Cork County Council,
Planning Department,
County Hall,
Carrigrohane Road,
Cork.

17th November, 2008.

RE: Planning application S/08/9317 submitted by Monkstown Bay Marina Co. Ltd. for construction of a marina to include 285 no. berths, three storey over basement marina building to include storage in basement, cafe/bar/restaurant, gym, provision shop, public toilets on ground floor, changing room, chandlery, marine training room on first floor, boat sales office, marina management office and public toilets on second floor, dedicated gated rowing club area to include single storey rowing club boat/equipment store, slipway & pontoon, provision of 174 no. car parking spaces, information/notice boards, viewing platform & public amenity walkway, bird hide, rock armour protection, diesel and petrol refuelling facilities, foul water pump out facilities, waste deposit facilities and associated infrastructure, reclamation of foreshore to provide for the above, and associated site works to include landscaping, piling and underground bunded fuel tanks and associated vents and ancillary site works at Monkstown, Co. Cork.

Dear Sir/Madam,

It is almost two years to the day since I made a submission to Cork County Council’s planning department in support of planning application 06/11584 submitted by Monkstown Bay Marina Ltd. for construction of an 82-berth marina at Monkstown, Co. Cork. I continue to be very much in support of a marina such as that proposed in 06/11584 and welcome its potential to assist in fulfilling the amenity-oriented role envisaged by the Cork Area Strategic Plan for Monkstown.

In my submission to planning application 06/11584, I emphasised how I considered it of vital importance that the 82-berth marina should be integrated appropriately with the existing facilities and environment of Monkstown.

While continuing to support improved recreational access to the waters of Cork Harbour, I have grave concerns in relation to the 285-berth marina and associated facilities proposed in planning application 08/9317. It is my considered opinion that the importance of integration increases linearly with the proposed 3½-fold increase in the size of the marina development now proposed by Monkstown Bay Marina Ltd. I fail to see adequate evidence of this integration. I consequently fear that the development proposed by Monkstown Bay Marina Ltd. would be merely superimposed on Monkstown village and its environment and, contrary to the claims made in the planning application, would bring very few benefits to the local community.

- **Need to integrate with local infrastructural requirements**
Monkstown is already a very popular amenity destination. It offers a busy Slí na Sláinte walking route along the waterfront. At present, it has the only reasonable launching facilities on the eastern side of Cork Harbour. Its influx of primarily weekend visitors serves to highlight some of the most severe
infrastructural deficits in the town. Key amongst these includes an absence of adequate public parking, particularly to facilitate trailers which, on busy summer Sundays, line both sides of the R610 through the village centre. Boat-launching vehicles can approach the narrow public slipway only by swinging at a 90° angle across the entire width of the R610. The only dinghy storage available to Monkstown Bay Sailing Club, with its self-professed focus on small rather than big boat activities, is the small and very open area of hardstanding adjacent to the water locally known as the Sandquay. Because changing and showering facilities are some distance from the Sandquay, dinghy sailors frequently change after an evening race either on the side of the road at the Sandquay or in their cars.

Yet the development outlined in planning application 08/9317, while claiming to be offering great benefits to the community, addresses none of these local infrastructural problems. The only slipway within the proposed development would be gated and solely for rowing club use. Most of the boats using the proposed marina would be too large to travel by trailer on the public road; they would be lifted into the water from a boatyard by crane. So if a public slipway is not incorporated into the development, boats would continue to be launched at the existing village slipway, hauled out at the end of an evening and, in the interim, trailers would continue to be parked on both sides of the public road. Dinghies would continue to be stored on the space-limited Sandquay. Showering and changing facilities, available at a walk south to the proposed development, would be unlikely to be any more attractive to the evening sailor than the existing Sailing Club facilities at a walk north.

I ask Cork County Council to consider that this could reasonably considered to be a once-in-a-lifetime chance to maximise the attractiveness of Monkstown as an amenity destination. A proposal of this nature and size offers an opportunity to provide public car parking for all, an easily-negotiated public slipway for launching removed from the public road, adequate and safe dinghy parking to serve both the local Sailing Club and members of the public and changing/showering facilities which would be accessible to dinghy sailors, rowers, divers and marina-users alike. Should the infrastructural needs of all amenity users of Monkstown not be integrated into the design of this development, then it cannot be considered to be anything other than superimposition on a community in considerable need of infrastructural input.

