

Galway Harbour Company



Galway Harbour Extension

Response to An Bord Pleanála Sept. 2024

EIS Addendum Chapter 2

Planning & Policy Context



Table of Contents

2.	PLANNING AND POLICY CONTEXT	2
2.1.	INTRODUCTION.....	2
2.2.	REPORT FORMAT	2
2.3.	REVIEW OF ANY MATERIAL CHANGES TO THE ORIGINAL EIS CHAPTER	2
2.4.	SUMMARY OF CONCLUSIONS OF ORIGINAL CHAPTER IN EIS	3
2.5.	ADDITIONAL POLICY DEVELOPMENTS OF RELEVANCE	4
2.5.1.	<i>European Policy Context</i>	4
2.5.2.	<i>National Policy Context</i>	7
2.5.3.	<i>Regional Policy Context</i>	14
2.5.4.	<i>Local Planning Policy</i>	15
2.6.	ASSESSMENT OF VALIDITY OF EARLIER CONCLUSIONS OR ANY NECESSARY AMENDMENTS TO SAME	22
2.7.	RELEVANT PLANNING HISTORY WITHIN THE APPLICATION BOUNDARY	22
2.8.	PLANNING HISTORY WITHIN THE VICINITY OF THE SUBJECT SITE	23
2.9.	CUMULATIVE IMPACT ASSESSMENT	25
2.9.1.	<i>Methodology for the Cumulative Assessment of Projects</i>	26
2.10.	CONCLUSION.....	26

2. Planning and Policy Context

2.1. Introduction

Chapter 2 of the original Environmental Impact Statement (“EIS”) sets out the planning context for the proposed development. It identifies the key relevant planning policy documents and assesses how the proposed development supports the stated policies and objectives of these strategies and plans. In addition, it includes a review of the relevant planning application history within and adjacent to the site of the proposed development. This chapter provides a summary of relevant European, national, regional and local policies and objectives that relate to the location and development of the Galway Harbour Extension. In particular, this chapter considers whether the findings that the Galway Harbour Extension is supported by existing planning and port-related policies and objectives remains valid as of the present time.

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2.2. Report Format

This update to the original EIS includes a review of any changes to the original EIS chapter, a summary of conclusions of the original EIS chapter, an overview of additional policies of relevance, an Assessment of the validity of earlier conclusions or any necessary amendments to same, cumulative impact assessment and methodology, followed by a conclusion.

2.3. Review of any material changes to the original EIS chapter

The purpose of this section is to analyse the current planning and policy context of ports and harbours at various levels, from international to local, particularly in the context of Galway Harbour, in order to determine whether the proposed development aligns with key policy and development objectives. The planning and policy documents reviewed are listed below:

- Trans European Network – Transport (TEN-T) (effective from July, 2024)

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- EU: Maritime Spatial Planning (MSP)
 - National Planning Framework: Project Ireland 2040
 - National Development Plan 2021-2030
 - National Ports Policy 2013
 - Irish Ports Capacity Study 2023
 - National Marine Planning Framework 2021
 - Northern and Western Regional Assembly (RSES) 2020-2032
 - Galway City Development Plan 2023-2029
 - Galway Transport Strategy 2016

2.4. Summary of conclusions of original chapter in EIS

The original EIS Chapter 2 identifies the key relevant planning policy documents and assesses how the proposed development supports the stated policies and objectives of these strategies and plans. In addition, it includes a review of relevant planning application history within and adjacent to the site of the proposed development. The relevant EIS Chapter included a review of the following planning context policy documents:

- > European Policy Context
- > Smarter Travel – A Sustainable Alternative Transport Policy 2009-2020
- > National Spatial Strategy 2002-2020
- > National Development Plan 2007-2013
- > National Ports Policy 2013
- > Regional Planning Guidelines for the West Region 2010-2022
- > Galway City Development Plan 2011-2017

The summary of the original planning context is as follows:

Impacts

In terms of planning policy context, the proposed development is consistent with European, national, regional and local policy objectives. The impact of the proposed development is therefore positive in this regard, representing the realisation of current policy objectives. In the event that the proposed development did not proceed (i.e. the “do nothing” scenario),

established planning policy objectives would be frustrated by the decline of harbour-related business and commerce in Galway.

Mitigations

The proposed development is fully supported by general and specific planning policy objectives, including those in the National Development Plan, Regional Planning Guidelines and the City Development Plan. There is therefore no need for any mitigation measures in this regard.

Conclusions

The proposed Galway Harbour Extension is consistent with the relevant planning policies and objectives outlined above, including the National Spatial Strategy, National Development Plan, Ports Policy Statement, Regional Planning Guidelines and Galway City Development Plan. In this regard, the proposed development is fully supported by the specific objectives included in the Regional Planning Guidelines and the City Development Plan. In addition, the proposed Galway Harbour Extension is in the interests of balanced regional development and will further ensure the long-term strategic role of Galway City as a Gateway city.

Overall, it is considered that the proposed development of the Galway Harbour Extension is in line with the relevant national, regional and local planning and regional development policies and objectives contained in the above documentation.

2.5. Additional policy developments of relevance

Planning and Policy Context Update

A number of policy updates have occurred since the original EIS was submitted, in addition to the provision of new policy documents, which are set out in this addendum. This section provides a summary of relevant current European, National, Regional and Local policies and objectives that relate to the location and development of ports and port businesses and to Galway Harbour in particular. In particular, this chapter reviews whether the expansion of Galway Harbour continues to be supported by planning and port-related policies and objectives.

2.5.1. European Policy Context

2.5.1.1. Trans European Network – Transport (“TEN-T”)

The trans-European transport network (“TEN-T”) is a Europe-wide network of roads, rail lines, ports and airports. The EU has defined a Trans European Network-Transport (“TEN-T”) which connects the major European urban areas and includes the major European transport corridors and multimodal

hubs. The TEN-T policy is based on Regulation (EU) 2024/1679, effective from July, 2024. The TEN-T network provides integrated international long-distance high-speed routes. The network involves the provision of guidance and investment.

The TEN-T network of July 2024 includes the Port of Galway as a comprehensive Port for the first time (See TEN-T Map OF July 2024 in Figure 2.1 below).

