Our Case Number: PA0033

An Bord Pleanála

Brendan Browne & Others
13 Frenchville
Grattan Road
The Claddagh
Galway

Date: 27 May 2025

Re: Galway Harbour Extension
Renmore and Townparks Townlands, Galway

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

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

CH08

Brendan Browne,
13 Frenchville,
Grattan Road,
Claddagh,
Galway,
H91XTW2

26-05-2025

TO: AN BOARD PLEANALA
Planning Application Ref: 61.PC0150 (PA:0033)

RE: Galway Harbour Extension Renmore and Townparks Townlands, Galway

ADDITIONAL WRITTEN SUBMISSION ON STRATEGIC INFRASTRUCTURE DEVELOPMENT – Galway Docks/Harbour Redevelopment

To whom it may concern,

A Chara,

This written submission should be read in conjunction with my earlier written submission made in respect of the proposed development regarding Galway Harbour Extension Renmore and Townparks, Townlands, Galway entitled *"Written Submission in respect of proposed Galway Port Development Plan pursuant to planning application ref. 61.PC0150 (PA0033)."* This submission re-iterates the serious and significant concerns previously raised vis-a-vis flooding impact on private dwellings along the following roadways in proximity and inclusive of my family home: 1-24 Frenchville, Grattan Road, Claddagh, Galway; 1-11 Grattan Road, Claddagh Galway, Claddagh Quay, Galway and Claddagh Hall, St. Mary's Claddagh Church; which this proposed development is likely to impact on a serious and significant scale as regards flooding and potential impact of flooding on our dwelings.

Response Submission

The issue of flooding is specifically referenced at pages 5 and 7 of the applicant's responding submission of the 17th April 2025.

At page 3 of the *"Response to Submissions Report"* the applicant (through its agents) have referenced as part of the primary concerns and objections advanced against the proposed development, our main concern, which is described in general terms as being *"relating to potential flooding and storm surge risks..." [emphasis added].*

At par 4.1.6 on page 7, the replying submission suggests that *"The proposed new harbour layout and design does not compromise any flood relief options that might be considered for the city. Importantly, the proposed development will not exacerbate costal and estuarine flooding and flood risk".* It is difficult to see how the proposed development could not have anything but a direct impact on flooding of what is a natural floodplain in its current state, having regard to its location and size (as is evident from the map attached and previous DVD which was submitted as real evidence of the concerns raised by the residence of the locality directly effected by flooding.

It remains unknown as to what *"relief options"* are suggested or referenced in the replying submission as they remain unidentified or unidentifiable. It further remains unclear as to when, if ever, these options might be considered being deployed (once such relief options have actually been identified). This is not being levied as a criticism but as an observation.

It is respectfully submitted that the response submission is based on an unknown hypothesis yet to be deployed and appears to be focused on some notional flood relief options that might be considered for the city at some future date. The position as regards flood defence systems has not changed since the holding of the oral hearing some 10 years ago.

The core concern from the residents point of view are very real and are primarily twofold:-

(a) Firstly, there are no flood defense systems in place at present to protect against costal and/or estuarine flooding for the houses along Frenchville, Grattan Road, and the surrounding roads adjacent to the park, known locally as *"the swamp"* or *"Southpark"* - which comprises of an open plane natural habitat and wetland which at present attempts to alleviate flooding and provide some drainage to the locality. The suggestion that this proposed development will not *"exacerbate"* the current (natural) floodplain, it is respectfully submitted, is so irrational, that it plainly flies in the face of fundamental reason and common sense, to borrow from a quotation was made by Henchy J. of the Supreme Court

in *The State (Keegan) v The Stardust Compensation Tribunal* [1986] I.R. 642 and followed subsequently in *O' Keeffe v An Bord Pleanala & Ors.* [1993] 1 I.R. 39 and is adopted as part of this submission.

(b) Secondly, the lack of flood defense systems as is in existence on the ground at present (and which has not changed since the holding of an oral hearing 10 years back in 2015) makes the location of the properties and dwellings and homes vulnerable and exposed to the elements and inclement weather conditions, which can only be exacerbated by a significant large scale development extending out into the ether of Galway Bay as is evident by the map attached at appendix 2.

A third issue relates to environmental factors relating to changes in weather patterns and increased storm surge as a combined core factors which are significant in the context of the scale, location and impact of the proposed development on the region.

