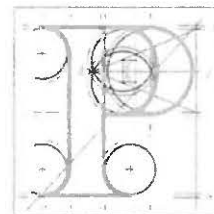


**Our Case Number:** PA0033



An  
Bord  
Pleanála

Health Service Executive  
Environmental Health Service  
Galway Business Park  
Dangan  
Co. Galway

**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](http://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  
Executive Officer  
Direct Line: 01-8737244

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Lauren Griffin

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**From:** Lauren Griffin  
**Sent:** Thursday 6 February 2025 13:04  
**To:** 'Niamh.Kelly@hse.ie'  
**Subject:** RE: Strategic Infrastructure Development Case for Galway Harbour Extension (ABP Reference Number: PA0033)

A Chara,

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

Kind regards,

Lauren

**From:** Niamh Kelly <[Niamh.Kelly@hse.ie](mailto:Niamh.Kelly@hse.ie)>  
**Sent:** Thursday 6 February 2025 10:18  
**To:** Bord <[bord@pleanala.ie](mailto:bord@pleanala.ie)>; LAPS <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Subject:** Strategic Infrastructure Development Case for Galway Harbour Extension (ABP Reference Number: PA0033)

**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.

A Chara

Attached are the observations of the National Environmental Health Service (NEHS) on planning application Case Reference: PA0033 **Further Information only**

Please confirm receipt of this email.

Best regards

Niamh Kelly  
Oifigeach Sláinte Comhshaoil Sinsearach/Senior Environmental Health Officer  
FSS Seirbhís Náisiúnta Sláinte Comhshaoil, Páirc Ghnó na Gaillimhe, An Daingean, Gaillimh.  
HSE National Environmental Health Service, Galway Business Park, Dangan, Galway.  
091-737350



"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil. Seans gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig [service.desk@hse.ie](mailto:service.desk@hse.ie) agus ansin glan an ríomhphost seo ded' chóras."

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**FSS Seirbhís Náisiúnta Sláinte  
Comhshaoil**

Páirc Ghnó na Gaillimhe, An  
Daingean, Gaillimh, H91 EW40

**HSE National Environmental  
Health Service**

Galway Business Park, Dangan,  
Galway H91 EW40

[www.hse.ie](http://www.hse.ie)

T: 091 737350

E: [PEHO.galway@hse.ie](mailto:PEHO.galway@hse.ie)

**Date:** 06-02-2025

**Type of consultation:** EIAR

**EHIS Reference:** 4457

Dear Sir/Madam

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE Departments were made aware of the consultation request for the proposed development on the 16<sup>th</sup> December 2024

- Emergency Planning
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO West & North West

If you have any queries regarding this report please contact, Maria Horkan Principal Environmental Health Officer, in the first instance.

Yours sincerely

---

Maria Horkan PEHO  
Galway Business Park, Dangan, Galway H91 EW40

T: (091) 737350

E: [PEHO.galway@hse.ie](mailto:PEHO.galway@hse.ie)

## **National Environmental Health Service Consultation Report**

(as a statutory consultee under the Planning and Development Acts 2000 (as amended) Regulations made thereunder)

<b>Report to:</b>	Galway County Council
<b>Type of Consultation:</b>	EIAR
<b>Planning Authority:</b>	Galway County Council
<b>Planning Reference:</b>	Bord Pleanála Case Reference: PA61.PA0033
<b>EHIS Reference Number:</b>	4457
<b>Applicant:</b>	Galway Harbour Company
<b>Proposed Development:</b>	Galway Harbour Extension – Renmore and Townparks Townland, Galway
<b>Location:</b>	Galway Harbour Renmore and Townparks Townland, Galway

The following HSE stakeholders were made aware of the application on 16<sup>th</sup> December 2024

Emergency Planning – Kay Kennington

National Capital Estates Office – Regional AND

Director of National Health Protection – Eamonn O’ Moore/ Ina Kelly

REO West & North West - Tony Canavan

### **General Introduction**

This report only comments on National Environmental Health Service (NEHS) impacts of the proposed development as outlined in the EIAR 2014 and the Addendum EIAR and the adequacy of the EIAR from the Environmental Health viewpoint

All commitments to future actions, including mitigation and further testing, have been taken as read and all data has been accepted as accurate. No additional investigations/measurements were undertaken in the review of this application

