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Statement to the Oral Hearing

Galway Harbour Extension

PL61.PA0033

AN BORD PLEANÁLA	
TIME	15.00 BY An Taisce
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Introduction

An Taisce notes the submissions by the applicant. We proposed to address the issues raised by the applicant in the format set out in the agenda of An Bord Pleanála for Module 2 Day 5/6, including:

- 1.0 Background and Need (Business Case)
- 2.0 Planning
- 3.0 Cost Benefit Analysis
- 4.0 Climate
- 5.0 Soils
- 6.0 Transport/Traffic/Rail
- 7.0 Landscape Visual

We shall make brief oral comments on archaeology, architecture and cultural heritage evidence.

1.0 Background and Need (Business Case)

The business case for the proposed Galway Harbour Extension development is that it will address all of the constraints limiting ship access to 5000 tonnes 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"*.

In his evidence of 20th January 2015 Capt. Brian Sheridan correctly described the GHE as a *"proposed commercial port"*, and this morning Dan Duggan described scheme as a *"new commercial port"*

The business case for what amounts to a new commercial port made in overlapping submissions by the applicants consultants, is to accommodate import and export of a range of product and act as a transnational bitumen distribution hub to handle ships of up to 40,000t and lower tonnages transiting out to a range of NW European destinations.

An individual analysis is needed for the business case of each of the elements proposed for new or expanded capacity:

Exports –

Galway is an internationally significant example of a city that has re-invented itself as a centre for technology and medical services and devices. The products and services created by Galway's new generation industry and technology are high value and low in volume – they do not require the proximity of a deep-sea port.

McGrath Quarries:

The EIS NTS states:

"McGrath Quarries of Cong began to export lime stone to Scotland and Sweden in late 2011 for use in glass making. The range of uses and tonnage has grown

continuously. Significant exports are projected for 2014 and this is forecast to continue to grow thereafter as new markets open up. The harbour extension that will allow larger vessels access the Port would help that growth in export'.

2014 export levels were 53,700t. It is noted that McGraths have stated that they are seeking deeper berthages in order to accommodate larger individual tonnages of limestone export. There is inadequate information to assess the long-term sustainability of this export trade when future shipping emissions will have to be accounted for and mitigated if any effective international action on climate emissions is to be achieved.

The main current market is for glass bottles. The continued single use and then discard non-returnable bottle is unsustainable and the global beverage industry will have to revert to returnable bottles to reduce high-energy consuming bottle production. The current bottle "recycling" involves breaking up rather than re-using bottles.

McGrath Quarries are located in Cong, Co Mayo, which has no rail access to Galway. Any increase in volume as projected by the proposal will increase HGV traffic between Cong and Galway City centre with multiple adverse traffic and emission impacts.

Scrap Metal

Levels of waste generated by the global consumer economy, including scrap metal, are unsustainable. While metal is collected for recycling, there is a high carbon and energy cost in the transportation and smelting of refined metals and in making replacement products and components. The future global economy will have to produce vehicles and metal components with a longer performance time to reduce the scrap generation and re-smelting chain.

RDF – Refuse Derived Fuel

This is a compressed and baled waste product. The 2014 tonnage was 41,400t. Continued export of this waste is unsustainable.

Imports –

Petroleum Products:

The EIS NTS states:

“Petroleum products are the principal trade through the port. Galway is the gateway to the west and northwest and is located strategically for the oil companies to allow them to distribute their products north as far as Buncrana, east as far as Athlone and south as far as Ennis”.

Galway is one of three remaining oil storage terminals in the state - the others being Dublin and Foynes. The Galway terminal is operated by Topaz Energy Ltd. It is stated that growth in volume will “recover” after 2018.

In order to achieve EU 2020 climate targets for transport and heating Ireland needs to immediately reduce its oil consumption and radically de-carbonise in the 2020 – 2030 period when much higher targets will be required if an effective international climate agreement is to be achieved in Paris this year.

Bitumen: import for Irish market and transshipment.

The EIS NTS states:

“Bitumen is imported into Galway by Cold Chon Ltd. and is sold to Local Authorities for road works. Cold Chon has secured planning permission for the construction of two new tanks which will only take place if planning permission for the new Port is secured. This will then allow the company to make Galway the transshipment port for Northern Europe exports”.

Further evidence was provided by John Killeen on 20th January 2015.

Bitumen is an environmentally problematic product in its extraction and processing, needing development of future alternatives.

The objective of Cold Chon in making Galway a "trans-shipment port", is contrary to the applicants own case for development of Galway as a regional service port for the Galway hinterland and west. and is not provided for in the considerations set out regarding Galway in the National Ports Policy 2013.

The creation of an international transshipment facility in the SAC and SPA in a regionally designated port has major implications.

Timber:

The submission from Raymond Burke Consulting of 20th January 2015 3.2.10. referred to shipments from Scotland since early July 2014. The Murray facility in Ballygar in NE County Galway is not serviced by rail. A press report of July 11th 2014 covering the first importation of 3000t of raw logs, stated that *"it required a hundred truck trips to offload the timber"*. - CONNARA TRIASUNO

Offshore Energy

THE EIS NTS states:

"The offshore energy sector is an industry sector that is expected to become a major economic opportunity as Ireland seeks to reduce its carbon footprint. Galway is well suited to be the port of choice to support those facilities to be located off the coast to the west and north west. At this time, there are limited facilities available for those who wish to visit Galway by boat and use it as a base for maritime tourism. The harbour extension will open up the area for new berths".

The facilitation of offshore energy does not require a major new port infill.

Onshore Energy:

Wind turbines are already being landed in Galway and it has not been demonstrated that the current port alignment constrains further landings.

Other Import and Export Opportunities

In 2.2.2.3.13 of the EIS it is stated: *"our research would suggest the following products offer potential for new freight through the port now and when the new facilities are in place"*.

- Energy Products,
 - Renewable Energy e.g. biomass
 - Bio Fuels
 - Building on the Green Economy

There is no sustainable future in import or export of biofuels. Import or export of wood chips is unsustainable. Any sustainable biomass should be used in the country of production to replace fossil fuel.

- Timber Products

There is limited capacity for additional Irish timber products. Currently timber from across the country is transported by rail to the Coillte plants in Clonmel and Waterford Port. There is also a major plant adjoining the Sligo rail line which has the potential to be transported to Dublin.

- Bulk Products

Import of fertilizer and animal feed needs to be reduced. There is no case for opening up new trade in bulk products in Galway.

- Offshore

This section confusingly mixes renewable energy with oil and gas. The servicing of renewable energy can be done through the current port. As most existing fossil fuel will need to be left in the ground to meet climate emission constraints, there is no basis for oil and gas exploration.

