Our Case Number: PA0033

An Bord Pleanála

An Taisce
26 Manor Avenue
Kingston
Galway
H91 C98X

Date: 30 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,

pp

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

From: Derrick Hambleton <derrickhambleton59@gmail.com>
Sent: Tuesday, May 27, 2025 3:58 PM
To: Bord <bord@pleanala.ie>
Cc: Brendan Mulligan <mulliganbrendan56@gmail.com>; Peter Butler <peterbutle@gmail.com>; Mark <Mark.Green@amicustec.ie>
Subject: Galway Harbour Compamy - Extension to Galway Port . Pl Ref No 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.

Dear Sirs,

Please accept and acknowledge receipt, in due course, of this attached pdf, as An Taisce submission in response to Tobin Consulting Engineers comments of 22nd April 2025.

Yours faithfully

D Hambleton
secretary

Galway Association of An Taisce - Planning Committee.

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

An Bord Pleanála,
64 Marlborough Street,
Dublin 1. D01 V02

27 May 2025

Re: 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

Response to the issues raised in Tobin Consulting Engineers' Response to Further Information submissions dated 17 April 2025

A chara,

An Taisce addresses below Issues 1-9 raised by Tobin Consulting Engineers in its response dated 17th April 2025 to An Taisce Galway Association's submission on the Further Information submitted by the Applicant to An Bord Pleanála.

Issue 1

Tobin focuses on Operational Carbon Emissions. It does not address at all the concern that An Taisce raised in relation to the Embodied Carbon in the proposed development in Section 4.3 of its submission.

The Do-Nothing Scenario assumes that 'Business as Usual' would continue at the port. Given the development at other ports of much improved facilities, with access to deeper water for larger cargo vessels, and for servicing the offshore wind industry elsewhere in Ireland since the application for this development was first submitted in

2014, it is unlikely that 'Business as Usual' will continue in this port at the same level as heretofore.

It is likely that the Supreme Court will clarify matters raised in the Coolglass Judgment in the next few months.

Issue 2

Tobin noted in its response *"the main alternatives for the Proposed Development have been addressed and properly considered ..... as part of the Oral Hearing into the Project and the Board's consideration of the matter at that time."* The oral hearing was held in 2014, 11 years ago. In Section 1 of its submission, An Taisce set out the very much changed context now prevailing since the date of the oral hearing. It also set out in Section 2 of its submission other significant developments already completed, underway or committed to at Ports in Ireland to facilitate Offshore Renewable Energy. This is addressed further by An Taisce in Section 4.1 The "need" for the proposed development of its submission. These same ports either have already or will have enhanced facilities for cargo handling.

Issue 3

The delivery of a rail connection to the port is not within the control of the applicant. The Shannon Foynes Port will have a connection to the mainline rail network in 2026.

The 'All-Island Strategic Rail Review – Final Report', published in July 2024, includes the following recommendation:

"Strengthen rail connectivity to the island's busiest ports where links are feasible and improve access to ports that currently are underserved by rail freight, including Foynes for Limerick, Waterford, Marino Point for Cork, and Rosslare Europort (in the longer term, when LoLo operations are feasible here, or, in the shorter term following analysis of the feasibility of RoRo rail freight)."

It is very unlikely that Galway Harbour will ever have a direct rail connection. The current level of freight activity, or the likely future level of freight activity, would not justify a rail connection.

An increase in the use the Port of Galway for the import and export of goods would mean that an increased number of HGV's would come into the centre of the most congested city in Ireland, through residential areas, to access the port. The findings in relation to Galway Metropolitan Area (GMA) in the recent report from the Department of Transport, 'The Economic Cost of Congestion in the Regional Cities 2022-2040', are that *"the cost of congestion is projected to grow from €35.3 million in 2022 to €106.9 million*

in 2040, which is an increase of approximately 203% in the Core Growth Scenario", and *"that the GMA will be likely to experience congestion throughout the day."* The cost of congestion is expressed in 2016 prices.

The provision of a rail freight hub at Athenry will mean there will be no need for HGV's to access Galway Port to export or import goods. There will be access for rail freight to and from several other ports in Ireland via the proposed freight hub at Athenry.

Issue 4

The focus in Tobin's response is on the serviceability of the project. An Taisce is not unduly concerned with the serviceability of this *"water-compatible type development"*. The risk of inundation is a matter for the applicant. An Taisce is concerned, however, about what happens to the surrounding properties in the vicinity if the proposed development is inundated. Where will the water that inundates the proposed development be driven? Will it be driven into the surrounding low-lying areas of the city which are not *"water-compatible"*?

Issue 5

The response refers to *"the recent historical maximum recorded tidal flood level of 3.78mOD recorded at the Port of Galway gauge on 13 November 2023 (Storm Debi)."* Storm Debi caused extensive flooding and damage in Salthill, Galway City and Clarinbridge. It could have been worse had the associated storm surge coincided with high spring tides.

While the tidal flood level recorded during Storm Debi was higher than that which occurred during Storm Éowyn, it was down to good luck that catastrophic flooding was avoided in Galway due to the much higher storm surge of the order of 2.6m that occurred during it.

It appears from Tobin's response that Tobin is significantly downplaying the significance of the storm surge that occurred during Storm Éowyn.

A University of Galway research team issued a Press Release on the 22 April 2025 in which it revealed that *"Storm Éowyn generated the highest storm surges ever recorded at key locations on Ireland's western seaboard."* The research team stated that *"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."*

The research team's predicted water level of 4.96m is 1.18m higher than *"the historical maximum observed tidal flood level at the Port of Galway"* of 3.78m OD associated with the Storm Debi event in 2023 referred to by Tobin.