It is submitted that there is a heightened concern amongst residents that the flooding impact of the proposed development poses a real and significant threat to the residents and homeowners of the Claddagh area affected and that this threat is borne out and highlighted with reference to the most recent Atlantic storm "Eowyn" and the findings of the research team at the University of Galway [comprised of Dr. Niall Madden, School of Mathematical and Statistical Sciences, Dr. Indiana Olbert, School of Engineering and Alexander Shchepelkin, School of Engineering] whose findings were reported at page 7 Galway City Tribune, Friday April 25th, 2025 [See Copy Attached - Appendix 1].

The reported research suggests that *"...at Galway Port, the storm surge peaked at 2.60m **above** the normal predicted astronomical tide, the highest ever recorded at this station since its operation began in 2007."*

The research further indicates from analysis that a rise in mean sea level rise will significantly increase the risk of coastal flooding in the future. This has to be a serious core evidential consideration when determining the extent of the large-scale development which has been proposed for Galway Harbour.

Given the new data available for interpretation, it is respectfully submitted that the EIS Water Chapter 8 data as referred to in paragraph 4.1.6 of the replying submission must be outdated and needs to be reconsidered in line with the latest scientific findings.

The coinciding full or flooding tide coupled with record high winds could only result in record high flooding and a development of this size can only exacerbate the threat and risk of flooding further in the future on a rational assessment of what has been put forward.

It is further submitted that there could be no overriding public interest in developing a project to the detriment of homeowners whose properties are likely to be significantly affected by the flood impact that this proposed development would have and is likely to have going forward.

It should be noted that whilst part 4 of the replying submission addresses specific submissions previously made by various interested groups, there is no specific response to the submissions made by or on behalf of the residents of the locality most likely to be affected by the proposed development and how those concerns should or could possibly be addressed with any certainty or assurance.

It is submitted that the objection to the proposed development is repeated in the strongest possible terms based on the concerns and submissions previously outlined herein with reference primarily to flooding issues and concerns for residential dwellings in the locality in addition to those other issues which were identified and canvassed in my prior written submission which I would respectfully ask the board to take into account as part of its overall considerations of the proposed development.

Appendix 1 - Galway City Tribune 25th April 2025
Appendix 2 - Map

By Email: laps@pleanala.ie

Date: 26th May 2025

Signed: Brendan Browne

Brendan & Larua Browne
13 Frenchville, Claddagh, Galway
Resident

CLOSE SHAVE!

Éowyn research reveals near-miss that could have left much of city under water

The University of Galway storm surge research team Dr Niall Madden, School of Mathematical and Statistical Sciences, Dr Indiana Olbert, School of Engineering, and Alexander Shchepetkin, School of Engineering, at the docks in Port of Galway

WE knew we were gripped in the storm of generation as it happened – but now a research team at the University of Galway has revealed how close we came to utter devastation as Storm Éowyn did its worst all along the west coast.

As it was, they confirmed what was evident from the impact – Storm Éowyn generated the highest storm surges ever recorded at key locations on Ireland's western seaboard.

The researchers revealed that, at Galway Port, the storm surge peaked at 2.60 metres above the normal predicted astronomical tide, the highest ever recorded at this station since its operation began in 2007.

The highest surge along the western coastline was recorded at Limerick Docks – reaching 2.99 metres above tidal level – and at Shannon Airport, the tidal gauge recorded surge of 2.70 metres.

Had these surges occurred a week earlier during the high-water spring tide, the water levels would have been much higher – with data predicting that the water level at Galway Port would have reached 4.96m, Limerick Dock at 5.85m, and Shannon Airport at 5.43m above average sea level – inundating the areas.

The university team has also produced maps showing whole swathes of the city and county would have been flooded in the event of water levels at 2.5 metres above normal.

All along the city's coastline, there would have been serious flooding, from Silverstrand to Ballyloughane, particularly severe in areas between Grattan Road and Renmore on the shores of Lough Atalia and including the city centre.

Large stretches of the county coastline, including Bearna and Oranmore, would also have been under water.

> "IN AN ODD WAY, WE WERE INCREDIBLY LUCKY"

Dr Niall Madden, Mathematical and Statistical Sciences at University of Galway, confirmed, that, in spite of how devastating Storm Éowyn was, "in an odd way, we were incredibly lucky".