- **Need to integrate with existing local businesses**

This potential superimposition of the proposed development is further illustrated than by the size of the proposed reclaim area and the structures proposed thereon. I understand 3 acres of reclamation is considered to be the minimum necessary to support the facilities proposed. I also understand the 3-storey over basement building to have been considered to be the most space-efficient way to provide the proposed facilities. But I see no market survey results within the planning application to demonstrate the demand for those facilities. There are already two restaurants and two bars in Monkstown village. A third bar closed within the last year. Is a third restaurant and third bar necessary? Two provision shops have closed in succession within the last four years. Both premises were owned by the shop-holders and both were in the centre of the village. While a provision shop would be most welcome, could it survive when it would be rented premises, outside of the village centre and supporting a seasonal clientèle? Being outside the village centre, would it serve the older, less mobile of the community, who are those most in need of a local shop?

I do not see questions relevant to the welfare of the Monkstown community such as these discussed within the planning application. I think it vital that they be addressed before any proposals are made for such dramatic changes to a popular, public shoreline on a much-travelled designated scenic route and I ask Cork County Council to give them serious consideration.

- **Need to integrate with existing and planned marina/boating facilities**

It is clear there is demand for a marina in Cork Harbour and this is indeed discussed in planning application 08/9317. However, I note the assessment of that demand was carried out prior to the granting of planning permission for a large marina in association with the redevelopment of the Royal Victoria Dockyard in Passage West (planning ref: 08/4086), merely two miles upstream. While improved access to the water is welcomed, a co-ordinated approach to planning that access is vital. It was the importance of long-term strategic planning which initiated the Cork Area Strategic Plan. Such long-term strategic planning is of no less importance in the context of Cork Harbour and it is the basis of Integrated Coastal Zone Management Planning. This proposed marina and that already granted planning permission in Passage West would almost double the number of marina berths available in
Cork Harbour. I ask Cork County Council to consider whether this could be considered realistic or sustainable in the context of strategic planning.

One of the principal reasons Crosshaven works as a centre for boating activity is the availability of a range of boating requirements within a small radius. Key amongst these is winter storage. While there may be only little over 500 marina berths available in Cork Harbour, the maximum number of boats that can be stored in boat yards is 555. Should both this proposed development and the Passage West marina proceed to construction, there would be the same concentration of summer boating activity on the eastern side of the Harbour as in Crosshaven. However, unlike Crosshaven, the only winter storage available would be that at Glen Marine Boatyard where all available spaces are already full. While I accept that this may not be a concern of Monkstown Bay Marina Ltd., I ask Cork County Council to consider whether the provision of berthage without the associated necessary services might result in haphazard and unsightly winter boat storage at such locations as car parks and roadside verges.

- Need to integrate with existing environment

It is proposed that part of this marina and its associated shoreside development would be situé in the Monkstown Creek Special Protection Area (SPA). Article 6(3) of Directive 92/43/EEC specifically requires that any project, whether directly or indirectly connected with a SPA, should have “appropriate assessment” of the implications of that project for the protected site.

I do not in any way consider that the Marine Ecology Survey submitted with planning application 08/9317 constitutes assessment in the context of the requirements of the Habitats Directive. Monkstown Creek was designated as part of the Natura 2000 network by virtue of the habitat it offers for winter wading waterfowl. The Marine Ecology Survey appears to have been no more than a desk-based study with regard to birds. The most recent bird count quoted relates to counts undertaken by BirdWatch Ireland during the 2005/2006 season. Even if bird counts had been undertaken for the purposes of this planning application, they would have been largely irrelevant, as the Marine Ecology Survey appears to have been carried out in August. The evaluation of the impact of the proposed development does not mention the impact of the loss of the fresh-water stream flowing under the road and across the intertidal zone, a valuable gathering point for both bird and mammal life. The proposed impacts do not address the potential impact of increased noise and light on the habitat of the SPA either during construction or operation, the potential impact of pile driving on both birds and underwater mammals or the potential impact to mammals of the interruption to long-established shoreline paths. The survey does not investigate the presence of otter, an Annex I species long established in Monkstown Creek and known to use this area of shoreline for feeding. It does not mention the potential impact of the proposed development on tidal flow or the potential impact of increased sedimentation in what is an area of recognised slack currents.

No alternatives to the proposed location are discussed. No compensation measures for direct loss of SPA are proposed. Again, this is contrary to the requirements of both Articles 6(3) and 6(4) of Directive 9/43/EEC. The mitigation measures are generally vague and unconvincing. A particular insult is proposed mitigation measure 11, which proposes discharge of wastewater to the “town’s wastewater treatment facility.” Sadly, Cork County Council will be aware that there is no wastewater treatment facility in Monkstown other than maceration and that it will be some considerable time before the Lower Harbour Wastewater Treatment Plant is commissioned and operational.