The NEHS has made observations and submissions on the following specific Environmental Health areas:

### **Assessment of principle and description of the project**

The EIAR was prepared by Brendan Rudden of TOBIN and has provided a description of the project in 4.3. The development will provide the following: 660m of quay berth to –14.9m O.D. depth, Port development serviced by a channel to -10.9m O.D. ,A 400m turning circle to -10.9m O.D. , 28.07 ha of land development, 660m of sheltered quays, Western Marina with 216 No. berths, Fishing Pier, Nautical Centre Slipway, Freight rail link to enable freight and cargo to be efficiently transported to and from the harbour. The Chapter 4 addendum stated that there are no changes to the proposal and the applicant stated that there are no findings to be updated.

A succinct summary of the proposed scheme is contained in 'Volume 1 –Non-Technical Summary'. Each phase of the proposed development is detailed in the EIAR and accompanying plans, drawings and schematics.

### **Assessment of Public Consultation and Non-Technical Summary**

The NEHS noted the public consultation that had been undertaken. The EIAR Non-Technical Summary provides a comprehensive, clear summary of the EIAR process, the proposed development and its potential significant impacts on public health.

***The NEHS would recommend that public consultation should be undertaken and recommends that, if permission is granted for the proposal, the community should receive regular updates on the progress of the construction of the development.***

### **Assessment of the Population and Human Health**

The NEHS notes the legislation, data sources and consultations referred to in the preparation of Chapter 5 on Population and Human Health. The EIAR recognises that the proposed Harbour Extension has the potential to impact on noise, air quality and water quality. The consultant has stated that it is of his opinion that “the impacts on human health in relation to changes in air quality are assessed as negligible but if anything there would be a positive effect.” In relation to noise, the consultant has stated, “The residual impact should see an improvement in noise levels in the

existing docks due to the removal of vessels and minimal or negligible impacts on human beings close to the new port post mitigation.”

## **Soils**

The NEHS has reviewed the chapter on Soils Chapter 6 addendum and is satisfied with the methodology used in the compilation of these chapters.

Chapter 6 Soils addendum states “there are no changes in design and no changes to the ground conditions of the proposed development since 2014 and therefore no changes in the approach to soils.”

The applicant states all projects will follow standard construction measures for control of silts. Furthermore, the applicant has stated “no projects of cumulative significance have been constructed since the original EIS was submitted in 2014, and there are no permitted but unbuilt projects of potential cumulative significance”.

Chapter 6 of the 2014 EIAR stated that “...the working of soils as proposed will not have a significant impact on the waters where work will be undertaken”, furthermore stated that there will be “minimum release of suspended sediments to sea by the implementation of suitable construction methods and practices thereby ensuring minimum impact on the surrounding Galway Bay Environment.”

The consultant has also stated in the EIAR 2014 section 6.13 that “minimum rock dredge with appropriately controlled drilling, blasting and rock excavation...will be undertaken”

## **Recommendations**

Therefore based on the information provided in the January 2014 EIAR and the addendum the NEHS recommends the following:

***That all the mitigation identified in Chapter 6 Section 6.11 of the January EIAR and addendum are implemented in full.***

***The NEHS recommends that Construction monitoring of the works shall be undertaken***

***The NEHS recommends that an odour management plan shall be devised and implemented. However if the odour is not addressed by the current mitigation measures, such measures should be reassessed and amended and remedial works undertaken.***

***The NEHS recommends a site dust-monitoring programme be put in place during the construction phase with secure monitoring locations to ensure compliance with dust deposition limits. A dust management plan should be implemented during the construction phase, to investigate any dust complaints/potential dust complaints and implement remedial action.***

### **Surface water and ground water**

The Environmental Health Service has reviewed the chapters on Hydrogeology and Hydrology (Chapter 8) and is satisfied with the methodology used in the compilation of these chapters. Both detailed desk top studies and field visits were undertaken in the assessment of the impacts of the proposed road development on surface and ground water.

Quantitative and Qualitative impacts of the proposed road development on surface water bodies were assessed in Chapter 8.

The applicant has stated that the Water quality in the Galway Harbour Area is of "Good to Excellent" bathing quality, with the Galway City WWTP operating within its limits and meeting its Water Framework Directive status in accordance with the EPA.