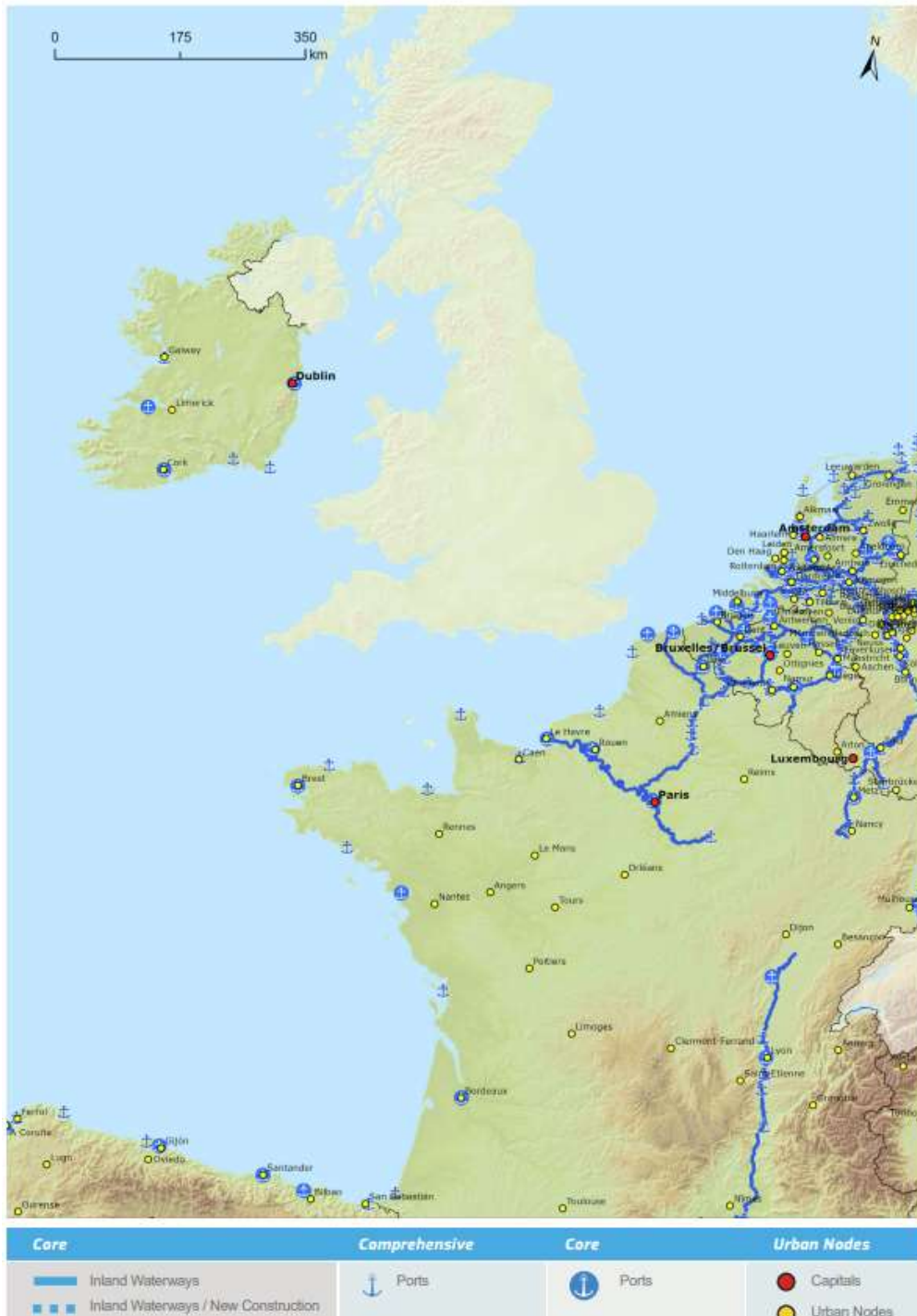


Figure 2.1: TEN-T Map.

Source:

https://transport.ec.europa.eu/document/download/b2f02275-f1d3-49a9-97b4-5c456e42dddb_en?filename=Annex1_ComprehensiveExtendedCore_ntw.pdf

The programme envisages coordinated improvements to transport infrastructure thereby creating integrated and intermodal long-distance, high-speed corridors. ‘Motorways of the Sea’ are considered the maritime pillar of the TEN-T and contribute towards the achievement of a European Maritime Transport Space without barriers, connecting Core Network Corridors by integrating the maritime leg and also facilitating maritime freight transport with neighbouring countries.

The TEN-T sets out urban nodes in Section 7 Article 40 which comprise “access points to the trans-European transport network, which are open to all operators and users in a non-discriminatory way, notably ports, airports as well as railway stations, bus terminals and multimodal freight terminals.” Annex II of the TEN-T document sets out the list of nodes of the Trans-European Transport Network in which Galway is included as an urban node.

2.5.1.2. Maritime Spatial Planning

In 2014 the adoption of Directive 2014/89/EU established an EU-wide framework for maritime spatial planning. The directive details the main goals and minimum requirements for Member States as follows:

- Balanced and sustainable territorial development of marine waters and coastal zones;
- Optimised development of maritime activities and business climate;
- Better adaptation to risks; and
- Resource-efficient and integrated coastal and maritime development.

Maritime spatial planning may be defined as a process by which the relevant Member State’s authorities analyse and organise human activities in marine areas to achieve ecological, economic and social objectives’ (Directive 2014/89/EU). Ireland transposed the Directive through the European Union (Framework for Maritime Spatial Planning) Regulations 2016, which was signed into law on 29th June 2016. Ireland’s *National Marine Planning Framework (2021)* is discussed below in section 1.4.2.5 of this addendum.

2.5.2. National Policy Context

2.5.2.1. National Planning Framework: Project Ireland 2040

Section 7.3 of the *National Planning Framework: Project Ireland 2040* (“NPF 2040”) acknowledges the strategic role of Ireland’s ports in terms of their role as enablers of economic growth, stating that “*Irish ports are critical infrastructure for international trade with over 90% of our international trade moving by sea. Ports also serve as logistics and distribution hubs*”. Section 7.3 emphasises the need for ports to be well-connected with other transport modes, such as road, rail and air, to facilitate efficient logistics and supply chains.