- Other (Cars, Windfarm Plant and Fish Meal)

With the need for future car manufacturing to be for vehicles with renewable power and longer performance life, there is no need for new car import facility in Ireland.

The issue of Windfarm Plant has been addressed.

The expansion of fishmeal production is constrained by global marine eco system protection.

Furthermore, other ports including Foynes will have surplus capacity as imports such as oil products, coal, animal feed fertilizer will need to be reduced to address long-term sustainability.

Cruise Liners

The EIS NTS states:

"To date, Galway has failed to capitalise on its unique attributes for the lucrative cruise liner business because of inadequate landing facilities but has commenced an active campaign of attracting the major cruise operators to Galway. In 2013, four cruise vessels visited Galway while eight cruise vessels are currently scheduled for 2014 with four more in 2015. The spend from the cruise industry and maritime leisure visitors is significant and there are valuable direct and indirect employment spin-offs as well as being a major boost to the local economy from the purchase of gifts, as well as on eating and drinking in local restaurants and bars, and visiting sites of interest. Cruise vessels often replenish their stores while in port and this spend provides an added economic contribution to the region".

The application before the Board is not for a cruise liner berthage terminal or jetty. The accommodation of cruise line berthage does not require the large-scale infill and commercial port service area proposed in this application.

If there were a business case for providing cruise liner berthage in Galway, it would need to be a standalone proposal independent of any commercial port development. As no such application is before the Board, and as the primary justification for the GHE is to accommodate the transit of goods and products in a new commercial port, we do not consider that further consideration of the issue of cruise liners is warranted.

2.0 Planning

2.1 Planning Policy Statement 2015

This newly published document from the Department Of Environment Community and Local Government constitutes a general government Planning Policy Statement¹.

The introduction states that:

"It is just over 50 years since national planning legislation was first implemented in Ireland. The Government wishes to reaffirm its strong belief in the value of a forward-looking, visionary and dynamic planning process because it will ensure that the right development takes place in the right locations and at the right time and in providing the social, economic and physical infrastructure necessary to meet the needs of our people in a way that protects the many qualities of our natural and built environment."

The stated objective of the document is set out in the Introduction:

*"(1) Key principles that it expects planning authorities, other public bodies and those that engage with the planning process will observe; and
(2) High level priorities for the continued enhancement of the planning system in Ireland"*

Accordingly, these objectives are entirely applicable to this consent scheme by a State owned port company to An Bord Pleanála.

¹ (<http://environ.ie/en/PublicationsDocuments/FileDownload,39991,en.pdf>)

The Document sets out 10 Key principles and states:

"Planning legislation in Ireland seeks to ensure, in the interests of the common good, the proper planning and sustainable development of urban and rural areas. The Government believes that the following 10 key principles should be used as a strategic guide in implementing the above."

The Galway Port development is evaluated as follows in accordance with the ten principles of the Planning Policy Statement:

1. Planning must be plan-led and evidence based so that at the appropriate level, from the National Spatial Strategy, Regional Spatial and Economic Strategies, City and County Development Plans and Local Area Plans, the Government, local authorities and local communities, work together to set out a cohesive vision for the future of our country.

The 2013 National Ports Policy is intended to inform a plan led strategy and defined a 3 Tier rating of ports. The Galway Harbour Extension proposal for a Tier 3 Regional port, without direct connection to the national road network, contravenes this national strategy.

2. Planning must proactively drive and support sustainable development, integrating consideration of its economic, social and environmental aspects at the earliest stage to deliver the homes, business and employment space, infrastructure and thriving urban and rural locations in an economically viable manner that will sustain recovery and our future prosperity.

The plan is based on a flawed socio-economic model of continued fossil fuel; resource consumption and biodiversity diminishing short-term economic development. The scheme is incompatible with the social and economic change needed to maintain a future stable society and economy on a climate stressed planet. The proposal would represent a wasted infrastructure investment.

3. Planning is about creating communities and further developing existing communities in a sustainable manner by securing high quality urban design through the design, delivery and co-ordination of new development providing a good quality of life for all existing and future users of land and buildings.

The plan worsens HGV traffic through the urban area of Galway, from Lough Atalia Road to the M6. It would undermine the implementation of a future HGV management strategy for the urban area.

4. Planning must support the transition to a low carbon future and adapt to a changing climate taking full account of flood risk and facilitating, as appropriate, the use of renewable resources, particularly the development of alternative indigenous energy resources.

This plan facilitates the unsustainable increase in imported fossil fuel and petroleum products and has no integration with the required transition to a low carbon future. The immediate driver of the plan in generating the scale of 24 ha infill proposed is the accommodation of new ~~oil~~^{bitumen} tank storage facility and transshipment bitumen facility in Galway Bay. The plan is based on an outdated projection model for 21st century sea level rise, which does not accord with updated international peer reviewed climate science.

5. Planning must ensure that development facilitates and encourages greater use of public transport as well as making walking and cycling more attractive for people in support of active and healthy lifestyles by focusing development, whenever possible, at locations with more sustainable travel options..

The generation of addition HGV and oil tanker traffic from Galway port to the national road system undermines the advancement of safer cycling.

6. Planning will encourage the most efficient and effective use of previously developed (brownfield) land over the use of greenfield land to ensure the most efficient use of

existing infrastructure, enhancing and strengthening the continued vitality of existing communities through regeneration.

The national low carbon road map provided under current Government policy, required to meet international climate mitigation will require the progressive reduction of import of coal, oil and other products leaving port space at Foynes redundant, obviating case for new capacity in Galway.

7. Planning will enhance a sense of place within and between cities, towns and villages and rural areas by recognising their intrinsic character and individual qualities and implement actions to protect and enhance that character and those qualities.

The future of Galway as a European and Irish historic port should be directed at maintaining the function of its historic harbour for shipping up to 5,000 tonnes, and to promote Galway for marine ecological research and education, marine leisure and sports such as sail racing.

8. Planning will conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance, from statutorily designated sites to sites of local importance, and including the conservation and management of landscape quality to the maximum extent possible, so that these intrinsic qualities of our country can be enjoyed for their collective contribution to the quality of life of this and future generations.

Galway Port needs to integrate with the urgent strategic planning needed to protect Galway city from rising sea levels and increased exposure to Atlantic storms. The current application is a misdirection of public investment resources. The proposal would result in a significant intrusion into the seascape of inner Galway Bay particularly when viewed from the east.

9. Planning will support the protection and enhancement of environmental quality in a manner consistent with the requirements of relevant national and European standards by guiding development towards optimal locations from the perspective of ensuring high standards of water and air quality, biodiversity and the minimization of pollution risk.