The EIAR states that the construction and operational phases in respect to sediment transport, deposition and suspended solids, the EIS findings and modelling results remains valid and does not represent a significant impact on seabed and on the water column.

The applicant states in the EIAR that the proposed harbour development meets in full the requirements of the Flood Risk Management Planning Guidelines (2009).

The applicant has stated that "...the treated effluent dispersion from the Mutton Island sewage outfall and the proposed future sewage outfall in the EIS remain valid" and the... applicant's conclusion is that "the proposed harbour development will not impact negatively on the water quality status, bathing water quality status and shellfish waters within and outside of Inner Galway Bay."

### **Recommendations**

Therefore based on the information provided in the January 2014 EIAR and the addendum the NEHS recommends the following:

***That all the mitigation measures identified in the January 2014 EIAR and addendum section 8.2 are implemented in full. Previously identified mitigation measures should remain in place to ensure this water quality status is maintained.***

***It is the opinion of the NEHS if all mitigation measures identified in the EIAR are implemented there is adequate protection. However, if as a result of the sampling programme, exceedances of the sampling parameters are identified, then the mitigation measures should be reassessed and amended to ensure the protection of ground and surface water.***

## **Air Quality**

Chapter 9 'Air Quality and Climate' refers to guidelines and legislation which were considered when assessing the impact on air quality during both the construction and operation of the proposed development.

The applicant has stated in EIAR that NO<sub>x</sub> has been modelled utilising background data from the EPA analyser. The results of the model are summarised in the EIAR in Tables 9.4 -9.5. The results in the table indicate that all levels of pollutant for different scenarios proposed are predicted to remain within the limits for the protection of human health.

The applicant has stated that the site will be deemed compliant with guideline values of 350mg/m<sup>2</sup> /day during construction and future operation, with the implementation of the mitigation measures proposed in Appendix 9.1 to control dust emissions from the installation during both construction and future operations.

## **Observations**

Therefore based on the information provided in the January 2014 EIAR and the addendum the NEHS recommends the following:

***The potential dust impacts where the main construction works will occur are assessed and mitigation measures are adopted during construction as described in Chapter 9 of 2014 EIAR, addendum and the Dust Management Plan as outlined in Appendix 9.1***

***The NEHS notes the proposal to undertake dust deposition monitoring at a number of sites in the vicinity of the proposed road. The Bergerhoff Method as specified in the German TA Luft Air Quality Standards (TA Luft 1986) will be used. If there are exceedances of the guidance levels; mitigation measures***

***should be reviewed and additional measures for dust control implemented. This recommendation is made in the interest of protection of public health.***

***The NEHS recommends that, should consent be granted for the proposed development that all mitigation measures referred to in the 2014 EIAR, addendum and Dust Management Plan in Appendix 9.1 in relation to air quality are applied as conditions of approval. This is in order to protect public health by minimising the significant impacts of the proposed construction works on air quality.***

## **Noise and vibration**

The impacts of noise and vibration from the proposed development are evaluated in Chapter 10 of the EIAR addendum. The NEHS has reviewed the methodology used as described in Chapter 10 and is satisfied that sensitive receptors have been identified, existing noise levels have been established and noise levels generated by both the construction and operation of the proposed road have been predicted. Results obtained have been compared against noise criteria specified in guidance.

The Table 10-4 taken from the report outlines that methodology and airborne noise guidance applied with reference to the 55dB daytime and 45dB night-time noise criteria.

**Table 10-4: Assessment findings summary.**

<b>Appendix</b>	<b>Conclusions</b>
10-1	<p><b>Updates to airborne noise guidance</b></p> <ul style="list-style-type: none"> <li>•The Environmental Noise Directive and the corresponding Irish Regulations, although updated, remain unchanged, and there are no implications for the EIS.</li> <li>•Two of the three documents used for the construction noise assessment have been updated since the 2014 EIS was prepared. However, criteria presented in the revisions are unchanged, and consequently there are no implications for the EIS.</li> <li>•The 55 dB daytime and 45 dB night-time criteria remain valid and relevant in 2024.</li> <li>•Road traffic noise changes are commonly assessed in 2024 with reference to Design Manual for Roads and Bridges guidance issued in 2020. Application of the guidance does not alter the EIS conclusions, apart from a slight reduction in impact category at the Radisson, now Galmont, Hotel, from moderate to minor.</li> </ul>

It is stated by the applicant that “apart from some minor exceptions, the findings of the EIS remain valid and relevant. While several guidance documents referenced in Chapter 10 have been updated in the interim, the EIS findings continue to remain valid in the context of these updates, again apart from a small number of exceptions in relation to marine acoustics.”

