

**Comment on the Chief Executive’s Report on the
Redevelopment of Port Facilities at Ringaskiddy
(PL04.PA0035 as submitted to An Bord Pleanala under the Strategic Infrastructure Act)**

1.0 Introduction

The Port of Cork is a key contributor to the economic well-being of County Cork. It currently has bulk loading facilities at the City Quays and a container terminal at Tivoli. A combination of the depth constraints imposed by the Jack Lynch Tunnel (permitting ships with a maximum draft of 6.5 metres upstream) and the global trend towards larger ships, the Port of Cork has identified the need to move downstream to the Lower Harbour. This proposal is regarded as advantageous from a land use perspective in that it would free up large tracts of water-side land close to the city for residential development.

The Port of Cork currently operates a deepwater berth at Ringaskiddy in the Lower Harbour. It has bulk facilities there with associated storage. Over the past few years, it has been increasing the intensity of its container activity at Ringaskiddy. The Cork – Roscoff ferry also operates out of Ringaskiddy.

The Port runs a very successful cruise liner terminal at Cobh. If the terminal at Cobh is fully berthed, cruise liners occasionally pull into Ringaskiddy also.

1.1 Ringaskiddy in the context of the Lower Harbour and the wider Cork environment

When development at Ringaskiddy is proposed and discussed, one rarely sees an image beyond port lands. I have included an image which illustrates where Ringaskiddy is in the context of its immediate neighbours (Figure 1). Whitepoint is less than 1 km across the water, Monkstown is a similar distance from port lands as is Shanbally. While Ringaskiddy and Shanbally are regarded as a single settlement within the Local Area Plan, Ringaskiddy and Monkstown are rarely associated. The harbour at this location is a bowl shape, with the settlements of Cobh and Monkstown on steeply sloping hills overlooking the Harbour water.

Ringaskiddy is also spoken about in the context of upgrading of the N28 but less commonly in the context of the wider Cork road network. I have included a second image to illustrate how the roads serving the Ringaskiddy peninsula are interconnected with Cork infrastructure generally (Figure 2). Any vehicle leaving the port at Ringaskiddy will end up on the N40, going either east or west. That is, of course, unless it is serving the south west region and it detours by the regional road network through Carrigaline. Some HGVs from the bulk loading at the deepwater berth already use this route.

1.2 Local concerns

Local residents close to Ringaskiddy have ongoing issues with port operations. In particular, these include noise, dust and traffic. They regularly contact both the Port of Cork and Cork County Council’s offices in Inniscarra to complain about dust and noise incidents in particular.

In the context of the larger development now proposed, their concerns include:

- Noise
- Dust
- Traffic
- Visual impact
- Damage to amenities

Two conservation designations directly impact on Ringaskiddy: the Cork Harbour Special Protection Area (SPA-004030) and the Monkstown Creek proposed Natural Heritage Area (pNHA 001979). As such, they form part of the “Natura 2000” network of sites spread throughout Europe. The Cork Harbour Special Protection Area is an internationally important wetland site, regularly supporting in excess of 20,000 wintering waterfowl, for which it is amongst the top five sites in the country. Monkstown Creek is situated between Monkstown and Ringaskiddy on the western shores of Cork Harbour. It is about 600 metres away from the proposed container terminal and adjacent to the bulk loading facility.

Other statutory and non-statutory bodies are also concerned about:

- Damage to wild birds/designated areas
- Damage to fisheries
- Damage to tourism prospects for Cork Harbour
- Over-reliance of the port on road freight transport into the future.

1.3 Previous planning application for container terminal at Ringaskiddy

The Port of Cork applied for planning permission to develop a container terminal in Ringaskiddy in 2008. This application included reclamation of 18 hectares of the Oyster Bank which, at the time they said was essential for achieving the required water depth. The CE’s report has clearly outlined the differences between the 2008 and the current proposed development.

An Bord Pleanála accepted the advice of its Senior Planning Inspector in refusing the 2008 planning application. The refusal was on the grounds that relocation of current port facilities from Tivoli which is served by a railway line and “*has reasonably direct access to the national road network*” to Ringaskiddy “*which is not connected to the national rail system and would be totally reliant on road based transport*” would be contrary to the proper planning and sustainable development.

