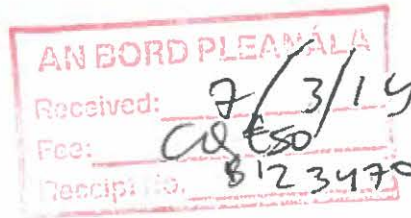


Ref: 61.PA.033

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 2



3rd March 2014

Re: Comments on the application on behalf of Galway Harbour Company for permission, submitted under section 37E of the Planning & Development Act, 2000, as amended. To extend the Port of Galway into environmentally protected areas of Galway Bay, as Strategic Infrastructure Development.

Dear Sir,

The following submissions represent my personal views and, are solely related to my opposition to the current application being made on behalf of The Galway Harbour Company – which is for the development of a major extension of the Port of Galway.

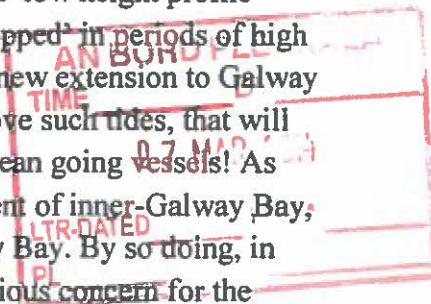
These developments are said to be necessary to enable the relocation of commercial port activity out to a new pier, and are to be constructed out and into a substantial area of Inner Galway Bay. Which areas are protected under specific Natura 2000, SPA and cSAC designations. The objective of these designations, are to maintain the conservation status of protected species and to preserve visual amenity of these areas which, are not alone important for residents of Galway, but, are important for the future sustainable development of tourism and tourism amenity. The loss of approx 26.93 ha of prime cSAC and SPA, would be significant, and no amount of mitigation measures can, in my view, compensate for such extensive loss of important coastal habitat!

The application is being presented to Bord Pleanála, and to the public under IROPI (*Imperative Reasons of Overriding Public Interest*). Conditions which, in my view, are an undeserved classification as this proposed extension is but a first step in a SDZ process which is designed to allow for, the future development of all other underused lands around the historic docks footprint - that may in turn be sold off for private development to leverage finance for the cost of this project. In my view, this project therefore cannot be justified as being deserving of IROPI classification. There are alternative options allowing for the removal of scrap handling and fuel discharge operations from the enclosed harbour. These were previously subject to an application that was submitted under - **PI Ref. No 09/24** for the Galway Harbour Company, when seeking permission for the excavation of a new dock, previously permitted under **PI. Ref. No. 08/283**) as a berth and for the construction of a **channel access sea wall and storage yard at Galway Harbour Enterprise Park, Renmore, Galway**. These plans were later withdrawn, but are not mentioned as an alternative in the EIS.

In setting out these views, I wish to make the following other general grounds of opposition to the application, followed by closing comment:

- It is my own view that the development being proposed, if allowed, would irrevocably damage the extensive protected habitat, for all animal and birds species that currently exist and have their futures within Galways Inner-Bay area. That all of these species, and any protected views lost thereafter, could be negatively impacted by such a significant development which is, unnecessary, to ensure the future enhancement of existing Galway Harbour Company owned lands and, is, unsustainable from both an economic and environmental standpoint ! The Environmental Impact Statement presented with this application admits that the loss of habitat is "*regarded as a significant negative impact on the conservation objectives for both Natura 2000 sites.*"
- I understand that the sea area likely to be impacted to the south of this proposed development is extremely important for the future of those fishermen working in the Galway Inshore Commercial Fishing Fleet. As their principle income is derived from the seasonal harvesting Galway Bay shrimp (*Palaemon Serratus*) and lobster the proposed development would be virtually certain to lead to the destruction of the recognised nursery grounds of the shrimp larvae and, would thereby wipe out the livelihoods for many fishermen deprive both them, and their families of an income.
- I believe that the proposed development does not truly reflect the recent policy changes that have been indicated through publication of the current government National Ports Policy Statement, as revealed last year. That Galway Harbours effective demotion, to becoming a *Port of Regional Significance*, would remove the harbour from any possibility of receiving future government financial supports; which are suggested as being necessary for this development!
- Historically, Galway Port has for decades derived a majority of its income through the import of liquid fuel oils and bitumen. However, more recent accounts indicate that more of its income is today being derived from, non-marine activities, such as Car Parking & Site leases and other land based activities, ie Furniture Stores and Bus Parking & Maintenance depots etc.
- Proposals designed to further develop the port are set to increase the importation of fossil fuels, which goes directly against government policy that clearly is set to reduce this countries dependence on importing fossil fuel derived energy. While this development is also being said to be needed, to increase the servicing of offshore energy research activity which is transitory, if at all - since other better placed West coast ports will also be competing for this business. The flush of components for wind turbines currently being imported through, or being stored at Galway Port is also a short term activity, as once they are up installed and running, replacements will be required only every twenty, to twenty five years.

