

Galway Bay Inshore Fishermens Association

23 Coole Park,

Bohermore,

Galway.

14th Feb '14

AN BORD PLEANÁLA
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Our Association wishes An Bord Pleanála to take note of our serious concerns regarding the above referenced submission received from Galway Harbour Company under Section 37E of the Planning and Development Act, 2000.

The proposed development is planned for an area which is designated as a candidate Special Area of Conservation, Special Protection Area (Natura 2000 sites) and proposed National Heritage Area. The objectives of both the SPA and cSAC are to "maintain or restore the favourable conservation condition" of habitats, animal and bird species. The proposed development is completely at odds with these objectives. As our submission will show, it is doubtful if the proposal meets the legal "Imperative Reasons of Overriding Public Interest" (IROPI) requirement of the EU Habitats Directive for development with "significant negative impact" on a cSAC and an SPA. It will be recalled that Dublin Port's planned infill of 21 ha was refused by An Bord Pleanála in 2010 (PA0007) because it was planned within Dublin Bay's SPA. By the report's own submission "the permanent loss of 26.93 ha of cSAC and SPA and the associated loss of feeding and foraging area to seals, otters, some bird species "of which 5 [Common Tern, Great Northern Diver, Little Egret, Red-throated diver and Sandwich Tern]" and lamprey and salmon which are listed as Qualifying Interests for the cSAC and SPA is regarded as a significant negative impact on the conservation objectives for both Natura 2000 sites."

This area is of extreme importance to the local inshore commercial fishing fleet as it produces a significant volume of the annual shrimp (*Palaemon serratus*) harvest. It is also a recognized nursery area for juvenile shrimp during the Summer as well as an historical lobster fishing area. Our members have been actively involved in the responsible management of this resource and have deferred fishery opening dates in order to preserve this unique resource. Galway Bay shrimp are recognised as amongst the very top of European quality and many families now depend on this excellent fishery for their livelihood.

The Environmental Impact Statement, extraordinarily, states the following "There will be no significant socio-economic impacts as a result of the proposed development; therefore no socio-economic mitigation measures are required. Whilst the footprint of the Galway Harbour extension may encroach marginally on areas that may currently be fished, the level of encroachment is negligible." It needs to be clearly stated that at no stage was there any consultation with our Association which represents all of the inshore fishermen in Galway Bay. There was zero communication. Had there been any communication whatsoever, the Harbour Company would have been informed of the very significant damage their proposal would cause to the existing critically important fisheries. Confirmation of the local importance of these fisheries can be confirmed by both the Marine Institute and Bord Iascaigh Mhara. The totally inaccurate statement from the Galway Harbour Company raises questions about the validity of a range of statements from the proposers.

shrimp fishery collapsed locally and took some years to rebuild. This spoil, which we believe to be contaminated with heavy metals will again be disturbed if the construction proceeds. The implications for human health are significant and we believe that this subject requires further serious study.

The report states that a geophysical survey of the sea bed did not discover any definitive archaeological shipwrecks. The quality of this work is open to question as the more recent sinking of a pleasure yacht revealed. While retrieving the sunken yacht, the divers located the wreck of a timber vessel which was discovered to lie directly beneath the yacht. This had been completely missed by the survey. One of our members skippered the vessel employed during the archaeological survey and reported that the surveying equipment was not operating properly during significant periods of the survey. We consider this survey to be very incomplete and therefore invalid.

On the issue of traffic we ask is it appropriate to expand a commercial port and generate additional traffic into a city centre? There is no direct link for HGVs from the port entrance to either national primary roads or the motorway system. An Bord Pleanála refused permission in 2008 to the Port of Cork Company for a container terminal at Ringaskiddy on the grounds that it would “result in much of the port related traffic traversing the city road network which would adversely affect the carrying capacity of the strategic road network in and around Cork city.” In this regard, we consider the proposal of a rail link to the proposed new port to be little more than a distraction from the additional road traffic likely to be generated. At present, the railway station is a very short distance from the harbour and we are unaware of any cargo whatsoever which is transported by both rail and sea to or from Galway. We request that the incline from the proposed pier level to the level of the railway track be examined as we are of the opinion that it may be too steep, in any case, to allow for a connection between the two levels.

Recent weather, in which we saw 30 depressions (of which in the region of 20 produced up to storm force winds) in succession hitting the West coast, have highlighted assumptions of Wave Climate and Flood Risk based on 200 year record tidal surges, albeit allowing for climate change. It is our opinion that the increased funnelling of the outflow of the Corrib freshwater plume during extreme weather events, including adverse wind conditions, will lead to increased flooding risk for Galway city centre.

In conclusion we believe that An Bord Pleanála should not grant permission to Galway Harbour Company for the proposed development as it would have a severely detrimental effect on the livelihoods of local fishing families, and it would be constructed within a cSAC, apNHA and a SPA. There is no demand for this facility other than from the Harbour company itself whose income in large part is generated from non port related activities. It is contrary to Government policy as outlined by the Department of Transport, Tourism and Sport. It would lead to further congestion of Galway city traffic. It is likely to further increase the risk of city centre flooding. It will produce a negative effect on the habitats of listed wildlife (seals, otters, lampreys, salmon and 5 bird species). The alternatives of Foynes/Shannon, Dublin, Cork and Rossaveal in conjunction with the improved road network are more than adequate for Galway’s needs.

Patrick Oliver (Chairman)

Vincent Connell (Treasurer)

Patrick Oliver

Vincent Connell