The Board accepted that there was a need to move port activities from Tivoli to facilitate expansion elsewhere in Cork Harbour but it found that the proposed container terminal at Ringaskiddy would:

- result in much of the port-related traffic crossing the city road network and this would in turn adversely impact on the carrying capacity of the strategic road network in and around Cork City and in particular the carrying capacity of the interchanges at Bloomfield, Dunkettle and the Jack Lynch Tunnel.
- be unable to make use of rail freight in the future and would therefore be a retrograde step in terms of sustainable transport planning.

The Board's Senior Planning Inspector also recommended refusal for an additional reason:

“That the proposed development by reason of excessive noise and the curtailment of boating and leisure activities in the lower harbour area and Oyster Bank in particular, would seriously injure the amenities of the residents of the lower harbour area and in particular the residents of Ringaskiddy, White Point, Black Point and parts of Monkstown”.

1.4 The current planning application for Ringaskiddy

The current planning application is for a smaller development than was proposed in 2008. The massive area of reclaim no longer seems essential for achieving water depths of 13 metres. The proposed development is described as being in three phases. In fact, this entire planning application is merely a first step along the Port of Cork's overall plan for Ringaskiddy as outlined in its Strategic Plan Review 2010. An illustration of its ultimate aim for container development at Ringaskiddy is attached as Figure 3.

As in the case of the 2008 planning application, the Port's proposals for Ringaskiddy are regarded as strategic development and so have been sent directly to An Bord Pleanala for consideration.

2.0 Examination of the CE's Assessment of the current proposal

As is required by the Planning and Development Act 2000, the CE must submit a report to An Bord Pleanala which outlines the views of Cork County Council on whether the proposed development constitutes, in the opinion of Cork County Council, proper planning and sustainable development for County Cork.

As a resident and user of the Lower Harbour and having been intimately involved with the 2008 planning application, I am most concerned that the CE's report is incomplete as it does not in any way reflect the views of residents living in and around the Ringaskiddy Basin.

2.1 Planning Policy

The CE's assessment states that:

“The report from the Planning Policy Unit outlines how the proposal is supported by an entire suite of both statutory and non-statutory policy documents including CASP Update 2008, Cork County Development Plan 2009 (and 2013 Draft), Regional Planning Guidelines 2010, Carrigaline and Middleton Electoral Area Local Area Plans 2011 and the Draft Cork Harbour Study 2011.”

2.1.1 CASP Update 2008

One of the listed proposals for an integrated transport system in the CASP Update 2008 is *“the development of new container terminal and other port related facilities at Ringaskiddy”*. The Update goes on to discuss the An Bord Pleanala refusal of the Port of Cork's planning application in 2008 and suggests that *“the Planning Authorities in*

conjunction with the Port of Cork will need to carefully assess the issues raised by An Bord Pleanála in relation to Ringaskiddy regarding the scale and nature of future port development and possible alternatives.”

CASP (2001) clearly identified Cork Harbour as being a unique asset, not merely to Cork but to the entire region. It noted the *“natural environment and in particular the spectacular Harbour area [as being] without comparison elsewhere in Europe”*. It emphasised the protection of this asset as being vital to the future success of the Cork area. It further strongly linked the economic development of the Cork region to Cork Harbour, *“an outstanding asset which has the potential to become Europe’s most exciting waterfront, the focus for a ‘mosaic’ of different opportunities”*.

Sadly, the CASP Update does not mention the potential for the multi-faceted development of Cork Harbour to contribute to the sustainable economic development of the CASP area. It abandons the 2001 concept of a Cork Technopole in the Cork Harbour Area. On the contrary, it takes over a full page to speak of the benefits of the Port of Cork to the CASP region. It notes the CASP and the Port of Cork’s Strategic Development Plan as being *“mutually reinforcing”*.

It is worth noting that the CASP Update was carried out by Indecon, who were also commissioned by the Port of Cork to carry out the economic justification for its proposed container terminal at Ringaskiddy in both 2008 and 2014. It is also worth noting that the CE of the Port of Cork is a member of the CASP Steering Committee.

One of the opening paragraphs of the Passage West Town Council submission to the draft CASP Update 2008 is reflective of the level of consultation afforded this non-statutory document:

“While Passage West Town Council welcomes the public invitation for submissions to the CASP update, it wishes to express its great regret that the opportunity for public involvement in the review of what is one of the most fundamental documents relating to planning in the near and wider Cork area has been so limited and so poorly publicised. The Town Council cannot but believe that it would have been of significant benefit to the CASP update should the consultants involved have taken the time to discuss the relevant issues with the elected representatives of Passage West and other Town Councils in the CASP area.”