Modernisation and expansion of port and harbour infrastructure are key priorities, with the NPF (2040) supporting investments to handle increased volumes of trade. This is aimed at enhancing the capacity and operational efficiency of ports and harbours, ensuring that they can meet future demands. Environmental sustainability is also a major focus, with the framework stressing the importance of adopting cleaner technologies and practices to reduce emissions and mitigate the environmental impacts of port activities. Protecting marine and coastal environments from the adverse effects of port operations is a critical component of this strategy. The need for ports to be integrated with national and regional planning strategies to ensure cohesive and sustainable growth is highlighted. Aligning port development with urban development plans supports balanced regional development and urban regeneration. Further to this, the development of intermodal transport solutions is encouraged to optimise the movement of goods and reduce road network congestion.

Adapting to climate change is another important aspect, with the NPF (2040) emphasising the need for ports to incorporate resilience and adaptation measures to address impacts such as rising sea levels and extreme weather events. Investment in infrastructure that enhances long-term sustainability and operational sustainability of ports and harbours is promoted.

The framework also recognises the importance of regional ports in supporting local economies and contributing to balanced regional development. The development and enhancement of regional ports are encouraged to support local industry, tourism, and employment. Furthermore, the NPF (2040) highlights the role of ports in enhancing Ireland's competitiveness in the global market by facilitating efficient and cost-effective trade routes. Initiatives that strengthen the economic viability and competitiveness of Irish ports are supported.

The NPF (2040) recognises Galway Harbour as a key port for the western region, with a focus on its strategic role in regional development. The framework supports the expansion and development of Galway Harbour to enhance its capacity and capability, enabling it to handle increased volumes of cargo and vessels. The importance of Galway Harbour in fostering economic development and facilitating international trade is also recognised, and it is therefore seen as a critical element in enhancing the economic vitality of Galway City and the surrounding area. This is acknowledged in Section 7.3 of the NPF (2040) which states that *“Other ports of regional significance, such as Galway and Drogheda, have an important role for regional employment and services and many smaller harbours serve rural and island communities. In addition to commercial freight, such ports support marine sectors that are dependent of local natural resources, such as fisheries, marine renewable energy, and marine tourism.”*

The NPF (2040) also highlights the need for the harbour’s development to be integrated within the urban development of Galway city and encourages the alignment of the harbour expansion with broader urban planning goals to ensure cohesive and sustainable growth. This is illustrated in the key future growth enablers for Galway, including:

- *“Delivering a number of regeneration projects **to extend and intensify the City Centre**, including the Station, **Docks** and Headford Road areas;*

Overall, the NPF (2040) envisions Galway Harbour as a central hub for regional development, economic growth and sustainable practices. The strategic development of the harbour is intended to boost Galway’s connectivity, competitiveness and resilience while integrating seamlessly with the city’s local development plan.

2.5.2.2. National Development Plan 2021-2030

The *National Development Plan (2021-2030)* (“NDP”), outlines a comprehensive framework for investment in Ireland’s infrastructure, including ports and harbours. There is a strong focus on promoting sustainable practices in port and harbour operations, including the adoption of cleaner technologies and energy-efficient systems to reduce environmental impacts, such as emissions and pollution. The plan supports initiatives that aim to protect marine and coastal environments, ensuring that port activities do not adversely affect natural habitats. The NDP also stresses the need for ports to be resilient to the impacts of climate change, and investments in this type of infrastructure are aimed at ensuring long-term sustainability and operational continuity. This is recognised in Chapter 11 of the NDP, which states that *“In line with the European Green Deal, airports and ports are already identifying pathways towards achieving net zero carbon emissions by 2050. Measures include improved energy efficiency of airports and port infrastructure and related services, on-site generation of the renewable energy, and alternatives to carbon-based fuels as technology improves”*, highlighting strategies of both climate change adaptation and mitigation through the increased and evolved use of ports and harbours.

Improving connectivity to and from ports is a key focus of the NDP. This includes enhancing road, rail and maritime links to facilitate efficient transport networks that integrate with national and international logistics chains. Better connectivity is expected to optimise port operations and support seamless intermodal transport solutions. Stemming from improved connectivity is increased economic resilience. Enhancing the competitiveness of Irish harbours and ports is a major priority, as these are seen as critical infrastructure for supporting Ireland’s economy, and their development is aligned with broader economic growth strategy. The role of regional ports is also explicitly recognised in promoting balanced development. Investments in regional ports are aimed at supporting local

economies, boosting tourism and creating employment opportunities. This is acknowledged in Chapter 7 of the NDP, which states that *“The importance of ports and airports in the context of regional connectivity continues to be of strategic importance, particularly the need to improve connectivity to State airports and ports in the NorthWest”*. This demonstrates the aim of the NDP to encourage regional ports such as the Galway Harbour to enhance their role in regional supply chains and local industry support.

Overall, the NDP recognises Ireland’s ports and harbours as strategically important assets for Ireland’s economic and social infrastructure, by outlining and recognising their critical roles in supporting national goals for trade, tourism, and local, regional and national development.

2.5.2.3. National Ports Policy 2013

The core objective of *National Ports Policy 2013* (“NPP”) is to facilitate a competitive and effective market for maritime transport services. The long-term international trend in ports and shipping is to consolidate resources in order to achieve optimum efficiencies of scale. The NPP is designed to ensure that the ports sector is capable of responding to global trends. For ports that have a limited future in commercial shipping over the medium to long term, a development framework that best suits their individual circumstances is required. It is crucial to note that Ireland’s ports differ greatly in current capability and future potential. This NPP therefore recognises the role played by all our ports, while acknowledging the differences between them, in order to maximise capabilities that will lead to enhanced socio-economic development of regions and the nation.

The NPP notes that Galway Harbour Company is a bulk port which caters primarily for liquid-bulk products, and the harbour is an important strategic regional hub for petroleum importation, storage and distribution. However, declining throughput levels have led to increasing reliance on non-core port activities as revenue streams. The company now derives over 50% of its revenue from non-core port activities. This highlights a key opportunity for expansion in order to enhance socio-economic competitiveness. The NPP states that the location of the harbour close to Galway’s city centre limits its potential for further expansion in terms of increasing trade. However, the inner harbour is an immensely attractive location for the development of marine tourism and leisure facilities, in particular a marina, as well as for urban redevelopment, highlighting its significant potential for enhanced growth, as well as a key regional economic contributor.

2.5.2.4. Review of the National Ports Policy 2023 – Issues Paper

The National Ports Policy provides the overarching policy framework for the governance and future development of Ireland's state port network. Since its introduction in 2013, the National Ports Policy has played a pivotal role in fostering competition among ports and reducing barriers for shipping

companies entering the Irish market. With the increasing environmental, technological, demographic, and geopolitical challenges facing the maritime sector, a revised approach is required to effectively address the needs of our ports in the coming decade. A new roadmap is needed not only to navigate these challenges successfully but to capitalise on the new opportunities they present.