"The worst of the storm surge coincided with a low and ebbing tide. Had it hit just a few hours earlier, on a full or flooding tide, Galway could have been dealing with a double disaster of record high winds and record high flooding," he said.

The team, based at the University's School of Engineering, analysed sea level information from 47 datasets provided by the Irish National Tide Gauge Network and the Office of Public Works.

That underlined the unprecedented power of the storm's surge – more than 2.5 metres above the normal predicted tidal water level.

Storm Éowyn, one of the most powerful storms to hit Ireland in recent years, also saw record-breaking winds. The highest gust recorded was 184 km/h, with the highest 10-minute wind speed reaching 142 km/h at Mace Head Atmospheric Research Station in County Galway.

The only positive outcome was that – despite the severity of Storm Éowyn in other ways and the devastation wrought by hurricane force winds and laying damage to power and water supplies – the timing of the tides during storm landfall meant little to no flooding impacts.

"The data we have recovered from the hours around Storm Éowyn shows just how narrowly tens of thousands of people avoided tidal inundation and threats to cities, towns and coastal communities said Dr Indiana Olbert, School of Engineering at University of Galway's College of Science and Engineering.

"It is hard to imagine how narrowly we avoided unprecedented storm surge flooding and an inundation, in particular in towns and cities," she added.

Overall, their extensive research suggests that flooding has increased in frequency and severity in recent decades around the world and this is attributed to climate change.

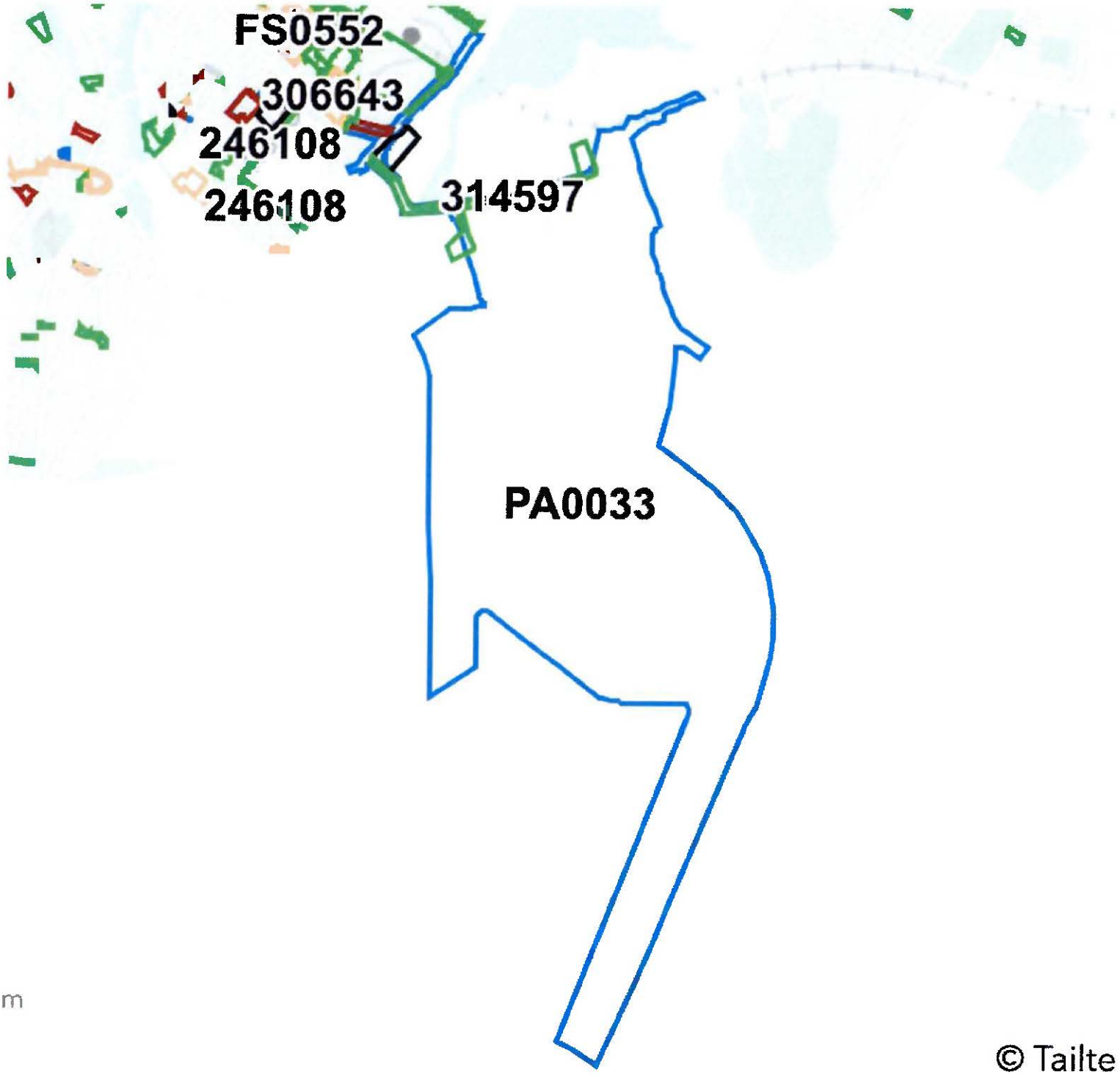
"Our analysis of the drivers of flooding in Ireland show that the anthropogenic climate change – that's the changes related to human activity – will drive more extreme rainfall and generate more intense flooding," said Dr Olbert.