2.1.2 Cork County Development Plan 2009

The County Development Plan 2009 states a commitment to the relocation of port facilities to Ringaskiddy (INF 4-1). It notes the alignment between the CASP Update and the Port of Cork’s plans, but it does not identify Ringaskiddy as the preferred location for the relocated Tivoli container terminal.

The County Development Plan 2009 also:

- Designates Cork Harbour as an Area of Strategic Tourism Potential (para 5.6.8)
- Defines Ringaskiddy as lying within a landscape with a value of very high sensitivity and within an area of national importance
- Has an objective (ENV 2-4) of ensuring that the management of development throughout the county will have regard for the value of the landscape, its character, distinctiveness and sensitivity
- Designates the R610, the N28, the R6330 and parts of the R624 overlooking the

- Harbour as Scenic Routes (S54, 51 and 53 respectively)
- Has as an objective (ENV 2-11) the preservation of “*the character of those views and prospects obtainable from scenic routes*”.
- Specifically acknowledges the marine leisure role of Cork Harbour and commits to assisting to provide a balance between competing land-uses in the Harbour (para 5.6.12)
- Recognises that the full potential of the harbour could best be realised through a more integrated approach to its planning and development.

At our Development Meeting on 11th July, we were told how the County Development Plan is a “contract” between the people and the County Council. It breaks that contract when the aspirations of the Plan in relation to merely one interested party are promoted over the aspirations of the Plan that relate to the interests of many other parties.

2.1.3 Draft Cork County Development Plan 2013

The draft County Development Plan 2013 proposes to include direct support for the relocation of the Tivoli container terminal to Ringaskiddy (para 6.6.4). I will be suggesting to the CE that this is entirely contrary to the principles of planning legislation. One of the key tenets of any Environmental Impact Statement is the examination of alternatives to a proposed site. In fact, the EPA says in its Guidelines for Environmental Impact Statements that “the consideration of alternative routes, sites, alignments, layouts, processes, designs or strategies, is the single most effective means of avoiding environmental impacts”. But how can there be any realistic examination of alternative sites within Cork Harbour when policy has already dictated where the container terminal should go?

If the County Development Plan as a statutory document were to define Ringaskiddy as the preferred choice of location for the Port’s container terminal, the County Council would have to undertake Strategic Environmental Assessment on the various impact of the container terminal on all aspects of the surrounding Cork Harbour environment. While a general SEA has been carried out on the general impact of the draft Plan, clearly no SEA has been specifically carried out for a container terminal at Ringaskiddy. Therefore the draft Plan may continue to support the move of Port facilities to the Lower Harbour, it may continue to define land use in certain areas for Port activity but it seems to me that if it takes that step of advising on the specific location of port facilities in those areas, it preempts the planning process.

We were also told at our Development Meeting on 11th July that the Local Government Act 2000 defines the County Development Plan as needing to provide for proper planning and sustainable development “*in the interests of the common good*”. It is not in the common good to preempt the planning process.

The Tourism and Heritage chapters of the draft County Development Plan are full of praise for Cork Harbour for its contribution to both of these aspects of the county’s well-being. They note:

- The marine leisure sector as being the fastest growing sector in the tourism industry (para 8.4.1)
- Heritage tourism as being one of the most important and fastest growing aspects of the tourist industry (para 8.5.2)

- Almost 100,000 visitors to Cork Harbour came through the Cobh cruise liner terminal in 2010 (para 8.3.4).

The draft Plan also contains the same aims for landscape and scenic route protection as are outlined in the 2009 Plan.

None of these aims which potentially compete with the Port of Cork's proposed "redevelopment" of Ringaskiddy is mentioned in the CE's Report either.

2.1.4 South West Regional Planning Guidelines 2010

Section 8.1 of the CE's Report states that the South West Regional Planning Guidelines 2010 endorse Ringaskiddy as the primary location for the relocation of port activities from the upper harbour in Tivoli and that Marino Point be used as a supplementary site for bulk/general cargo. This is not the case.

The Regional Planning Guidelines do indeed support the moving of the Port of Cork's activities from the Docklands and Tivoli downstream to the Lower Harbour but do not suggest at all any particular location where these activities should take place. They say:

"Integral to both the expansion of the Port of Cork and the planned redevelopment of the City Docklands is the relocation of port activities and related uses from the City Docklands and Tivoli to new sustainable locations in the harbour."

