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An Bord Pleanála
64 Marlborough Street
Dublin 1



10th March, 2014

**RE: GALWAY HARBOUR EXTENSION, RENMORE AND TOWNPARKS
TOWNLANDS, GALWAY.**

Applicant: Galway Harbour Company

An Bord Pleanála reference: PL 61.PA0033

We, Coakley O'Neill Town Planning Ltd, Building 1000, City Gate, Mahon, Cork, have been instructed by Atlantic Fuel Supply Company Ltd (AFSC), River House, Blackpool Park, Blackpool, Cork to make a submission to An Bord Pleanála in respect of the application for Strategic Infrastructure Development (SID), Galway Harbour Extension, by Galway Harbour Company at Renmore and Townparks Townlands, Galway.

AFSC is a leading oil storage terminal owner and operator for the supply of fuel and energy in Ireland, supplying biofuels, fuel oils, kerosene, marine fuel, gasoil, diesel, specialities and petrol for a wide range of industrial, marine, wholesale, commercial, and agricultural applications, as well as retail petrol stations. AFSC operates an 84,000m³ oil terminal that was completed in 2010 and is the largest single oil terminal in the Republic of Ireland for inland distribution of oil products. The terminal is situated in the deepwater harbour of Foynes, part of Shannon Foynes Port which is identified as a Tier 1 Port of National Significance in the National Ports Policy 2013.

Having reviewed the application materials in detail, including the pre-application consultation records under register reference PL61 .PC0150, AFSC is of the opinion that the proposed development, by reason of its scale, involving the reclamation of approx 27 ha from the foreshore and sea bed and dredging over a further area of approx 46.5ha, facilitating a substantial 660m of quay berth to -14.9m O.D. depth, and Port development serviced by a channel to -10.9m O.D, to accommodate 20,000 tonnes capacity vessel size, as well as new petroleum and bitumen terminals and transfer pipelines to existing tank farms, is excessive for a Tier 3 Port of Regional Significance.

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In our opinion, the proposed development is contrary to the provisions of the National Port Policy with respect to the handling of commercial freight.

While the National Port Policy identifies Galway Harbour as an important strategic regional hub for petroleum importation, storage and distribution (Section 2.7), the adopted policy for ports such as Galway is that they could play a more significant role in supporting national economic development in certain specialised trades (e.g. off-shore energy servicing) and maritime tourism.

It is not, therefore, the intended strategic function of Galway Harbour, a Tier 3 Port of Regional Significance only, to compete with the existing and future commercial trade of Ports of National Significance (either Tier 1 or Tier 2) for commercial trade, but, rather, to support Tier 1 and Tier 2 Ports, and this point appears to have been overlooked by the Galway Harbour Company in presenting this application for an extensive development of the foreshore and sea bed in Galway Harbour.

Rather, the focus for commercial trade in ports such as Galway Harbour is on serving their region, and, as a consequence, their scale should be relative to the region they serve.

This is evidenced in the pre-application consultation reports under register reference PL61 .PC0150, where the Department of Transport, Tourism and Sport is on record as stating that it expects the strategic national ports, which have deep water to accommodate larger ships and good access, to be core players and to lead the State's response to port capacity requirements, while, conversely, Tier 3 ports would be particularly valuable for tourism, marine leisure and fishing and could develop niche markets or uses in conjunction with local businesses or requirements.

This is further echoed in the West Regional Planning Guidelines 2010-2022, which acknowledges the role of a relocated and expanded Galway Harbour area in contributing to the local and regional economy. Critically, the Galway City Development Plan 2011-2017 also acknowledges the potential contribution to the local economy, but cautions that this is subject to an assessment of economic viability and environmental grounds, among others. There is no reference to the contribution of Galway Harbour to the national economy in statutory planning policy guiding the development of the area.

In this context, we do not find the applicant's business case for the scale of development, in particular the baseline projection that current liquid and dry freight at Galway Harbour will increase almost fourfold in eleven years, to be convincing based on existing trends relative to other ports, in particular Tier 1 and Tier 2 Ports as set out in Table 2.2.3 of the EIS.