"Such changes are likely to continue with further warming. In future we will witness more extreme weather events that will result in devastating floods.

"Our analysis also shows that a rise in mean sea level rise will significantly increase the risk of coastal flooding in the future.

This map of the Galway coastline shows how an increase of 2.5 metres in water levels during a storm surge would have left the areas of the city in red flooded.

PhotoScan by Google Photos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Harbour housing plans under spotlight after storm surge

By Maxim Kelly

Questions have been raised about flood defences for a proposed residential development on lands around the Port of Galway as academics publish new storm surge projections.

Last week the state owned Land Development Agency was given the green light to apply for planning permission for 356 apartments in four tower blocks on over six acres of lands stretching from the entrance through Arana to the Commercial Docks.

University of Galway storm surge research team, Dr Niall Madden, Dr Indiana Olbert, School of Engineering, and Alexander Shchepetkin. (Photo: Aengus McMahon)

Model imagery of the areas at risk of a 2.5m storm surge or sea level rise in the Galway Bay area (Credit: Climate Central)

Galway's docks flooded in 2017 during Storm Ophelia. (Photo: James Corbally)

INDUSTRY IN THE WEST

The Galway Advertiser are running an **Industry in the West** supplement on the 15th of May to highlight the diverse range of industries operating in the West of Ireland.

To advertise in this supplement please contact Maire on 091 530 951 or sales@galwayadvertiser.ie

Galway Advertiser

In January, tidal gauges at the docks recorded the largest ever storm surge due to Storm Eowyn, which battered the area during an ebbing tide. New modelling from the University of Galway predicts the possibility of massive flooding of the area if a storm of similar strength makes landfall at high tide.

Speaking in a private capacity, Derrick Hambleton, former chairman of An Taisce Galway said he was warned that Galway city's flood prevention measures are still only at a preliminary design stage, according to publicly available information from the Office of Public Works (OPW).

"I would be concerned about the implications for a number of current planning applications in the city that are perhaps vulnerable to any future storms, especially where flood prevention measures are unlikely to be in place inside the next ten years," he said.

The OPW commissioned JBA Consultants to draw up a report on flood prevention measures in 2015, but to date no infrastructure has been designed for Galway city's coastal areas.

The OPW says it has committed €100m per year expenditure on national flood prevention up to 2030. For comparison, the Scottish government spent €56m last year on just one coastal flood prevention scheme in the town of Millport including a 400m breakwater using 140,000 tons of rock armour.

Last year, the Environmental Protection Agency warned that urban areas of Galway were highly exposed to increased storm surges and coastal erosion due to sea level rises.

Planning officials in Galway City Council say they have not yet received a formal planning application from the LDA for its dockland project, expected to include buildings higher than five storeys.

"Where a development, including residential development, is proposed in identified flood risk areas in Galway City, the type or nature of the development needs to be carefully considered and the potential risks mitigated and managed through on-site location, layout and design of the development to reduce flood risk to an acceptable level," Planners said in a statement.

Recommendations from the Strategic Flood Risk Assessment (SFRA) elements of the city's development plan may be applicable alongside technical flood management recommendations published in ministerial guidelines 2009.

A spokesperson for the LDA did not respond to enquiries.