The current National Ports Policy was approved by Government in 2013. This was at a time when Ireland, and its port sector, were still dealing with the consequences of the financial crisis. Over the subsequent ten years, the broad objectives outlined by the policy have been achieved. Ports have been categorised in order of National Significance, a move that aligned our ports with the emerging EU trans-European Transport Network (Ten-T Network).

Galway Harbour is listed as a port of Regional Significance in the Issues Paper.

2.5.2.5. Irish Ports Capacity Study 2023

The *Irish Ports Capacity Study (2023)* assesses the capacity within the port system (all-island) to meet present and future demand over the period to 2040, as required in the National Ports Policy (NPP) 2013. The study covered all Irish Ports categorised in the NPP as Tier 1 and Tier 2 ports, as well as those of regional significance, with the exception of New Ross. The key objective of the study was to develop a standardised approach to demand and capacity assessment for the Irish ports going forward. The baseline analysis was undertaken in 2018 using Eurostat data from 2017 and information received from the ports in June 2018.

The study considers Galway Harbour to be of ‘regional significance’; however, it identifies the need for significant investment to enhance its capacity. This includes improving its infrastructure to handle larger vessels and increasing its cargo handling capabilities to meet projected demand growth. Galway Harbour’s role in supporting the regional economy of the west is recognised; the study, however, emphasises that, by expanding its capacity and improving connectivity with inland transport networks, the harbour can better facilitate trade and contribute to economic growth.

As part of the broader strategy for all Irish ports, the study emphasises the importance of integrating sustainable practices. For Galway Harbour, this means investing in green technologies and infrastructure that minimise environmental impacts and align with national and EU climate goals. Stemming from this, Galway Harbour’s strategic location on the west coast positions it as a key player in the maritime network, capable of supporting Ireland’s offshore renewable energy projects and enhancing connectivity with international markets.

The study also outlines key risks to Ireland’s ports, including Galway Harbour, such as operational and infrastructure deficits leading to underinvestment causing capacity deficit, lack of funding hindering capacity increase, risk of delays with planning consent or planning permission refusal, as well as

climate-related regulations and impacts. This highlights the importance of addressing these issues in the context of Galway Harbour in order to facilitate increased capacity growth that will subsequently promote economic competitiveness of the city and wider northwest region.

2.5.2.6. National Marine Planning Framework 2021

Chapter 18 of the *National Marine Planning Framework 2021* (“NMPF”) explicitly references planning policies and objectives relating to ports, harbours and shipping. The four key objectives for ports and harbours are set out below:

- *“Safeguard the operation of ports as key actors in the economic wellbeing of the State through the provision of safe and sustainable maritime transport.*
- *Facilitate a competitive and effective market for maritime transport services.*
- *Sustainable development of the ports sector and full realisation of the National Ports Policy with a view to providing adequate capacity to meet present and future demand, and to adapt to the consequences of climate change.*
- *Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, and smaller harbours are appropriately addressed in regional and local marine planning policy”*

The framework has a strong focus on sustainable development practices. Ports and harbours are encouraged to adopt green technologies and practices that reduce environmental impacts, such as improving energy efficiency, reducing emissions and enhancing waste management systems. This aligns with national and EU climate goals, and is embedded in policy in *Ports, Harbours and Shipping Policy 2*, which states that *“Proposals that may have a significant impact upon current activity and future opportunity for expansion of port and harbour activities should demonstrate that they will, in order of preference: a) avoid, b) minimise, or c) mitigate significant adverse impacts, and d) if it is not possible to mitigate significant adverse impacts on current activity and future opportunity for expansion of port and harbour activities, proposals should set out the reasons for proceeding.”*

The framework recognises the key role of Galway Harbour as a regionally significant, stating that *“It is important to recognise that all ports play a role in servicing the Irish economy, with regional ports supporting the role of Tier 1 and Tier 2 ports, as well their local and regional hinterlands. While ports of national significance are key international gateways, there is potential for other ports to complement those roles and ensure the continued sustainable development and growth of our economy at a national as well as regional level.”* Galway Harbour, as well as a number of other regional and nationally significant ports, all play a role in contributing to the national economy by facilitating trade and supporting industries such as fishing, aquaculture and tourism. This is explicitly recognised

in Chapter 18 which notes that *“The ports of Regional Significance play important local roles as a facilitator of the regional economy”*. The NMPF therefore highlights the need for strategic investments to ensure that ports can continue to support and enhance economic growth as well as regional and national development.

Overall, the NMPF 2021 provides a strategic vision and policy framework to guide the sustainable development of Ireland’s ports and harbours, ensuring that they can meet future demands to support economic growth whilst simultaneously protecting the marine environment.

2.5.2.7. Climate Action Plan 2024

The Climate Action Plan 2024 (“CAP24”) is the third annual update to Ireland’s Climate Action Plan.

The purpose of the Climate Action Plan is to lay out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

The impacts of climate change are already evident in Ireland, with record temperatures experienced in June 2023, pluvial flooding events affecting communities, along with significant effects on our coastlines, land use and natural resources. In addition to reducing emissions, urgent acceleration of adaptation efforts is required to minimize risks and build resilience to the locked-in impacts of climate change. The 2018 National Adaptation Framework and the 2019 Sectoral Adaptation Plans established the strategic direction for adaptation in Ireland. The Government will shortly consider the adoption of a new National Adaptation Framework. This will underpin a new cycle of revised Sectoral Adaptation Plans informed by the first National Climate Change Risk Assessment. Adaptation will be further progressed through the implementation of local authority Climate Action Plans, which will integrate adaptation into local policymaking.

The Current and Future Actions include;

- Rapid and significant reductions in Greenhouse Gas emissions (“GHG”) are required if we are to meet the 2015 Paris Agreement Goals
- The European Green Deal commits to delivering net-zero GHG emissions at EU level by 2050; with Ireland committed to achieving a 51% reduction in emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050
- While the benefits of transitioning to a low carbon economy are increasingly being recognised, action to reduce emissions must be significantly accelerated in the period to 2030
- Ireland must act now to secure an economy-wide low carbon future for all its citizens

The Expected Outcomes of the Climate Action Plan 2024 is for the plan to set out a roadmap to deliver on Ireland’s climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022.

