Our Case Number: PA0033

An Bord Pleanála

Dr. James McCarthy
Rosshill
Galway

Date: 07 February 2025

Re: Galway Harbour Extension
Renmore and Townparks Townlands, Galway

Dear Sir,

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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

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An Bord Pleanála

SID Online Observation

Online Reference
SID-OBS-002602

Online Observation Details

Contact Name	Lodgement Date	Case Number / Description
James McCarthy	06/02/2025 23:44:45	PAOO33

Payment Details

Payment Method	Cardholder Name	Payment Amount
Online Payment	James McCarthy	€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of
€

Lodgement No
LDG—

Reason for Refund

Documents Returned to Observer
☐ Yes ☐ No

Request Emailed to Senior Executive Officer for Approval
☐ Yes ☐ No

Signed
EO

Date

Finance Section

Payment Reference
ch_3QpekTB1CW0EN5FC12QZBE0e

Checked Against Fee Income Online
EO/AA (Accounts Section)

Amount
€

Refund Date

Authorised By (1)
SEO (Finance)

Authorised By (2)
Chief Officer/Director of Corporate Affairs/SAO/Board Member

Date

Date

Rosshill,

Galway

Feb 5 2025

ABP - To Whom it May Concern

I wish to make an OBSERVATION in relation to the STRATEGIC INFRASTRUCTURE DEVELOPMENT UNDER REFERENCE NUMBER 61.PAOO33 (Galway City Council)

The Proposed Development, first submitted in 2014, is entitled *"Planning Permission is sought for the development of an extension of Galway Harbour at Renmore and Townparks Townslands and on lands to be reclaimed from the foreshore and the sea in Galway Bay to the south of the existing Galway Harbour Enterprise Park, which contains a Seveso site. …. "*

I wish to point out a number of reasons why the Proposed Development, if carried out, even in part, will destroy many of the features that make Galway uniquely attractive to locals, students, tourists and all the Wildlife it harbours. I will also outline reasons why I believe several of the major economic benefits the proposal's backers suggest will be generated from this massive, climate negative, ecosystem destructive development are based on speculative assumptions. Furthermore, this Development Proposal totally ignored better, much lower cost options for Port Development that better serve People, the Climate, and the Environment/NATURE.

…A…

The Proposed Development will be highly destructive to the City Marine and Shoreline Ecosystems. The huge proposed land creation and development project will totally distort and massively degrade, on multiple levels, the current River Corrib Estuary flow, as well as having dramatic impacts on all beaches and the neighbouring shoreline over several kilometres from the development. It will also negatively impact the Nature/Biodiversity and Ecosystems of the entire Inner Galway Bay.

… The Proposed Development will cause massive, unparalleled, and totally unwarranted damage to the Inner Galway Bay and its ecosystem, and the EU protected Galway Bay SAC and EU protected Galway Bay SPA. To be a balance and counterweight to environmental studies provided by those pushing this project forward, ABP should request, and the Developers/Sponsors of the Project should pay for, a broad and totally independent study of the extent of the probable Nature and Biodiversity impacts of this project. Transparency and independence of these vital

new studies will be enabled by a substantial, developer financed fund of several million euros to adequately cover the large, peer reviewed, multi-group project research studies required.

... The Proposed Development will necessitate massive quantities of infill material. This is clearly not a land reclamation project but a publically (part or fully) funded land creation project. It will require huge climate change emissions related infill materials, and include stone extraction and cement production and the transport of materials from site of origin, like stone quarries/cement production areas, to the docks construction site. Unknowns in these critical aspects of the proposal include the impact of the infill materials on the immediate marine area, and long term on the surrounding waters and the Nature living within it. An independent and audited accounting of all the Climate related emissions and environmental impacts of the mining, as well as the degradation of inner and outer City roads associated with transportation of the extensive earthworks/in-fill alone needs to be demanded by ABP (any assumptions by the Bord that related studies submitted only by the project developers have been/will be completely exhaustive are neither logical, nor sensible). In short, it is plausible that the Climate and Environmental impacts alone of this proposed development are completely incompatible with Irelands "Sustainable Development", Climate Ambitions, or EU Climate, Biodiversity, and Nature Obligations and related duties of care.

... In addition to proper risk analysis of the Climate and Environmental impacts of the project, it is imperative that risk analysis work also be carried out on how "Climate Adapted" this proposal is. Has all the analysis presented to ABP included storm impact levels like we saw only in the last year, with a very strong storm in 2024 causing high tide storm surge damage all along the City coast, then in Jan 2025, a hurricane level storm. I remind ABP that there is already serious Climate Change Driven flooding issues in the Center of Galway City. How will increased flooding problems play out related to this massive port development project? What happens in the City when large storm surges occur ... and excessive Corrib flow from high, persistent rainfall hits a massive storm tide?

NOTE: As presented in the EU 2023 Blue Economic Report, economic damage from coastal flooding in the EU-27 currently amount to €1 billion annually. ... 72 000 people in the EU are exposed to coastal flooding every year. **Damage from coastal flooding are projected to rise sharply with global warming for all EU-27 countries with a coastline if current levels of coastal protection are not raised.** Annual damage grow to €814 billion and €137 billion by 2100 under a high emissions scenario and a moderate mitigation scenario respectively.