The only mention of Marino Point is in the context of the existence of its "specialised facility constructed to serve the former IFI plant". It does not mention Marino Point at all in the context of the Port of Cork.

The Guidelines also comments on the significant asset that is Cork Harbour and the "huge potential" it offers for sustainable economic development, population growth, recreation and tourism.

2.1.5 Carrigaline Electoral Area Local Area Plan 2011

The Carrigaline Electoral Area LAP is actually contradictory. Para 4.3.2 states reasonably that "Cork County Council will facilitate the relocation of port related facilities which are deemed appropriate for Ringaskiddy subject to the principles of proper planning and sustainable development, and having regard to the adjacent Special Protection Area and overlapping proposed Natural Heritage Area", but Objective DB-02 is more specific, stating "it is an objective to facilitate the relocation of the Port of Cork's container and bulk goods facilities to Ringaskiddy".

Where the Local Area Plan falls down is that by its nature it tends to regard each settlement around Cork Harbour as being a discrete entity. So while Ringaskiddy and Shanbally are planned for as a single settlement, the as-the-crow-flies distance between Ringaskiddy and Shanbally is actually twice that between Ringaskiddy and Whitepoint in Cobh. So while the land use intent of the County Development Plan is carried into the Local Area Plan as is its statutory requirement, one must rely entirely on the County Development Plan for evaluating the impact of that land use intent on the area generally. Consequently, no aim for Ringaskiddy defined in the Local Area Plan can be taken at face value without reference to the wider aims of the County Development Plan.

2.1.6 Draft Cork Harbour Study 2011

The draft Cork Harbour Study is quite special in that it recognises all potential uses of Cork Harbour as being equally valuable. It emphasises the need to mind land beside the Harbour for uses that are water-specific. In other words, uses such as residential development on harbour-side lands are inappropriate. Its key message is that the only way to advance the development of Cork Harbour is through integrating the approach to development of the Harbour using Coastal Zone Management.

2.2 Visual impact

It is the opinion of the acting County Architect that the two proposed cranes will “*not be detrimental to the visual aesthetic of the harbour*”. He comments merely on the fact that the cranes will be visible from the water area in the Ringaskiddy basin and the immediate hinterland. The reality (as evidenced by the planning application photomontages) is that they will be visible from far further afield.

He comments merely on the cranes, which in fairness at least have some potential to blend with the other vertical elements in this part of the Harbour. On the contrary, he does not comment at all on the harsh visual impact that would be the bank of 5-high multicoloured containers. These are also visible from “*all quarters of the water area in the Ringaskiddy basin and the immediate hinterland*”.

I have included merely two of several before and after photomontages included with the EIS. The first pair of photomontages illustrates that contrary to Section 9.2 of the CE’S assessment, the ADM jetty and Ballybricken Pier, because they are at water level, do nothing to mitigate the impact of the proposal from Monkstown. The photographs behind these photomontages are taken from the footpath along the R610. This is a dedicated Sli na Slainte and is hugely popular as a walking route every day of the week and particularly with the elderly and families on weekends.

Whether or not the proposed development impinges on what is designated as nationally important, sensitive landscape is a matter for opinion. But protection of designated scenic routes and landscapes is an aim of objectives ENV 2-6, ENV 2-7, ENV 2-9, ENV 2-11, ENV 2-12 and ENV 2013 of the County Development Plan 2009. The acting County Architect does not mention any of these objectives. It is my opinion and that of the local residents that all of these objectives would be contravened by the Port of Cork’s proposals.

Please note that all the photomontages show the cranes with the jib down rather than raised. Also note that photomontages are by their nature developed from photographs taken with a wide angle lens. Because in real life the eye focuses merely on one aspect of the landscape, the real life impact of the proposal would be immeasurably greater than that predicted in the photomontages.

2.3 Traffic and Transportation

The CE is correct in his assessment that traffic were and continue to be one of the principal issues with any proposed move by the Port of Cork to Ringaskiddy. It is also correct that whilst the traffic impact of the Port’s 2008 proposal was one of the key

reasons for the project's refusal, the current proposal is significantly reduced over the 2008 proposal.