The proposed Galway Harbour Extension will positively contribute to the strategies and goals set out in the National Climate Action Plan 2024. The proposal will accommodate inter-modal transport, facilitate offshore and onshore renewable energy projects which will positively support the delivery of the goals and objectives set out in the Climate Action Plan 2024. The proposal also includes a Freight rail link to enable freight and cargo to be efficiently transported to and from the Galway Harbour Extension, when viable, to allow positive road traffic and environmental benefits.

2.5.3. Regional Policy Context

2.5.3.1. Northern and Western Regional Assembly (RSES) 2020-2032

The *Northern and Western Regional Assembly Regional Spatial & Economic Strategy* (“RSES”) 2020-2032 outlines a comprehensive plan for the economic development of Galway and the wider northwestern region. The strategy highlights the importance of the harbour within the broader regional and national context, emphasising its role in supporting economic growth, improving connectivity, and supporting sustainable development.

The RSES acknowledges Galway Harbour as a critical asset for the regional economy, stating that *“Galway Harbour is ideally placed along the western seaboard to tap into emerging marine enterprises in particular, in the sustainable energy sector and offshore renewable energy. The harbour is an important facility serving the City and wider region”*.

The RSES further state that the proposals for redevelopment and extension of the Galway Harbour *“is of strategic importance and has the potential to contribute significantly to the economy of both the City and the region, increasing connectivity and contributing to the tourism, enterprise and offshore energy sectors”*.

Regional Policy Objective (“RPO”) 3.6.4 states that *“The Assembly support the regeneration and development of city centre sites at Galway Harbour, Ceannt Station and Headford Road (S/M).”*

The strategy includes objectives to enhance the harbour's infrastructure, enabling it to handle increased cargo volumes and larger vessels, which is crucial for accommodating future economic activities and ensuring competitiveness. This is demonstrated through the following policy objectives:

- **RPO 4.5:** To enhance access to our tourist assets, including the development of a Coastal Walking/Cycling Route along the Western Seaboard, which extends generally along the Route

of the Wild Atlantic Way (“WAW”), and incorporates existing resources, such as beaches, ports, harbours, piers and marinas.

- **RPO 4.35:** To support the ongoing upgrade and improvement of the region’s harbours and ports and ensure the sustainable development of this infrastructure to enable aquaculture and seafood industry expansion responsively.
- **RPO 4.36:** To support the sustainable expansion and upgrade of Galway Harbour and Galway Port as part of the overall vision to grow Galway as a City Region.

In addition, the RSES notes that "The upgrade of Galway Harbour and Port continues to represent a key strategic priority for the Western Region. The ambition to upgrade Galway Port will allow for the facility to serve a dual role as a commercial port for cargo, and also a destination point for cruise tourism. This upscaling of the facility would increase Galway Ports influence (and spin-off) across the wider region in terms of recreation and delivery of additional visitors into Galway City and beyond. The Marine Institute and Ryan Institute at NUIG are additional key resources in the Marine sector." This highlights the importance of investment into Galway Harbour, in order to continue to enhance its socio-economic offerings to the city and wider regional area, including the possibilities of offshore wind.

In alignment with the NPF and the NDP, the RSES aims to develop Galway Harbour in a way that integrates with the city's growth strategy. This involves leveraging the harbour's strategic location to boost regional economic development and enhance Galway's status as a major urban centre outside of Dublin. The RSES notes that this is crucial for overall competitiveness and addressing opportunities through investment in the island's ports and harbours.

Furthermore, the strategy promotes sustainable practices within the harbour's operations. This includes adopting green technologies and improving environmental management to minimize the ecological impact of port activities, aligning with broader climate action goals.

Overall, the RSES positions Galway Harbour as a key component in the region's economic and spatial development framework, emphasizing its role in driving growth, enhancing connectivity, and supporting sustainable development initiatives.

2.5.4. Local Planning Policy

2.5.4.1. Galway City Development Plan 2023-2029

The *Galway City Development Plan 2023-2029* (“GCDP”) provides a policy framework to guide the future growth of the City to 2029 and into the longer term. The process of reviewing the *Galway City Development Plan 2017-2023* and preparing the new Development Plan commenced on 7 January

2021 and culminated the adoption of a new plan by Elected Members on 24 November 2022. The GCDP came into effect on 4 January 2023. It was prepared and adopted following extensive consultation with members of the public, statutory bodies and relevant stakeholders. The plan notes that *“With a population growth target set by the RSES for the city to grow to a population of 120,000 over the next twenty years, Galway City will become a city of scale and a key driver of growth and prosperity for the Northern and Western Region.”*

Section 4.7 of the GCDP highlights that Galway Port is an important transport facility. It also highlights that the Port is an important strategic regional hub for petroleum importation, storage and distribution and it serves the tourism industry as it is an important ferry port for passengers to the Aran Islands. The GCDP notes that if the proposed Galway Harbour Extension application is approved, it will give significant potential to diversify the current port activities, with *“particular regard to both the renewable energy sector and offshore wind energy opportunities”*. The plan states:

“The establishment of land based infrastructure to service offshore energy will enable Galway Port to play a much greater role in supporting this sector in the future, which will become increasingly important to the region as the role of fossil fuels become less significant over time”.

Section 4.7 of the GCDP notes that the RSES include Galway Port as A ‘Port of Regional Significance’, which provides important economic activity and acts as an economic driver for the wider region, the GCDP states;

“The Council will continue to support appropriate proposals for the improvement, development and extension of port facilities and supporting infrastructure to link in with the rail network and its potential to become part of the EU TEN-T Comprehensive Networks, subject to environmental review and considerations”.

Galway is now included as an urban node within the TEN-T , please refer to section 2.5.1.1 Trans European Network – Transport (TEN-T) above for further information.

Policy 4.7 Galway Port sets out to:

“Support proposals for development and extension of port facilities and an extension of the rail line to the port, which are of strategic importance to the City and the northern and western region.”

Section 6.1 Economy and Enterprise refers to Galway City and the main urban centre in the region, and a key economic and service support:

“to enable the regional targeted 2040 population growth of 160,000-180,000 and to accommodate the significant proportion of the allied targeted 115,000 increase in regional jobs”.

