Our Case Number: PA0033

An Bord Pleanála

An Taisce
26 Manor Avenue
Kingston
Galway
H91 C98X

Date: 06 February 2025

Re: Galway Harbour Extension
Renmore and Townparks Townlands, Galway

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Lauren Griffin

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

PA04

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
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Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Thursday 6 February 2025 13:04
To: derrickhambleton59@gmail.com
Subject: RE: ABP Ref No PA 0033 - Galway Harbour extension.

A Chara,

The Board acknowledges receipt of your email, official correspondence will issue in due course.

Kind regards,

Lauren

From: Derrick Hambleton <derrickhambleton59@gmail.com>
Sent: Tuesday 4 February 2025 13:55
To: Bord <bord@pleanala.ie>
Cc: Phoebe Duvall <Phoebe.Duvall@antaisce.org>; Ian Lumley <heritage@antaisce.org>; Peter Butler <peterbutle@gmail.com>; Brendan Mulligan <mulliganbrendan56@gmail.com>; Mark <Mark.Green@amicustec.ie>
Subject: ABP Ref No PA 0033 - Galway Harbour extension.

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Dear Secretary,

Please accept and acknowledge as usual receipt of An Taisce - Galway Association Planning Committees full submission and comments to the above application.

Yours faithfully

Derrick Hambleton
Secretary.

An Taisce

The National Trust for Ireland
Galway Association – Planning Committee

An Rúnaí,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

4th February 2025

An BP Ref. No:	**PA61.PA0033**
Applicant:	**Galway Harbour Company**
Application:	**Galway Harbour Extension**
	Environmental Impact Statement ("EIS") Addendum 2024 and Natura Impact Statement ("NIS") Addendum 2024 Response to An Bord Pleanála letter of 16 July 2024
At:	**Renmore and Townparks Townlands, Galway city**

A chara,

Please find enclosed herewith An Taisce Galway Association's submission in relation to the Further Information submitted by the applicant.

Please acknowledge receipt of this submission.

Is mise, le meas,

Derrick Hambleton

An Taisce, Galway Association - Planning Committee

c/o 26 Manor Avenue, Kingston, Galway. H91 C98X

An Taisce
The National Trust for Ireland
Galway Association – Planning Committee

An BP Ref: PA61.PA0033

Proposed Galway Harbour Extension in Renmore and Townparks Townlands, Galway city.

Environmental Impact Statement ("EIS") Addendum 2024 and

Natura Impact Statement ("NIS") Addendum 2024

Response to An Bord Pleanála letter of 16 July 2024

Submission to An Bord Pleanála in relation to Further Information submitted by the Applicant.

Contents: **Page No.**

1. A very much changed context since 2014

The application for permission was made to An Bord Pleanála in January 2014.

The response to An Bord Pleanála in September 2024 doesn't appear to have adequately considered the following significant changes that have occurred since the application was initially lodged in January 2014:

1.1 The Paris Agreement

> The Paris Agreement is a **legally binding international treaty on climate change**. It was adopted by 196 Parties at the UN Climate Change Conference (COP21) in Paris, France, on 12 December 2015. It entered into force on 4 November 2016.
>
> Its overarching goal is to hold *"the increase in the global average temperature to well below 2°C above pre-industrial levels"* and pursue efforts *"to limit the temperature increase to 1.5°C above pre-industrial levels."*
>
> However, in recent years, world leaders have stressed the need to limit global warming to 1.5°C by the end of this century.
>
> That's because the UN's Intergovernmental Panel on Climate Change indicates that crossing the 1.5°C threshold risks unleashing far more severe climate change impacts, including more frequent and severe droughts, heatwaves and rainfall.
>
> To limit global warming to 1.5°C, greenhouse gas emissions must peak before 2025 at the latest and decline 43% by 2030.
>
> UNFCC

1.2 EU Effort Sharing Regulation

The Effort Sharing Regulation was adopted in May 2018 with the aim to reduce emissions from key sectors by 30% by 2030 (compared to 2005 levels).

In April 2023, the Effort Sharing Regulation was amended under which the 2030 emission reduction target was set to -40%. The regulation assigned an emission target for each Member State. Member States had to prepare National Energy and Climate Plans to achieve the targets.

In Octobre 2023, the EU adopted the two final pillars of its 'Fit for 55' legislative package for delivering the EU's 2030 climate targets. EU countries are now **legally bound to reduce emissions by at least 55% by 2030**. This is an intermediate step towards net-zero emissions in 2050.

1.3 Ireland's National Energy and Climate Plan (NECP) 2021-2030

The first draft NECP was submitted to the European Commission in December 2018.

The draft updated NECP was submitted to the European Commission in July 2024.

1.4 The Climate Action and Low Carbon Development Acts 2015-2021

- Carbon budgets
- Sectoral Emissions Ceilings
- Annual Climate Action Plans

1.5 The Galway City Local Authority Climate Action Plan (LACAP) 2024-2029

The LACAP includes the objective to reduce Galway City's carbon emissions by 51% from 493,503 tCO_2e in 2018 to 241,816 tCO_2e in 2030.

1.6 Coolglass Wind Farm Ltd and An Bord Pleanála and Ireland and The Attorney General

The judgement of Humphreys J., delivered on Friday 10 January 2025, determined that public bodies must comply with the obligations under Section 15 of the Climate Action and Low Carbon Development Act, 2015 (as amended).

1.7 The National Planning Framework 2018

National Policy Objective 40:

Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, metropolitan area and city/county development plans, to ensure the effective growth and sustainable development of the city regions and regional and rural areas.

1.8 The Policy Statement on the Facilitation of Offshore Renewable Energy in Commercial Ports in Ireland, December 2021.

The Policy Statement recognised that the following ports could play a significant part in the provision of the required large scale port infrastructure:

- Shannon-Foynes Port,
- Port of Cork

It recognised that there will also be opportunities for other ports along the west coast such as the ports of:

- Galway,
- Bantry Bay (under the Port of Cork),

and the Major Fishery Harbour Centres of:

- Ros an Mhíl,
- Killybegs,
- Castletownbere

1.9 National Ports Policy Review

- Issues Paper published 18 October 2023
- Consultation commenced in January 2024
- A second consultation will take place in 2025.

It would be premature to decide to grant permission prior to the publication of the National Ports Policy Review.

2. **Developments already completed, underway or committed to at Ports in Ireland to facilitate Offshore Renewable Energy**

2.1 Shannon-Foynes

The port of Shannon Foynes unveiled its €32m jetty expansion and logistics park in September 2024 as it aims to establish the estuary as a floating offshore wind hub.

The two-year programme of works delivered an additional 117m jetty, and 12,000 square metres of set down storage and also delivered one of the country's largest port logistics parks on a 38-hectare site with planning permission for extensive logistics warehousing units.

The record investment, which was co-funded by Shannon Foynes Port and the EU's 'Connecting Europe Facility' (CEF), is a key element of the company's Vision 2041 masterplan.

2.2 Port of Cork

It was announced in October 2024 that the Port of Cork is to get an €88.5 million investment to build new facilities at its container terminal in Ringaskiddy.

It is part of a new partnership between the port and the Ireland Strategic Investment Fund, which first invested €18 million in the facility in 2017.

It is understood the financial injection is part of the €99 million investment into the port announced by the Minister for Public Expenditure and Reform Paschal Donohoe during his Budget 2025 speech.

The project will cost more than €100 million to complete and will be co-funded by the EU. The funding will be used to build quay infrastructure, for which planning permission has already been granted, at Ringaskiddy and to support offshore renewable energy development.

2.3 Ros an Mhíl Major Fishery Harbour Centre

In December 2022, the Department of Agriculture and the Marine signed a €30m contract for a new 200m long deepwater quay at Ros an Mhíl. An extension of the duration of the planning permission, originally granted in 2018, was granted in 2023. The works are reportedly 75% complete but have been halted following a Judicial Review of the decision to grant an extension of duration. It appears that an application for a Substitute Consent will be necessary to enable the completion of the works.

According to a Cost Benefit analysis prepared by MWP in association with Raymond Burke consulting in December 2022:

"In recent times, the importance of servicing the offshore energy sector has become more pronounced and the Fishery Harbour at Rossaveel is considered an ideal location and of strategic importance as a base offering supporting facilities for such projects off the west coast because of its proximity to potential wind farms. Being some 40 kilometres west of Galway reduces steaming time to sites thus saving travel and fuel costs."

"Both the IPORES and Carbon Trust Reports confirm that Rossaveel is suitable as an Operations & Maintenance facility location for instance."

"The Marine Renewables Industry Association (MRIA) is a strong advocate of Rossaveel as an offshore servicing site".

2.4 Belfast Harbour

In January 2025, Belfast Harbour unveiled its Strategy 2025-2029 which sets out plans to position the port at the forefront of the clean energy transition as a key player in the development of offshore wind energy port capacity in the UK & Ireland.

Belfast Harbour previously invested £53m in its D1 terminal to become the first UK port with a bespoke offshore wind facility and remains the only port on the island of Ireland with offshore wind capability. Between 2013 and 2018, Belfast Harbour's facility enabled the delivery of 66% of the offshore wind projects developed in UK waters.

By investing in a new deepwater berth, Belfast Harbour is aiming to build on its offshore wind business, by expanding the capacity of its current offshore facility by 2027/28 and developing a brand-new terminal to service next generation floating turbines by 2030. The £90m investment in a new deepwater quay and facilities will support the deployment of the next generation of floating offshore wind farms and meet the growing needs of offshore renewable energy developers.

Under the plans, the offshore wind logistics facility at Belfast Harbour's D1 terminal will again become a full-time offshore wind facility.

3. Climate Change

3.1 The current reality

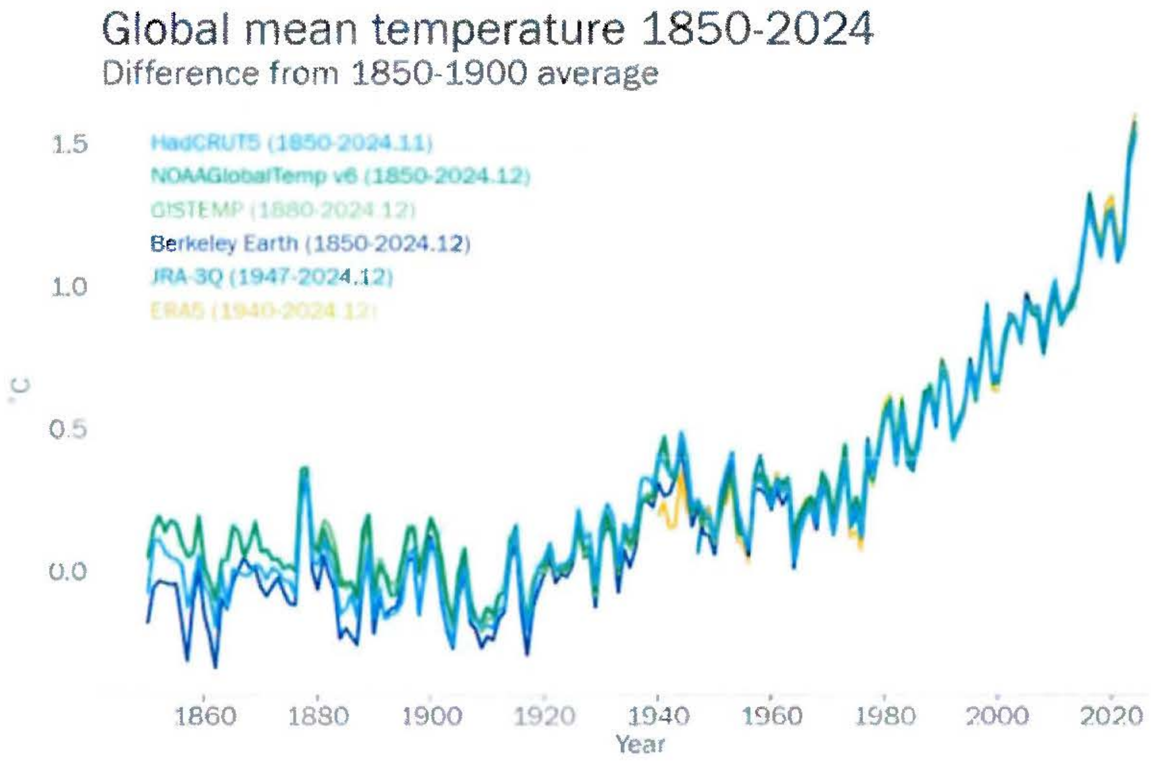
On the 10 January 2025, the World Meteorological Office issued the following statement:

> *"The World Meteorological Organization (WMO) has confirmed that 2024 is the warmest year on record, based on six international datasets. The past ten years have all been in the Top Ten, in an extraordinary streak of record-breaking temperatures.*
>
> *The lobal average temperature increased by 1.55deg C in 2024. There has been an increase in the frequency and severity of extreme weather events since the coming into effect of the Paris Agreement."*

On the same day, the UN Secretary-General issued a statement – there is an extract from the statement in the text box below:

> Today's assessment from the World Meteorological Organization is clear: Global heating is a cold, hard fact.
>
> We have just endured the hottest decade on record – with 2024 topping the list, and likely to be the first calendar year with a global mean temperature of more than 1.5°C above pre-industrial levels.
>
> Individual years pushing past the 1.5 degree limit do not mean the long-term goal is shot. It means we need to fight even harder to get on track.
>
> Blazing temperatures in 2024 require trail-blazing climate action in 2025.
>
> Specifically, governments must deliver new national climate action plans this year to limit long-term global temperature rise to 1.5°C, and support the most vulnerable deal with devastating climate impacts.
>
> There's still time to avoid the worst of climate catastrophe. But leaders must act – now.

The statement included the following graph of global mean temperature from 1850-2024:



The *Copernicus Global Climate Highlights Report 2024*, published on the 10th January 2025, confirmed:

> *"2024 as the warmest year on record and the* ***first to exceed 1.5°C above pre-industrial levels for the annual global average temperature****. Last year was also the warmest for all continental regions, including Europe, except Antarctica and Australasia."*
>
> *"The overall frequency and severity of extreme weather events are increasing. Sea surface temperatures remained exceptionally high, with July to December 2024, being the second warmest on record for the time of year, after 2023."*

The *2023 European State of the Climate Report* and the European Climate Risk Assessment, highlighted that:

> *"the European continent has been warming twice as fast as the global average since the 1980s, becoming the fastest-warming continent on Earth."*

Ireland is facing a €20bn fine in early 2030s

The latest assessment report from the Irish Fiscal Advisory Council (IFAC) in December 2024 estimates that the total bill Ireland could face in the early 2030s from not meetings its EU emissions targets for the years 2021 to 2030 could be up to €20 billion.

3.2 Risk of Climate Tipping Points

The Institute and Faculty of Actuaries published a paper, 'Planetary Solvency – finding our balance with nature', in January 2025. It included the following dire warning of the risk at global warming by 1.5°C.

"Non-linearity and tipping points

Warming of 1.5°C is extremely risky, with a chance of triggering multiple climate tipping points such as the collapse of ice sheets in Greenland, West Antarctica and the Himalayas, permafrost melt, Amazon die back and halting major ocean current circulation.

We system tipping points act to accelerate global warming (by increasing GHG levels) and the impacts, (e.g. accelerating multi-metre sea level rise)."

There is no sense in the response to An BP that the applicant has any appreciation of the risk that we face.

3.3 NASA Sea Level Rise

Key Takeaway:
Global sea levels are rising as a result of human-caused global warming, with recent rates being unprecedented over the past 2,500-plus years.

Sea level rise is caused primarily by two factors related to global warming: the added water from melting ice sheets and glaciers, and the expansion of seawater as it warms.

The first graph below tracks the change in global sea level since 1993, as observed by satellites.

The second graph, which is from coastal tide gauge and satellite data, shows how much sea level changed from about 1900 to 2018. Items with pluses (+) are factors that cause global sea level to increase, while minuses (-) are what cause sea level to decrease. These items are displayed at the time they were affecting sea level.

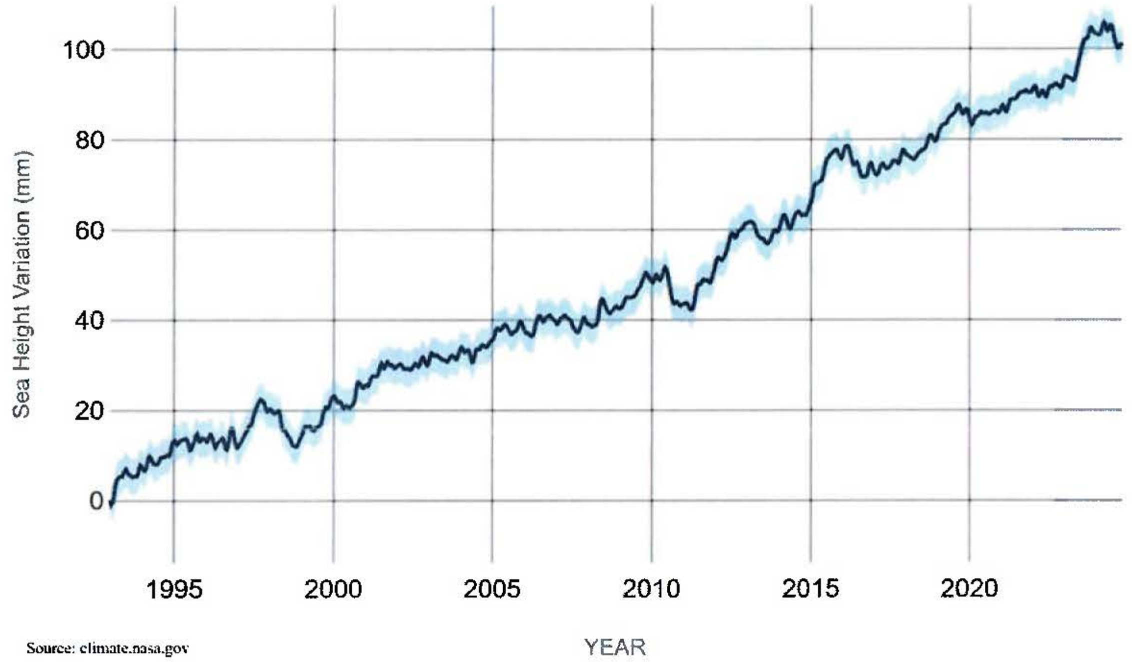


Figure 1 Change in global sea level since 1993, as observed by satellites

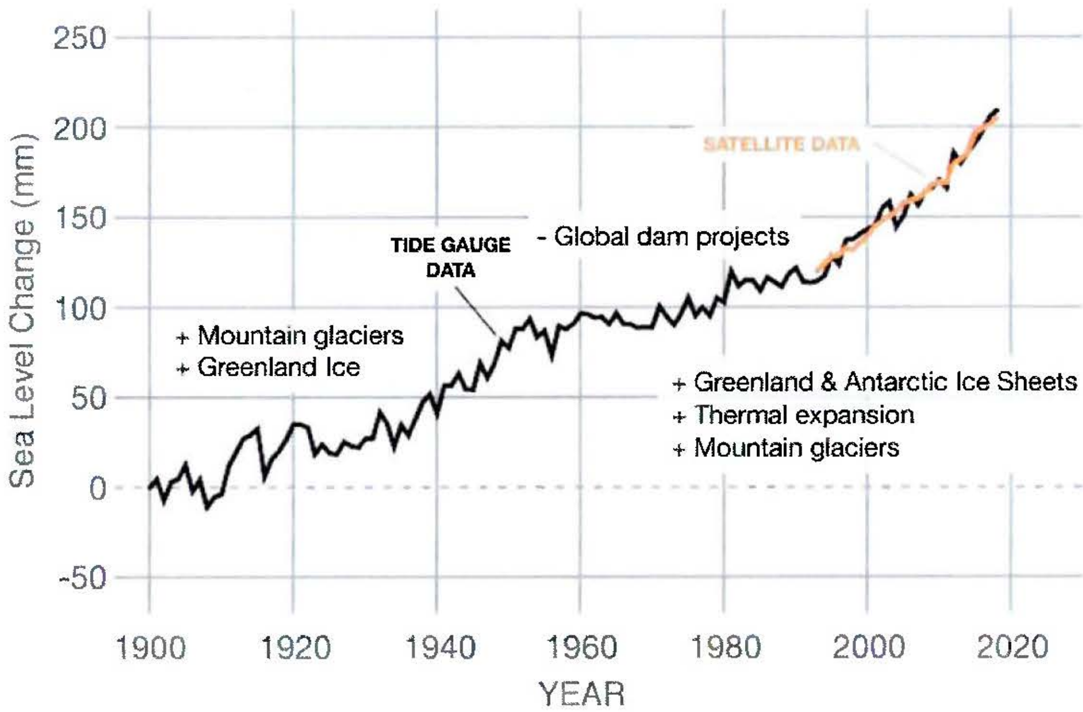


Figure 2 Sea level change from about 1900 to 2018, using coastal tide gauge and satellite data

SOURCE DATA: 1900-2018

Data source: Frederikse et al. (2020)
Credit: NASA's Goddard Space Flight Center/PO.DAAC

Global warming has progressed at a much faster rate than was envisaged when the Paris Agreement was made. We have witnessed more frequent and more extreme weather events over the past 20 years as climate change accelerates.