- The development of a Cruise Liner business is a passing fashion that has been promoted to gain the support from the local business community, and to provide print and broadcast media with something to write about. Early submissions to past Galway City Development Plans made by consultants employed by the Galway Harbour Company, made no reference to the cruise liner business, but concentrated on the need to prepare the port to be capable of accepting larger fuel oil tankers.
- It is without doubt that the proposed development, if allowed, would impact even more negatively on the serious traffic problems Galway City commuters already experience at certain times of the day, and, at different times of the year. That is, during morning and evening passenger commute times, and in the summer tourist season. While it will be said that maritime activity is being removed further away from the city centre. It is of course apparent, that all vehicular movements both into and out of the new harbour development are to be directed onto the existing heavily trafficked city centre roads network, via a necessarily upgraded junction at Lough Atalia Road! Corks port authority were previously refused permission to move their container terminal to Ringaskiddy. Among the reasons given for refusal “*poor roads access,*”
- It is my view that in seeking to reclaim a considerable amount of public foreshore, the building of a 900mtr pier out into protected waters will induce as yet, unquantifiable effects on the littoral processes of sediment distribution within Galway bay. Longshore drift of beach material and sedimentation effects to be expected from the River Corribs estuarial waters on dredged channels, will, in my view be inevitable. This will impose a significant cost impact for future more regular maintenance dredging that will become necessary.
- It is contended, that the massing, height and sheer scale of the proposed development will have serious impacts on the loss of visual amenity as, currently enjoyed by people walking Nimmos pier, in South Park, Salthill and the Claddagh. By reason of the scale of civil engineering required to support the hosting of Cruise Liners and the berthing of larger fuel carrying tankers, that the pier will be required to be built to a scale and height above the sea bed which is vastly higher than the causeway recently constructed to facilitate access to the, nearby, Mutton Island Waste Water Treatment Plant. That particular causeway was constructed to, present a ‘low height profile’ and, was deliberately designed to be capable of being ‘overtopped’ in periods of high spring tide, or, during storm events. The construction of this new extension to Galway Harbour is required to be of a significantly greater height above such tides, that will allow it to always be capable of managing the berthing of ocean going vessels! As such, it will in my view, introduce into the natural environment of inner-Galway Bay, a vast sea wall, extending almost a kilometre out into Galway Bay. By so doing, in certain weather, tidal and wind directions – be a cause of serious concern for the



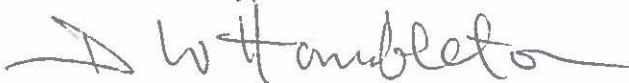
possibility of inducing future flooding events into the vicinity of the present docks and city centre.

- When objecting to Dublin Port Authorities previous application for new developments, campaigners quoted from the Environmental Protection Agency (EPA) 2003 report entitled *Climate Change, Scenarios and Impacts for Ireland*, the campaign group Dublin Bay Watch said the planting of 52 acres of "hard material in Dublin Bay represented a 'considerable flooding risk' in addition to that being posed by rising sea levels". I agree with this statement as the same issues are of serious concern here in Galway!

For all of the reasons above, and for many others. I believe that the above project would not readily be in the best interests of the people of Galway. But would in fact be detrimental to the future imaginative planned development of the proposed harbour district, as was recommended to me in a letter sent, by the Department of the Environment's own Spatial Planning Unit Principal Mr. Dave Walsh, who wrote saying, that "*The Department feels that a Local Area Plan for the wider harbour/docks/south city area should be prepared which would set out the broad context for development e.g, vision, uses, design standards and links with other city centre developments.*" 9th July 2009. DoE's Spatial Planning Unit.

Therefore, such premature development of the harbour lands, in isolation, would most certainly be detrimental to the future regeneration of this historic, but presently run-down part of Galway City and should be refused.

Yours faithfully



Derrick Hambleton
26 Manor Avenue
Kingston
Galway.

Derrickhambleton59@gmail.com

€50 euro fee attached.

AN BORD PLEANÁLA	
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07 MAR 2014	
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