This is the largest marine infill proposed in Ireland since the adoption of the Birds and Habitats Directive. The development constitutes an intervention in a candidate SAC and SPA that the applicant's consultants have accepted to be "significant".

10. Above all, planning will be conducted in a manner that affords a high level of confidence in the openness, fairness, professionalism and efficiency of the process, where people have the opportunity to participate at both the strategic plan making and individual planning application level with decisions always being taken in the interests of the common good and in a timely and informed fashion and where people can have confidence that appropriate enforcement action will be taken where legal requirements are not upheld.

The proposal is not in the interest of the common good. It is based on a narrow and outdated short-term socio-economic model that does not address a climate and resource stressed world.

In addition, Section 4 sets out provision for Quality in Planning Outcomes:

"The planning process plays a very significant role in promoting patterns of development which help Ireland meet its international obligations by:

- tackling the sources of climate change by reducing Ireland's carbon footprint;*
- securing less energy and travel intensive development patterns;*
- facilitating the generation of energy from low carbon sources; and*
- adapting to the effects of climate change."*

The Galway Port development fails this test. It increases Ireland carbon footprint in through increased trade and concurrent emissions. It does not reflect the key

infrastructural investment priorities for Galway and the wider region in climate mitigation and adaptation. It is not integrated with the national and regional decarbonisation strategy required for energy and resource consumption, including the need to phase out fossil fuels. It constitutes inappropriate expenditure by a state body in a city under mounting threat from climate change. The city needs mitigation through flood protection investment.

2.2 Trans European Network - Transport (TEN- T)

The EU Trans European Network transport (TEN- T) consists of a two-tier port network, with 83 in the core network and 236 in the comprehensive network. In Ireland Dublin Cork and Shannon Foynes are in the core network, and Rosslare and Waterford in the wider comprehensive network. Galway is not included in the Trans European Network transport (TEN- T)

2.3 National Ports Policy 2013

It is the core objective of National Ports Policy:

"to facilitate a competitive and effective market for maritime transport services. The long-term international trend in ports and shipping is toward increased consolidation of resources in order to achieve optimum efficiencies of scale. This has knock on effects in terms of vessel size, the depths of water required at ports and the type and scale of port hinterland transport connections".

It states ports differ greatly in size, in current capability and potential. The structure in place since 1996 and the laissez-faire policy where 'one size fits all' is no longer appropriate.

The National Ports Policy introduces clear categorisation of the ports sector into:

- Ports of National Significance (Tier 1) Dublin, Cork and Shannon Foynes;
- Ports of National Significance (Tier 2) Rosslare and Waterford; and
- Ports of Regional Significance (Tier 3).

Ports of Regional Significance include the five smaller State-owned commercial port companies – Drogheda, Dún Laoghaire, Galway, New Ross and Wicklow – and all other ports that handle commercial freight. It states that:

These five State-owned port companies collectively handle approximately just 3% of total tonnage in the State. It is clear that there is no longer a role for central Government in ports that fulfil a regional or local need. The longer-term development of these ports is best placed within their regional and local communities to allow both develop in a manner that is mutually beneficial.

This is in line with broader Government reforms in respect of local government, which seek to ensure that functions of national significance are carried out at a national level, while those of a regional and local significance are carried out at that level. It is intended therefore to introduce legislation to allow for the transfer of these smaller State commercial port companies to relevant local authority control.

There is a specific section on Galway Port in 2.7.3 of the Strategy.

Galway Harbour Company is a bulk port which caters primarily for liquid-bulk products, and the harbour is an important strategic regional hub for petroleum importation, storage and distribution. However, declining throughput levels have led to increasing reliance on non-core port activities as revenue streams. The company now derives over 50% of its revenue from non-core port activities.

The document endorses the development of marine tourism and development of cruise tourist traffic. However, there is no comment or endorsement of the plans to “relocate commercial port activities to a new site on reclaimed land”.

Section 4.2 refers to the offshore renewable energy sector:

In relation to the emerging ocean energy sector, the recently published IMDO Report on Irish Ports' Offshore Renewable Energy Services concluded that the three Ports of National Significance (Tier 1) had the greatest potential in servicing current and future demand in the offshore renewable energy sector. The report additionally identified the two Ports of National Significance (Tier 2), as well as Galway Harbour Company and Killybegs Fishery Harbour Centre, as having important potential in terms of servicing future demand in this sector. National Ports Policy endorses these findings.

However, this does not provide any justification for the scale of port facility and infill proposed. We submit that the proposal does not sufficiently comply with the National Ports Policy 2013. We would concur with the submission of 10th March 2014 from the Shannon Foynes Port Company the proposed development does not adhere to National Ports Policy on the detailed grounds stated.

3.0 Cost Benefit Analysis

3.1 Socio-Economic Model of Cost Benefit Analysis

The scientific basis of the socio-economic model and cost benefit analysis provided by consultants for the EIS on which the Galway Harbour Extension is based needs critical evaluation. Section 5.3.2.6 refers to "a significant positive impact for human beings". The EIS takes as an unquestioned assumption both the viability and desirability of accommodating an economic model based on additional import and export of goods through the port.

Section 2.2.2 of the EIS outlines the materials and goods on which the proposed port expansion is justified. The models of development on which these projections are based are not reconciled with the mounting scientific data on the destabilising of the global climate and the diversity of life on a finite planet. The current model of global trade and investment, food production, human consumption, movement of goods and people has a mounting environmental and carbon footprint. This impact is transboundary affecting biodiversity, resource extraction, land use, energy, transport, emissions, and waste generation both now and in the future - generating tipping points of climate instability or resource depletion undermining future social and economic stability

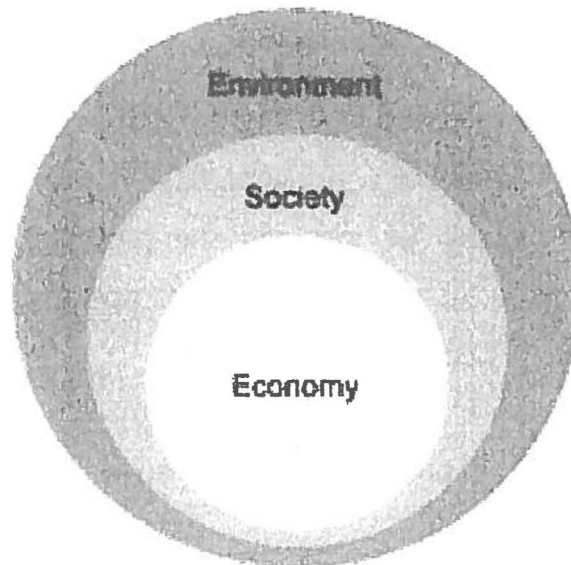
There are both direct and indirect national and transport impacts in expanding the capacity of any port. The ease of long distance transport is increased. Larger ships means that the fuel and other cost per tonne of goods transported are significantly reduced, thus incentivising the increase of tonnages transported, reducing any net carbon reduction through lower carbon emission per tonne.