However, as residents and representatives of residents, this is our Harbour, our port and our road network. We want the best for all three elements of our infrastructure. The N28 and Dunkettle interchange upgrades have been put on hold indefinitely. The national economy may improve and the upgrades may be advanced, but there is no certainty around this. The Port of Cork has massive longer term plans for Ringaskiddy; this development at Ringaskiddy would be curtailed well into the future should the proposed upgrades be indefinitely delayed.

During the Pre-application Consultation meeting of 28th May 2012, the NRA stated that there are 23,000 (AADT) vehicles between Carrigaline and the Southern Ring Road which was well over the capacity of this road (a two lane road). Approximately 19-20,000 of this comes from Carrigaline itself. The road network cannot accommodate the proposal without additional strain on the existing infrastructure. The Port proposes to manage traffic entering the road network by employing a Mobility Management Plan. It has discussed this in detail with Cork County Council and the NRA. But the Mobility Management Plan necessitates longer opening hours which in turn impacts on local residents. The greater volume of HGVs travelling directly outside the school at Shanbally has not been discussed at all by the CE's report. The Area Engineer recommends that consideration be given to closing the existing access to the Port at the eastern end of Ringaskiddy village as to minimise the interaction between local residents and port traffic. This is a very reasonable suggestion but I cannot see it reflected in either the CE's requests for further information or in the proposed conditions.

In her report to the CE, the Area Engineer is concerned that the EIS refers to 800 construction jobs without detailing whether these jobs are specific to the proposed development or what timescale they might be created over. The CE acknowledges this concern in Suggested Condition 7, proposing a monitoring and management regime for all vehicles entering and leaving the Port. In view of the significant implications of a further 800 cars entering this already overburdened road network, this is an element of the proposal which needs to be examined in the public realm for its practical implications and its wider implications for limiting the potential for future development in the zoned Ringaskiddy Strategic Employment Centre.

The Area Engineer also requests details of how staff car parking will be dealt with both in the shorter and longer term, noting 80 car parking spaces as being illustrated adjacent to the administration building. The CE does not include this request in the Suggested Further Information Questions.

The proposal raises further concern in the context of Ringaskiddy as a Strategic Employment Zone. Car traffic using not merely the N28 but also the local roads to access the pharmaceutical factories is a source of tremendous worry to local residents. The Port's proposal, if granted, has the potential to not merely further push pharmaceutical traffic onto local roads but additionally, it is prejudicial to future industrial development because of the additional strain it will place on existing infrastructure.

Please do not forget that although the N28 and its upgrade is that which is most spoken about in association with this project, all traffic from any port development at Ringaskiddy will affect congestion at the strategic interchanges of the Kinsale Road

Roundabout, the Dunkettle Interchange and the Bloomfield Interchange. I cannot understand how the draft County Development Plan 2013 supports port development in Ringaskiddy so that *“port traffic can directly access the National Road network without passing through the City Centre”*. None of the container traffic at Tivoli passes through the city centre; it has direct access to the Dublin road and only that which heading south west goes through the Jack Lynch Tunnel. The proposals currently on the table for Ringaskiddy would see immeasurably greater interaction between port and city traffic than is seen with the current port configuration.

2.3.1 Rail

Rail connectivity to ports is regarded as being vital for long-term sustainability. European legislation requires it and all other major ports in the country either have or have the potential for rail access (Dublin, Waterford, Foynes, Rosslare). Ringaskiddy is located at the south east of the city, is not connected to the national rail system and would be totally reliant on road-based transport.

Neither did any department assess the long-term implications for climate change by consigning all port traffic from Cork to road. The Environmental Report for the draft County Development Plan 2013 states that the main threat for air quality in Ireland is emissions from road traffic and that, *“given our reliance on car based transport, this will continue to be a problem unless measures are introduced to reduce car use and emissions from vehicles”*. Any south-based strategic documents reporting on the future of rail freight transport in Ireland quote studies commissioned by the Port of Cork. None has commissioned its own study, despite the requirement of the National Spatial Strategy that governments should determine the future role of rail freight themselves. This same strategy seeks to adopt a new approach to freight transport and goods distribution based on planning that takes into account the way in which various links such as road, rail and ports in the goods supply chain are interdependent. This is entirely reflective of European legislation.

The Port of Cork’s current proposals are merely the very beginning of its anticipated development at Ringaskiddy. Down-the-line expansion is outlined in its Strategic Development Plan Review. Whether or not the N28 is upgraded is, at this point, irrelevant. To confine cargo from the second largest port in Ireland to road indefinitely would be the most retrograde condemnation of Cork’s economic future.