The applicant has stated the following

“construction phase impacts will be imperceptible in most cases....

Piling impacts, and night-time backhoe dredging impacts will be not significant to slight at the nearest receptors....

Road traffic noise impacts will be imperceptible, potentially increasing to not significant at some receptors during the construction phase....

Rail traffic impacts will be imperceptible to not significant....

Noise impacts due to berthed vessels will be imperceptible to not significant. At receptors near the existing docks, there will be a profound positive impact....

Vibration impacts will be imperceptible....”

The mitigation measures to minimise the significant impacts of noise from the construction of the proposed road development are detailed in Chapter 10 of the EIAR 2014, EIAR Addendum 2024 and updated within Appendix 10 -13.

The applicant has stated that the mitigation originally proposed remain broadly valid and relevant. The use of marine mammal exclusion zones during construction works continues to represent best practice. Two updates are required, as follows:

Exclusion zone radii in relation to porpoises require an increase during certain construction works, as listed in Table A13-1 within Appendix 10-13

All underwater blasts will be designed taking into account the updated document BS British Standard BS 5607:1998 Code of Practice for the Safe Use of Explosives in the Construction Industry.

In addition to the above, it is noted that the response to item 7 of the RFI in 2014 included a proposal to undertake noise monitoring at receptors during the construction phase.

The applicant states that based on the assessment and assumptions outlined in this section that... *“The local soundscape is likely to experience a reduction in traffic noise levels in the long term. This is unlikely to cause an appreciable difference in noise levels at receptors during the GHE construction period.”*

## **Recommendations**

The World Health Organisation (WHO) has identified noise as a significant Public Health issue, particularly if sleep is disturbed. (*Environmental Noise Guidelines for the European Region* WHO 2018) Therefore based on the information submitted the NEHS recommends the following:

**It is recommended that the mitigation measures outlined in Chapter 10 Noise and Vibration and the EIA addendum Appendix 10:4' are included as conditions of approval should permission be granted. If there are exceedances of the relevant guidance and criteria levels, mitigation measures should be reviewed and additional measures for noise control implemented**

**If consent is given for the development the NEHS would recommend noise monitoring should be undertaken at the nearest receptors during the construction phase.**

**Individual sensitive receptors are informed at least 24 hours in advance, of the date, time and duration of noisy operations likely to cause significant impacts, for example, drilling, rock breaking and blasting. This can be done by a method agreed with the individuals and can be in person, in writing or by text message**

**Regular updates are provided to the wider community by way of radio announcements or via appropriate social media channels.**

**Any work undertaken outside standard hours is agreed with the Planning Authority**

### **Opportunities for Health Gain**

The NEHS notes that the EIA states that '*the proposed development has the potential to provide opportunities for health improvements*'

(HiAP)' concept contained in the Healthy Ireland Framework (2013-2025). Goal 4 of the Healthy Ireland Framework aims to 'create an environment where every individual and sector of society can play their part in achieving a healthy Ireland'. The EHS recommends that opportunities for health gain are maximised by the provision of walkways and cycle paths etc.

## **Conclusion**

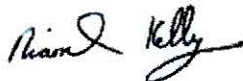
The NEHS makes the following recommendations in addition to the recommendations previously outlined above in respect of the proposed development

**Should permission be granted, the community should receive regular updates on the progress of the construction of the proposed road scheme by means of posters, articles in local newspapers and on local radio/television, in addition to the information provided in the dedicated website.**

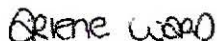
**That details provided on mitigation measures proposed in the EIAR are implemented in full.**

**That individual sensitive receptors are informed at least 24 hours in advance, of the date, time and duration of noisy operations likely to cause significantly impacts, for example, drilling, rock breaking and blasting. This can be done by a method agreed with the individuals and can be in person, in writing or by text message**

**Any work undertaken outside standard hours is agreed with the Planning Authority**



Niamh Kelly  
Senior Environmental Health Officer



Arlene Ward  
Environmental Health Officer