Schedule 5 of the Planning and Development Regulations, 2001 requires that an Environmental Impact Assessment should be carried out for a marina development of 300 berths of more, regardless of its proximity to a designated area. This proposed development is merely 15 berths short of needing an Environmental Impact Assessment and is located in a designated area. I respectfully ask that Cork County Council should require an Environmental Impact Assessment to be submitted with this planning application, to include a particular focus on the impact of construction and operation of the proposed facility on the SPA of Monkstown Creek.

- Conclusion
There is huge potential for development of Cork Harbour as a unique recreational asset. Monkstown, as identified in the Cork Area Strategic Plan, is ideally placed to facilitate such recreation by providing improved water access.

However, I believe a marina of reasonable size should be only one such component of a suite of measures for improved water access. Water sports are for all, not just for the elite few who can afford expensive marina fees and the even more expensive boats they are designed to accommodate. There are currently over 100 moorings in Monkstown Bay. These accommodate boats of all types, size and age, many of which would never take a berth on any marina. Facilitating holders of these moorings is a vital consideration when designing improved measures for accessing Cork Harbour. I would have thought that the planning application for a development such as that proposed, which professes to have the aim of improved water access, would have identified the number of moorings needing to be taken out to facilitate its construction and would have proposed a means by which the holders of these moorings might be accommodated.

I respectfully ask Cork County Council to give serious consideration to not merely the implications of a large-scale development such as that outlined in planning application 08/9317, but also to whether the real impact of the development proposed can even be evaluated properly without up-to-date market surveys, consideration of existing moorings holders, general dearth of associated boating ancillary facilities on the eastern side of Cork Harbour or proper ecological assessment of the SPA that is Monkstown Creek.

I also ask that Cork County Council might consider what a marine leisure facility, whether of the size proposed or smaller, might bring to a waterside community such as Monkstown should it be designed for integration with the community, thereby opening up opportunities for multi-purpose access to the water and relieving infrastructural deficits already clogging up inadequate services. I ask Cork County Council to consider that such a marine leisure facility might require:

- any associated reclaim area to remain in public ownership such that it may never be redeveloped for purposes other than marine leisure in the longer term
- a public slipway to be incorporated as part of the proposed development
- a car park on the reclaim area to be run without a barrier as a public facility and preferably remaining under the operational control of Cork County Council
- this car park to have a clearly marked area dedicated to trailer parking
- an area adjacent to a public slipway to be retained for dedicated public dinghy parking
- a package sewage treatment plant to be installed to treat wastewater arising from the proposed facility until the Lower Harbour Wastewater Treatment Plant comes on stream
- a comprehensive system of traffic calming to be put in place on the R610 through Monkstown village to improve pedestrian safety.

I reiterate my support for improved access to the water at Monkstown and ask that Cork County Council should avail of this opportunity to properly plan parking, traffic calming and other infrastructural requirements that will give Monkstown the long-term capability of performing the amenity-oriented role envisaged for the village by the Cork Area Strategic Plan.

Please find enclosed the appropriate fee of €20.

Yours faithfully,

____________________________________
Cllr. Marcia D’Alton,
Member, Passage West Town Council.
Considerable emphasis has been placed in the planning application on the Blue Flag designation towards which the proposed marina would be designed to operate. There is much evidence to indicate that the Blue Flag cannot be used to justify the size of the proposed marina or the extent of its ancillary facilities. Requirements addressing safety, services and environmental education are associated with achieving the Blue Flag award, but the facilities essential to the Blue Flag award are simple and basic:

- segregated and identified containers for general waste, hazardous waste and recyclables
- bilge water and toilet pumping facilities
- sanitary facilities with controlled sewage disposal
- drinking water.

Kilmore Quay is the only marina in the country has been awarded the Blue Flag this year. Owned and managed by Wexford County Council, Kilmore Quay has 55 berths and is served by public toilets, showers/toilets specific to the marina and a public telephone. Previous Blue Flag award winners include Fenit Marina, Quigley’s Marina at Killinure and Athlone Marina. Fenit Marina, owned and run by Kerry County Council, has 130 berths served by toilets, showers, a laundry room, telephones, fuelling facilities and a wheelchair lift. Quigley’s, a private marina with 100 berths on the River Shannon, has showers, laundry, a public telephone, fuel and a reception area. Athlone Marina, run by Westmeath County Council, has 87 berths and obtained Blue Flag status every year from 2003 to 2007 inclusive. It offers toilets, showers, a reception area and laundry facilities.

What is, however, required by the Blue Flag is integration of a marina with the surrounding natural and built environment. Also required is for the pump-out facilities to be linked to a sewerage system discharging to a wastewater treatment plant in compliance with the EU Urban Wastewater Directive. I ask Cork County Council to consider whether, even if considered within the “flagship” category, the proposed marina building could ever integrate with the surrounding environment. I