In order to sustain economic and socio-economic benefits within the City, the plan states that the city:

*“needs to target sectors where Galway has **competitive advantages**, such as those relating to **natural resources** and to knowledge based resources. These would include sectors **such as maritime and blue economy, renewable energy**, fourth level education and training, research and development, creativity and innovation, digital, ICT and life sciences.”*

Policy 6.1.1 aims to:

“Support and facilitate the role of Galway as a Regional City and driver of sustainable economic growth for the whole Northern and Western Region through the provision of balanced and sustainable economic and employment opportunities for development, enterprise, innovation and investment across all employment sectors consistent with the goals and objectives of the National Planning Framework and Regional Spatial and Economic Strategy, including Metropolitan Area Strategic Plan)”

Policy 6.1.5 aims to:

“Provide for opportunities for growth, innovation and investment across all sectors in order to create a resilient and diverse city economy that will maximise high value employment opportunities for the entire workforce and facilitate measures for a just transition in society”.

Section 6.3.3 *General Industry and the Advanced Manufacturing Sector* states that there is a need to retain lands to accommodate light industrial uses and services which are required to support the whole of the economy needs. Regarding the Harbour Enterprise Park the GCDP states that *“The future of these lands will be linked to the current proposal at consent stage to significantly expand the port and emerging proposals to regenerate the inner harbour lands closer to the city centre.”*

Section 6.3.9 of the GCDP focuses on the Marine Sector and Renewable Energy sectors. This section acknowledges that the port capacity is extremely constrained, and the facilities are deemed inadequate for developing the business to a modern international standard. This section also states that the Galway Metropolitan Area Strategic Plan (“MASP”) recognises that the planning improvements of the Galway Harbour facilities can strengthen the NPF’s ambition for Galway to be a strong and competitive regional city. The plan states that the Marine Sector while already important to Galway City and Council given its location and accessibility to the wider ocean,

“has great potential to expand and tap into the broader global marine market, including for seafood, tourism, renewable ocean energy and application for health and technologies”.

This section states that *“In the city the main focus of maritime economic activity is at the Port of Galway, a port classified in national port policy as a port of Regional Significance (Tier 3).”* The plan states that goods imported mainly include petroleum products, bitumen and steel and intermittently large scale project related cargo such as wind turbines.

Policy 6.9.1 Marine Sector & Renewable Energy *“Promote, encourage and facilitate the sustainable growth and competitiveness of enterprise activities associated with the ocean and coastal economy including transport, trade, fishing, aquaculture, research, marine industries, renewable energy, tourism and leisure”*

Policy 6.9.2 Marine Sector & Renewable Energy *“Support the migration of industrial uses from the inner harbour area to suitable locations to enable regeneration of the inner harbour area in line with national and regional objectives”*

Policy 6.9.4 *“Support the sustainable re-development and extension of the Port of Galway and the diversification and expansion of activities subject to environmental, visual, economic viability and transportation considerations. in line with the National Marine Planning Framework (NMPF) 2021, and any successor thereof, or any emerging national ports strategies.”*

Policy 9.1.2 Flood Risk - *Support and facilitate the implementation of the Coirib go Cósta Galway City Flood Relief Scheme in conjunction with the OPW to support a climate resilient city, protect against flooding and minimise the impact of future climate events. Support in general the associated mitigation and adaptation measures in order to prevent flooding and coastal erosion, subject to appropriate environmental, visual, built heritage and other relevant considerations.*

Policy 9.5 Safe Environment - Control of Major Accident Hazards Directive (Seveso III Directive)

1. *Consult with the Health and Safety Authority (also known as the National Authority for Occupational and Health Standards) when changing any policies/objectives and assessing any proposed relevant developments in or in the vicinity of sites identified under the Control of Major Accident Hazards Directive (Seveso III Directive), in order to prevent major accidents involving dangerous substances and to limit their consequences to the environment and community.*

2. *Ensure that major developments comply with the requirements of the Galway City Major Emergency Plan.*

Section 10.6 Inner Harbour Regeneration Site of the GCDP sets out the strategy for the Inner Harbour Regeneration Site which is approximately 7 hectares. *“It has potential for significant redevelopment*

providing an opportunity to re-establish links between the city centre and the sea, to create a high quality waterfront setting, a new city centre mixed use neighbourhood and include for water-related leisure uses". The GCDP acknowledges the constraints to modernise the harbour and address deficiencies, and notes that *"the harbour functions will need to be relocated to an alternative site"*. The plan notes that the Galway Harbour Company has plans to provide a major new port development to the east of the existing inner harbour and the proposed development is being assessed by An Bord Pleanála. The GCDP states that *"In principle the proposals for a mix of uses on these lands complemented by a unique waterfront setting linked to the city centre is acceptable and welcome."*

Section 10.6 also states that a Masterplan will be prepared for the overall site and will be required to undertake a number of comprehensive measures which also states that

"The preparation of this Plan shall be the responsibility of the Galway Harbour Company in consultation with the local authority, adjoining landowners and stakeholders. This will build on the acknowledged co-operation existing between the Port of Galway landowners and Ceannt Station landowners, which includes for a common objective to have a co-ordinated and integrated approach embedded into future proposals".

2.5.4.2. Inner Harbour Regeneration Project

Inner Harbour Regeneration Project

The 'Inner Harbour Regeneration Project' relates to the potential development of 17 acres of land. A non-statutory vision document has been prepared in relation to this project and was released to the public in May 2021. The vision is underpinned by a planning framework. The Inner Harbour Regeneration Site is referenced in Section 10.6 of the Galway City Development Plan 2023 - 2029 and a Masterplan is pending for the entire site. The Land Development Agency ("LDA") and Galway Harbour Company are also working on a more detailed Masterplan for an initial phase of the overall site.

2.5.4.3. Galway City Council - Local Authority Climate Action Plan 2024-2029

The Galway City Local Authority Climate Action Plan 2024-2029 ("LACAP") states that Climate change is the most significant challenge to all communities in Galway City. In Ireland, we are currently seeing the impacts of climate change with many parts of the country flooded after storms and continuous high rainfall. This is having a devastating impact on homes, businesses, and communities.

Galway City's inaugural climate action plan marks a significant milestone in our City's commitment to address this challenge by implementing measures to mitigate and adapt to climate change. This plan

sets out ambitious targets to deliver transformative action across all functions of Galway City Council and throughout Galway City. Climate action also offers opportunities to communities and businesses to promote sustainability, biodiversity, active travel and to make positive changes in our daily lives. The LACAP comprises a significant further step in delivering our 2030 targets and progressing towards a climate neutral Galway City by 2050 in line with Ireland’s Climate Action Plan targets.