An acceleration in the rate of sea level rise since about 1995 is evident from the satellite data in Figure 2 above.

It reasonable to anticipate that sea level rise may be much greater than anticipated heretofore as sea temperatures increase and the Antarctic and Greenland ice sheets and mountain glaciers melt at an increasing rate. This is supported by a paper titled "Fusion of Probabilistic Projections of Sea-Level Rise" published online in *Earth's Future*, 11 December 2024.

An interdisciplinary team of researchers from Nanyang Technological University, Singapore (NTU Singapore), and Delft University of Technology (TU Delft), The Netherlands, has projected that if the rate of global CO_2 emissions continues to increase and reaches a high emission scenario, sea levels would as a result very likely rise between 0.5 and 1.9 metres by 2100. The high end of this projection's range is 90 centimetres higher than the latest United Nations' global projection of 0.6 to 1.0 metres. The very likely range (90 per cent probability for the event to occur), reported by the NTU team in the scientific journal Earth's Future, complements sea-level rise projections reported by the United Nation's Intergovernmental Panel on Climate Change (IPCC), which only assessed the probability of projections up to a likely range (66 per cent probability).

There is no evidence that such potential sea level rise has been factored into the development since the application for permission was submitted 11 years ago.

3.4 Storm Éowyn 24 January 2025

This storm set new records for mean 10-minute wind speed and 3-second gust speed at Ceann Mhása (Mace Head) in Co. Galway.

In the immediate aftermath of the storm there were 776,000 homes, farms and businesses without electricity. That is approximately one-third of all customers. One week later there were still over 100,000 customers without power.

It caused structural damage to buildings, felled trees and flattened commercial forestry across the country.

Galway city and other coastal cities and towns had a lucky escape from very severe coastal flooding because the onset of the storm coincided with a period in which there were neap tides. Neap tides occur two days before and after the first and third quarter of the moon, when there is least difference between high and low water. The following are the predicted astronomical tides for Galway in January 2025:

GALWAY JANUARY 2025

◗ First Quarter 6 | ● Full Moon 13 | ◖ Last Quarter 21 | ○ New Moon 29

FOR LOCAL VARIATIONS SEE BELOW OR CENTREFOLD	ALL TIMES ARE IN LOCAL TIME • TIDEMARK (Ht) IS GIVEN IN METRES (Mtrs)							
	HIGH WATER				LOW WATER			
DATE / DAY	MORNING	Ht/Mtrs	AFTERNOON	Ht/Mtrs	MORNING	Ht/Mtrs	AFTERNOON	Ht/Mtrs
1 W	05:50	5.1	18:20	4.8	11:50	1.0		
2 TH	06:30	5.1	19:02	4.8	00:03	1.2	12:30	0.9
3 F	07:12	5.1	19:44	4.8	00:44	1.2	13:11	0.9
4 SA	07:55	5.0	20:29	4.7	01:28	1.3	13:56	1.0
5 SU	08:42	4.9	21:18	4.6	02:14	1.4	14:43	1.1
◗ 6 M	09:34	4.7	22:12	4.4	03:06	1.5	15:35	1.3
7 TU	10:32	4.5	23:12	4.3	04:03	1.7	16:33	1.5
8 W	11:39	4.4			05:09	1.8	17:40	1.7
9 TH	00:23	4.3	12:57	4.3	06:25	1.8	19:00	1.8
10 F	01:38	4.4	14:11	4.4	07:49	1.7	20:17	1.7
11 SA	02:42	4.6	15:13	4.6	08:57	1.5	21:16	1.6
12 SU	03:37	4.8	16:06	4.8	09:51	1.3	22:05	1.4
● 13 M	04:26	5.0	16:55	5.0	10:37	1.1	22:48	1.3
14 TU	05:11	5.2	17:40	5.0	11:19	0.9	23:28	1.2
15 W	05:54	5.3	18:23	5.1	11:56	0.9		
16 TH	06:35	5.2	19:03	5.0	00:04	1.2	12:31	0.9
17 F	07:13	5.1	19:42	4.9	00:40	1.3	13:06	1.0
18 SA	07:51	5.0	20:20	4.7	01:17	1.4	13:42	1.2
19 SU	08:29	4.7	20:59	4.5	01:54	1.5	14:20	1.4
20 M	09:10	4.5	21:40	4.3	02:32	1.7	14:58	1.7
◖ 21 TU	09:55	4.2	22:27	4.1	03:13	2.0	15:41	1.9
22 W	10:45	4.0	23:19	4.0	04:02	2.2	16:34	2.2
23 TH	11:43	3.9			05:32	2.4	18:19	2.3
24 F	00:18	3.9	12:51	3.8	07:03	2.3	19:33	2.3
25 SA	01:28	4.0	14:11	3.9	08:05	2.2	20:29	2.1
26 SU	02:36	4.2	15:14	4.2	08:57	1.9	21:18	1.9
27 M	03:28	4.5	16:01	4.4	09:43	1.6	22:01	1.6
28 TU	04:12	4.8	16:43	4.7	10:25	1.3	22:40	1.3
○ 29 W	04:53	5.0	17:23	4.9	11:03	1.0	23:16	1.1
30 TH	05:34	5.2	18:03	5.1	11:39	0.7	23:53	0.9
31 F	06:14	5.4	18:42	5.2			12:16	0.6

AVERAGE TIME VARIATION ON GALWAY *(see centrefold for complete list of secondary locations and precise variations)*

KILKEE: SEAFIELD PT. -0:10
LAHINCH/LISCANNOR -0:05
ROUNDSTONE BAY +0:05
CLIFDEN: CLIFDEN BAY +0:05
CLEGGAN: INISHBOFIN/BOFIN HBR. +0:10
WESTPORT: INISHGORT +0:40
ACHILL: INISHBIGGLE +1:00
BELMULLET: BLACKSOD QUAY +0:30
KILLALA BAY: INISHCRONE +0:45

A high tide, with a height of 3.9m, was predicted to occur at 00:18 on Friday 24th January, the day that Storm Éowyn occurred. It is highlighted in yellow in the table above.

The higher spring tides that occurred on 15 and 31 January are highlighted in green.

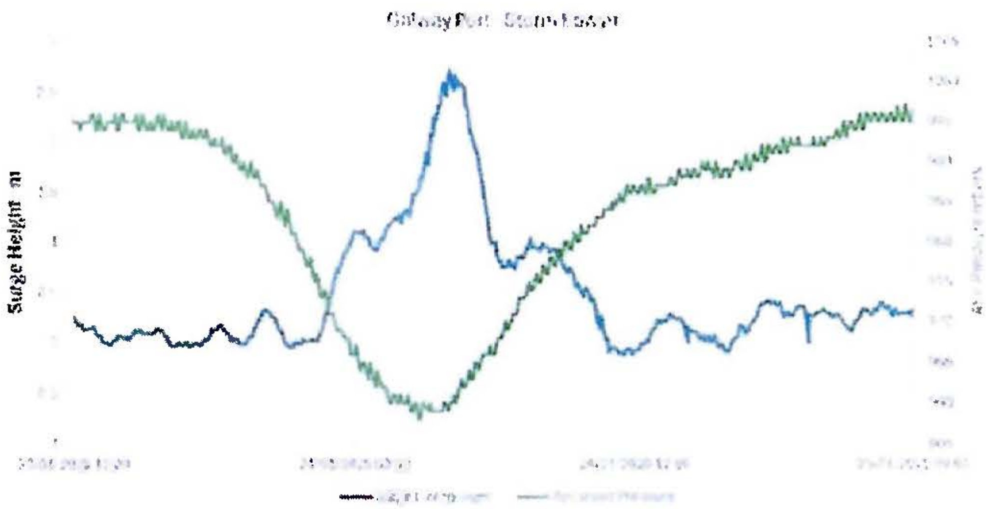
The online Afloat.ie Team posted online later that day, and the following is taken from the post.

"Galway Port recorded levels of 5.25 metres during a surge which only began to recede four hours after high tide, according to harbourmaster Capt Brian Sheridan."

Tony Cawley, Hydrologist and Director of Hydro Environmental Ltd, the author of the Response to An Bord Pleanála, EIS Addendum Sept. 2024 Chapter 8 Water, posted the following on LinkedIn a few days after Storm Éowyn.

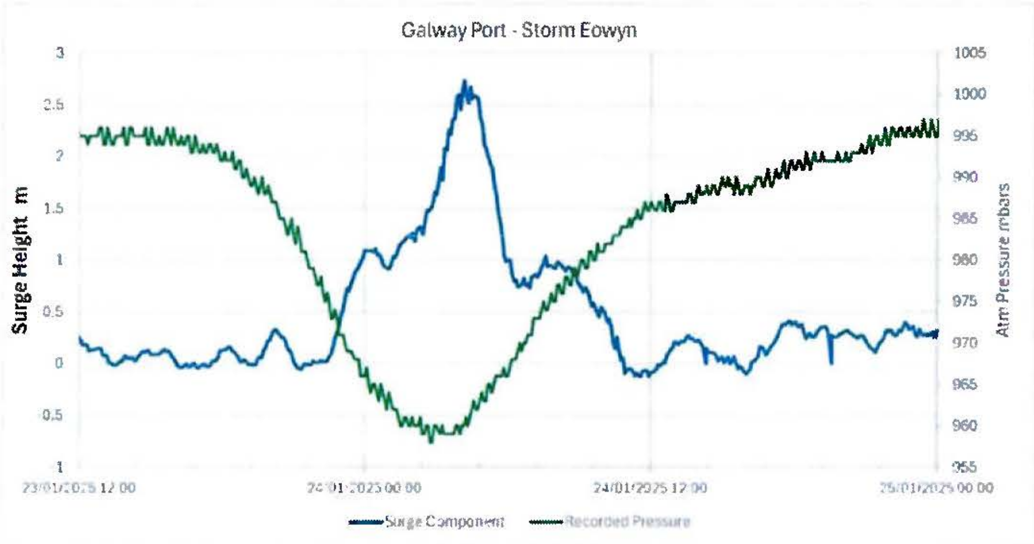
Tony Cawley • 1st
Hydrologist and Director of Hydro Environmental Ltd.
4d •

The Storm Surge recorded at Galway Port for Storm Eowyn was Historic and fortunate to have coincided with the lower neap tides and towards low water producing just over 2.5m on the astronomical tide



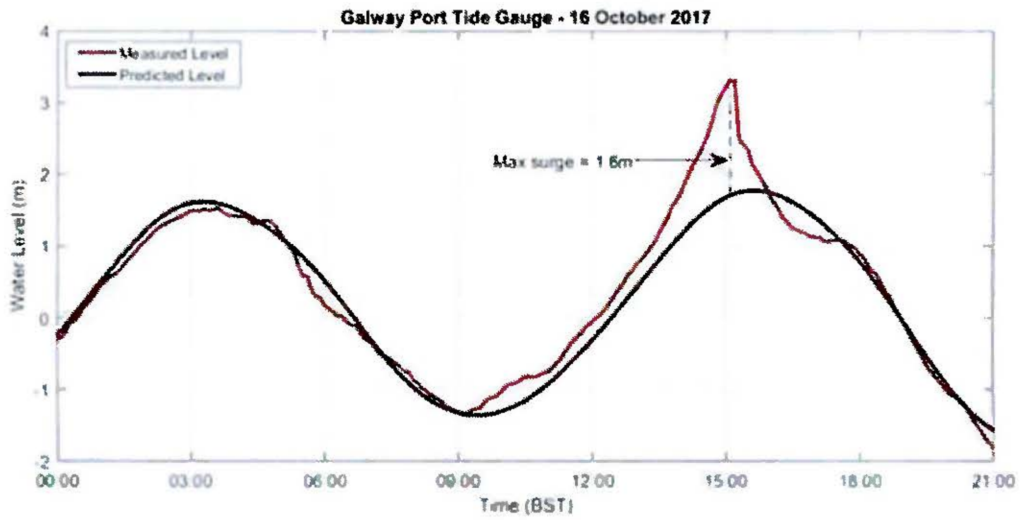
Storm Surge Profile

A clearer image of the Storm Surge Profile posted by Tony Cawley is below:



Storm Surge Profile

It appears from the graph above that the storm surge was of the order of 2.75m above the predicted astronomical tide. The surge persisted for several hours.



Tide gauge recordings from Galway Port during Storm Opheila on 16 October 2017.

(figure retrieved from the Marine Institute)

The storm surge during Storm Opheila on the 16 October 2017 was 1.6m above the predicted astronomical tide and it occurred 30 minutes before high tide. This resulted in flooding at the Docks, Spanish Arch and Salthill Promenade. Fortunately, the surge quickly dissipated on that occasion.

Tidal Observations are available on the Marine Institutes' website for the Irish National Tidal Gauge Network, which includes Galway Port. The highest water level recorded during Storm Éowyn was 5.64m at 04:10 on the 24 January.

The predicted high tide was 3.9m at 00:18. The water level was in excess of 3.9m from 22:55 on the 23 January to 05:35 on the 24 January, a period of 6 hours and 40 minutes. That was from 1hour and 23 minutes before high tide and 5 hours 17 minutes after high tide.

Had Storm Éowyn struck 4 hours earlier it would have coincided with the time of high tide. Worse still, had it occurred on the morning of Friday 31 January, 7 days later, the predicted high tide would have been 5.4m. The storm surge would have added 2.75m to the heigh of the tide bringing it to 8.15m which would have caused very extensive flooding in the city centre, the Claddagh, Salthill, around Loch an tSáile, in Oranmore and Bearna. The situation would have been similar on the morning of the 15 January when the high tide was predicted to be 5.3m

In Section 8.6.9. Flood Risk Assessment, it is stated that:

"...........the operational quay level is set at 4.70m OD. The minimum finish floor level for all buildings on the development site is to be 5.5m O.D. which is well above the design flood level providing a free board of 806mm and thus not considered at risk of flooding."

The difference between Ordnance Datum (O.D.) Malin Head and Chart Datum is 2.945m. A quay level of 4.70m O.D. would be 7.645m Chart Datum which would be 505mm below the water level, 8.15m, that would have been reached had Storm Éowyn happened during the morning of the 31 January 2025 at high tide. The proposed minimum floor finish level for all buildings of 5.5m O.D. (8.445m Chart Datum) would only provide freeboard of only 295mm during a storm with the same surge height as Storm Eowyn, not 800mm as suggested in Section 8.6.9. It is probable that, given sea level rise and increased storm intensity, the proposed buildings will be at risk of flooding.

All indications are that the frequency and severity of storms will increase, as will their impacts. In the Response to An Bord Pleanála Sept. 2024, EIS Addendum Chapter 1, Introduction & Background, Section 1.2 Review of any material changes to the chapter in the original EIS, it is stated as follows:

“Decommissioning

This project is a permanent structure and therefore it is not envisaged that decommissioning will ever occur.”

There are many examples of maritime infrastructure around the coast that have been much more than a century in existence. None of the studies in support of this development have looked forward to a horizon more than a century from now, never mind into eternity.

An Taisce respectfully suggests that An Bord Pleanála ask the Applicant to review the impacts of storm surges of the height that occurred during Storm Éowyn and the potential for even greater storm surge heights as the impacts of Climate Change become more severe. The review should consider not only the impacts on the proposed development itself, but also how the development when completed might cause deflection of storm surge waters at increased storm surge height, thus increasing the risk of flooding to other areas in the vicinity of it.

4. Response to An Bord Pleanála Sept. 2024, EIS Addendum Chapter 1, Introduction and Background

4.1 The "need" for the proposed development

In Section 1.2 Review of any material changes to the chapter in the original EIS it is stated that:

"there is an additional need for the project to cater for the likely development of offshore renewable energy installations"

There is potential for offshore renewable energy installations off the west coast of Ireland. The figure below is taken from The National Ports Study for Wind Energy Ireland:

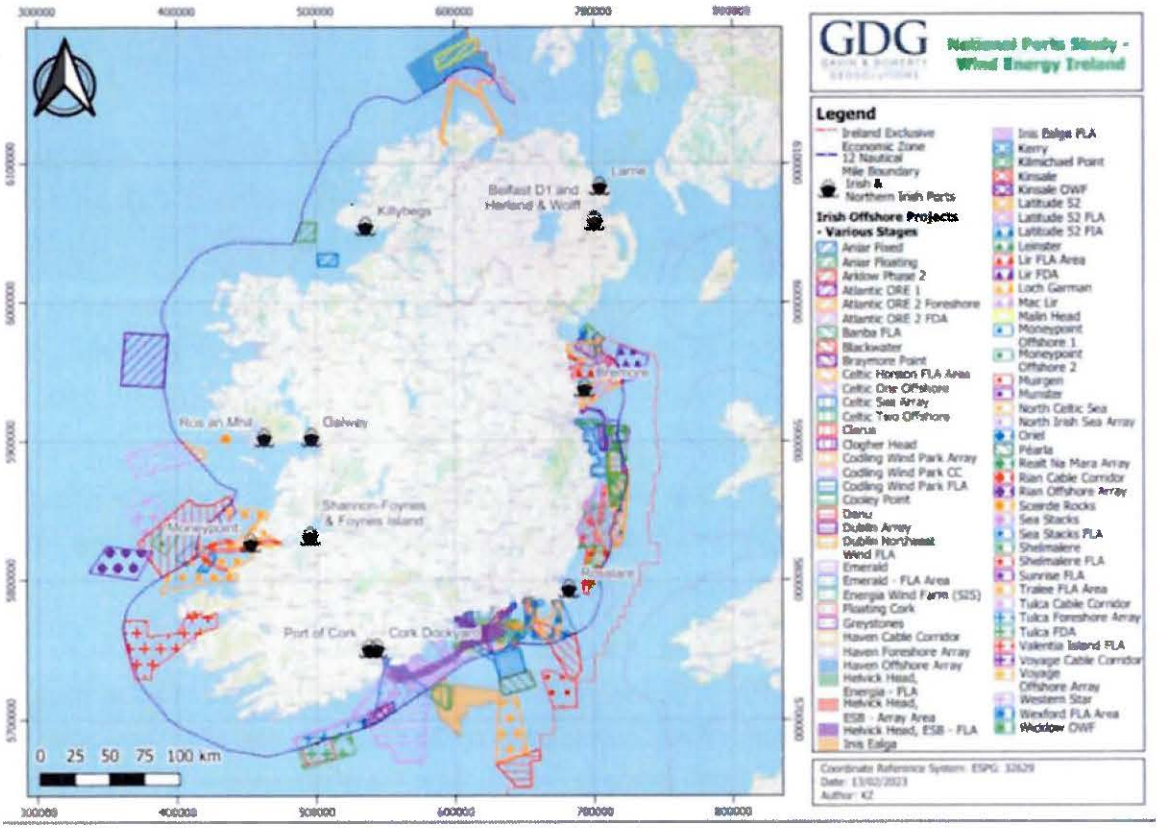


Figure 1-1: Ports Considered within National Port Study Relative to Proposed Irish Projects

Depending on the exact location of the renewable offshore renewable energy developments, the Tier 1 Ports of Cork and Shannon Foynes and the Major Fishery Harbours at Ros an Mhíl and Killybegs may be better placed to service any need arising off the west coast.