The global shipping sector has escaped environmental regulation on climate and air quality in the use of unrefined bunker fuel which has highly polluting particle emissions. International shipping emissions were not included in the Kyoto Treaty or current EU emission targets.

The climate and environmental impact of cruise liners in particular is escaping international regulation. A typical cruise generates higher per capita emission than a transatlantic flight².

Current national economic development policies demonstrate a long-term blindness to the limitations of the physical world. Responses to the crisis which aim to restore the status quo are misguided and doomed to failure. Income today means nothing if it undermines the conditions upon which the prosperity of tomorrow depends. Economic Growth modelling which does not factor transboundary and future impact on cumulative climate impact and bio diversity loss is no longer tenable. This test must inform all future decision making including for individual infrastructural projects.

It should also be remembered the economy is a 'wholly-owned subsidiary' of the environment. This can be illustrated in a simple Venn Diagram



Understandably much of the current national and political and media focus is on promoting economic development and employment. All mainstream commentators and politicians eulogize the accepted wisdom of the virtues of a return to economic growth (GDP/GNP) as the conventional solution to our current economic, unemployment and fiscal difficulties. However, it should be borne in mind that there is an inherent contradiction

² <http://www.responsibletravel.com/copy/how-responsible-are-cruise-liners>

between the current model of economic growth and environmental and resource sustainability. Our society is currently locked into an economic system that has a GDP growth imperative and, as a consequence, increased energy demand, increased greenhouse gas emissions and increased transboundary resource throughput and depletion. Our ecological debts are as unstable as our financial debts. Neither is properly accounted for in the relentless pursuit of consumption growth. This contradiction is placing further pressure on the carrying capacity of the environment to support society and the economy.

Furthermore, GDP economic growth is a highly imperfect and counter-productive measure of human progress as it measures only income and does not account for the consumption of natural capital (resources), social inequality or the significant costs of anthropogenic pollution. The Stern Report 2007 noted that climate change is the greatest and widest-ranging market failure ever seen.

3.2 The Scientific Evidence

It is now over two decades since the 1992 Earth Summit in Rio de Janeiro where scientists warned humanity that 'no more than a few decades remain before the chance to avert the threats we now confront will be lost and the prospects for humanity immeasurably diminished'. The worldwide response to these messages from those in a position to bring about change has been almost nil.

In 2012 The Royal Society (London) published *People and the Planet*³. One of the main recommendations was:

"The most developed and the emerging economies must stabilise and then reduce material consumption levels through: dramatic improvements in resource use efficiency, including: reducing waste; investment in sustainable resources, technologies and infrastructures; and systematically decoupling economic activity from environmental impact"

³ <https://royalsociety.org/policy/projects/people-planet/report/>

The Living Planet Report published by the World Wide Fund for Nature (WWF) on September 2014 assessed global ecological footprint⁴. Ecological footprint is calculated on the individual consumption levels in each country both within its own territorial area as well resources obtained from other countries. It assesses the use of land, fresh water, timber and energy per person.

Ireland's import of steel and household goods, fossil fuel, fertiliser, feed for animals and caged fish, sugar products, palm oil, clothes and plastics are linked to significant environmental degradation across the world. Clothing imports are for example resulting in the depletion of fresh water reserves in central Asia.

Goods services and materials, e.g. imported timber and feedstuffs consumed in Ireland, contributes to biodiversity loss in other countries, and this report puts our per capita consumption rates at one of the highest in the globe and finds that Ireland has the 14th highest ecological footprint in global resource consumption impact on a per capita basis, just behind Australia. The WWF report also finds that global populations of fish, birds, mammals, amphibians and reptiles have declined by 52% since 1970. The message is simple: the 1992 UN Convention of Biological Diversity has failed.

Yet Bord Bia and Teagasc are actively promoting the expansion of agriculture resulting in increased greenhouse gas emissions, pressure for land reclamation, fertilizer and imported animal feed, as well as increased pressure for slurry spread which of course has downstream water quality impact and biodiversity loss.

Meanwhile, Bord Iascaigh Mara is proposing a massive increase in caged salmon farming and other marine exploitation in Ireland without proper prior assessment of the impact of increases in import fish based feedstuffs the marine eco system and biodiversity loss.

The information revealed in the WWF report is more important than international credit ratings. It shows that Ireland is among the world's most damaging and resource-consuming countries, owing a mounting ecological debt to the rest of the planet.

⁴ http://wwf.panda.org/about_our_earth/all_publications/living_planet_report/

2015 has already seen the publication of two significant international scientific reports summarised in the Guardian on 15th January 2015 with the title "Rate of environmental degradation puts life on Earth at risk, say scientists"⁵. The two studies, published in *Science and Anthropocene Review*, featured the work of scientists from countries including the US, Sweden, Germany and India. The findings will be presented in seven seminars at the World Economic Forum in Davos, which takes place between 21 and 25 January. The report states:

Humans are "eating away at our own life support systems" at a rate unseen in the past 10,000 years by degrading land and freshwater systems, emitting greenhouse gases and releasing vast amounts of agricultural chemicals into the environment, new research has found.

3.3 Addressing Fossil Fuel

All economic and social policies and the evaluation of infrastructural proposals needs to address the overwhelming urgency of climate change as outlined in the Intergovernmental Panel on Climate Change (Fifth Assessment Report AR5), for which the final synthesis report was published in October 2014.

During the last decade the extraction of oil from conventional well sources peaked. Ireland is the seventh most oil dependent economy in the world where energy usage increased by 67% between 1990 and 2006. Further, demand for fossil fuels is increasing, not decreasing.

The impact of shale oil and gas drilling in the US and deep drilling globally has resulted in the dramatic fall in oil prices since the autumn of 2014. Allied to this are the up scaling of massive open cast coal extraction in Australia, the US and other countries. This is reducing the cost per tonne of coal on the global market.