The LACAP is aligned to the Government’s overall National Climate Objective set out in the Climate Action and Low-Carbon Development National Policy Position Ireland, which seeks to pursue and achieve, by no later than the end of 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. The vision for the Galway City Council Climate Action Plan 2024-2029 is to be a climate resilient, biodiversity rich, environmentally sustainable and carbon neutral city by no later than the end of 2050. This will be achieved by delivering transformative change and measurable climate action within the City Council’s organisation and services and across Galway City, through leadership, example, and mobilising action at a local level.

The plan sets a clear pathway for Galway City Council to;

- Actively translate national climate policy to local circumstances with the prioritisation and acceleration of evidence-based measures.
- Assist in the delivery of the climate neutrality objective at local and community levels.
- Deliver a Decarbonisation Zone (DZ) within the local authority area to act as a test bed for a range of climate mitigation, adaptation, and biodiversity measures in a specifically defined area, through the identification of projects and outcomes that will assist in the delivery of the National Climate Objectives.

The LACAP will be implemented by Galway City Council. Whilst the plan requires a whole-of-Council approach, the stewardship of the plan is held within the Corporate Governance and Services, Community and Climate Change Directorate. To ensure that the actions within this LACAP are implemented and reported on, Galway City Council has established a wide range of structures and channels of communication, within the council, with external stakeholders and neighbouring local authorities, as well as with regional bodies (CARO).

The proposed Galway Harbour Extension will positively contribute to the strategies and goals set out in the LACAP. The proposal will accommodate inter-modal transport, facilitate offshore and onshore renewable energy projects which will positively support the delivery of the goals and objectives set out in the LACAP. The proposal also includes a Freight rail link to enable cargo to be efficiently transported to and from the Galway Harbour Extension, when viable, to allow positive road traffic and environmental benefits.

2.5.4.4. Galway Transport Strategy 2016

The Galway Transport Strategy 2016 (“GTS”) sets out a series of proposed actions and measures for implementation, covering infrastructural, operational and transport policy requirements. It aims to make best use of existing infrastructure, to ensure the most efficient and sustainable use of the limited road space, and to provide new infrastructure in the most appropriate locations and for the most suitable modes. The GTS therefore formulates the overall future transport programme for Galway City and the surrounding areas. The Galway Harbour is identified as a brownfield site that is a key development opportunity, noting that the development expansion of the Port is also expected to occur in the coming years.

In terms of managing city centre traffic, it is acknowledged that *“Galway Port and industrial areas need to retain reliable transport connections for the movement of goods”*, noting that consequently the development and management of the city’s road network must take the movement of goods vehicles into account, whether to or from the port. This highlights the prioritisation of economic development within the city. The City Centre Access Network aims to facilitate active modes and public transport, whilst acknowledging that some journeys by private car will still be essential and Heavy Goods Vehicles (“HGV’s”) will need to access the city and port. This network will streamline traffic flow and support the efficient movement of freight, subsequently supporting the successful operation of the port.

In addition to this, the Cross-City Link aims to create a safe and efficient route through the city centre, prioritising public transport, pedestrians and cyclists. This initiative is expected to reduce congestion and improve accessibility to the port area by reducing non-essential private car journeys, supporting both the operation of the port as well as enhancing its walkability and quality of public realm.

While the GTS recognises that the strategic movement of goods (for example to Galway Port) will continue to be predominantly road based, it is considered that the wider transport initiatives across Galway City will reduce overall traffic congestion and consequently support the flow of traffic to and from the port, allowing it to enhance its offerings and capabilities. Further to this, the Strategy notes that *“the M6/N6 is a highly important national road...and is identified as a Strategic Radial Corridor in the National Space Strategy, and is an important inter-urban transport corridor linking the Gateway City of Galway with the Greater Dublin Area via the Midlands Linked Gateway.”* It therefore provides access to regional and international markets through the strategic location of Galway Port, highlighting its potential to enhance its socio-economic offerings.

2.6. Assessment of validity of earlier conclusions or any necessary amendments to same

The original EIS submitted as part of the original planning application concluded that:

“The proposed Galway Harbour Extension is consistent with the relevant planning policies and objectives outlined above, including the National Spatial Strategy, National Development Plan, Ports Policy Statement, Regional Planning Guidelines and Galway City Development Plan. In this regard, the proposed development is fully supported by the specific objectives included in the Regional Planning Guidelines and the City Development Plan. In addition, the proposed harbour extension is in the interests of balanced regional development and will further ensure the longterm strategic role of Galway City as a Gateway city. Overall, it is considered that the proposed development of the Galway Harbour Extension is in line with the relevant national, regional and local planning and regional development policies and objectives contained in the above documentation”.

This EIS Addendum has comprehensively reviewed the updated planning policy context, specifically referencing the key documents listed below:

- Trans European Network – Transport (TEN-T)
- EU: Marine Spatial Plan
- National Planning Framework: Project Ireland 2040
- National Development Plan 2021-2030
- National Ports Policy 2013
- Irish Ports Capacity Study 2023
- National Marine Planning Framework 2021
- Northern and Western Regional Assembly (RSES) 2020-2032
- Galway City Development Plan 2023-2029
- Galway Transport Strategy 2016

2.7. Relevant Planning History within the Application Boundary

Upon review of the Galway City Councils Online Planning Applications Search Portal there were no new planning applications within the red line boundary since the Galway Harbour Extension application was lodged in 2014.

A statement of case letter in support of planning consent submitted by An Bord Pleanála to the Minister of Housing, Local Government and Heritage on 24 March 2021, in accordance with section 177AA of the Planning and Development Act 2000 as amended is included as Appendix 2.2.

2.8. *Planning History within the vicinity of the subject site*

The original EIS looks at a number of relevant planning applications in the vicinity of the proposed Galway Harbour Extension which were set out in the Relevant Planning History section of Chapter 2. Below sets out an updated list of planning applications within the immediate vicinity of the site boundary which were granted since the Galway Harbour Extension was lodged in January 2014. The list includes planning applications which are recorded on Galway City Councils Online Planning Applications Search Portal.

PI Ref 13321

Permission was sought by Moroil Ltd. for Permission and Retention and Completion of alterations to existing service station granted under Pl. Ref. No.'s 03/94 & 04/960, consisting of: (1) Retention of revised site layout, access and egress arrangements and (2) Retention and completion of bored water well (including associated pump, pressure vessel and external water tanks), together with all associated site works and services. This application was granted by Galway City Council on 20/10/2014.