Tobin eventually acknowledge the approximate magnitude of the storm surge by stating that *"In a worst case Scenario, if it had coincided with a mean spring tide exactly at high water, then the peak flood level using the estimated surge profile could have reached 4.83m OD Malin."* This is merely 0.13m below the water level of 4.96m predicted by the University of Galway research team. The fact that Tobin used *"mean spring tide level"* may account for the difference of 0.13m.

Dr Niall Madden, a member of the research team at University of Galway, said: *"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."*

Dr Indiana Olbert, another member of the research team, observed that *"The data that 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."* Dr Olbert predicted that *"in future we will witness more extreme weather events that will result in devastating floods."*

The response by Tobin states that *"The profile of the storm surge as presented in the An Taisce submission is an over simplistic representation."* The storm surge profile in An Taisce's submission is a profile that was published by Tony Cawley, the author of the response to An Bord Pleanála, EIS Addendum Sept. 2024 Chapter 8 Water. It was Tony Cawley who produced this surge profile, not An Taisce.

In his post on LinkedIn in the days after Storm Éowyn, Tony Cawley wrote the following as well as posting the surge profile:

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

Tobin suggest that the alignment of storm surges and high astronomical tides are *"extremely rare representing a very low combined probability."* An Taisce notes that a storm surge of 1.6m occurred during Storm Ophelia in 2018, 30m minutes before high tide. It resulted in flooding of the Docks, Spanish Arch and Salthill Promenade. Luckily, it dissipated quickly. The storm surge associated with Storm Debi in 2023, resulted in flooding in Salthill, Galway city and Clarinbridge. Tobin seems to suggest that the residents of Galway should just continue to ride their luck and hope that storm surges will not coincide with the occurrence of spring tides.

Sea level rise is occurring at an increasing rate due to the accelerating melting of polar ice caps and thermal expansion of the oceans due to global warming. There is huge uncertainty about the scale of sea level rise that will occur in the coming years, but a prudent approach would be advisable. An Taisce is of the opinion that insufficient provision has been made for future sea level rise.

As in our submission to An Bord Pleanála, 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.

Issue 6

Tobin refers to the 'Coirib go Cósta' Flood Relief Scheme. An Taisce did not, because the scheme is only at Stage 1 of five stages.

A presentation on the 'Coirib go Cósta' scheme was given to the Project Development SPC of Galway City Council last February. It was expected at that time that detailed design will commence in 2029, and construction will commence in 2030.

How can Tobin say with any certainty that *"The proposed new harbour layout and design does not compromise any potential flood relief scheme that might be considered for Galway city"*, given that the 'Coirib go Cósta' Scheme is only at Stage 1 of a five-stage process?

Tobin refer to the Hydrodynamic analysis in the original EIS Water Chapter 8 which was *"reviewed by an independent marine expert on behalf of An BP who attended the oral hearing for the scheme."* That was 11 years ago – much has changed since. An Taisce respectfully suggest that a further analysis now would be advised given the current state of knowledge about climate change, accelerating sea level rise and more frequent and severe storms with associated storm surges.

Issue 7

Tobin claims that 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.

Tobin claims that the compensatory measures are additional to actions that are normal practice under the Birds or Habitats Directive or those actions that the State may be obliged to do by reason of European Law.

An Taisce submits that the proposed restorations and measures are no more the measures which Ireland should have applied long before now to these areas because they are part of the Galway Bay SAC.

Tobin claims that the proposed measures are intended to and designed to offset the impacts of the Project so that the overall ecological coherence of the Natura 2000 Network is maintained.

An Taisce submits that the planned destruction of an area of the Galway Bay SAC to build the proposed development cannot be equated to questionable improvements to some other area of the Galway Bay SAC. If that principle were to be accepted, no part of any Special Area of Conservation would be protected from destruction for any development.

Issue 8

An Taisce has seen many "Confirmations of Feasibility" issued by Uisce Éireann to developers in relation to connections of proposed developments to the wastewater drainage network in the Galway Agglomeration where there is actually no capacity in the drainage network. There has been no significant investment in the wastewater drainage network for more that 20 years. Uisce Éireann submitted its Draft Capital Investment Plan 2025-2029 to the CRU last October. The CRU has still not issued a decision yet, so it is not yet known what, if any at all, capital investment in the wastewater drainage network will be provided for over the next four years. No remedial works have been carried out on the larger of the two siphons, which was found in May 2024 to have structural defects which mean it *"is at risk of collapse at any time."* The two siphons together convey all of the wastewater arising from east of the River Corrib under the river for treatment at the Mutton Island WWTP, including that which will arise from this proposed development,

Tobin made no specific responses to the many significant concerns An Taisce has about deficiencies in wastewater network in Section 4.5 of its submission to An Bord Pleanála.

Issue 9

Tobin has completely avoided addressing An Taisce's concerns about the embodied carbon in the proposed development. Tobin has attempted to deflect attention away

from the issue of embodied carbon in the proposed development by instead referring to operational carbon emissions only.

An Taisce requests that An Bord Pleanála consider the scale of the embodied carbon in the proposed development and what other more necessary developments might have to be foregone, such as building badly needed homes, to enable compliance with the mandatory Carbon Budgets.

The Appropriate Decision for An Bord Pleanála to make

The Planning Committee of the Galway Association of An Taisce respectfully submits that, taking all the evidence in this response and in previous submissions by An Taisce into account, the appropriate decision or An Bord Pleanála to make would be to refuse permission for the proposed development.

Is mise, le meas,

Derrick Hambleton

An Taisce, Galway Association - Planning Committee

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