⁵ <http://www.theguardian.com/environment/2015/jan/15/rate-of-environmental-degradation-puts-life-on-earth-at-risk-say-scientists>

The extension oil and gas exploration into new areas and with problematic new technologies has resulted in new explorations ranging from the Arctic wilderness to Central Africa. Russia is promoting drilling in the Arctic with the 2010 Deepwater Horizon spill showing the risks involved. The increased level of extraction from Canadian Tar Sands and the Niger Delta is devastating in environmental impact and generates a much higher level of emissions than conventional wells. Fracking in the US has created new environmental risks and has significant impact through methane leakage during the extraction process. Globally energy companies are in an exploration race to secure a level of fossil fuel extraction which is incompatible with the level of decarbonisation required to stabilise global climate at 2 degrees average surface temperature above pre industrial levels.

In 2012 the Grantham Institute for Climate Change (based in Imperial College London) and the Carbon Tracker Initiative (An International NGO monitoring carbon emissions) published 'Unburnable Carbon 2013: Wasted Capital and Stranded Assets'⁶. This reveals that total fossil fuel reserves already far exceed the global atmosphere capacity to absorb the emissions generated if temperatures are not to exceed 2 degrees above preindustrial levels.

Between 60-80% of coal oil and gas reserves of publically listed companies are unburnable if the world is to have chance of not exceeding global warming of 2 degrees Celsius. The issue is now to achieve an effective global climate agreement and carbon tax regime which will secure this.

In January 2015 the international scientific journal *Nature* published a major paper on the level of fossil fuel burning compatible with maintaining a stable climate⁷. It stated:

"If global warming is to be limited in this century to the much-publicized 2 °C rise compared to pre-industrial levels, fossil fuel use and the associated release of greenhouse gases will need to be severely limited. This raises questions regarding the specific quantities and locations of oil, gas and coal that can be safely exploited. Christophe McGlade and Paul Ekins use an integrated

⁶ <http://www.carbontracker.org/report/wasted-capital-and-stranded-assets/>

⁷ <http://www.nature.com/news/blacklist-proposed-for-fossil-fuels-1.16695>

assessment model to explore the implications of the 2 °C warming limit for different regions' fossil fuel production. They find that, globally, a third of oil reserves, half of gas reserves and over 80% of current coal reserves should remain unused during the next 40 years in order to meet the 2 °C target and that the development of resources in the Arctic and any increase in unconventional oil production are incompatible with efforts to limit climate change."

Former President Mary Robinson, now UN Climate envoy summed up the issue in September 2013:

'There is a global limit on a safe level of emissions. That means major fossil fuel reserves must be left in the ground. That has huge implications for economic and social development.'

3.4 Socio Economic Basis of Alternatives Considered by Applicant

The consideration of alternatives is set out in Chapter 3 of the EIS. The socio-economic basis of the alternatives considered are not based on and appropriate scientific foundation, being underpinned by uncritical assumptions of continuing or increases in fossil fuel use.

Section 3.5.1 considers "do nothing" scenario obviating the need for the development. The main argument is that failure to proceed with the project "*could result in increased costs to the West and is not in accordance with sustainable transport considerations*".

If larger ships of up to 20,000 tonnes land at Galway, import or export of goods and products handled through the port will not be limited to the West region. Furthermore, if ships up to 40,000t are accommodated for the bitumen trans-shipment business this raises the concern that other cargoes of this scale will be promoted through Galway. Any transport and carbon saving gained by the movement of goods to and from a new commercial port in Galway, to the city and

the West, could be nullified by longer travel distances to other regions, since Galway would be deflecting the use of other Tier I and Tier 2 ports for cargoes with national, as opposed to regional distribution.

The claimed loss of "maritime tradition" is not founded since the potential of Galway to become a marine research centre, ocean energy service base, and of sustainable marine leisure, and sport would continue, and indeed would be enhanced if the development were not carried out. This is the continuing marine role envisaged for Galway as Tier 3 port in National Ports Policy 2013. The only issue on which we could concur with in the alternatives evaluation of the EIS is in relation to the unsuitability of other locations in Inner Galway Bay.

Section 3.7 considers alternative ports beyond Galway Bay. In relation to Foynes the consideration of alternatives has not modelled the reduction of fossil fuel and other products which will be required in the coming years to achieve sustainable socio-economic development models and the surplus port capacity which this will create.

4.0 Climate

The consideration of climate is timely in view of the publication of the *Climate Action and Low Carbon Development Bill 2015* on the 19th January 2015. The modelling of the climate impact of any development needs to address how the proposal strategically integrates with national and trans-boundary climate and the mitigation and adaptation therein.

In assessing the impact of climate on any infrastructural or development proposal, it is not sufficient to take a narrow look at the immediate emissions generated by the development. Climate proofing and analysis must also address how the strategic and actual impact of the development relates to national and international decarbonisation and the reduction of the trans-boundary resource consumption, land use change, food production, energy and transport impact.

Our initial submission raised concern at the lack of consideration of climate impact. The response given on 13th January 2014 by Eugene McKeown, Mechanical Engineer of RPS, in Section 3.6 to 3.8 and 3.18 to 3.21 specifically responding to the An Taisce submission, sought to address this. While the figures provided by Mr McKeon are not in dispute within the narrow parameters calculated, it is the methodology of climate impact assessment that is questioned.

Section 3.6 referred to lower carbon footprint of sea and rail. It did not address increased emission impact additions from generating more sea traffic and lack of strategy for any material to be transported by rail. Section 3.7 considered transportation of goods from other ports to Galway in comparison to direct access to Galway via port. Any gain is nullified by increase tonnages and consequent road traffic that the scheme would create in additional traffic generation.

Section 3.8 states scale of emissions from Galway Port relative to national emissions, and the use of larger vessels would reduce emission by 30% per tonne of goods through the port. The scale of emission generated by Galway relative to current national emissions is irrelevant; it is how the proposal achieves decarbonisation. The CO₂ gain per tonne moved

from larger vessels is nullified by the increase in tonnages and upstream and downstream impacts.

Section 3.18 states no "significant impact on the climate is likely to occur". This misses the point entirely. It does not address how the proposal is to be reconciled with a low carbon future. It does not address the transboundary impact of extracting, refining and processing of oil, bitumen and of other materials projected by the development that is reconcilable with the low carbon future and climate science. Section 3.19 repeats the irrelevant argument in 3.8.

Section 3.20 states "a regional port with 24 hour marine access and both rail and road links to the region has the potential to significantly reduce national CO2 emissions in the longer term". The new marine traffic proposed will generate more road transport emissions, and while there is a rail link provided, there is no indication that it will be used.

Section 3.21 which considers the high medium, and low growth scenarios is irrelevant since even the low growth scenario is based on an unsustainable continuing resource consuming model which will increase emissions.