The Port of Cork will be the first port in the country to have both assembly and storage facilities for offshore wind projects. The Port of Cork, a TEN-T core maritime port, is to get an €88.5 million investment to carry on building quay infrastructure at Ringaskiddy and to support offshore renewable energy development. It is part of a new partnership between the port and the Ireland Strategic Investment Fund, which first invested €18 million in the facility in 2017. It is understood the financial injection is part of the €99 million investment into the port announced by the Minister for Public Expenditure and Reform Paschal Donohoe during his budget speech in November 2024. The project will cost more than €100 million to complete and will be co-funded by the EU.

In September 2024, Shannon Foynes Port Company complete a €32m investment in at the TEN-T core maritime port at Foynes. The development included:

- An additional 117m jetty,
- An additional 12,000 square metres of set down storage, and
- One of the country's largest port logistics parks on a 38-hectare site with planning permission for extensive logistics warehousing units.

The reinstatement of the rail connection for both intermodal and bulk traffic is already well advanced and is expected to reopen by mid-2026. The new Limerick to Foynes road will give motorway and dual carriageway access directly to the port.

The Government has committed €30m in funding to the development of a deep-water harbour at Ros an Mhíl to provide 200m of berthage and the works are already well advanced. Works have been suspended pending the submission of an application for substitute consent to An Bord Pleanála.

Travelling in and out to dock at Galway Harbour would add an additional 80Km in travel distance rather than docking at Ros an Mhíl, which add significantly to the time and cost of the servicing of offshore renewable energy developments off the west coast.

Galway Harbour is located in the heart of the 22nd most congested city in the EU (Inrix Report 2024?). Access to and from the M6 motorway is, and will continue to be, through seriously traffic congested roads. A rail connection to Galway Harbour is not included in Iarnród Éireann's Rail Freight 2040 strategy. A Strategic Freight Terminal at Athenry is included in the 2040 Strategy which will have rail freight connections to the TENT -T *"core maritime ports"* at Shannon Foynes, Cork and Dublin and the port at Waterford

4.2 Trans European Network - Transport TEN-T

The port of Galway was included in the TEN-T network in July 2024 as a *"comprehensive maritime port".*

The Port of Cork and Shannon Foynes Port had already been included in the TEN-T network, both with a higher designation as a *"core maritime port".*

Work has commenced on the M28 Cork to Ringaskiddy motorway to connect the Port of Cork to the motorway network.

There is an objective in Iarnród Éireann's Rail Freight 2040 Strategy to reestablish the rail connection to Marino Point in the Port of Cork to facilitate the transport of bulk commodities to and from the port.

4.3 Galway Harbour Extension – EIS, Carbon Life Cycle Assessment Report

A Carbon Life Cycle Assessment Report, prepared by Tobin, has been submitted.

The embodied carbon in the proposed development is estimated to be 73,060 tonnes CO_2e - see Table 3-4 in the report. It represents 0.0366% of Ireland's 2026-2030 Carbon Budget of 200 $MtCO_2e$. Ireland is going to overshoot its 2021-2025 legally binding Carbon Budget so the overshoot will have to be deducted from the legally binding 2026-2030 Budget thus reducing the available carbon budget to less than the allocated 200 $MtCO_2e$.

The embodied carbon in the proposed development would represent 0.3% of the Sectoral Emission Ceiling of 24 $MtCO_2e$ for Industry for the period 2026-2030. There is no reference to the Sectoral Emissions Ceiling in the report.

The following is taken from the Galway City LACAP:

"The GHG emissions for Galway City in 2018 totalled 493,503 tonnes of carbon dioxide equivalent (tCO_2e) which equates to approximately 0.6% of the national total. Considering the national level target to achieve a 51% reduction in greenhouse gas emissions vs 2018 by 2030, the 2030 emissions target for Galway City is a reduction to 241,816 tCO_2e."

The embodied carbon of the proposed development, 73,060 tCO_2e, would represent 30.21% of the target carbon emissions for Galway City in 2030, 241,816 tCO_2e.

To put the embodied carbon of the proposed development in context, one might consider it in terms of that in future homes. We have a housing crisis. Building the homes we need will result in significant embodied carbon. The Programme for Government 2025 has a target to build 300,000 homes between 2025 and 2031.

According to data from Statista Research Department in November 2023, the average size in 2023 of newly built scheme dwellings was 119 m^2 and of newly built apartments was 72 m^2.

If the RIAI 2030 Climate Challenge Targets for embodied carbon of 625 $KgC0_2e/m^2$ for dwellings are achieved, the embodied carbon of the Galway Harbour Extension would be equivalent to that of:

- 982 scheme dwellings, or
- 1,624 apartments.

If the targets in the Climate Action Plan are to be achieved, building the Galway Harbour Extension would mean that the construction of 982 scheme dwellings, or 1,624 apartments, would have to be abandoned to compensate for it.

4.4 Response to An Bord Pleanála Sept. 2024 – EIS Addendum Chapter 11 – Climatic Factors.

In Section 11.4 Summary of previous conclusions of this EIS Chapter it is stated, in relation to CO_2 emissions, that:

"When aligned with the rail proposal at the new port, when same is viable, there may be further reductions possible."

<u>There is no provision in Iarnród Eireann's Rail Freight 2040 Strategy for a rail connection to the new port!</u>

It is also stated in the report that:

"As outlined in EIS Chapter 9 (2014), Do-Nothing Scenarios, the alternative transportation of good by road from Foynes, Cork or Dublin would result in significantly higher CO_2 emissions."

This does not consider the objectives in Iarnród Éireann's Rail Freight 2040 Strategy to:

- Reestablish the rail connection to Marino Point in the Port of Cork,
- Reconnect Shannon-Foynes port to the rail network by mid-2026 and
- Develop Tactical Rail Freight Terminals in Athenry, Sligo and Cork to establish a cross-country network of rail freight facilities.

The proposed developments above will enable the achievement of:

- An increase in the market share of rail freight in line with other European countries,
- Over 100 new weekly rail freight services,
- The avoidance of 140,000 Heavy Goods Vehicle journeys per year,
- The reduction of CO_2 emissions by more than 25,000 tonnes per annum, and
- A reduction in the impact of congestion in towns and cities across Ireland.

There is the following reference to the EPA projections in Section 11.5. Additional Surveys and Up to Date Data:

"EPA projections show that almost all sectors are on trajectory to exceed their national sectoral emissions ceilings for 2025 and 2030. However, if policies and measures in the higher ambition (With Additional Measures) scenario are implemented, Ireland can achieve a reduction of 29% by 20230 compared to 2018 if planned climate policies and measures are fully implemented."

EPA projection of a 29% reduction in emissions by 2030 is far short of the necessary 51% reduction. This means that Carbon Budgets and Sectoral Emissions Ceilings in subsequent Carbon Budgets will have to be reduced very considerably. When this happens, the relative impact of the proposed development on national CO_2 emissions will increase.

In Section 11.6 Assessment of EIS Conclusions, it is concluded that:

"The 'Do-Nothing' scenario would result in higher CO_2 emissions from increased road traffic hauliers than the emissions scenario for the proposed development."

This conclusion is arrived at having failed to consider the objective of Iarnród Éireann's Rail Freight 2040 Strategy which is to achieve the switching of significant volumes of freight from the road network to the rail network.

In Section 11.7 Cumulative Impact Assessment, it is stated that:

"It is estimated that during the operational stage, the average annual emissions of CO2e would be c. 10,255 tonnes/year. The operational phase of this proposed development will contribute c. 2.1% of Galway City's emissions on an annual basis."

This is significantly understating the position. It would be 2.1% of Galway city's 2018 emissions! Galway city's target emissions in 2030 are 241,816 tCO_2e. The estimated annual emissions of 10,255 tCO_2e would be 4.2% of Galway city's target carbon emissions in 2030, double the percentage of the 2018 emissions.

In Section 11.8 Conclusion, it is stated that:

"The operational stage of the Galway Ports would contribute approximately 2.5% of Galway City's annual Carbon Dioxide emissions."

This is a significant understatement of the impact of the proposed development. It is stated that:

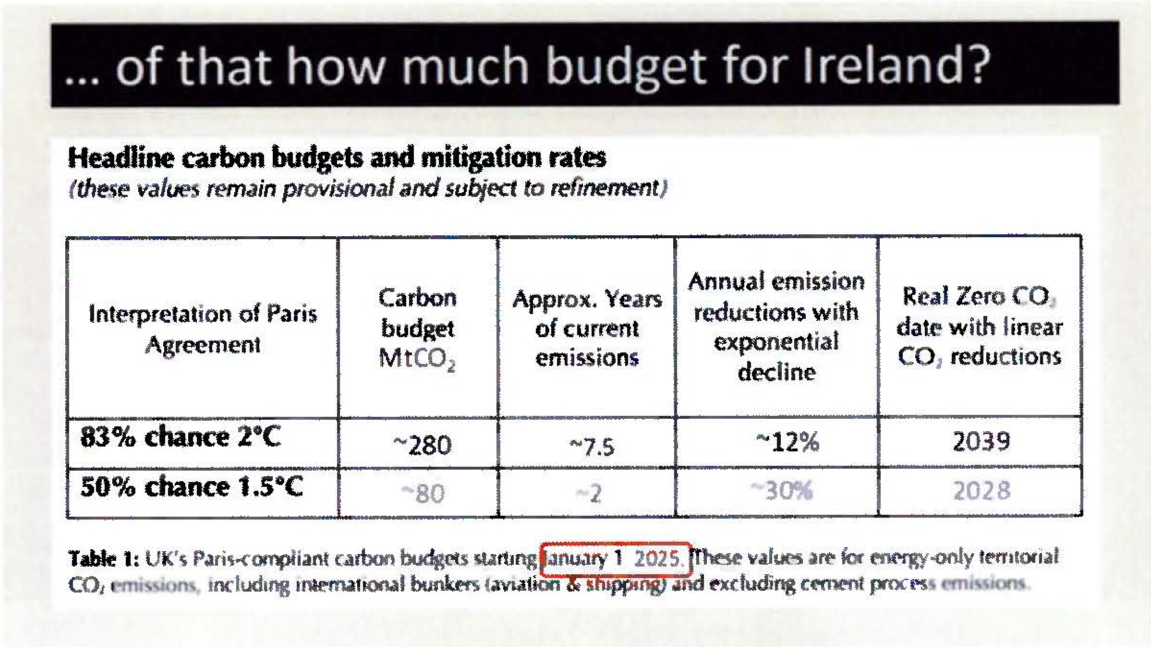
"The operational stage of this installation is projected under the Carbon Life Cycle Assessment Report to generate approximately 10.3 kt CO_2e per annum".

The target carbon emissions for Galway City in 2030 in the LACAP 2024-2029 is a reduction to 241,816 tCO_2e. Annual emissions of 10.3 $ktCO_2e$ from the proposed development would be 4.3% of the target emissions for Galway City in 2030 of 241.816 $KtCO_2e$. That is 72% more than the *"approximately 2.5% of Galway City's annual Carbon Dioxide emissions"* claimed in the Response to An Bord Pleanála.

Professor Kevin Andersen, University of Manchester, was a speaker on a webinar, 'Ireland's Climate Justice Obligations', hosted by Community Law and Mediation on the 23 January 2025. He is one of the leading climate scientists in the UK.

An Taisce draws the Board's attention to the following two slides in Professor Anderson's presentation in relation to Carbon Budgets.

The following slide from Kevin Anderson's presentation sets out Ireland's share of the global carbon budget to achieve the Paris Agreement targets:



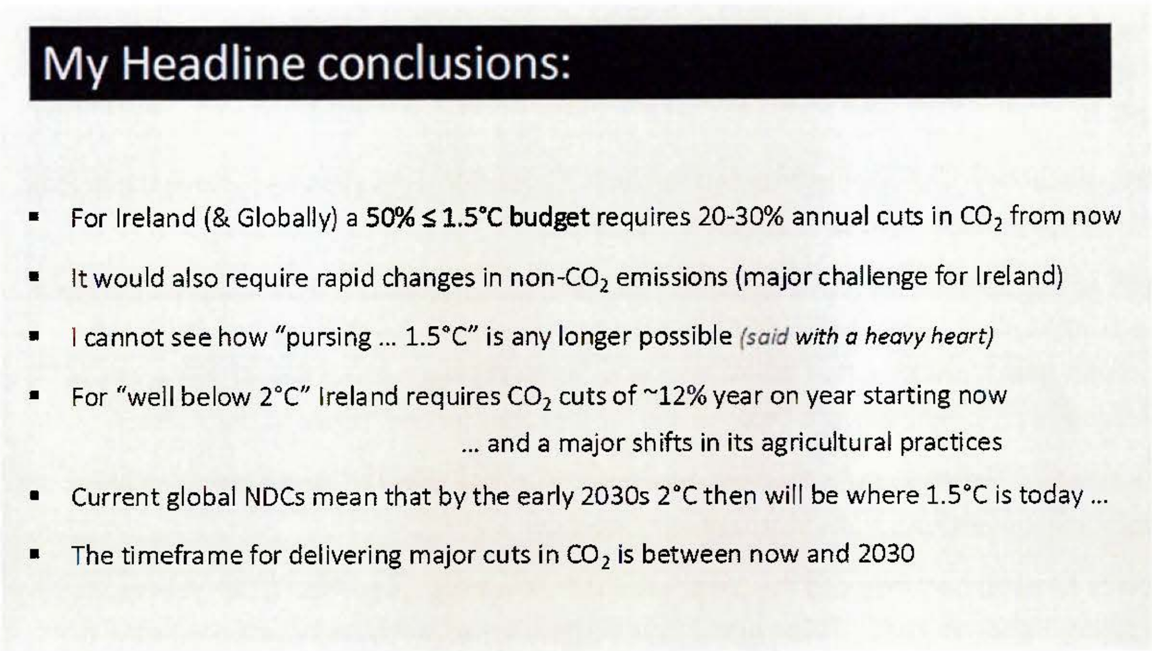
... of that how much budget for Ireland?

Headline carbon budgets and mitigation rates
(these values remain provisional and subject to refinement)

Interpretation of Paris Agreement	Carbon budget $MtCO_2$	Approx. Years of current emissions	Annual emission reductions with exponential decline	Real Zero CO_2 date with linear CO_2 reductions
83% chance 2°C	~280	~7.5	~12%	2039
50% chance 1.5°C	~80	~2	~30%	2028

Table 1: UK's Paris-compliant carbon budgets starting January 1 2025. These values are for energy-only territorial CO_2 emissions, including international bunkers (aviation & shipping) and excluding cement process emissions.

The following is a slide from his presentation with his headline conclusions:



4.5 Response to An Bord Pleanála, EIS Addendum Sept. 2024, Chapter 8 Water

In Section 8.6.3. Water Quality, there is a reliance on the Annual Environmental Report 2022 submitted by Uisce Éireann to the EPA on 17/05/2023. The Annual Environmental Report 2022 is deficient in that:

- It only includes the 13 Stormwater Overflows that are licenced under the Wastewater Discharge Licence Ref. No. D0050-01, there are at least another 12 Stormwater Overflows, that are unlicenced and are excluded.
- It does not disclose the frequent and significant discharges to the estuary of the River Corrib and Galway Bay, from Stormwater Overflows, contrary to the conditions of the licence.
- It does not disclose the existing serious deficiencies in the wastewater collection network.
- It ignores the inadequate capacity of the existing 2 siphons under the bed of the estuary of the River Corrib. The wastewater from the proposed development would have to pass through the existing siphons to reach the Mutton Island WWTP for treatment.
- It offers no timeline for completing the Schedule of Improvements which were required by the licence to have been completed by 01/05/2014.

The Annual Environment Report, 2023, submitted 27/05/2024, disclosed that there was a further 8 Storm Water Overflows on the network which are unlicenced, bringing the total number of Stormwater Overflows to 21.

The Drainage Area Plan (DAP) Stage 3 Risk Identification and Needs Identification Report, issued in June 2024, disclosed that there are a total of 25 Stormwater Overflows on the network, 12 of which are unlicenced. That is 4 more than were included in AER 2023.

No application has been submitted by Uisce Éireann to date seeking to have the matter of unlicensed Stormwater Overflows regularised.

The Annual Environmental Reports that Uisce Éireann (formerly Irish Water) submitted to the EPA since 2014 have not addressed the fact that Uisce Éireann has failed to comply with Condition 5 of the licence with regard to the completion of the works in Schedule C.3 Improvement Programme for Stormwater Overflows to the licence.

The Annual Environmental Reports have continuously failed to report frequent and significant overflows from Storm Water Overflow.

Uisce Éireann commenced the preparation of a Drainage Area Plan (DAP) for the Galway Agglomeration in 2016. Three of the four stages of the DAP have been completed to date.

The DAP Stage 3 Risk Identification and Needs Identification Report was issued in June 2024. It revealed that there are major deficiencies in the wastewater collection network in the Galway Agglomeration among which are:

- An additional 12 Storm Water Overflows over and above the 13 included in the Wastewater Discharge Licence. These additional overflows are not licenced.
- The frequent activation of several SWOs on the wastewater collection network, during rainfall events far below the criteria for *"Unusual Weather Conditions"*, which is not permitted under the licence
- The very significant discharges of polluting matter from SWO's into the estuary of the River Corrib and into Galway Bay, both of which are SACs.
- The very significant tidal infiltration into the network.

The DAP Stage 3 Report did not disclose the following:

- The fact that it has been recognised since 2007 that a third, larger siphon would be necessary under the estuary of the River Corrib to convey wastewater from east of the river to the west of the river for treatment at the Mutton Island WWTP,

- The finding in May 2024, following a survey of the siphons by McBreen Environmental, that the larger of the two existing siphons has structural defects and ***"is a risk of collapse at any time".***

As the proposed development will provide facilities for ships to discharge sewage into the network, the findings of the DAP Stage 1, Stage 2 and Stage 3 reports and that of the McBreen Environmental survey on the existing siphons should have been considered.

It is proposed to pump sewage discharged from ships and arising from within the proposed development into an existing inadequate drainage network. See TOBIN's Drawings Nos. 2139-2207 to 2139-2210 inclusive. The excess sewage over the capacity of the network will overflow through the Stormwater Overflow at the Dock Street and then the Stormwater Overflow at The Long Walk and be discharged into the estuary of the River Corrib during rainfall at much lower levels than that permitted under the licence.

The DAP Stage 3 Report, issued in June 2024, includes, in Section 7 Key Asset Performance Risk, an assessment of the performance of the SWOs. It looks at 3 Scenarios:

1. Current Design Model: Including completed or nearly completed developments.
    - A population of 95,305 plus a trade effluent flow of 200 litres/second.
2. Short Term Design Model: Including development assumed to be completed in next 5 years.

- A population of 128,416 (35% increase) plus a trade effluent flow of 231 litres per second (15% increase).

3. Strategic Future Design Model: Including development assumed to be complete within 25 years from now.
    - A population of 148,948 (16% increase) plus a trade effluent of 231 litres per second (0% increase)

The following table sets out the performance of the 5 SWOs with the most significant spill volumes in the Short-Term Design Model. For context, the spill volumes are expressed as numbers of equivalent Olympic swimming pool volumes. An Olympic swimming pool typically holds 2,500 cubic metres, 2.5 million litres of water.