PI Ref 22167

Permission was sought by Iarnród Éireann development which will consist of a stand alone waste compactor building at Ceannt Railway Station, Station Road, Galway, H91 T9CE. Ceannt Station is a protected building (RPS 10001). This application was granted by Galway City Council on 17/04/2024.

PI Ref 20295

Permission was sought by MOR OIL Ltd for Permission for development which will consist of revisions, extensions and enhancements to existing service station on an enlarged site. This application was granted by Galway City Council on 26/10/2021.

PI Ref 2183

Permission was sought by Harbour Office Galway Harbour Company for development which will consist of: Temporary planning permission for the use of an area for outdoor dining with pitches for adapted vehicles/food stalls, outdoor seating area, temporary portable toilets and all necessary associated site works at the site. This application was granted by Galway City Council on 13/09/2021.

PI Ref 22307

Permission was sought by Galway Harbour Hotel Limited for development which consists of the change of use of the existing ground floor retail unit/sales office approved under planning ref number 123/04 and 220/98 to coffee shop along with any associated site development works. This application was granted by Galway City Council on 28/04/2023.

PI Ref 21316

Permission was sought by Galway Harbour Company for development which will consist of the partial demolition of the 1st, 2nd, 3rd and 4th storey of the existing Ice House building whilst retaining and upgrading the ground floor, ground floor entrance and existing ESB substation within. A temporary substation (5.72sq.m) will remain on-site throughout the duration of the development works. This application was granted by Galway City Council on 17/12/2021.

PI Ref 20331

Permission was sought by Deepsea Fibre Networks LTD for development which will consist of amendments to approved telecommunication development (Reg.Ref.20/50) involving telecommunication cabins, emergency generators, management office with staff facilities, security fencing, cabling and associated works. Planning permission sought to remove condition no 3 of the order which limits the use of the development to five year. This application was granted by Galway City Council on 11/02/2021.

PI Ref 14272

Permission was sought by Galway Harbour Company for Permission for bulk store (1625m²), the demolition of an existing water tank (85m³) and all associated site services. This application was granted by Galway City Council on 02/02/2015.

PI Ref 14226

Permission was sought by P&O Maritime Ireland Ltd. for Permission for the construction of a storage shed including all associated services. This application was granted by Galway City Council on 14/01/2015.

PI Ref 173

Permission was sought by Cold Chon Galway Ltd. for an Extension of duration on Pl. Reg. Ref. No. 11/113. Permission for the construction of a bitumen storage facility. The development will consist of two number 9330m³ bitumen storage tanks (30m diameter and height above ground to eaves is

11.7m), containment bund, perimeter fencing and associated drainage and site works. This application was granted on 02/03/2017.

2.9. Cumulative Impact Assessment

A planning application search has been conducted of two areas which included a 15km buffer from the subject site, and a second search of a marine buffer. Both followed the same process. The search included a number of data sets within the relevant buffers. Data which was included in the search was anything lodged, applied for, or present since the time of the original Galway Harbour Extension application in 2014. For both searches, the following data sets were included:

- Planning applications (those which were valid, but still under consideration, and approved planning applications. Results from any appeals to an application were considered here.)
- Part 8 applications
- ABP Cases (Excluding appeals and referrals. Including all cases which were valid, but still under consideration, and those approved)
- EPA Waste Scheme
- EPA Licenced Facilities – Waste and IPC
- EIA Locations
- SEVESO Site's

For the search of the marine buffer, the following data sets were included:

- Fishery Order Sites
- Licensed Aquaculture Sites

The cumulative search resulted in a comprehensive 'long-list' of information from each data set. This list was then filtered to a 'short-list' to assist the project team in identifying the most noteworthy projects. The full long-list, inclusive of the 15km and marine buffers, is included as Appendix 2.1.

The EIS addendum includes a description of likely significant impacts of the project, the factors considered in relation to potential impacts include human beings, flora and fauna, soil, water, climatic factors, landscape, noise, cultural heritage, and material assets. Within each chapter of the EIS addendum, the projects considered for cumulative assessment are selected from this list as are deemed relevant for each discipline.

The potential cumulative impact of the proposed development and other relevant developments has been carried out with the purpose of assessing the proposed development on the surrounding environment when considered cumulatively and in combination with relevant permitted, proposed, and constructed projects in the vicinity of the application site.

2.9.1. Methodology for the Cumulative Assessment of Projects

The cumulative impact assessment of projects has four principle aims;

1. To establish the range and nature of existing projects within the cumulative impact study area of the proposed residential development.
2. To summarise the relevant projects which have a potential to create cumulative impacts.
3. To establish anticipated cumulative impact findings from expert opinions within each relevant field. Detailed cumulative impact assessments are included in each relevant section of the EIS Addendum.
4. To identify the projects that hold the potential for cumulative interaction within the context of the proposed development and discard projects that will neither directly or indirectly contribute to cumulative impacts.

2.10. Conclusion

The enhancement of Galway Harbour has been and continues to be supported across a range of policies from International, European, National to Local Level. These policy documents collectively aim to enhance the Harbours infrastructure, sustainability and economic role ensuring that Galway Harbour can accommodate future economic growth and increased maritime activities. By integrating these initiatives, Galway Harbour is positioned as a vital economic hub that contributes to regional and national development goals, aligns with environmental sustainability objectives, and enhances its capacity to serve as a key player in Ireland's maritime infrastructure. The importance of Galway Harbour in fostering economic development and facilitating international trade is explicitly recognised within the NPF (2040), and it is therefore seen as a critical element in enhancing the economic vitality of Galway City and the surrounding area.

In the current Galway City Development Plan 2023-2029, there is a wealth of supportive policies and objectives for the Extension of Galway Harbour, again emphasising its potential in terms of sustainable social, economic and environmental development. This is explicitly referenced in Section 6 of the GCDP, which states that the Galway Metropolitan Area Strategic Plan ("MASP") recognises that the planning improvements of the Galway Harbour facilities can strengthen the NPF's ambition for Galway to be a strong and competitive regional city.

Overall, it is clear across all policy levels that the development of the Galway Harbour Extension will bring about significant social, economic and environmental benefits, ensuring that a coordinated approach not only meets current demands but is also prepared for future challenges and opportunities in order to enhance competitiveness and resilience across the region and wider island.