The evidence of 20th January 2015 given by John Lawler of DKM rejecting the use of Foynes as an alternative to a new commercial port in Galway, made a major case with regard to the adverse impact of the fuel consumption and emissions which would be generated if road traffic from around Galway were to travel to and from Foynes. He gave detailed figures regarding diesel consumption and a range of emissions. However, the same concern for emissions impact is not directed at the overall development of the GHE which will increase both trans-boundary and national emissions.

4.1 Current International Science

2014 year was Earth's warmest on record, according to separate reports by NASA and the National Oceanic and Atmospheric Administration released on 16 Jan 2015. The average

temperature was 0.69C above the 20th Century average, beating the previous record-holding years of 2005 and 2010 by 0.04C.

With the exception of 1998, the ten warmest years on record have now occurred since the year 2000, according to analysis of surface temperature measurements by NASA and NOAA. Since 1880, when record keeping began, Earth's average surface temperature has warmed by about 0.8C.

The 5th IPCC Synthesis report published in October 2014 is clear and unequivocal. Climate change at a speed unprecedented in all human experience is happening now because of human-caused greenhouse gas emissions. Carbon emissions continue to accelerate due to humanity's burning of fossil fuels, including coal, peat, oil and gas. Deforestation and agriculture, especially with increasing dairy and meat production are also adding to greenhouse emissions.

New science in this fifth IPCC assessment shows that the amount of future global warming is directly related to the total amount of accumulating human-caused emissions of greenhouse gases – past, present, and future, they all add up. If our emissions continue to rise then temperatures will continue to rise, extreme weather will be more frequent, sea level will rise ever faster, and more land and sea ice will be lost. Only sustained and substantial emission reductions by all nations, especially by wealthy ones like Ireland, can limit climate change and reduce future severe risks to our future.

Droughts, coastal storm surges from the rising oceans and wildlife extinctions on land and in the seas will all worsen unless emissions are cut, the report states. This will have knock-on effects, according to the IPCC:

"Climate change is projected to undermine food security". The report also found the risk of wars could increase: "Climate change can indirectly increase risks of violent conflicts by amplifying well-documented drivers of these conflicts such as poverty and economic shocks"

The lowest cost route to stopping dangerous warming would be for emissions to peak by 2020 – an extremely challenging goal – and then fall to zero later this century. The report calculates that to prevent dangerous climate change, investment in low-carbon electricity and energy efficiency will have to rise by several hundred billion dollars a year before 2030. However, it also found that delaying significant emission cuts to 2030 puts up the cost of reducing carbon dioxide by almost 50%, partly because dirty power stations would have to be closed early. “If you wait, you also have to do more difficult and expensive things,” said Jim Skea, a professor at Imperial College London and an IPCC working group vice-chair.

4.2 The Irish Situation

European Environment Agency data under current limited accounting headings show Ireland having 12.8 tonnes emissions per capita with an EU average of 9.4. The figures calculated under the Kyoto and EU accounting process does not include shipping, aviation and the real consumption impact of individual countries through imports. Ireland 2013 emissions were published by the EPA in December 2014 and show a rise in transport by 2.1% as well as agriculture and heating.

To date Ireland has failed to limit emissions to the level needed, and only unintended economic recession has reduced them. As we have no effective climate strategy the Environmental Protection Agency projects that with economic growth Ireland ^{is} ~~are~~ on a pathway of ever-increasing carbon emission adding to increased risk for us and all future generations, a path that is Ireland’s contribution to dangerous climate change. We must choose a different path, one of rapid decarbonisation and if we act quickly and effectively, we can succeed.

The December 2012 Department of the Environment Community and Local Government (DoECLG) *National Climate Change Adaptation Framework* does not factor the level of risk now posed by the sort of rainfall variation with caused the drought and then flood crisis in southern England in 2012. Vague objectives for “sectoral plans”, “local adaptation plans” and “capacity building” are put forward to address climate adaptation, combined with the lack of any legally binding or specific targets is a guarantee of failure.

The OPW is working to out of date sea rise models to 2100, in planning for flood and storm exposure of settlements and infrastructure. Ireland's emissions need to be capped now and decrease rapidly in every year thereafter. Understanding and planning among all sectors are vital to make this transition happen as quickly and equitably as possible.

Ireland can take a lead role in advocating that the EU to push for a global agreement at Paris in 2015 to limit global cumulative total emissions. Without such an agreement our 'emissions savings' will likely be spent elsewhere or in the future.

By urging agreement on a global carbon cap in Paris, and in cutting emissions rapidly from now on, we in Ireland can make a difference. The IPCC and science has given us due notice. This requires the adoption of a cumulative carbon budget principle defining the level to which emissions need to be reduced on a year by year basis to achieve a stable climate and the margin between 1 and 2 tonnes per capita needed to be reached by 2050.

4.3 Investing in Mitigation and Adaptation

All further investment needs to advance and be compatible with the mitigation, that is reduction, of climate emissions both national and transboundary in all sectors. Secondary to this is the issue of adaptation to the climate impact of a warming world that was shown up by the situation in Cork and Limerick and impact on coastal settlements and tourism centres such as Salthill and Lahinch in early 2014. At the same time, the value of the flood defences constructed in Waterford City has been demonstrated.

The storms during early 2014 confirm climate models that warming atmospheric and ocean temperatures will generate storm events with greater frequency. In February 2014, the highest ever recorded wave height at 25m was recorded off Kinsale. Ireland has no current strategy for mitigation of climate emissions and adaptation to climate change.

There is currently a consultation process for a "Low Carbon Road map to 2050". This is not linked to any scientifically credible adaption of targets or effective legal

implementation strategy. Following publication of the Heads of a Climate Bill in 2013, the full Bill is to proceed through the Oireachtas in 2015.

We attach as a formal part of our evidence to this hearing the summer 2014 An Taisce magazine, on which Page 3 sets out an overview by Professor John Sweeney on the 5th UN Intergovernmental Panel on Climate Change (IPCC) assessment report:

- (i) the inadequacy of current proposed Irish climate legislation to set targets;
- (ii) Ireland's vulnerability to climate impact.

Pages 3 to 10 sets out the actions required to address the Irish situation. Pages 17 and 18 relates to energy, pages 19 to agriculture in Ireland. Pages 22 and 23 of the attached An Taisce magazine refer to land use and transport and are highly critical of the decision-making record of An Bord Pleanála in relation to transport, retail and other development-affecting climate and sustainable transport.

There is now an overriding imperative to address mitigation and adaptation of climate change - the global average temperature for 2014 has been the highest since records began.

The 2014 5th UN IPCC synthesis report establishes 97% scientific certainty on that human caused or anthropogenic greenhouse gas emissions are accelerating climate change. The only current uncertainty is the extent and period of sea level rise, temperature and climate volatility that will occur regardless of what mitigation measures on reducing global emissions are taken.