SWO	**Number of Spills in 10-year Time Series Rainfall (TSR)**	**10-year TSR Spill Volume in cubic metres**	**Spill Volume expressed in equivalent numbers of Olympic swimming pool volumes**
Long Walk SWO	709	2,130,176	852
Claddagh Quay	588	1,471,905	589
Oranmore PS	786	638,130	255
Moneenageisha	1,023	349,155	140
Dock Street	3,663	149,241	60

According to the DAP Stage 3 Report, 5 of the 25 SWOs will not pass forward Modified Formula A flows prior to spilling (Table 6-2) in the Short-Term Design Model. The Formula A flow is the *"flow setting which sets the minimum level at which wastewater is sufficiently diluted to avoid pollution of the receiving watercourse when overflowed from the sewer."* [DAP Stage 3 Report, page 116]

The sewage arising from the proposed development will pass through the Stormwater Overflow manholes highlighted in the table above, namely the Dock Street Stormwater Overflow manhole and The Long Walk Stormwater Overflow manhole. This means that raw sewage arising from the development will effectively be discharged directly into the estuary of the River Corrib, without even basic primary treatment, during rainfall events well below the criteria for *"Unusual Weather Conditions"*. The Dock Street Stormwater Overflow is not licenced. The predicted frequency of discharges and volumes discharged from both Stormwater Overflow manholes, even under the Short-Term Design Model, which considers development that is assumed to be completed within the next 5 years (from 2024), is utterly unacceptable.

Uisce Éireann has not completed the specified improvements works set out in Schedule C: Specified Improvement Programme of the licence which were required to be completed by 01/05/2014 under Condition 5 of the Wastewater Discharge Licence

Uisce Éireann has not yet submitted any proposals to the EPA to address the deficiencies in the network or to regularise the matter of their being 12 unlicensed Stormwater Overflows in the Galway Agglomeration.

The EPA continues to show remarkable forbearance for the past 11 years given the continuing failure of Uisce Éireann to comply with the Wastewater Discharge Licence.

5. **Volume 1C, Natura Impact Statement**

In Section 2.1.2.2 Operations, it is asserted that:

"There will be a rail link from the adjacent existing Dublin to Galway rail line which will connect to the new commercial quay."

There is no provision in Iarnród Eireann's Rail Freight 2040 Strategy for a rail connection to the new commercial quay!

The NIS needs to be reviewed taking into account that there is no prospect of a rail link to the proposed development in the foreseeable future.

6. **Cruise Tourism**

The following is taken from the National Ports Policy Review – Issues Paper which was published as part of the first stage of a consultation:

"The growth of the cruise sector globally has also raised increasing concerns regarding the environmental pollution caused by ocean cruising. Cruise passengers and crews generate a significant amount of waste and pollutants. According to a recent study published in Marine Pollution Bulletin, a large cruise ship can have a carbon footprint greater than 12,000 cars (Lloret, 2022)."

The Italian government banned large cruise ships from entering the Venetian lagoon in 2021. Barcelona banned cruise ships from docking near its city centre in 2023 and Dubrovnik introduced restrictions to combat associated over-tourism. In January 2025, the Mayor of Nice announced plans to ban large cruise ships from entering the port and berth, with effect from 1 July 2025, to mitigate the effects of mass tourism. Those cities cannot handle the large influx of cruise tourists. Galway city would be unable to handle large influxes of cruise tourists on top of other visitors to the city.

The objective of the cruise ship owners is to maximise the passengers spend onboard ship rather than in the port cities and regions that the cruise ship visits. Other European cities now realise that he benefits to the local economy from cruise ship tourism are limited.

7. Compensatory Measures Plan, Accompanying Measures and Additional Environmental Benefits

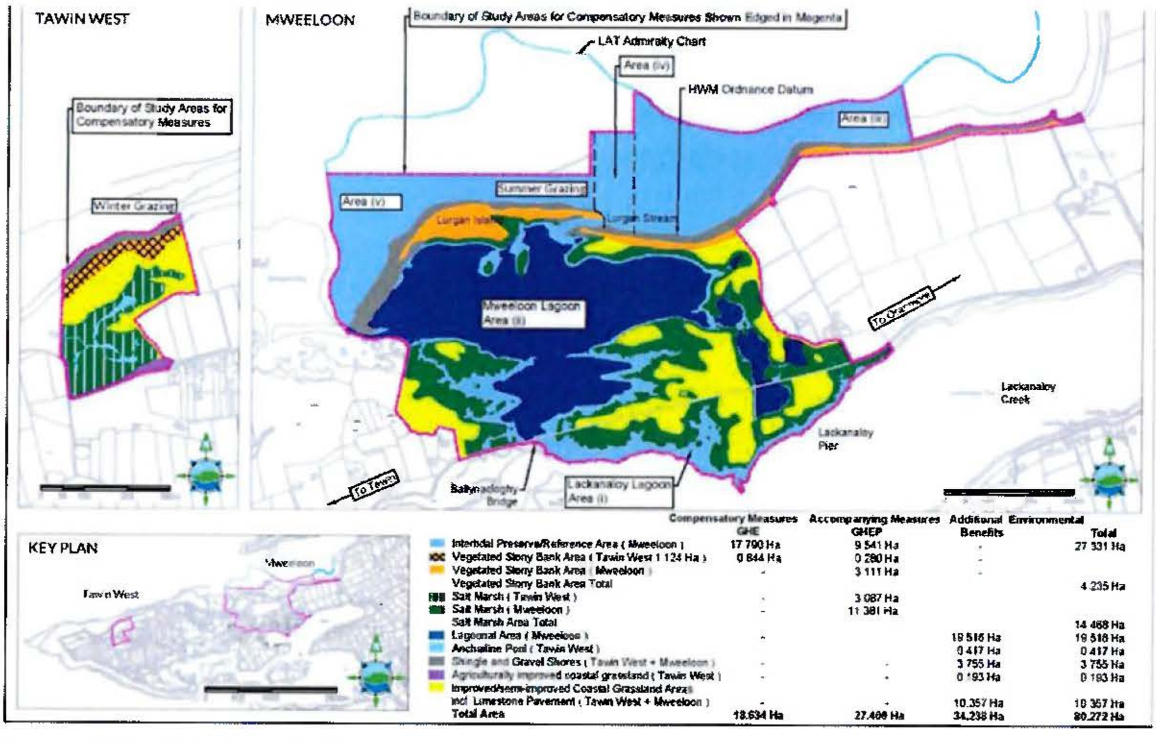
7.1 Proposed areas for Compensatory Measures should already be conserved

The proposed areas for Compensatory Measures should already be conserved in accordance with best practice for Special Areas of Conservation, and therefore not need Compensatory Measures to ensure their conservation.

An Taisce submits that both areas, for which Compensatory Measures are proposed by the Applicant, are already located within the Galway Bay Complex SAC 000268. See maps below. Therefore, no additional land is being added to the Galway Bay Complex SAC 000268.

17.790 ha of the Intertidal habitat at Mweeloon.

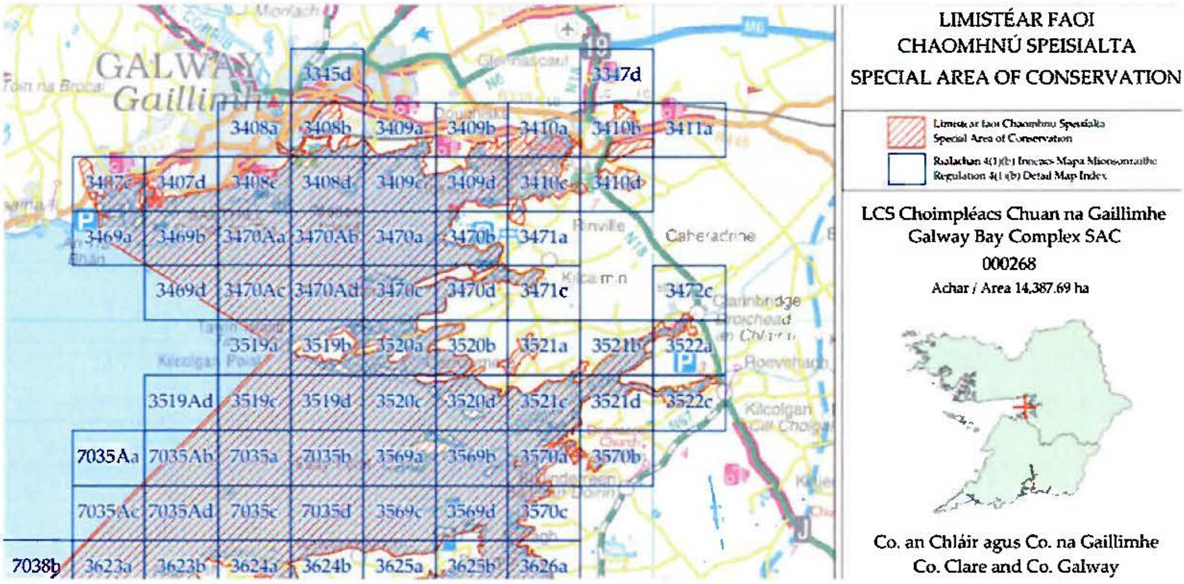
0.844 ha of the stony bank at Tawin West.

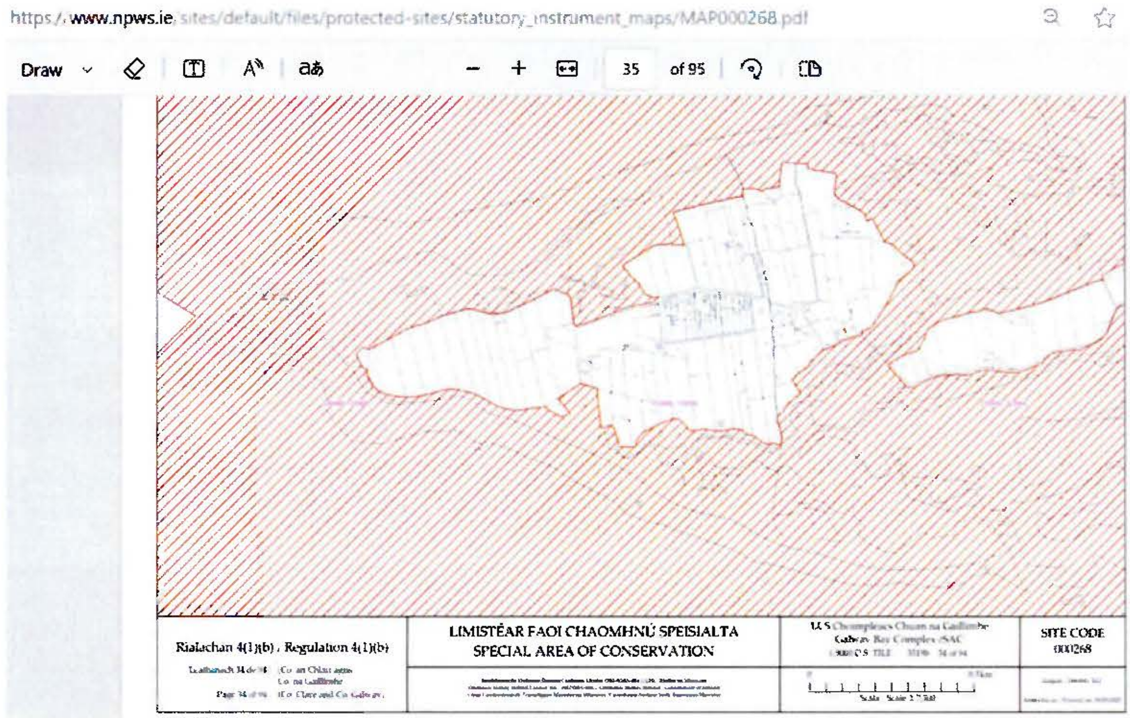


	Compensatory Measures GHE	Accompanying Measures GHEP	Additional Environmental Benefits	Total
Intertidal Preserve/Reference Area (Mweeloon)	17 790 Ha	9 541 Ha	-	27 331 Ha
Vegetated Stony Bank Area (Tawin West 1 124 Ha)	0 844 Ha	0 280 Ha	-	
Vegetated Stony Bank Area (Mweeloon)	-	3 111 Ha	-	
Vegetated Stony Bank Area Total				4 235 Ha
Salt Marsh (Tawin West)	-	3 087 Ha		
Salt Marsh (Mweeloon)	-	11 381 Ha		
Salt Marsh Area Total				14 468 Ha
Lagoonal Area (Mweeloon)	-		19 516 Ha	19 516 Ha
Anchialine Pool (Tawin West)			0 417 Ha	0 417 Ha
Shingle and Gravel Shores (Tawin West + Mweeloon)	-	-	3 755 Ha	3 755 Ha
Agriculturally improved coastal grassland (Tawin West)	-	-	0 193 Ha	0 193 Ha
Improved/semi-improved Coastal Grassland Areas incl Limestone Pavement (Tawin West + Mweeloon)	-	-	10.357 Ha	10 357 Ha
Total Area	18.634 Ha	27.400 Ha	34.238 Ha	80.272 Ha

Figure 2-15: GHE Intertidal and Stony Bank Habitat Area Impacted and Renmore and Compensatory Areas at Tawin.

Source: Figure 2-15 of Compensatory Measures Plan, Accompanying Measures and Additional Environmental Benefits.





Map 3519B, showing that the Intertidal habitat at Mweeloon and the stony bank at Tawin West (the subject of the Compensatory Measures are currently both already within the Galway Bay Complex SAC 000268 . https://www.npws.ie/sites/default/files/protected-sites/statutory_instrument_maps/MAP000268.pdf

7.2 Need for specific, measurable metrics aligned with each objective.

In 2.1.2 "Objectives and Compensatory Measures" the Applicant states the following:

"The habitats identified have aquaculture activity and are in need of restoration and would not have been restored in the normal course were it not for the measures proposed herein which are over and above normal practice. "

An Taisce submits that the above statement is a de facto statement that Ireland is unable to conserve a Special Area of Conservation in accordance with best practice.

The section goes on to state that *"The four main objectives of the Intertidal Management Plan are:*

1. *Control of the non-native, invasive tunicate Didemnum vexillum (Didemnum) in Mweeloon.*
2. *Fallowing of parts of Mweeloon Bay that are used for oyster cultivation.*
3. *Implementation of "nature friendly" farming practices that besides having beneficial effect on terrestrial habitats, may also have beneficial effect on intertidal marine ecology.*
4. *Collection and disposal of anthropogenic litter and rubbish from within the Compensatory Area."*

An Taisce submits that the above objectives are so vague and unmeasurable that it will never be possible to objectively determine if the objectives are being achieved. The proposed development will result in a permanent and irreversible destruction of a portion of the Galway Bay Complex SAC 000268. Of that there is no doubt.

An Taisce submits therefore that An Bord Pleanála should require the Applicant to provide a specific measurable metric for each of the four objectives before making a decision on the proposed development. While it is not for An Taisce to suggest specifically what those metrics should be, An Taisce suggests that they might be in the following form:

1. Reduction of the non-native, invasive tunicate Didemnum vexillum (Didemnum) within the Study area in Figure 2-15 in Mweeloon plus Tawin West (from a measured based level in 2024). By 25% when measured in 2026, by 50% when measured 2028 and by 75% when measured in 2030.
2. Fallowing within the Study area in Figure 2-15 in Mweeloon plus Tawin (from a measured based level in 2024) that are used for oyster cultivation. By 25% when measured in 2026, by 50% when measured 2028 and by 75% when measured in 2030.
3. Implementation of "nature friendly" farming practices that besides having beneficial effect on terrestrial habitats, may also have beneficial effect on

intertidal marine ecology. To be achieved within the Study area in Figure 2-15 in Mweeloon plus Tawin (from a measured based level in 2024) by 25% when measured in 2026, by 50% when measured 2028 and by 75% when measured in 2030.

4. Collection and disposal of anthropogenic litter and rubbish from within the Compensatory Area. To be achieved within the Study area in Figure 2-15 in Mweeloon plus Tawin. Percentage of Study area where anthropogenic litter and rubbish are found to be no more than 1% at any time in each year form 2025 onwards.

7.3 Need for Planning Permission (if granted) to be made conditional on ongoing achievement of the Objectives of the Compensatory Measures.

In Section 1.1 Overview it is stated that *"An Bord Pleanála (ABP) conducted an Appropriate Assessment (AA) of the Galway Harbour Extension (GHE) and concluded that the development will cause:*

- *Direct and Permanent Loss of 5.93ha of [1170] fucoid dominated reef habitat and [1140] Mud and Sand Flat habitat of the Galway Bay Complex Special Area of Conservation (SAC), and the,*
- *Loss of perennial vegetation of stony banks [1220] (0.35 ha) due to the sheltering effect of the harbour extension will also have a significant adverse effect on the integrity of the SAC."*

An Taisce submits that there needs to be an imperative on the Applicant to achieve the objectives of the proposed Compensatory Measures. An Taisce has submitted in the previous section that the Applicant should be required to provide specific, measurable metrics for each objective.

An Taisce submits that given the permanent nature of the loss of habitats, that Planning Permission (if granted) should be made conditional on achievement of specific metrics for each over the lifetime of the proposed development.

7.4 Need for Planning Permission (if granted) to be made conditional on purchase of the lands.

An Taisce notes that the Galway Harbour Company claims to have purchased, or contacted to purchase, lands within which it proposes to carry out mitigating measures. See maps below.

17.790 ha of the Intertidal habitat at Mweeloon

0.844 ha of the stony bank at Tawin West

An Taisce submits that if the Board is minded to grant planning permission for the development, then the permission should be made conditional on the purchase, within a set timeframe of the granting of planning permission, of the 17.790 ha of the Intertidal habitat at Mweeloon and the 0.844 ha of the stony bank at Tawin West.

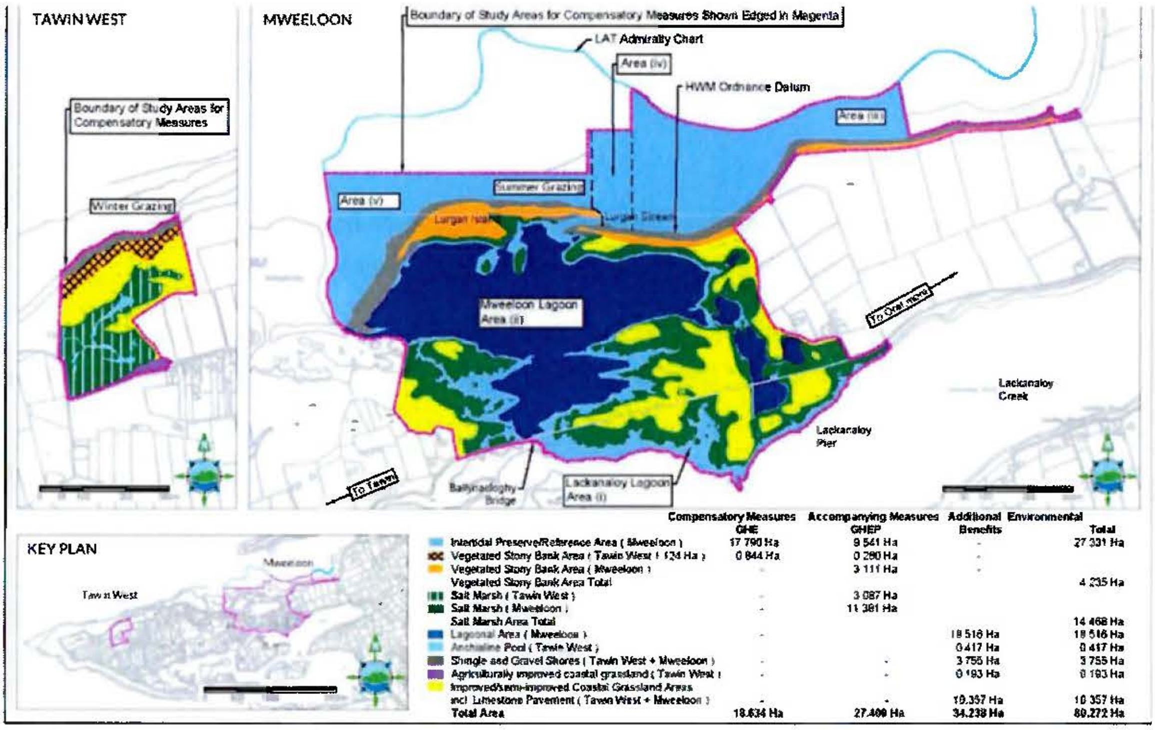


Figure 2-15: GHE Intertidal and Stony Bank Habitat Area Impacted and Renmore and Compensatory Areas at Tawin.

