



**BirdWatchIreland**  
protecting birds and biodiversity

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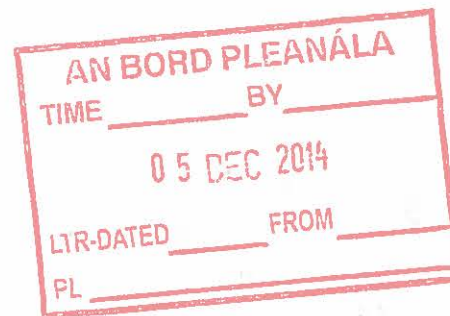
Éarlaimh  
Micheál D. Ó hUiginn  
Uachtarán na hÉireann

An Bord Pleanála

64 Marlborough Street

Dublin

5<sup>th</sup> December 2014



**Reference: PA0033 Proposed Galway Harbour development SID Inner Galway Bay SAC, SPA and cNHA**

Dear Sir/Madam

Thank you for providing additional more detailed information on the proposed Galway Harbour extension. BirdWatch Ireland had previously raised a number of significant concerns relating to the original proposals (*Ref: BWI Submission 11<sup>th</sup> of March 2014*).

Based on the new information provided, our concerns still remain regarding the potential impacts on the wild bird interests of the area identified and below we have outlined those concerns in relation to the adequacy of the ecological assessments accompanying this application:

- While I-WeBS data provide essential context information, this survey is not designed to assess potential impacts or relative importance and habitat usage across a given site. Based on the new Bird Species Assessment information, , count data across two winters at the site from a total of 13 counts (with no specific dates listed) is insufficient for measuring the likely variability in site usage over time. The assessment of the suitability of saltmarsh habitat as a potential roosting site for birds was inadequate.
- Bird populations from nearby SPAs that may also use the site have not been addressed. There is a mention of species of potential interest from Lough Corrib SPA being assessed separately but this report has not yet been published and results with the new information provided are not included here
- Lack of consideration of ecological needs of species particularly in extreme weather and potential impacts of the proposed development
- Location of the development compared to other areas within the SPA. The report states the site is not of significant importance for any species in comparison with other areas of the SPA. However, there is a clear lack of rationale for determining the relative importance of the specific location in question.
- The likely disturbance impacts to birds and intertidal habitats will extend far beyond the footprint of the planned development area
- We understand the total area of intertidal and subtidal habitat concerned is circa c.26.9 ha. The direct loss of habitat should be fully assessed in terms of habitat type and prey availability, and knowledge about the tidal sediment regime at this location to determine whether any change in the regime would result in adverse effects on the integrity of the site as a whole is required. The integrity of individual sites and their functioning in the



Directors: K O'Byrne, Chairman, S Bridgeman, J Dowdall, D Fay, B Lavery, G Lyons, JB Peart, M Stephens

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context of the entire Natura 2000 Network is a key objective of the Natura Directives affording this site its protection

- There remains a lack of full consideration of Mitigation measures and Alternatives in advance of IROPI considerations in this new report. There are some mitigation measures listed in new information to avoid disturbance to a Common Tern colony on Rabbit Island although the bird section of the new information states the Rabbit Island colony has been abandoned in 2014 with the main colony having returned to Mutton Island.
- Concerns regarding the possible significant cumulative impacts from habitat loss in combination with impacts on waterbird populations of the Inner Galway Bay SPA from other pressures, such as increased disturbance, mussel bottom culture, and other extrinsic factors such as sea-level rise and storm surge events.

We would welcome the opportunity to discuss the details of this submission.

Yours sincerely

Siobhán Egan

Head of Policy, Communications & People Engagement



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## Kieran Doherty

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**From:** Sinead Cummins <scummins@birdwatchireland.ie>  
**Sent:** 05 December 2014 17:22  
**To:** Kieran Doherty  
**Cc:** segan@birdwatchireland.ie; Case Work  
**Subject:** PA0033 Proposed Galway Harbour development SID Inner Galway Bay SAC, SPA and cNHA  
**Attachments:** GalwayPortExt\_BWI\_51214\_Final.pdf

Dear Kieran,

Please find attached a copy of our submission to the Proposed Galway Harbour development for your consideration.

Kind Regards,

Sinéad Cummins.

Policy, Communications & People Engagement Team.



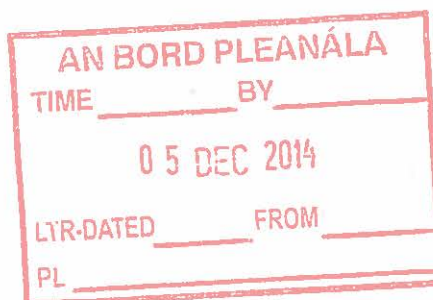
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