Ireland because of:

- (i) the extensive coastline;
- (ii) the concentration of major population centres on tidal rivers along the coast;
- (iii) the unpredictability of north Atlantic ocean temperature warming in generating more regular and intense storm patterns;

faces increased risks from the combination sea level rise, Atlantic storm conditions and concentrated periods of high rainfall in river catchments upstream from urban centres. This was reflected in the floods that affected Cork and Limerick cities in the early part of 2014, and storm damage over a wide area of coastline particularly in Co Clare.

Serious risk modelling is required to address ongoing adverse impact on coastal and estuarine infrastructure and settlements, including sea walls, roads, railway lines and wastewater treatment plants like Mutton Island, and direct investment capacity into adapting to climate impacts.

Despite this the NRA, and individual state bodies including port companies are still putting forward uncoordinated projects for development predicated on continued growth in fossil fuel demand, disregarding climate emissions and uncritical assumption of growth in global resource consumption.

Ireland has limited investment capacity for infrastructural development in the future. A national investment programme is required to ensure protection of urban settlements and key infrastructure.

Accordingly, available financial capacity for the Galway region needs to invest prudently in:

- (i) Mitigation of climate change through setting an international lead in reducing agricultural, energy and transport emissions;
- (ii) Adapting to climate change in particular in protecting vulnerable urban centres and infrastructure;

This is particularly relevant to the Galway City area where investment priority is needs to protect the historic centre of Galway city and Southpark from future increased storm and flood risk.

No consideration should be given to any infrastructural investment by any State company in the Galway city area without an integrated strategy being in place for the west region in

climate mitigation and adaptation, including protection of Galway City from continued future increased flood risk.

5.0 Soils

Chapter 6 of the EIS covers soils. The ecological evidence presented to the Board in the first week of the oral hearing established that the impact of the development is significant. The mitigation measures and the conclusions reached need to be addressed by the Board in relation to the Habitats Directive. Accordingly, we request that our written submission presented to the oral hearing record on 14th July 2015 should also be applied to the consideration of Chapter 6 on soils and all relevant and associated information including the evidence of D. Duggan.

6.0 Transport/Traffic/Rail

An Taisce's concerns in relation to the proposed development principally lie in the fact that Galway Harbour is located in an area where the road network is centred in and around the focal point of Galway City. All port related traffic would have to travel into and out of the residential and commercial areas of Galway City. It is considered that the city location will have an inherent disadvantage to other ports in Ireland from the point of view of access. This is a factor as to why the port is only considered of regional importance.

It is noted that the Road Traffic and Infrastructure section of the Environmental Impact Statement was carried out in June 2011. The report assumes due to the current economic slowdown, it is highly unlikely that such high growth will be experienced in the city. However, this assumption is outdated. Ireland's economy is now growing at its fastest rate in seven years, according to the latest Quarterly National Accounts. Furthermore, the population of Galway City is increasing as information from the 2011 census shows Galway City has a population of 75,414, an increase of 3,000 over the 2006 census figures.

While the EIS primarily focuses on the impact on the road network near Galway Harbour and allows for various improvements to the road network including the outer-bypass, it fails to adequately address the wider or macro implications of the strategic road network in and around Galway City.

It is also clear that many of the strategic junctions and interchanges are approaching capacity and are in need of upgrading. Where a road is at or reaching capacity one should be extra vigilant in ensuring that future land use proposals are prudent in terms of safeguarding capacity. Therefore, the appropriateness of locating a development, which is so reliant on a road network and centred in Galway City, its ring roads and its strategic junctions should be questioned in terms of sustainable land use and transportation planning. Locating a large-scale port related development that is reliant on a local road network that will ultimately shorten the life span of that road network to operate effectively when more viable alternatives exist, is problematic.

Another factor worth considering in relation to port in generation traffic is the fact that a significant proportion of the traffic will be HGV traffic. The proportion of HGV traffic is significant in the sense that large trucks can disproportionately affect the capacity of strategic roundabouts and interchanges principally because they take up larger amounts of space on roundabouts, have slower acceleration and deceleration speeds thus inhibiting traffic to flow through junctions efficiently. HGVs also pose a significant problem for the promotion of smarter travel. Researchers from the London School of Hygiene & Tropical Medicine (LSHTM) analysed police road casualty data over a 15-year period from 1992 to 2006. During that period there were 242 deaths in London, or an average of 16 a year. Heavy goods vehicles were involved in 103 out of 242 of these incidents⁸.

In relation to transport, the National Ports Policy states:

The interconnections between the national primary road network and the commercial port network will continue to be of primary importance. This is recognised in the recently adopted Spatial Planning and National Roads – Guidelines for Planning Authorities. These state, "the primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports. (Department of Environment, Community and Local Government, 2012)."

An Taisce considers there to be a significant deficiency in the lack of national road connection from Galway Port to N6 and N17 and N18. The existing Galway Port entrance is also in a busy location in the city centre and is approximately 7km from the M6.

The current proposal will increase the level of port traffic generation without addressing or resolving national road access. It is considerably access difficult access arrangement compared to other Irish ports. Dublin has the Port Tunnel link to the M50 and the relocated Waterford Port has a new National direct access link road, the N29, which feeds in the N25.

⁸ <http://www.biomedcentral.com/content/pdf/1471-2458-10-699.pdf>

The grounds on which An Bord Pleanála refused the Port of Cork at Ringaskiddy are entirely relevant to Galway Port. The interconnection between the national primary road and motorway network and the main commercial port network is of primary importance. This is recognised in the Spatial Planning and National Roads – Guidelines for Planning Authorities (Department of Environment, Community and Local Government, 2012). This states:

“the primary purpose of the national road network is to provide strategic transport links between the main centres of population and employment, including key international gateways such as the main ports and airports to provide access between all regions.”

Strategic traffic, in the context of national roads, primarily comprises major interurban and inter-regional traffic, whether HGV, car, public transport bus services or other public service vehicles, which contributes to socio-economic development, the transportation of goods and products, especially traffic to/from the main ports and airports, both freight and passenger related.

The existing or proposed extended Galway Port does not have direct access to the national network, and is therefore not a suitable location for generating addition traffic through a mixed-use urban area.

The applicants are making the argument that the railway connection extension proposed to the new commercial port infill area will greatly enhance connectivity.

In reality, the application primary motive is to seek to circumvent one of the grounds on which An Bord Pleanála refused the Port of Cork development at Ringaskiddy, which has a significant lack of rail access. (Ref ANBP PA0003)

The refusal was on grounds that relocation of current port facilities from Tivoli which is served by a railway line and *‘has reasonably direct access to the national road network’* to Ringaskiddy *‘which is not connected to the national rail system and would be totally reliant*

on road based transport' would be 'contrary to the proper planning and sustainable development of the area.