Source: Figure 2-15 of Compensatory Measures Plan, Accompanying Measures and Additional Environmental Benefits.

7.6 Conclusion

The view of the Planning Committee of the An Taisce, Galway Association is that the appropriate decision would be to refuse permission for the proposed development on the grounds that:

- The needs of the Offshore Renewable Energy industry can be met by the developments already completed, underway or committed to at other Irish ports,
- The significant embodied carbon and operational carbon emissions associated with the proposed development given the current limited Carbon Budgets and Sectoral Emissions Ceilings, which will become even more restricted in future years. We need to prioritise housing which will also have significant embodied carbon. It is necessary to conserve the limited Carbon Budgets for essential purposes.
- The corollary of Mr Justice Humphries' decision in the Coolglass v ABP {2025] IEHC 1 judgement means that projects, such as this proposed development, which would contribute significant carbon emissions now face a much higher standard of proof in relation to Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended.
- The recent Storm Éowyn has exposed the lack of preparedness of infrastructure and the inadequacy of Climate Adaptation Plans to face the more frequent and intense weather events associated with Climate Change.
- It is not evident that the studies to date have adequately considered the adverse effects of future coastal storm events, associated storm surges and sea level rise given the high level of uncertainty associated with Climate Change.
- The potential for the proposed development, if completed, to deflect higher than previously experienced storm surges associated with future storms onto surrounding residential and commercial areas with consequential flooding.
- **There is, as of now, no finalised plan for a flood relief scheme within Galway city.** The 'Coirib go Cósta' Galway Flood Relief Scheme, intended to alleviate the risk from river and coastal flooding, will not be ready to go to planning until 2027 at the earliest. It would be premature to grant permission for this proposed development in advance of permission being granted for an appropriate Flood Relief Scheme for Galway city.

Confirmation Copy emailed Tuesday 4th

An Taisce
The National Trust for Ireland
Galway Association – Planning Committee

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An Bord Pleanála,
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Dublin 1,
D01 V902

AN BORD PLEANÁLA
LDG-
ABP-
06 FEB 2025
Fee: €
Type:
Time: 9.14
By: post

4th February 2025

An BP Ref. No:	**PA61.PA0033**
Applicant:	**Galway Harbour Company**
Application:	**Galway Harbour Extension**
	Environmental Impact Statement ("EIS") Addendum 2024 and Natura Impact Statement ("NIS") Addendum 2024 Response to An Bord Pleanála letter of 16 July 2024
At:	**Renmore and Townparks Townlands, Galway city**

A chara,

Please find enclosed herewith An Taisce Galway Association's submission in relation to the Further Information submitted by the applicant.

Please acknowledge receipt of this submission.

Is mise, le meas,

D Hambleton

Derrick Hambleton

An Taisce, Galway Association - Planning Committee

c/o 26 Manor Avenue, Kingston, Galway. H91 C98X

An Taisce
The National Trust for Ireland
Galway Association – Planning Committee

An BP Ref: PA61.PA0033

Proposed Galway Harbour Extension in Renmore and Townparks Townlands, Galway city.

Environmental Impact Statement ("EIS") Addendum 2024 and

Natura Impact Statement ("NIS") Addendum 2024

Response to An Bord Pleanála letter of 16 July 2024

Submission to An Bord Pleanála in relation to Further Information submitted by the Applicant.

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1. A very much changed context since 2014

The application for permission was made to An Bord Pleanála in January 2014.

The response to An Bord Pleanála in September 2024 doesn't appear to have adequately considered the following significant changes that have occurred since the application was initially lodged in January 2014:

1.1 The Paris Agreement

The Paris Agreement is a **legally binding international treaty on climate change**. It was adopted by 196 Parties at the UN Climate Change Conference (COP21) in Paris, France, on 12 December 2015. It entered into force on 4 November 2016.

Its overarching goal is to hold *"the increase in the global average temperature to well below 2°C above pre-industrial levels"* and pursue efforts *"to limit the temperature increase to 1.5°C above pre-industrial levels."*

However, in recent years, world leaders have stressed the need to limit global warming to 1.5°C by the end of this century.

That's because the UN's Intergovernmental Panel on Climate Change indicates that crossing the 1.5°C threshold risks unleashing far more severe climate change impacts, including more frequent and severe droughts, heatwaves and rainfall.

To limit global warming to 1.5°C, greenhouse gas emissions must peak before 2025 at the latest and decline 43% by 2030.

UNFCC

1.2 EU Effort Sharing Regulation

The Effort Sharing Regulation was adopted in May 2018 with the aim to reduce emissions from key sectors by 30% by 2030 (compared to 2005 levels).

In April 2023, the Effort Sharing Regulation was amended under which the 2030 emission reduction target was set to -40%. The regulation assigned an emission target for each Member State. Member States had to prepare National Energy and Climate Plans to achieve the targets.

In Octobre 2023, the EU adopted the two final pillars of its 'Fit for 55' legislative package for delivering the EU's 2030 climate targets. EU countries are now **legally bound to reduce emissions by at least 55% by 2030**. This is an intermediate step towards net-zero emissions in 2050.

1.3 Ireland's National Energy and Climate Plan (NECP) 2021-2030

The first draft NECP was submitted to the European Commission in December 2018.

The draft updated NECP was submitted to the European Commission in July 2024.

1.4 The Climate Action and Low Carbon Development Acts 2015-2021

- Carbon budgets
- Sectoral Emissions Ceilings
- Annual Climate Action Plans

1.5 The Galway City Local Authority Climate Action Plan (LACAP) 2024-2029

The LACAP includes the objective to reduce Galway City's carbon emissions by 51% from 493,503 tCO_2e in 2018 to 241,816 tCO_2e in 2030.

1.6 Coolglass Wind Farm Ltd and An Bord Pleanála and Ireland and The Attorney General

The judgement of Humphreys J., delivered on Friday 10 January 2025, determined that public bodies must comply with the obligations under Section 15 of the Climate Action and Low Carbon Development Act, 2015 (as amended).

1.7 The National Planning Framework 2018

National Policy Objective 40:

Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, metropolitan area and city/county development plans, to ensure the effective growth and sustainable development of the city regions and regional and rural areas.

1.8 The Policy Statement on the Facilitation of Offshore Renewable Energy in Commercial Ports in Ireland, December 2021.

The Policy Statement recognised that the following ports could play a significant part in the provision of the required large scale port infrastructure:

- Shannon-Foynes Port,
- Port of Cork

It recognised that there will also be opportunities for other ports along the west coast such as the ports of:

- Galway,
- Bantry Bay (under the Port of Cork),

and the Major Fishery Harbour Centres of:

- Ros an Mhíl,
- Killybegs,
- Castletownbere

1.9 National Ports Policy Review

- Issues Paper published 18 October 2023
- Consultation commenced in January 2024
- A second consultation will take place in 2025.

It would be premature to decide to grant permission prior to the publication of the National Ports Policy Review.

2. **Developments already completed, underway or committed to at Ports in Ireland to facilitate Offshore Renewable Energy**

2.1 Shannon-Foynes

The port of Shannon Foynes unveiled its €32m jetty expansion and logistics park in September 2024 as it aims to establish the estuary as a floating offshore wind hub.

The two-year programme of works delivered an additional 117m jetty, and 12,000 square metres of set down storage and also delivered one of the country's largest port logistics parks on a 38-hectare site with planning permission for extensive logistics warehousing units.

The record investment, which was co-funded by Shannon Foynes Port and the EU's 'Connecting Europe Facility' (CEF), is a key element of the company's Vision 2041 masterplan.

2.2 Port of Cork

It was announced in October 2024 that the Port of Cork is to get an €88.5 million investment to build new facilities at its container terminal in Ringaskiddy.

It is part of a new partnership between the port and the Ireland Strategic Investment Fund, which first invested €18 million in the facility in 2017.

It is understood the financial injection is part of the €99 million investment into the port announced by the Minister for Public Expenditure and Reform Paschal Donohoe during his Budget 2025 speech.

The project will cost more than €100 million to complete and will be co-funded by the EU. The funding will be used to build quay infrastructure, for which planning permission has already been granted, at Ringaskiddy and to support offshore renewable energy development.

2.3 Ros an Mhíl Major Fishery Harbour Centre

In December 2022, the Department of Agriculture and the Marine signed a €30m contract for a new 200m long deepwater quay at Ros an Mhíl. An extension of the duration of the planning permission, originally granted in 2018, was granted in 2023. The works are reportedly 75% complete but have been halted following a Judicial Review of the decision to grant an extension of duration. It appears that an application for a Substitute Consent will be necessary to enable the completion of the works.

According to a Cost Benefit analysis prepared by MWP in association with Raymond Burke consulting in December 2022:

"In recent times, the importance of servicing the offshore energy sector has become more pronounced and the Fishery Harbour at Rossaveel is considered an ideal location and of strategic importance as a base offering supporting facilities for such projects off the west coast because of its proximity to potential wind farms. Being some 40 kilometres west of Galway reduces steaming time to sites thus saving travel and fuel costs."

"Both the IPORES and Carbon Trust Reports confirm that Rossaveel is suitable as an Operations & Maintenance facility location for instance."

"The Marine Renewables Industry Association (MRIA) is a strong advocate of Rossaveel as an offshore servicing site".

2.4 Belfast Harbour

In January 2025, Belfast Harbour unveiled its Strategy 2025-2029 which sets out plans to position the port at the forefront of the clean energy transition as a key player in the development of offshore wind energy port capacity in the UK & Ireland.

Belfast Harbour previously invested £53m in its D1 terminal to become the first UK port with a bespoke offshore wind facility and remains the only port on the island of Ireland with offshore wind capability. Between 2013 and 2018, Belfast Harbour's facility enabled the delivery of 66% of the offshore wind projects developed in UK waters.

By investing in a new deepwater berth, Belfast Harbour is aiming to build on its offshore wind business, by expanding the capacity of its current offshore facility by 2027/28 and developing a brand-new terminal to service next generation floating turbines by 2030. The £90m investment in a new deepwater quay and facilities will support the deployment of the next generation of floating offshore wind farms and meet the growing needs of offshore renewable energy developers.

Under the plans, the offshore wind logistics facility at Belfast Harbour's D1 terminal will again become a full-time offshore wind facility.

3. Climate Change

3.1 The current reality

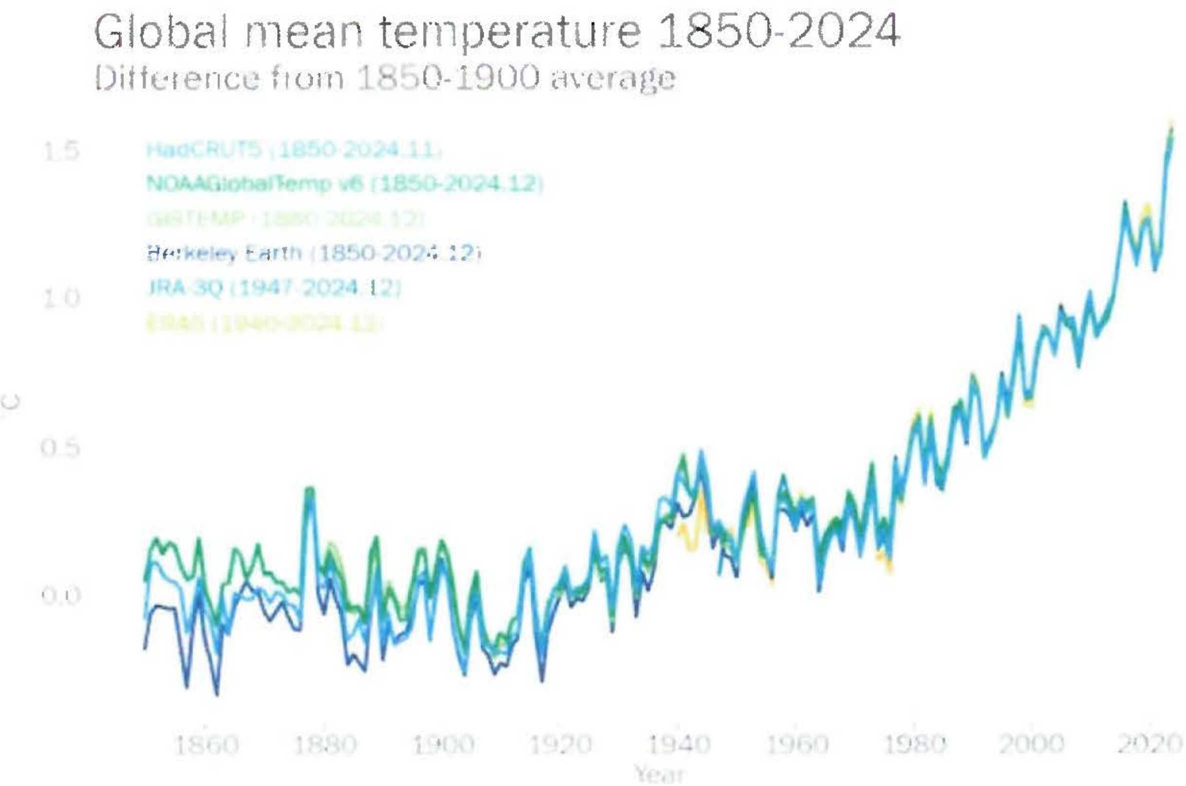
On the 10 January 2025, the World Meteorological Office issued the following statement:

> *"The World Meteorological Organization (WMO) has confirmed that 2024 is the warmest year on record, based on six international datasets. The past ten years have all been in the Top Ten, in an extraordinary streak of record-breaking temperatures.*
>
> *The lobal average temperature increased by 1.55deg C in 2024. There has been an increase in the frequency and severity of extreme weather events since the coming into effect of the Paris Agreement."*

On the same day, the UN Secretary-General issued a statement – there is an extract from the statement in the text box below:

> Today's assessment from the World Meteorological Organization is clear: Global heating is a cold, hard fact.
>
> We have just endured the hottest decade on record – with 2024 topping the list, and likely to be the first calendar year with a global mean temperature of more than 1.5°C above pre-industrial levels.
>
> Individual years pushing past the 1.5 degree limit do not mean the long-term goal is shot. It means we need to fight even harder to get on track.
>
> Blazing temperatures in 2024 require trail-blazing climate action in 2025.
>
> Specifically, governments must deliver new national climate action plans this year to limit long-term global temperature rise to 1.5°C, and support the most vulnerable deal with devastating climate impacts.
>
> There's still time to avoid the worst of climate catastrophe. But leaders must act – now.

The statement included the following graph of global mean temperature from 1850-2024:



The *Copernicus Global Climate Highlights Report 2024*, published on the 10th January 2025, confirmed:

> *"2024 as the warmest year on record and the* ***first to exceed 1.5°C above pre-industrial levels for the annual global average temperature****. Last year was also the warmest for all continental regions, including Europe, except Antarctica and Australasia."*
>
> *"The overall frequency and severity of extreme weather events are increasing. Sea surface temperatures remained exceptionally high, with July to December 2024, being the second warmest on record for the time of year, after 2023."*

The *2023 European State of the Climate Report* and the European Climate Risk Assessment, highlighted that:

> *"the European continent has been warming twice as fast as the global average since the 1980s, becoming the fastest-warming continent on Earth."*

Ireland is facing a €20bn fine in early 2030s

The latest assessment report from the Irish Fiscal Advisory Council (IFAC) in December 2024 estimates that the total bill Ireland could face in the early 2030s from not meetings its EU emissions targets for the years 2021 to 2030 could be up to €20 billion.

3.2 Risk of Climate Tipping Points

The Institute and Faculty of Actuaries published a paper, 'Planetary Solvency – finding our balance with nature', in January 2025. It included the following dire warning of the risk at global warming by 1.5°C.

"Non-linearity and tipping points

Warming of 1.5°C is extremely risky, with a chance of triggering multiple climate tipping points such as the collapse of ice sheets in Greenland, West Antarctica and the Himalayas, permafrost melt, Amazon die back and halting major ocean current circulation.

We system tipping points act to accelerate global warming (by increasing GHG levels) and the impacts, (e.g. accelerating multi-metre sea level rise)."

There is no sense in the response to An BP that the applicant has any appreciation of the risk that we face.

3.3 NASA Sea Level Rise

Key Takeaway:
Global sea levels are rising as a result of human-caused global warming, with recent rates being unprecedented over the past 2,500-plus years.

Sea level rise is caused primarily by two factors related to global warming: the added water from melting ice sheets and glaciers, and the expansion of seawater as it warms.

The first graph below tracks the change in global sea level since 1993, as observed by satellites.

The second graph, which is from coastal tide gauge and satellite data, shows how much sea level changed from about 1900 to 2018. Items with pluses (+) are factors that cause global sea level to increase, while minuses (-) are what cause sea level to decrease. These items are displayed at the time they were affecting sea level.

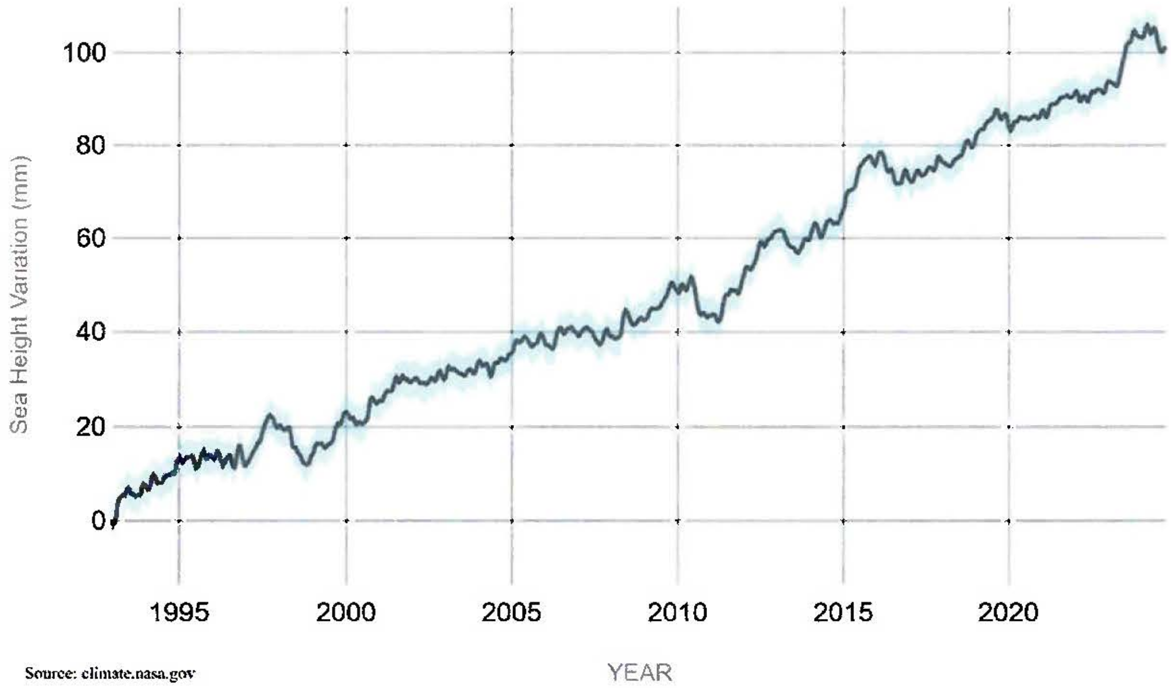


Figure 1 Change in global sea level since 1993, as observed by satellites

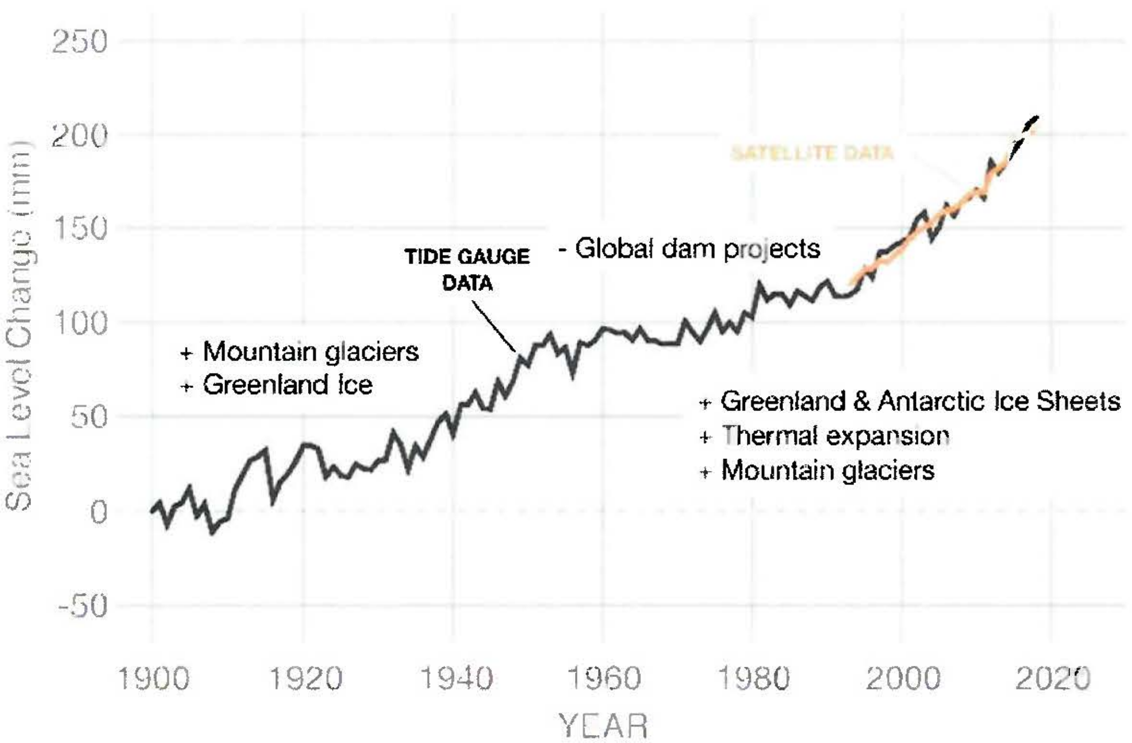


Figure 2 Sea level change from about 1900 to 2018, using coastal tide gauge and satellite data

SOURCE DATA: 1900-2018

Data source: Frederikse et al. (2020)
Credit: NASA's Goddard Space Flight Center/PO.DAAC

Global warming has progressed at a much faster rate than was envisaged when the Paris Agreement was made. We have witnessed more frequent and more extreme weather events over the past 20 years as climate change accelerates.

