritage Area (pNHA). The EIS states that while a number of alternatives which include the 'do-nothing' option, 'improve inner harbour', 'other coastal ports' and 'Galway Bay Port Scenarios' were considered, the proposed extension represents the least damaging option environmentally in terms of meeting the project objectives, including compliance with national policy and the socio-economic well-being of the region.

#### **Relevant Sections, Policies and Objectives of the Regional Planning Guidelines for the West Region 2010-2022**

Section 5.2.3 of the Regional Planning Guidelines (RPGs) refers to 'Ports and Harbours', acknowledging their significant contribution to economic development and their role as important transportation links facilitating regional growth and connectivity. Galway Harbour is recognised as being of strategic



importance to the West Region and the RPGs discussed the planned relocation and extension of Galway Harbour area to include deepwater port facilities. Such development was identified as having the potential to contribute to both tourism and enterprise in the local economy and considered critical for supporting regional growth.

Objective I021 of the RPGs seeks to *'support the sustainable redevelopment and expansion of Galway Harbour which is critical for the continued important role in the growth of the West Region. Galway Harbour is also supported in its role to serve and promote water-based tourism. Facilities or infrastructure could include a secure berthing area for the marine leisure industry. All proposals will be subject to assessment on environment sustainability, including impacts on the Natura 2000 network through Habitats Directive Assessment, visual, travel and transport impacts. Any proposals should support enhanced integration with the rail and road network'*.

The proposed development also includes a *'twin track freight rail link from the existing Galway to Dublin line to the commercial quays, including embankments, rail over-bridge to existing service road and noise abatement screening'*. Objective CO8 in Section 1.3 of the RPGs supports the *'double-tracking'* of the railway line between Galway and Athenry as a priority, followed by subsequent improvements to the remainder of the line. While this is not proposed as part of this application, the link from the Harbour to the existing rail line must be considered as a vital component of the wider rail improvements. In this context, Section 5.2.2 of the RPGs (*'Rail Services'*) also promotes dual-tracking and the installation of freight handling equipment to facilitate greater usage of the rail network for freight transport.

#### **Environmental Impact Statement (EIS), Flood Risk & Screening for Appropriate Assessment and Natura Impact Statement (NIS)**

The EIS Non Technical Summary states that the proposed Harbour extension will cause the permanent loss of c. 27 ha of candidate Special Area of Conservation and Special Protection Area and the temporary loss of a further c.46.5ha. This loss includes feeding and foraging area for seals, otters, some bird species, lamprey and salmon which are listed as qualifying interests for the Galway Bay Complex cSAC and Inner Galway Bay SPA. Mitigation measures have been proposed for many of the activities and associated impacts which are likely to arise from the proposed development. Despite this, permanent loss of habitat within the cSAC and SPA will arise, which is considered a significant negative impact on the conservation objectives for both Natura 2000 sites.

The proposed development is located in a Flood Zone A and the quay height and operational ground level are proposed at a height which is above the design flood level. Minimum finish floor level is proposed at 0.8 metres above the design flood level. The EIS concludes that the development will not increase flood risk to adjacent lands and developments as a result of any changes to sea levels, wave, climate and river flows.

As per the EIS, the NIS identified that impacts on the Natura 2000 network arising from the proposed development cannot be ruled out. Therefore it is proposed that a Stage 4 assessment which seeks to acquire approval for the development based on *'Imperative Reasons of Overriding Public Interest'* (IROPI) will be required.

#### **Conclusion**

The policies and objectives of the RPGs for the West Region 2010-2022 support the proposed development and recognise its strategic importance to overall regional development. Therefore the project proposal is considered to be consistent with the RPGs.

Mise le meas,



Mark O'Donnell,  
Director,  
West Regional Authority.

AN BORD PLEANALA	
TIME _____	BY _____
21 FEB 2014	
LTR-DATED _____	FROM _____
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