It was stated that:

'while the Board accepts that there is a need to move port activities from Tivoli Docks and expand at other location(s) within the Cork Harbour area' the proposed development would 'result in of the port related traffic traversing the city road network' and 'would exacerbate serious traffic congestion' and 'be unable to make use of rail carrying facilities in the future'.

The fact is that the applicant has failed to identify how much if any or the projected tonnages of export and import cargoes for the enlarged port would use rail.

The overall application is justified on the basis of accommodating imports and export to Connacht and the North West. Much is made of the sustainability of the proposal including reduction of Co2 through use of rail. The reality is that there is no rail freight strategy in place, either nationally or regionally for Connacht and the north-west, and the applicants are not in position to remedy this deficiency.

The European Commission's White Paper, Roadmap to a Single European Transport Area – Towards a Competitive and Resource-Efficient Transport System, stated that it is likely that *"freight movements over short and medium distances (below some 300km) will to a considerable extent remain on trucks"* (Commission of the European Communities, 2011).

The Irish national rail network, and the provision of freight in particular has been run down over the last five decades There is no longer rail distribution network from Galway to Connacht, and no rail connection at all to Donegal.

In Connacht there are rail termini remaining at Sligo on the line from Dublin via Mullingar, and Ballina and Westport from Dublin the Dublin line via Portarlinton and Athlone.

A freight train load from Galway to Sligo would first have to go to Dublin as the Athenry to Sligo line via Claremorris, and the Athlone to Mullingar lines have been abandoned. A load from Galway to Mayo would have to go via Athlone.

Between 1980 and 2009, national rail freight volumes have fallen from 637m to 97m tonne kilometres or by some 88 per cent. The mining developments at Lisheen Co. Tipperary and Glamoy Co. Kilkenny were permitted without requiring construction of rail spur. The period from 2005 to 2009 in particular has represented a period of marked decline in freight because of the withdrawal from certain key markets by Iarnród Éireann. Today, rail freight carries less than 1 per cent of the total national inland freight movements.

The distribution of kegs of ale, beer and stout including to Galway has long been a mainstay of the freight business. However, in 2005, the country's largest brewer – Diageo – announced the complete withdrawal of their kegs business from Iarnród Éireann.

The movement of petrol and oil on a commercial basis ceased in 2005. The major contract at that time was for the transport of oil from Dublin Port to Sligo. New regulations required an upgrade of the Sligo facility if it was to remain compliant with environmental and safety requirements. The cost of upgrading was prohibitive and the operation ceased.

One of the strategic objectives of department of Transport Smarter travel 2009 was to have a stakeholder's forum which would review a number of issues including "the realistic potential for rail freight ". The situation has worsened with the closure of the line between Waterford Port and Rosslare in 2010.

In 2011, Iarnrod Eireann published "2030 Rail Network Strategy Review"⁹. It recommended that Freight services will be those that are commercially viable (full cost recovery of 'above rail' costs) and those conveyed under the auspices of direct and transparent Government-sponsored contractual agreement (e.g. train service agreement or other instrument with performance regimes and efficient cost calculations) where the net societal gains have been determined in a transparent manner using an appropriate

⁹ http://www.irishrail.ie/media/irishrail_28febfinal_part11.pdf?v=grhdypa

methodology or where an incentive or State grant scheme, appropriately structured and administered, is in place.

No new investment in rail freight wagons, locomotives, terminals (including handling equipment) should be made without the support of a 'business case' underpinned by economic evaluation. The continuing motorway and dual carriageway programme including the Gort Tuam M17/ M18 now under contract are locking Ireland into road freight dependency.

What An Taisce would favour a large-scale redirection of road freight movement to rail; this is unlikely to occur in the immediate term. We do however fully support the objective that any future developments or infrastructure generating traffic should, be provided with rail access, and the adoption of a national transport policy to favour and increase in the volume and ratio of freight transported by rail. Such a strategy would use require the more active use of rail freight from the Tier 1 ports of Dublin Rosslare and Waterford and Cork and the restoration of the Foynes Limerick Rail line.

Rail freight requires critical mass and regularity of cargo. A national rail freight strategy would need to focus on the Tier 1 and 2 ports and would not require capacity expansion at Tier 3 Galway port.

The Department of Transport, Tourism and Sport's policy, *Smarter Travel: A Sustainable Transport Future – A New Transport Policy for Ireland 2009-2020* launched in February 2009. Circular PSSP-4-2010 to all planning authorities and has determined that the policy documents relate to proper planning and sustainable development under Section 9(6) of the Planning & Development Act 2000.

The document, which was the subject of extensive public consultation, includes five key goals – (i) to reduce overall travel demand, (ii) to maximise efficiency of the transport network, (iii) to reduce reliance on fossil fuels, (iv) to reduce transport emissions and (v) to improve accessibility to transport.

The most relevant goals, (iii) and (iv), indicated the applicant should have the overall objective of significantly reducing transport demand by creating a development that will

reduce energy and emissions from the freight sector. The addition of an extra port capacity at Galway, whilst ostensibly for the purpose of alleviating congestion at the existing port facilities will have the concomitant effect of further encouraging and consolidating freight movement into road based freight movements centred in an urban location.

The proposed does not go far enough in addressing its greenhouse gas emissions from traffic and increased congestion generated having regard to Article 3 of the EIA Directive, which require an assessment of both the direct and indirect effects of a project on climate.

This proposal will facilitate an increase of use in road freight feeding through a urban road network and undermine a future HGV management, and cycling enhancement.

We consider that the lack of direct connection to the M6 and the N17 – N18 from the port entrance, is sufficient grounds alone to warrant refusal of this application.

7.0 Landscape Visual

Chapter 12 of the EIS covers landscape/visual.

Visual Receptor 2 Southpark/Mutton Island Causeway/Nimmo's Pier identified a significant degree of visual impact for Nimmo's Pier

The conclusion in 12.22 requires evaluation. The development is appropriately described as a "reclaimed peninsula protruding from the existing Enterprise Park out into the bay waters.

The third paragraph states:

The nature of the proposed development provides limited scope for visual mitigation. Mitigation measures such as the implementation of screening planting, light spill reduction and colour recommendations are proposed.

The fifth and final paragraph states:

In summary, the range of mitigated visual and landscape character impacts vary from neutral to moderately negative.

This contradicts the third paragraphs and the contents of page 12-16 which refers to a significant impact at Nimmo's Pier

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