An acceleration in the rate of sea level rise since about 1995 is evident from the satellite data in Figure 2 above.

It reasonable to anticipate that sea level rise may be much greater than anticipated heretofore as sea temperatures increase and the Antarctic and Greenland ice sheets and mountain glaciers melt at an increasing rate. This is supported by a paper titled "Fusion of Probabilistic Projections of Sea-Level Rise" published online in *Earth's Future*, 11 December 2024.

An interdisciplinary team of researchers from Nanyang Technological University, Singapore (NTU Singapore), and Delft University of Technology (TU Delft), The Netherlands, has projected that if the rate of global CO2 emissions continues to increase and reaches a high emission scenario, sea levels would as a result very likely rise between 0.5 and 1.9 metres by 2100. The high end of this projection's range is 90 centimetres higher than the latest United Nations' global projection of 0.6 to 1.0 metres. The very likely range (90 per cent probability for the event to occur), reported by the NTU team in the scientific journal Earth's Future, complements sea-level rise projections reported by the United Nation's Intergovernmental Panel on Climate Change (IPCC), which only assessed the probability of projections up to a likely range (66 per cent probability).

There is no evidence that such potential sea level rise has been factored into the development since the application for permission was submitted 11 years ago.

3.4 Storm Éowyn 24 January 2025

This storm set new records for mean 10-minute wind speed and 3-second gust speed at Ceann Mhása (Mace Head) in Co. Galway.

In the immediate aftermath of the storm there were 776,000 homes, farms and businesses without electricity. That is approximately one-third of all customers. One week later there were still over 100,000 customers without power.

It caused structural damage to buildings, felled trees and flattened commercial forestry across the country.

Galway city and other coastal cities and towns had a lucky escape from very severe coastal flooding because the onset of the storm coincided with a period in which there were neap tides. Neap tides occur two days before and after the first and third quarter of the moon, when there is least difference between high and low water. The following are the predicted astronomical tides for Galway in January 2025:

GALWAY JANUARY 2025

◗ First Quarter 6 | ● Full Moon 13 | ◖ Last Quarter 21 | ○ New Moon 29

FOR LOCAL VARIATIONS SEE BELOW OR CENTREFOLD	ALL TIMES ARE IN LOCAL TIME • TIDEMARK (Ht) IS GIVEN IN METRES (Mtrs)							
	HIGH WATER				LOW WATER			
DATE / DAY	MORNING	Ht/Mtrs	AFTERNOON	Ht/Mtrs	MORNING	Ht/Mtrs	AFTERNOON	Ht/Mtrs
1 W	05:50	5.1	18:20	4.8	11:50	1.0		
2 TH	06:30	5.1	19:02	4.8	00:03	1.2	12:30	0.9
3 F	07:12	5.1	19:44	4.8	00:44	1.2	13:11	0.9
4 SA	07:55	5.0	20:29	4.7	01:28	1.3	13:56	1.0
5 SU	08:42	4.9	21:18	4.6	02:14	1.4	14:43	1.1
◗ 6 M	09:34	4.7	22:12	4.4	03:06	1.5	15:35	1.3
7 TU	10:32	4.5	23:12	4.3	04:03	1.7	16:33	1.5
8 W	11:39	4.4			05:09	1.8	17:40	1.7
9 TH	00:23	4.3	12:57	4.3	06:25	1.8	19:00	1.8
10 F	01:38	4.4	14:11	4.4	07:49	1.7	20:17	1.7
11 SA	02:42	4.6	15:13	4.6	08:57	1.5	21:16	1.6
12 SU	03:37	4.8	16:06	4.8	09:51	1.3	22:05	1.4
● 13 M	04:26	5.0	16:55	5.0	10:37	1.1	22:48	1.3
14 TU	05:11	5.2	17:40	5.0	11:19	0.9	23:28	1.2
15 W	05:54	5.3	18:23	5.1	11:56	0.9		
16 TH	06:35	5.2	19:03	5.0	00:04	1.2	12:31	0.9
17 F	07:13	5.1	19:42	4.9	00:40	1.3	13:06	1.0
18 SA	07:51	5.0	20:20	4.7	01:17	1.4	13:42	1.2
19 SU	08:29	4.7	20:59	4.5	01:54	1.5	14:20	1.4
20 M	09:10	4.5	21:40	4.3	02:32	1.7	14:58	1.7
◖ 21 TU	09:55	4.2	22:27	4.1	03:13	2.0	15:41	1.9
22 W	10:45	4.0	23:19	4.0	04:02	2.2	16:34	2.2
23 TH	11:43	3.9			05:32	2.4	18:19	2.3
24 F	00:18	3.9	12:51	3.8	07:03	2.3	19:33	2.3
25 SA	01:28	4.0	14:11	3.9	08:05	2.2	20:29	2.1
26 SU	02:36	4.2	15:14	4.2	08:57	1.9	21:18	1.9
27 M	03:28	4.5	16:01	4.4	09:43	1.6	22:01	1.6
28 TU	04:12	4.8	16:43	4.7	10:25	1.3	22:40	1.3
○ 29 W	04:53	5.0	17:23	4.9	11:03	1.0	23:16	1.1
30 TH	05:34	5.2	18:03	5.1	11:39	0.7	23:53	0.9
31 F	06:14	5.4	18:42	5.2			12:16	0.6

AVERAGE TIME VARIATION ON GALWAY *(see centrefold for complete list of secondary locations and precise variations)*

KILKEE: SEAFIELD PT. -0:10
LAHINCH/LISCANNOR -0:05
ROUNDSTONE BAY +0:05
CLIFDEN: CLIFDEN BAY +0:05
CLEGGAN: INISHBOFIN/BOFIN HBR. +0:10
WESTPORT: INISHGORT +0:40
ACHILL: INISHBIGGLE +1:00
BELMULLET: BLACKSOD QUAY +0:30
KILLALA BAY: INISHCRONE +0:45

A high tide, with a height of 3.9m, was predicted to occur at 00:18 on Friday 24th January, the day that Storm Éowyn occurred. It is highlighted in yellow in the table above.

The higher spring tides that occurred on 15 and 31 January are highlighted in green.

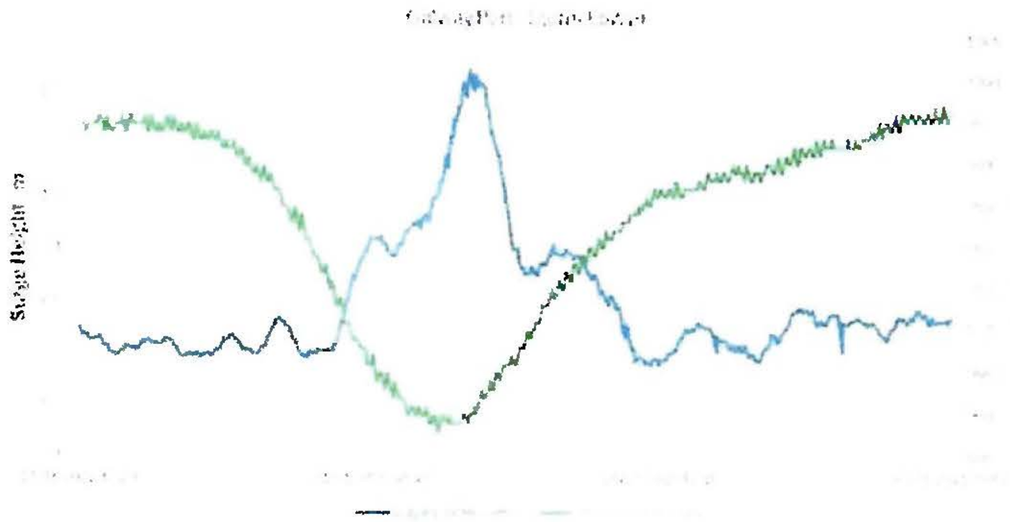
The online Afloat.ie Team posted online later that day, and the following is taken from the post.

"Galway Port recorded levels of 5.25 metres during a surge which only began to recede four hours after high tide, according to harbourmaster Capt Brian Sheridan."

Tony Cawley, Hydrologist and Director of Hydro Environmental Ltd, the author of the Response to An Bord Pleanála, EIS Addendum Sept. 2024 Chapter 8 Water, posted the following on LinkedIn a few days after Storm Éowyn.

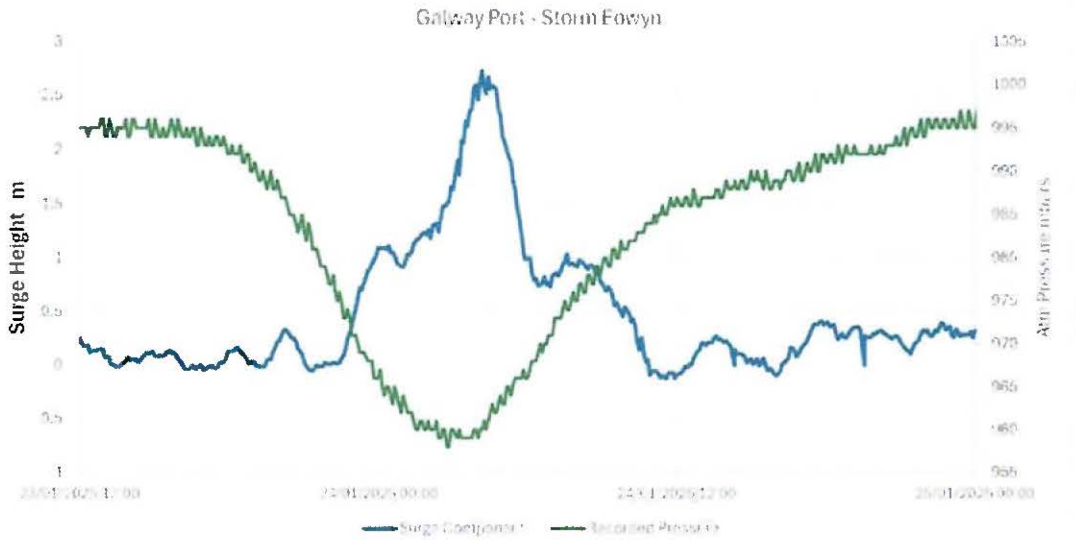
Tony Cawley

The Storm Surge recorded at Galway Port for Storm Eowyn was Historic and fortunate to have coincided with the lower neap tides and towards low water producing just over 2.5m on the astronomical tide



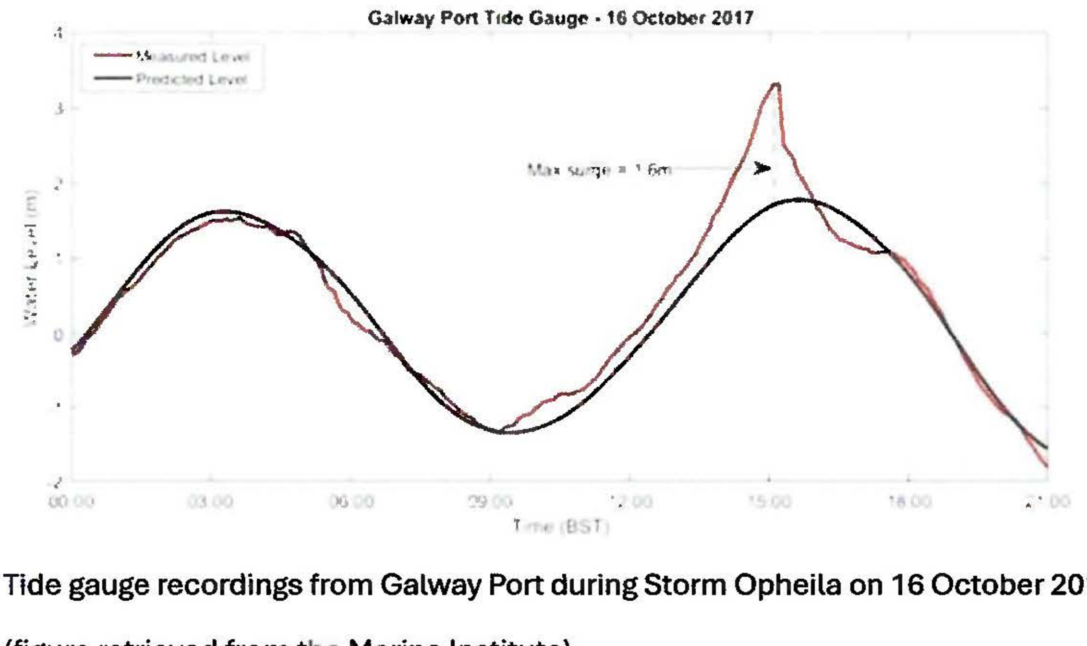
Storm Surge Profile

A clearer image of the Storm Surge Profile posted by Tony Cawley is below:



Storm Surge Profile

It appears from the graph above that the storm surge was of the order of 2.75m above the predicted astronomical tide. The surge persisted for several hours.



Tide gauge recordings from Galway Port during Storm Opheila on 16 October 2017.

(figure retrieved from the Marine Institute)

The storm surge during Storm Opheila on the 16 October 2017 was 1.6m above the predicted astronomical tide and it occurred 30 minutes before high tide. This resulted in flooding at the Docks, Spanish Arch and Salthill Promenade. Fortunately, the surge quickly dissipated on that occasion.

Tidal Observations are available on the Marine Institutes' website for the Irish National Tidal Gauge Network, which includes Galway Port. The highest water level recorded during Storm Éowyn was 5.64m at 04:10 on the 24 January.

The predicted high tide was 3.9m at 00:18. The water level was in excess of 3.9m from 22:55 on the 23 January to 05:35 on the 24 January, a period of 6 hours and 40 minutes. That was from 1hour and 23 minutes before high tide and 5 hours 17 minutes after high tide.

Had Storm Éowyn struck 4 hours earlier it would have coincided with the time of high tide. Worse still, had it occurred on the morning of Friday 31 January, 7 days later, the predicted high tide would have been 5.4m. The storm surge would have added 2.75m to the heigh of the tide bringing it to 8.15m which would have caused very extensive flooding in the city centre, the Claddagh, Salthill, around Loch an tSáile, in Oranmore and Bearna. The situation would have been similar on the morning of the 15 January when the high tide was predicted to be 5.3m

In Section 8.6.9. Flood Risk Assessment, it is stated that:

"...........the operational quay level is set at 4.70m OD. The minimum finish floor level for all buildings on the development site is to be 5.5m O.D. which is well above the design flood level providing a free board of 806mm and thus not considered at risk of flooding."

The difference between Ordnance Datum (O.D.) Malin Head and Chart Datum is 2.945m. A quay level of 4.70m O.D. would be 7.645m Chart Datum which would be 505mm below the water level, 8.15m, that would have been reached had Storm Éowyn happened during the morning of the 31 January 2025 at high tide. The proposed minimum floor finish level for all buildings of 5.5m O.D. (8.445m Chart Datum) would only provide freeboard of only 295mm during a storm with the same surge height as Storm Eowyn, not 800mm as suggested in Section 8.6.9. It is probable that, given sea level rise and increased storm intensity, the proposed buildings will be at risk of flooding.

All indications are that the frequency and severity of storms will increase, as will their impacts. In the Response to An Bord Pleanála Sept. 2024, EIS Addendum Chapter 1, Introduction & Background, Section 1.2 Review of any material changes to the chapter in the original EIS, it is stated as follows:

"Decommissioning

This project is a permanent structure and therefore it is not envisaged that decommissioning will ever occur."

There are many examples of maritime infrastructure around the coast that have been much more than a century in existence. None of the studies in support of this development have looked forward to a horizon more than a century from now, never mind into eternity.

An Taisce respectfully suggests that An Bord Pleanála ask the Applicant to review the impacts of storm surges of the height that occurred during Storm Éowyn and the potential for even greater storm surge heights as the impacts of Climate Change become more severe. The review should consider not only the impacts on the proposed development itself, but also how the development when completed might cause deflection of storm surge waters at increased storm surge height, thus increasing the risk of flooding to other areas in the vicinity of it.