It is noted in the pre-application consultation records under register reference PL61 .PC0150 that the Board's representatives, in stating that the criteria to justify the port should be related to national policy, queried how the proposed development would fit into the hierarchy of ports. We do not find any plausible explanation but forward by the applicant for a proposal which is intended to serve existing and future long-term needs over a minimum 30 year period.

The Board may have been determined the proposed development to constitute strategic infrastructure for the purposes of assessment, it is our opinion that the proposed development is of an inappropriate scale in a non-strategic location.

We also find the assessment of alternatives particularly lacking.

For example, Shannon Foynes, a Tier 1 Ports of National Significance, is ruled out on the basis of its perceived lack of connectivity from existing rail and motorway networks, yet this has no regard to the planned upgrades for the N69, which has been given priority status by the NRA and the Gort to Tuam N17/N18 motorway which is due to commence this year. It is also an objective of the Shannon Foynes Harbour Company's Vision 2041 masterplan to seek an upgrade to the existing section of track from Foynes to Limerick, to ensure that the Port of Shannon/Foynes will have access to the National Rail Network. In any event, the Department of Transport, Tourism and Sport is of the view that, due to the shorter distances that goods travel on the island of Ireland in comparison to mainland Europe, rail access is not considered to be of as much of a requirement as in other countries..

It is also stated by the applicant that Shannon Foynes Port is not regarded as a viable and appropriate alternative to the Galway Harbour Extension because of its distance from the main market that Galway Harbour serves, yet this has no regard to the existing status of Shannon Foynes as a Tier 1 Port of National Significance nor its recognition by the European Commission as one of the three core ports in Ireland under the Trans-European Transport Network (TEN-T).

In addition, in the context of oil importation and distribution, the existing facilities in Shannon Foynes and AFSC have sufficient capacity to cater to the demand for oil and fuels in the main market that Galway Harbour serves, and indeed the facilities at Shannon Foynes Tier 1 Port of National Significance currently supply much of that demand. In our view there is no need for the proposed development.

Galway Harbour is neither a Tier 1 National Port nor a core port under TEN-T, and is not an appropriate location, from a strategic perspective, for the scale of the development proposed.

In addition, there are no imperative reasons of overriding public interest to permit a proposed development that will adversely affect the integrity of the Galway Bay Complex cSAC, a European Site, which includes a priority habitat (Lough Atalia), in particular where there are clear alternatives such as Shannon Foynes Tier 1 Port of National Significance.

What is clear from the National Port Policy is that, in addition to a supporting commercial role for Galway Harbour, it endorses the development of the cruise tourism business and the proposals for marine tourism and leisure facilities in the inner harbour, as advocated by the current Regional Planning Guidelines for the West Region and the current Galway City Development Plan.

In this regard, the development of Galway Port for tourism uses, and an appropriate scale of commercial trade relative to its place in the hierarchy of Ports in Ireland as well as its regional catchment, consistent with national, regional and local port and planning policy, is a more appropriate proposal than what is now before the Board.

We ask the Board to refuse permission for the proposed development by reason of its excessive scale which is not supported by national ports policy, and which prejudices the designated Shannon Foynes Tier 1 Port of National Significance. There are no imperative reasons of overriding public interest for the proposed development, having regard to clear alternatives such as Shannon Foynes Tier 1 Port of National Significance.

The proposed development is also contrary to the Regional Planning Guidelines for the West Region 2010-2022 and the Galway City Development Plan 2011-2017 which express support for the proposed development of a scale which contributes to the local and regional economy only. The proposed development has failed to establish that is acceptable on grounds of economic viability and impact on the environment in accordance with Policy 5.2 of the Galway City Development Plan 2011-2017.

This submission is made pursuant to the provisions of Section 37E(3)(a) of the Planning and Development Act 2000-2013 and is accompanied by the statutory fee of €50.00.

Please direct all correspondence to Aiden O'Neill, Coakley O'Neill Town Planning Ltd, Building 1000, City Gate, Mahon, Cork.

Yours faithfully



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