... Another important issue I would remind ABP to examine during their consideration of this "Super Sized Development" is what will be its impact on waste water issues in Galway? It will be already well known to ABP that the waste water management system in Galway City is at a breaking point, with pipes under the river in danger of

bursting and waste water already flowing into various City marine areas via multiple storm overflow points after high rains (or sometimes even with no rain at times). Will this massive port development further exacerbate, in hitherto unexplored, ways (ie. have the sponsors of the development adequately looked at this)? True Climate Risk analysis and also simple logic around the building of a new, massive, very expensive, and totally exposed structure right out into the sea, may not be "Sustainable" or Responsible Planning on multiple levels as noted above.

...B... **The Proposed Development is totally disproportionate for a City the size of Galway**

The proposed size, as well as the design of the Development appears to me to be completely disproportionate and inappropriate for the site and for a City the size of Galway. The proposal's backers clearly have decided, for the City, and without in my opinion, proper broad public consultations, that this project is better than other alternative options that could, for example, provide more reasonable, sustainable, and environment/climate friendly expansion of the port capabilities and added, liveable housing.

... The Proposed Development is unlikely to be justified by the speculative "economic growth opportunities" presented as supporting arguments for the Project.. In fact, the Development, as proposed, appears to me to have many deep flaws in its various economy related propositions. It is unclear to me how, when delivered, the development will dramatically and positively impact the economy of the region, apart from a stimulatory and inflationary effect of the massive, multi decade building/works activities.

For example, consider

a. that the proposal implies Galway needs more frequent and heavy merchant shipping, and thus needs dramatically increased capability to welcome more, and bigger ships. Is this not potentially far fetched and totally speculative? For example, how will materials be transported in or out of a huge new port? For trucks to enter this port they must pass through the most limited inner city road transport system in Ireland. Every new truck trip in and out of the Docks region is one too many to add to the existing, twice daily traffic jams, and then there is the road damage from very heavy vehicles on critical city roads and this on top of increased toxic exhaust gases /pollution for City citizens.

   Additionally, any arguments that a bigger port is needed to stimulate heavy manufacturing in the new port area is also very far fetched.

b. furthermore, the idea that the railway line link in the Center of the City can be expanded for ship-to-rail transport is totally unrealistic currently. It is clear that the railway line to the center of Galway is already highly stressed (physically and financially) trying to increase public transport alone, and the idea that even one extra track can be added for freight is very tenuous on multiple levels. And who will fund an additional railway link (some time in the future)? The much more logical, All Ireland solution for most ship-to-rail transport in the west is for ships to land and unload in the Shannon estuary area and then transport containers and goods by rail to, for example to East Galway City (followed by truck transport further west). Although not desirable for local Galway politics, building major port infrastructure in the Shannon region to serve the west of Ireland via rail is the best vision/use of EU and Irish government port related funding. If Galway investors wants a port for pleasure boats and related tourism then let them propose this type of port and fund it at 100% alone.

c. The concept that Galway needs a much bigger pleasure boat harbour area is also rather tenuous in my opinion (weather?). Is there really solid data supporting the idea of pent up desire for this type of pleasure boat marine activity? If there is solid data, ABP should request to see it in its entirety and also ask why can this pleasure boat activity cant be accommodated in another way in another part of greater galway area (a pleasure port and associated flood protection development with promenade and cycleway for Oranmore?)

d. The proposition that Galway Port needs to be much bigger to service future off shore wind industry is also very tenuous. Again, the Shannon Estuary, with multiple, already existing deep water facilities is the totally logical place for ALL capital investment serving the heavy shipping side of the offshore wind energy business. Maybe Galway could get some crumbs around the "support" aspect (small boats bringing workers in and out) .... But that will very likely be minimal and easily satisfied by simple, small new pier, either in City, at Oranmore, or elsewhere within 20km of the City

e. The concept that the Dock Development will be a magnet for tourist bearing ocean liners may appear a ludicrous idea in even 5 years from now. It is also completely counter to sustainable and climate friendly development. The idea that liners will be queuing up to come into the "Super Sized" new Galway port when it is ready in 2040 is probably not founded in reality. Simple points to consider,

i. will Galwegians agree to this clear path to over-tourism?,
ii. will Galwegians want liners sitting in the Center of Galway spewing ocean liner quantities of smokestack pollution into the City on a daily basis (where is the Duty of Care against pre-programmed Increased Pollution?)?
iii. Who is proposing the idea that liner based tourism will continue increasing, or even remain at current levels, in the face of the Climate and Biodiversity Emergencies? And also, in the face of the need for governments to reduce CO2 emissions more and more each year?

Again, it may be interesting for the Port of Galway to consider a simple, small new pier to accommodate tenders from the current Ocean Liner visits?

In conclusion, as noted above, it appears to me that many, if not all, of the major economic and other benefits that are predicted to occur IF this massive port development is delivered, are a mirage. Except, perhaps two benefits, one being that all people and businesses associated with the construction of a massive white elephant new port will be well supported and maintained over the duration of the projects lifetime (or over funding duration if the project stops part way to completion for any reason). The second benefit to accrue, perhaps, will be to the developers supporting the Port Development Proposal as they are first in line to build tightly paced high rise apartments on the dozens of new acres to be created right in the Center of the City .... With the return on the EU and Irish government investment in land creation being directly proportional to the number of stories of the apartment blocks that are allowed on the newly created lands.

As noted above, the level of destruction of the marine and shoreline environment/NATURE from this project will be enormous. In addition, in my opinion, the proposed development will almost surely negatively impact people living/staying as visitors in the vicinity of this massive construction site over at least 10-15 years as this huge project is executed (located as it is, dead centre in the City).

It is my hope that logic and reason will prevail, and ABP refuses permission for this Land Creation and Port Expansion Project to advance.

Yours Sincerely,

Dr. James McCarthy