4. Response to An Bord Pleanála Sept. 2024, EIS Addendum Chapter 1, Introduction and Background

4.1 The "need" for the proposed development

In Section 1.2 Review of any material changes to the chapter in the original EIS it is stated that:

"there is an additional need for the project to cater for the likely development of offshore renewable energy installations"

There is potential for offshore renewable energy installations off the west coast of Ireland. The figure below is taken from The National Ports Study for Wind Energy Ireland:

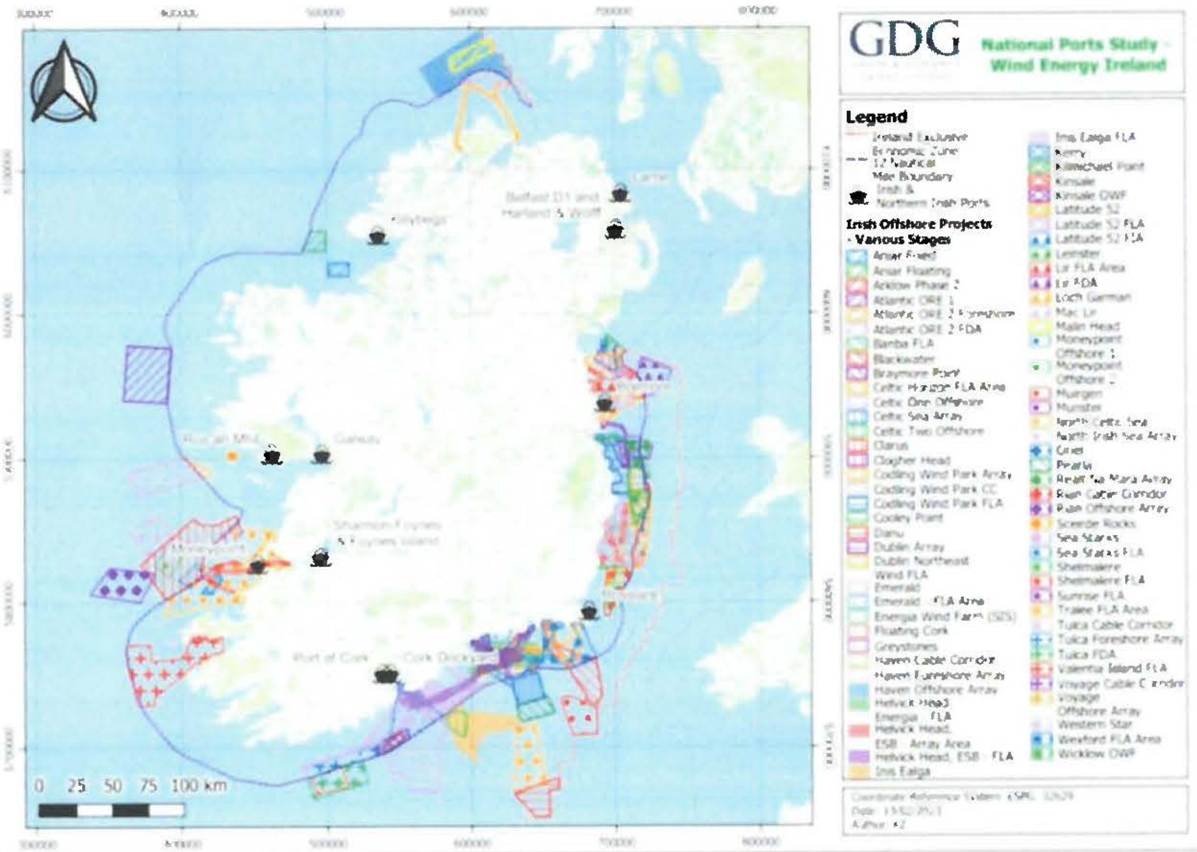


Figure 1-1: Ports Considered within National Port Study Relative to Proposed Irish Projects

Depending on the exact location of the renewable offshore renewable energy developments, the Tier 1 Ports of Cork and Shannon Foynes and the Major Fishery Harbours at Ros an Mhíl and Killybegs may be better placed to service any need arising off the west coast.

The Port of Cork will be the first port in the country to have both assembly and storage facilities for offshore wind projects. The Port of Cork, a TEN-T core maritime port, is to get an €88.5 million investment to carry on building quay infrastructure at Ringaskiddy and to support offshore renewable energy development. It is part of a new partnership between the port and the Ireland Strategic Investment Fund, which first invested €18 million in the facility in 2017. It is understood the financial injection is part of the €99 million investment into the port announced by the Minister for Public Expenditure and Reform Paschal Donohoe during his budget speech in November 2024. The project will cost more than €100 million to complete and will be co-funded by the EU.

In September 2024, Shannon Foynes Port Company complete a €32m investment in at the TEN-T core maritime port at Foynes. The development included:

- An additional 117m jetty,
- An additional 12,000 square metres of set down storage, and
- One of the country's largest port logistics parks on a 38-hectare site with planning permission for extensive logistics warehousing units.

The reinstatement of the rail connection for both intermodal and bulk traffic is already well advanced and is expected to reopen by mid-2026. The new Limerick to Foynes road will give motorway and dual carriageway access directly to the port.

The Government has committed €30m in funding to the development of a deep-water harbour at Ros an Mhíl to provide 200m of berthage and the works are already well advanced. Works have been suspended pending the submission of an application for substitute consent to An Bord Pleanála.

Travelling in and out to dock at Galway Harbour would add an additional 80Km in travel distance rather than docking at Ros an Mhíl, which add significantly to the time and cost of the servicing of offshore renewable energy developments off the west coast.

Galway Harbour is located in the heart of the 22nd most congested city in the EU (Inrix Report 2024?). Access to and from the M6 motorway is, and will continue to be, through seriously traffic congested roads. A rail connection to Galway Harbour is not included in Iarnród Éireann's Rail Freight 2040 strategy. A Strategic Freight Terminal at Athenry is included in the 2040 Strategy which will have rail freight connections to the TENT -T *"core maritime ports"* at Shannon Foynes, Cork and Dublin and the port at Waterford

4.2 Trans European Network - Transport TEN-T

The port of Galway was included in the TEN-T network in July 2024 as a *"comprehensive maritime port".*

The Port of Cork and Shannon Foynes Port had already been included in the TEN-T network, both with a higher designation as a *"core maritime port".*

Work has commenced on the M28 Cork to Ringaskiddy motorway to connect the Port of Cork to the motorway network.

There is an objective in Iarnród Éireann's Rail Freight 2040 Strategy to reestablish the rail connection to Marino Point in the Port of Cork to facilitate the transport of bulk commodities to and from the port.

4.3 Galway Harbour Extension – EIS, Carbon Life Cycle Assessment Report

A Carbon Life Cycle Assessment Report, prepared by Tobin, has been submitted.

The embodied carbon in the proposed development is estimated to be 73,060 tonnes CO_2e - see Table 3-4 in the report. It represents 0.0366% of Ireland's 2026-2030 Carbon Budget of 200 $MtCO_2e$. Ireland is going to overshoot its 2021-2025 legally binding Carbon Budget so the overshoot will have to be deducted from the legally binding 2026-2030 Budget thus reducing the available carbon budget to less than the allocated 200 $MtCO_2e$.

The embodied carbon in the proposed development would represent 0.3% of the Sectoral Emission Ceiling of 24 $MtCO_2e$ for Industry for the period 2026-2030. There is no reference to the Sectoral Emissions Ceiling in the report.

The following is taken from the Galway City LACAP:

"The GHG emissions for Galway City in 2018 totalled 493,503 tonnes of carbon dioxide equivalent (tCO_2e) which equates to approximately 0.6% of the national total. Considering the national level target to achieve a 51% reduction in greenhouse gas emissions vs 2018 by 2030, the 2030 emissions target for Galway City is a reduction to 241,816 tCO_2e."

The embodied carbon of the proposed development, 73,060 tCO_2e, would represent 30.21% of the target carbon emissions for Galway City in 2030, 241,816 tCO_2e.

To put the embodied carbon of the proposed development in context, one might consider it in terms of that in future homes. We have a housing crisis. Building the homes we need will result in significant embodied carbon. The Programme for Government 2025 has a target to build 300,000 homes between 2025 and 2031.

According to data from Statista Research Department in November 2023, the average size in 2023 of newly built scheme dwellings was 119 m^2 and of newly built apartments was 72 m^2.

If the RIAI 2030 Climate Challenge Targets for embodied carbon of 625 $KgC0_2e/m^2$ for dwellings are achieved, the embodied carbon of the Galway Harbour Extension would be equivalent to that of:

- 982 scheme dwellings, or
- 1,624 apartments.

If the targets in the Climate Action Plan are to be achieved, building the Galway Harbour Extension would mean that the construction of 982 scheme dwellings, or 1,624 apartments, would have to be abandoned to compensate for it.

4.4 Response to An Bord Pleanála Sept. 2024 – EIS Addendum Chapter 11 – Climatic Factors.

In Section 11.4 Summary of previous conclusions of this EIS Chapter it is stated, in relation to CO_2 emissions, that:

"When aligned with the rail proposal at the new port, when same is viable, there may be further reductions possible."

There is no provision in Iarnród Eireann's Rail Freight 2040 Strategy for a rail connection to the new port!

It is also stated in the report that:

"As outlined in EIS Chapter 9 (2014), Do-Nothing Scenarios, the alternative transportation of good by road from Foynes, Cork or Dublin would result in significantly higher CO_2 emissions."

This does not consider the objectives in Iarnród Éireann's Rail Freight 2040 Strategy to:

- Reestablish the rail connection to Marino Point in the Port of Cork,
- Reconnect Shannon-Foynes port to the rail network by mid-2026 and
- Develop Tactical Rail Freight Terminals in Athenry, Sligo and Cork to establish a cross-country network of rail freight facilities.

The proposed developments above will enable the achievement of:

- An increase in the market share of rail freight in line with other European countries,
- Over 100 new weekly rail freight services,
- The avoidance of 140,000 Heavy Goods Vehicle journeys per year,
- The reduction of CO_2 emissions by more than 25,000 tonnes per annum, and
- A reduction in the impact of congestion in towns and cities across Ireland.

There is the following reference to the EPA projections in Section 11.5. Additional Surveys and Up to Date Data:

"EPA projections show that almost all sectors are on trajectory to exceed their national sectoral emissions ceilings for 2025 and 2030. However, if policies and measures in the higher ambition (With Additional Measures) scenario are implemented, Ireland can achieve a reduction of 29% by 20230 compared to 2018 if planned climate policies and measures are fully implemented."

EPA projection of a 29% reduction in emissions by 2030 is far short of the necessary 51% reduction. This means that Carbon Budgets and Sectoral Emissions Ceilings in subsequent Carbon Budgets will have to be reduced very considerably. When this happens, the relative impact of the proposed development on national CO_2 emissions will increase.

In Section 11.6 Assessment of EIS Conclusions, it is concluded that:

"The 'Do-Nothing' scenario would result in higher CO_2 emissions from increased road traffic hauliers than the emissions scenario for the proposed development."

This conclusion is arrived at having failed to consider the objective of Iarnród Éireann's Rail Freight 2040 Strategy which is to achieve the switching of significant volumes of freight from the road network to the rail network.

In Section 11.7 Cumulative Impact Assessment, it is stated that:

"It is estimated that during the operational stage, the average annual emissions of CO2e would be c. 10,255 tonnes/year. The operational phase of this proposed development will contribute c. 2.1% of Galway City's emissions on an annual basis."

This is significantly understating the position. It would be 2.1% of Galway city's 2018 emissions! Galway city's target emissions in 2030 are 241,816 tCO_2e. The estimated annual emissions of 10,255 tCO_2e would be 4.2% of Galway city's target carbon emissions in 2030, double the percentage of the 2018 emissions.

In Section 11.8 Conclusion, it is stated that:

"The operational stage of the Galway Ports would contribute approximately 2.5% of Galway City's annual Carbon Dioxide emissions."

This is a significant understatement of the impact of the proposed development. It is stated that:

"The operational stage of this installation is projected under the Carbon Life Cycle Assessment Report to generate approximately 10.3 kt CO_2e per annum".

The target carbon emissions for Galway City in 2030 in the LACAP 2024-2029 is a reduction to 241,816 tCO_2e. Annual emissions of 10.3 $ktCO_2e$ from the proposed development would be 4.3% of the target emissions for Galway City in 2030 of 241.816 $KtCO_2e$. That is 72% more than the *"approximately 2.5% of Galway City's annual Carbon Dioxide emissions"* claimed in the Response to An Bord Pleanála.

Professor Kevin Andersen, University of Manchester, was a speaker on a webinar, 'Ireland's Climate Justice Obligations', hosted by Community Law and Mediation on the 23 January 2025. He is one of the leading climate scientists in the UK.

An Taisce draws the Board's attention to the following two slides in Professor Anderson's presentation in relation to Carbon Budgets.

The following slide from Kevin Anderson's presentation sets out Ireland's share of the global carbon budget to achieve the Paris Agreement targets:

... of that how much budget for Ireland?

Headline carbon budgets and mitigation rates
(these values remain provisional and subject to refinement)

Interpretation of Paris Agreement	Carbon budget $MtCO_2$	Approx. Years of current emissions	Annual emission reductions with exponential decline	Real Zero CO_2 date with linear CO_2 reductions
83% chance 2°C	~280	~7.5	~12%	2039
50% chance 1.5°C	~80	~2	~30%	2028

Table 1: UK's Paris-compliant carbon budgets starting January 1 2025 (These values are for energy-only territorial CO_2 emissions, including international bunkers (aviation & shipping) and excluding cement process emissions.

The following is a slide from his presentation with his headline conclusions:

My Headline conclusions:

- For Ireland (& Globally) a **50% ≤ 1.5°C budget** requires 20-30% annual cuts in CO_2 from now
- It would also require rapid changes in non-CO_2 emissions (major challenge for Ireland)
- I cannot see how "pursing ... 1.5°C" is any longer possible *(said with a heavy heart)*
- For "well below 2°C" Ireland requires CO_2 cuts of ~12% year on year starting now
  ... and a major shifts in its agricultural practices
- Current global NDCs mean that by the early 2030s 2°C then will be where 1.5°C is today ...
- The timeframe for delivering major cuts in CO_2 is between now and 2030

4.5 Response to An Bord Pleanála, EIS Addendum Sept. 2024, Chapter 8 Water

In Section 8.6.3. Water Quality, there is a reliance on the Annual Environmental Report 2022 submitted by Uisce Éireann to the EPA on 17/05/2023. The Annual Environmental Report 2022 is deficient in that:

- It only includes the 13 Stormwater Overflows that are licenced under the Wastewater Discharge Licence Ref. No. D0050-01, there are at least another 12 Stormwater Overflows, that are unlicenced and are excluded.
- It does not disclose the frequent and significant discharges to the estuary of the River Corrib and Galway Bay, from Stormwater Overflows, contrary to the conditions of the licence.
- It does not disclose the existing serious deficiencies in the wastewater collection network.
- It ignores the inadequate capacity of the existing 2 siphons under the bed of the estuary of the River Corrib. The wastewater from the proposed development would have to pass through the existing siphons to reach the Mutton Island WWTP for treatment.
- It offers no timeline for completing the Schedule of Improvements which were required by the licence to have been completed by 01/05/2014.

The Annual Environment Report, 2023, submitted 27/05/2024, disclosed that there was a further 8 Storm Water Overflows on the network which are unlicenced, bringing the total number of Stormwater Overflows to 21.

The Drainage Area Plan (DAP) Stage 3 Risk Identification and Needs Identification Report, issued in June 2024, disclosed that there are a total of 25 Stormwater Overflows on the network, 12 of which are unlicenced. That is 4 more than were included in AER 2023.

No application has been submitted by Uisce Éireann to date seeking to have the matter of unlicensed Stormwater Overflows regularised.

The Annual Environmental Reports that Uisce Éireann (formerly Irish Water) submitted to the EPA since 2014 have not addressed the fact that Uisce Éireann has failed to comply with Condition 5 of the licence with regard to the completion of the works in Schedule C.3 Improvement Programme for Stormwater Overflows to the licence.

The Annual Environmental Reports have continuously failed to report frequent and significant overflows from Storm Water Overflow.

Uisce Éireann commenced the preparation of a Drainage Area Plan (DAP) for the Galway Agglomeration in 2016. Three of the four stages of the DAP have been completed to date.

The DAP Stage 3 Risk Identification and Needs Identification Report was issued in June 2024. It revealed that there are major deficiencies in the wastewater collection network in the Galway Agglomeration among which are:

- An additional 12 Storm Water Overflows over and above the 13 included in the Wastewater Discharge Licence. These additional overflows are not licenced.
- The frequent activation of several SWOs on the wastewater collection network, during rainfall events far below the criteria for *"Unusual Weather Conditions"*, which is not permitted under the licence
- The very significant discharges of polluting matter from SWO's into the estuary of the River Corrib and into Galway Bay, both of which are SACs.
- The very significant tidal infiltration into the network.

The DAP Stage 3 Report did not disclose the following:

- The fact that it has been recognised since 2007 that a third, larger siphon would be necessary under the estuary of the River Corrib to convey wastewater from east of the river to the west of the river for treatment at the Mutton Island WWTP,
- The finding in May 2024, following a survey of the siphons by McBreen Environmental, that the larger of the two existing siphons has structural defects and ***"is a risk of collapse at any time".***

As the proposed development will provide facilities for ships to discharge sewage into the network, the findings of the DAP Stage 1, Stage 2 and Stage 3 reports and that of the McBreen Environmental survey on the existing siphons should have been considered.

It is proposed to pump sewage discharged from ships and arising from within the proposed development into an existing inadequate drainage network. See TOBIN's Drawings Nos. 2139-2207 to 2139-2210 inclusive. The excess sewage over the capacity of the network will overflow through the Stormwater Overflow at the Dock Street and then the Stormwater Overflow at The Long Walk and be discharged into the estuary of the River Corrib during rainfall at much lower levels than that permitted under the licence.

The DAP Stage 3 Report, issued in June 2024, includes, in Section 7 Key Asset Performance Risk, an assessment of the performance of the SWOs. It looks at 3 Scenarios:

1. Current Design Model: Including completed or nearly completed developments.
    - A population of 95,305 plus a trade effluent flow of 200 litres/second.
2. Short Term Design Model: Including development assumed to be completed in next 5 years.

- A population of 128,416 (35% increase) plus a trade effluent flow of 231 litres per second (15% increase).

3. Strategic Future Design Model: Including development assumed to be complete within 25 years from now.
   - A population of 148,948 (16% increase) plus a trade effluent of 231 litres per second (0% increase)

The following table sets out the performance of the 5 SWOs with the most significant spill volumes in the Short-Term Design Model. For context, the spill volumes are expressed as numbers of equivalent Olympic swimming pool volumes. An Olympic swimming pool typically holds 2,500 cubic metres, 2.5 million litres of water.

SWO	Number of Spills in 10-year Time Series Rainfall (TSR)	10-year TSR Spill Volume in cubic metres	Spill Volume expressed in equivalent numbers of Olympic swimming pool volumes
Long Walk SWO	709	2,130,176	852
Claddagh Quay	588	1,471,905	589
Oranmore PS	786	638,130	255
Moneenageisha	1,023	349,155	140
Dock Street	3,663	149,241	60

According to the DAP Stage 3 Report, 5 of the 25 SWOs will not pass forward Modified Formula A flows prior to spilling (Table 6-2) in the Short-Term Design Model. The Formula A flow is the *"flow setting which sets the minimum level at which wastewater is sufficiently diluted to avoid pollution of the receiving watercourse when overflowed from the sewer."* [DAP Stage 3 Report, page 116]

The sewage arising from the proposed development will pass through the Stormwater Overflow manholes highlighted in the table above, namely the Dock Street Stormwater Overflow manhole and The Long Walk Stormwater Overflow manhole. This means that raw sewage arising from the development will effectively be discharged directly into the estuary of the River Corrib, without even basic primary treatment, during rainfall events well below the criteria for *"Unusual Weather Conditions"*. The Dock Street Stormwater Overflow is not licenced. The predicted frequency of discharges and volumes discharged from both Stormwater Overflow manholes, even under the Short-Term Design Model, which considers development that is assumed to be completed within the next 5 years (from 2024), is utterly unacceptable.

Uisce Éireann has not completed the specified improvements works set out in Schedule C: Specified Improvement Programme of the licence which were required to be completed by 01/05/2014 under Condition 5 of the Wastewater Discharge Licence

Uisce Éireann has not yet submitted any proposals to the EPA to address the deficiencies in the network or to regularise the matter of their being 12 unlicensed Stormwater Overflows in the Galway Agglomeration.

The EPA continues to show remarkable forbearance for the past 11 years given the continuing failure of Uisce Éireann to comply with the Wastewater Discharge Licence.

5. Volume 1C, Natura Impact Statement

In Section 2.1.2.2 Operations, it is asserted that:

"There will be a rail link from the adjacent existing Dublin to Galway rail line which will connect to the new commercial quay."

There is no provision in Iarnród Eireann's Rail Freight 2040 Strategy for a rail connection to the new commercial quay!

The NIS needs to be reviewed taking into account that there is no prospect of a rail link to the proposed development in the foreseeable future.