2.4 Social and Economic Impacts

No department within the County Council has informed the CE’s assessment of the social and economic impacts of the Port’s proposed development at Ringaskiddy. The CE’s assessment (Section 9.4) relies entirely on the Indecon economic assessment of the benefits of the Port’s proposal – a report commissioned by the Port itself.

What those living and working in the Harbour are desperate for is an independently commissioned study on the local and wider economic benefits of the residential, amenity, tourism, fishing and ecological values of Cork Harbour. The fame of Cork Harbour as a cultural and tourism destination grows year on year. The County Council’s *Marine Leisure Infrastructure Strategy* has a stated aim to *“develop Cork Harbour as a major heritage tourism destination with the important heritage sites of Spike Island and Fort Camden”*.

In 2013, 62 cruise liners called to Cork, bringing a staggering 123,000 passengers and crew to the region. Fort Camden receives 1,000 visitors each weekend during the summer. Having been brought back by local volunteerism from 21 years of dereliction, Fort Camden is a major success story for Cork Harbour tourism. The value of Camden and Spike Island are recognised para 8.3.3 of the draft County Development Plan 2013. Cork County Council has put tremendous effort and energy into the development of Spike Island. The committee leading its development is truly multi-disciplinary, encompassing representatives from all aspects of the community including Cork County Council, Fáilte Ireland, the Naval Service, the Army, University College Cork, the National Maritime College, the Community Services and the Office of Public Works. This is integrated management at its best.

The draft County Development Plan is also clear on the value of marine leisure tourism. The CE's assessment in Section 9.2 does not mention the impact of increased shipping on this very valuable aspect of the Harbour. Monkstown Bay and Cobh Sailing Clubs share the Ringaskiddy Basin with the Port of Cork. Both have intensive dinghy and cruiser racing schedules throughout the week. This month alone there are 76 children aged 7 – 11 on the Monkstown Bay Sailing Club sailing course. The National Maritime College has its own sailing club immediately adjacent to the Port's proposed area of expansion. The College has recently formed an alliance with the Sailing Academy of Ireland and now offers sailing instruction for all ages and all levels of experience. Many of the Royal Cork Yacht Club events use the wider Lower Harbour area, with both junior and other sailors inevitably interacting with shipping lanes. The calendar of the Royal Cork is intensive, with class racing/training organised almost seven nights a week. Cork Week, a biennial big boat event in the Harbour, is a massive occasion in the Irish and European sailing calendar. Organised by the Royal Cork Yacht Club since 1976, it saw an all-time high of 600 entries in the late 1990s and through the first decade of 2000. The Coastal Rowing Clubs which use the Harbour include Rushbrooke, Passage West, Commodore, Crosshaven, Fishermans', NMCI and the Naval Service. The Ocean to City Race which is a rowing race from Crosshaven to the City is held annually. It is very important in the context of the Cork Maritime Festival which attracts national and international participants and visitors. The Great Island Race also takes place annually, whilst kayaking in the Lower Harbour has increased dramatically as a pastime over the past number of years.

The CE's assessment does not talk about any of this. It merely mentions the Port's proposal to move the existing public amenity area to Paddy's Point. Locals know that currents are so strong at Paddy's Point that the area will be virtually unusable. The Port of Cork does not mention this in its planning application and the CE does not in his assessment either.

The only other aspect of the social and economic impact of the proposal mentioned in Section 9.2 of the CE's assessment is that on the fishery of the Oyster Bank. In a one-sentence assessment, he concludes that the proposal will not have an adverse impact on the Oyster Bank fishery. In fact, Inland Fisheries Ireland has made a submission to the proposal, stating that *“unfortunately associated with the development is significant and measurable fisheries losses”* including a *“permanent loss of fisheries habitat together with the loss of commercial and amenity resource value”*.

It is fair in the context of local hopes and aspirations for Cork Harbour which are potentially diametrically opposed to the Port's proposals for Ringaskiddy to regard the

CE's assessment of the social and economic impacts of the Port's proposals as, at best, inadequate.

2.5 Heritage/Ecology/Appropriate Assessment

The Heritage Officer of Cork County Council has made an assessment of the potential of the proposed development at Ringaskiddy to impact on designated sites, protected species and habitats of conservation value. This is summarised in the Section 9.5 of the CE's assessment.