6. Cruise Tourism

The following is taken from the National Ports Policy Review – Issues Paper which was published as part of the first stage of a consultation:

"The growth of the cruise sector globally has also raised increasing concerns regarding the environmental pollution caused by ocean cruising. Cruise passengers and crews generate a significant amount of waste and pollutants. According to a recent study published in Marine Pollution Bulletin, a large cruise ship can have a carbon footprint greater than 12,000 cars (Lloret, 2022)."

The Italian government banned large cruise ships from entering the Venetian lagoon in 2021. Barcelona banned cruise ships from docking near its city centre in 2023 and Dubrovnik introduced restrictions to combat associated over-tourism. In January 2025, the Mayor of Nice announced plans to ban large cruise ships from entering the port and berth, with effect from 1 July 2025, to mitigate the effects of mass tourism. Those cities cannot handle the large influx of cruise tourists. Galway city would be unable to handle large influxes of cruise tourists on top of other visitors to the city.

The objective of the cruise ship owners is to maximise the passengers spend onboard ship rather than in the port cities and regions that the cruise ship visits. Other European cities now realise that he benefits to the local economy from cruise ship tourism are limited.

7. Compensatory Measures Plan, Accompanying Measures and Additional Environmental Benefits

7.1 Proposed areas for Compensatory Measures should already be conserved

The proposed areas for Compensatory Measures should already be conserved in accordance with best practice for Special Areas of Conservation, and therefore not need Compensatory Measures to ensure their conservation.

An Taisce submits that both areas, for which Compensatory Measures are proposed by the Applicant, are already located within the Galway Bay Complex SAC 000268. See maps below. Therefore, no additional land is being added to the Galway Bay Complex SAC 000268.

17.790 ha of the Intertidal habitat at Mweeloon.

0.844 ha of the stony bank at Tawin West.

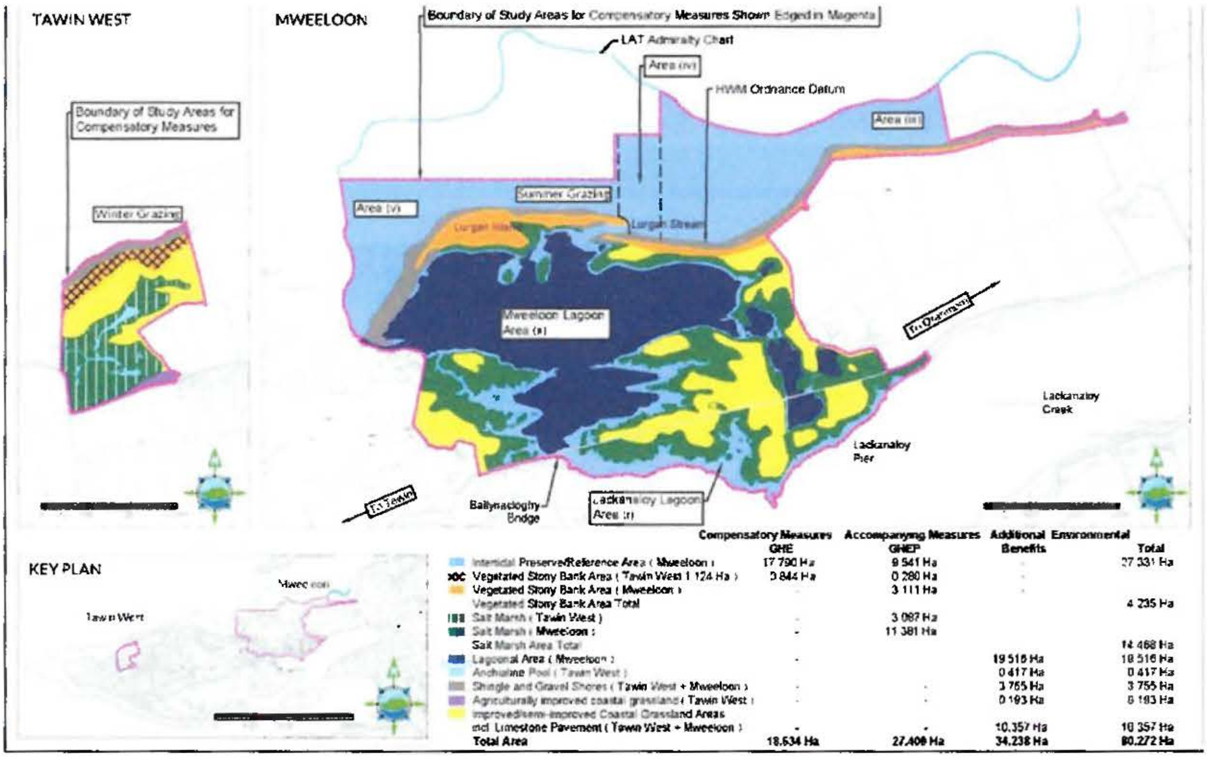
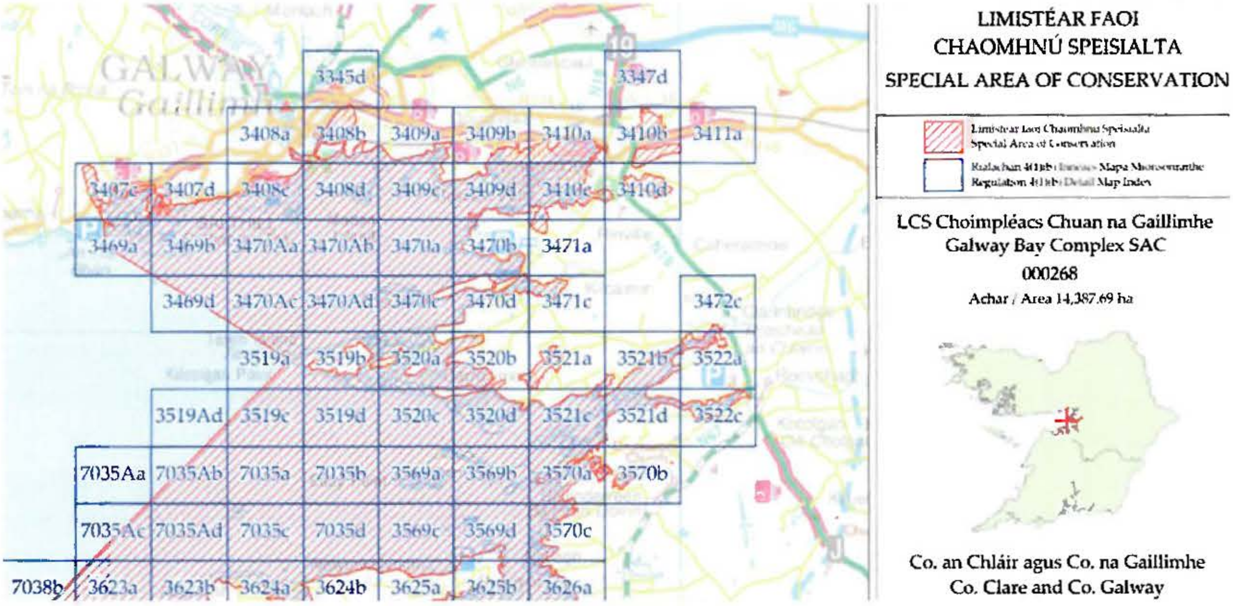
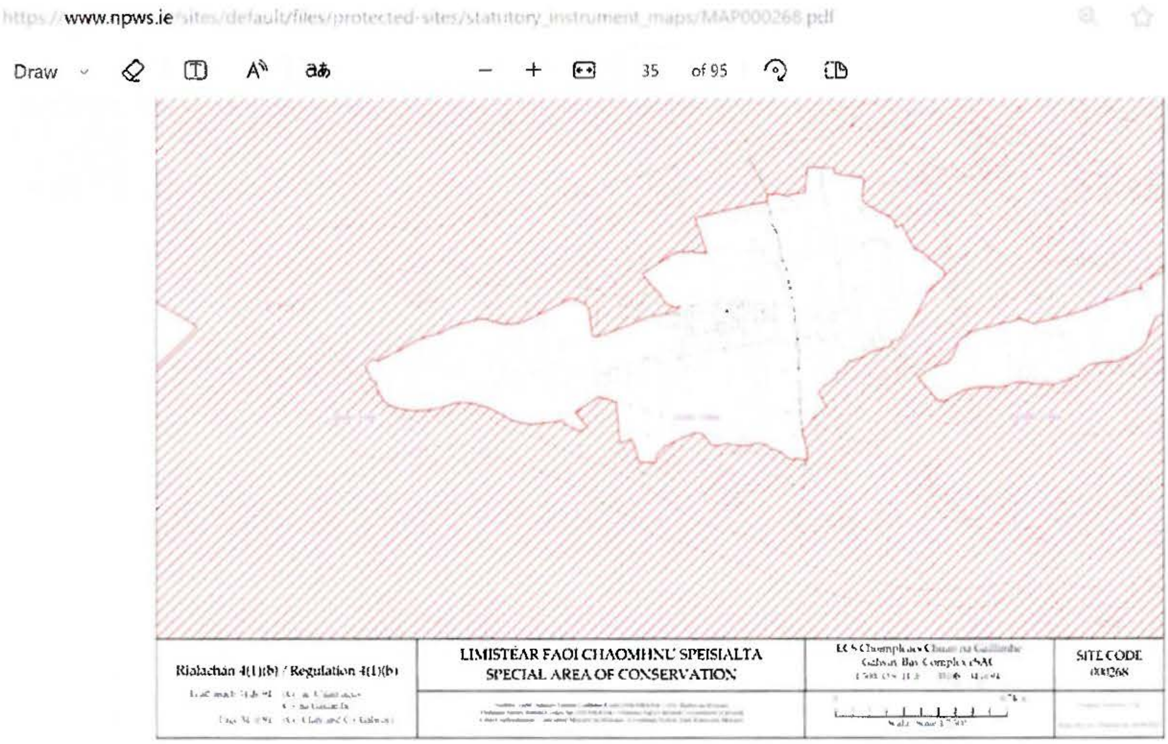


Figure 2-15: GHE Intertidal and Stony Bank Habitat Area Impacted and Renmore and Compensatory Areas at Tawin.

Source: Figure 2-15 of Compensatory Measures Plan, Accompanying Measures and Additional Environmental Benefits.





Map 3519B, showing that the Intertidal habitat at Mweeloon and the stony bank at Tawin West (the subject of the Compensatory Measures are currently both already within the Galway Bay Complex SAC 000268 . https://www.npws.ie/sites/default/files/protected-sites/statutory_instrument_maps/MAP000268.pdf

7.2 Need for specific, measurable metrics aligned with each objective.

In 2.1.2 "Objectives and Compensatory Measures" the Applicant states the following:

"The habitats identified have aquaculture activity and are in need of restoration and would not have been restored in the normal course were it not for the measures proposed herein which are over and above normal practice. "

An Taisce submits that the above statement is a de facto statement that Ireland is unable to conserve a Special Area of Conservation in accordance with best practice.

The section goes on to state that *"The four main objectives of the Intertidal Management Plan are:*

1. *Control of the non-native, invasive tunicate Didemnum vexillum (Didemnum) in Mweeloon.*
2. *Fallowing of parts of Mweeloon Bay that are used for oyster cultivation.*
3. *Implementation of "nature friendly" farming practices that besides having beneficial effect on terrestrial habitats, may also have beneficial effect on intertidal marine ecology.*
4. *Collection and disposal of anthropogenic litter and rubbish from within the Compensatory Area."*

An Taisce submits that the above objectives are so vague and unmeasurable that it will never be possible to objectively determine if the objectives are being achieved. The proposed development will result in a permanent and irreversible destruction of a portion of the Galway Bay Complex SAC 000268. Of that there is no doubt.

An Taisce submits therefore that An Bord Pleanála should require the Applicant to provide a specific measurable metric for each of the four objectives before making a decision on the proposed development. While it is not for An Taisce to suggest specifically what those metrics should be, An Taisce suggests that they might be in the following form:

1. Reduction of the non-native, invasive tunicate Didemnum vexillum (Didemnum) within the Study area in Figure 2-15 in Mweeloon plus Tawin West (from a measured based level in 2024). By 25% when measured in 2026, by 50% when measured 2028 and by 75% when measured in 2030.
2. Fallowing within the Study area in Figure 2-15 in Mweeloon plus Tawin (from a measured based level in 2024) that are used for oyster cultivation. By 25% when measured in 2026, by 50% when measured 2028 and by 75% when measured in 2030.
3. Implementation of "nature friendly" farming practices that besides having beneficial effect on terrestrial habitats, may also have beneficial effect on

intertidal marine ecology. To be achieved within the Study area in Figure 2-15 in Mweeloon plus Tawin (from a measured based level in 2024) by 25% when measured in 2026, by 50% when measured 2028 and by 75% when measured in 2030.

4. Collection and disposal of anthropogenic litter and rubbish from within the Compensatory Area. To be achieved within the Study area in Figure 2-15 in Mweeloon plus Tawin. Percentage of Study area where anthropogenic litter and rubbish are found to be no more than 1% at any time in each year form 2025 onwards.

7.3 Need for Planning Permission (if granted) to be made conditional on ongoing achievement of the Objectives of the Compensatory Measures.

In Section 1.1 Overview it is stated that *"An Bord Pleanála (ABP) conducted an Appropriate Assessment (AA) of the Galway Harbour Extension (GHE) and concluded that the development will cause:*

- *Direct and Permanent Loss of 5.93ha of [1170] fucoid dominated reef habitat and [1140] Mud and Sand Flat habitat of the Galway Bay Complex Special Area of Conservation (SAC), and the,*
- *Loss of perennial vegetation of stony banks [1220] (0.35 ha) due to the sheltering effect of the harbour extension will also have a significant adverse effect on the integrity of the SAC."*

An Taisce submits that there needs to be an imperative on the Applicant to achieve the objectives of the proposed Compensatory Measures. An Taisce has submitted in the previous section that the Applicant should be required to provide specific, measurable metrics for each objective.

An Taisce submits that given the permanent nature of the loss of habitats, that Planning Permission (if granted) should be made conditional on achievement of specific metrics for each over the lifetime of the proposed development.

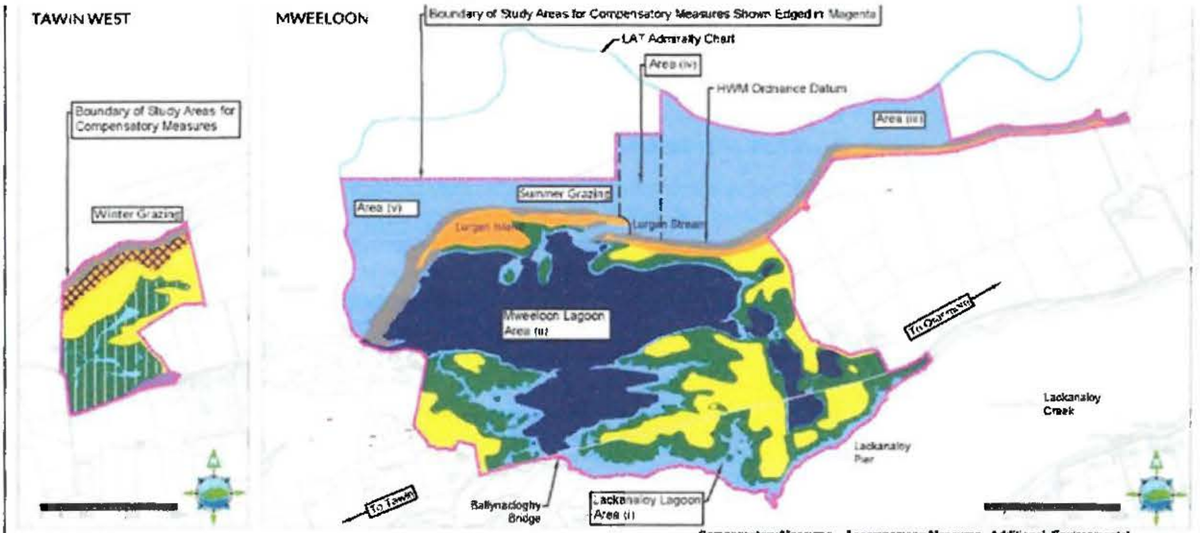
7.4 Need for Planning Permission (if granted) to be made conditional on purchase of the lands.

An Taisce notes that the Galway Harbour Company claims to have purchased, or contacted to purchase, lands within which it proposes to carry out mitigating measures. See maps below.

17.790 ha of the Intertidal habitat at Mweeloon

0.844 ha of the stony bank at Tawin West

An Taisce submits that if the Board is minded to grant planning permission for the development, then the permission should be made conditional on the purchase, within a set timeframe of the granting of planning permission, of the 17.790 ha of the Intertidal habitat at Mweeloon and the 0.844 ha of the stony bank at Tawin West.



	Compensatory Measures GHE	Accompanying Measures GHEP	Additional Environmental Benefits	Total
Intertidal Preserve/Reference Area (Mweeloon)	17 790 Ha	9 541 Ha	-	27 331 Ha
Vegetated Stony Bank Area (Tawin West 1 124 Ha)	3 844 Ha	0 280 Ha	-	
Vegetated Stony Bank Area (Mweeloon)	-	3 111 Ha	-	
Vegetated Stony Bank Area Total				4 235 Ha
Salt Marsh (Tawin West)	-	3 087 Ha		
Salt Marsh (Mweeloon)	-	11 381 Ha		
Salt Marsh Area Total				14 468 Ha
Lagoonal Area (Mweeloon)	-		19 516 Ha	19 516 Ha
Anchialine Pool (Tawin West)			0 417 Ha	0 417 Ha
Shingle and Gravel Shores (Tawin West + Mweeloon)	-	-	3 755 Ha	3 755 Ha
Agriculturally improved coastal grassland (Tawin West)	-	-	0 193 Ha	0 193 Ha
Improved/semi-improved Coastal Grassland Areas incl Limestone Pavement (Tawin West + Mweeloon)	-	-	10.357 Ha	10 357 Ha
Total Area	18.634 Ha	27.400 Ha	34.238 Ha	80.272 Ha

Figure 2-15: GHE Intertidal and Stony Bank Habitat Area Impacted and Renmore and Compensatory Areas at Tawin.

Source: Figure 2-15 of Compensatory Measures Plan, Accompanying Measures and Additional Environmental Benefits.

7.6 Conclusion

The view of the Planning Committee of the An Taisce, Galway Association is that the appropriate decision would be to refuse permission for the proposed development on the grounds that:

- The needs of the Offshore Renewable Energy industry can be met by the developments already completed, underway or committed to at other Irish ports,
- The significant embodied carbon and operational carbon emissions associated with the proposed development given the current limited Carbon Budgets and Sectoral Emissions Ceilings, which will become even more restricted in future years. We need to prioritise housing which will also have significant embodied carbon. It is necessary to conserve the limited Carbon Budgets for essential purposes.
- The corollary of Mr Justice Humphries' decision in the Coolglass v ABP {2025] IEHC 1 judgement means that projects, such as this proposed development, which would contribute significant carbon emissions now face a much higher standard of proof in relation to Section 15 of the Climate Action and Low Carbon Development Act 2015, as amended.
- The recent Storm Éowyn has exposed the lack of preparedness of infrastructure and the inadequacy of Climate Adaptation Plans to face the more frequent and intense weather events associated with Climate Change.
- It is not evident that the studies to date have adequately considered the adverse effects of future coastal storm events, associated storm surges and sea level rise given the high level of uncertainty associated with Climate Change.
- The potential for the proposed development, if completed, to deflect higher than previously experienced storm surges associated with future storms onto surrounding residential and commercial areas with consequential flooding.
- **There is, as of now, no finalised plan for a flood relief scheme within Galway city.** The 'Coirib go Cósta' Galway Flood Relief Scheme, intended to alleviate the risk from river and coastal flooding, will not be ready to go to planning until 2027 at the earliest. It would be premature to grant permission for this proposed development in advance of permission being granted for an appropriate Flood Relief Scheme for Galway city.