The Heritage Officer's report is excellent. It is completely correct in describing baseline and modelling completed in conjunction with the EIS as being undertaken by the applicant. It is clear that the measures and procedures proposed to mitigate the impact of the development are proposals on the part of the applicant and need to be independently verified by suitably qualified experts in the relevant areas. It is a genuine assessment which correctly and reasonably states where the Port's proposals are adequate, where further information is required and where independent verification is necessary.

Contrary to the CE's assessment in Section 9.5, the Heritage Officer's report does not say anywhere that the proposal is acceptable from an ecological/heritage point of view. It makes several recommendations, advises of potential considerations and has many requests for further information which would be "critical" to assessing whether the project could proceed without negatively impacting the adjacent protected area of Monkstown Creek.

2.6 Environment

2.6.1 Air quality

The County Council assessment of impact on air quality arising from the proposed redevelopment of Ringaskiddy simply relies on information commissioned by the Port of Cork in preparation of its EIS. It proliferates with phrases such as "it is submitted" and "it is stated". There is no supplemental air quality monitoring carried out, no in-house assessment of baseline conditions, simply nothing at all to attempt to confirm or otherwise any part of the assessment commissioned by the Port of Cork.

I find this particularly extraordinary because I am aware that the people of Ringaskiddy have regularly called Cork County Council over many years for assistance when dust from port activities have been a particular nuisance. At the very least, the analysis could have listed the occasions on which the County Council has been called by the residents of Ringaskiddy or identified when and where the County Council has undertaken baseline air quality monitoring in the area. Even the residents accept that the County Council's resources are so limited as to be of little practical assistance to their ongoing difficulties with fugitive dust, but one would expect at least some effort on the part of the Environment Directorate to contribute independently to analysis of the Air Quality section of the EIS. Equally, it would have been appropriate and valuable for the assessment to have compared the benefits/disadvantages of the grabs and hoppers used in Ringaskiddy against the enclosed conveyor system used by the Port at the Cork City Quays.

2.6.2 Noise/vibration

Similar comments apply to the Environment Directorate's analysis of the noise and vibration potential of the proposed development. The internal report simply paraphrases Chapter 9 of the EIS. This is not responsible analysis.

The Environment Directorate's report repeats page 9.33 of the EIS that "*there is potential for significant noise level to be experienced in the vicinity of Ringaskiddy village and the Whitepoint/Blackpoint area and for worst case predicted noise levels when alarms are active to be prominent at Monkstown also*". The people of Ringaskiddy and Monkstown already report significant disturbance arising from noise from existing port activities. Surely it is appropriate that the Environment Directorate would at least offer opinion of any changes in noise level? But it does not. Nor does it comment on the potential noise impact of the "extended opening hours" that the Traffic and Transportation Section notes will be an integral component of successful operation of the Ringaskiddy Mobility Management Plan. And there is no mention at all of the noise impact of trucks on the learning and amenity environment of children in Shanbally school, immediately adjacent to the N28. As recently as last Friday (11th July), a complaint from a local resident was telephoned in to Cork County Council.

2.6.3 Waste/Water

The assessment of waste impacts from the proposed development made by the Environment Directorate is reasonable. It notes that there is no chapter in the EIS relating to waste, analyses the relevant aspects of the proposals and notes a significant range of further information required. In the event that the further information is not supplied, it makes suggestions for conditions relating to waste that might be attached to a grant of planning.

The assessment of water by the Environment Directorate is very limited. It deals only with those areas which are within the Directorate's expertise and this up front approach is laudable. Unfortunately, though, there is no other department within the County Council which has the expertise to deal with:

- the significant potential impact on water quality through the major dredging programme associated with the proposed development
- the potential impacts on designated Shellfish Waters
- the impact on marine ecology
- the impact of sediment drift, reclamation and other aspects of the proposed development on coastal processes.

The CE's analysis in Section 8.2 does not mention at all the need for these further and crucially important aspects of the proposed development to be assessed elsewhere. It comments merely on the straightforward aspects of groundwater protection and stormwater runoff. It is therefore incomplete and misleading.

The assessment of wastewater by the Environment Directorate notes deficits within the information supplied by the EIS but suggests that these deficits can be dealt with by way of Conditioning. This is accurately reflected in Section 8.2 of the CE's analysis.

3.0 Summary

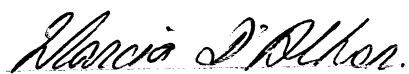
The appropriateness of any development cannot be determined solely on commercial and economic considerations. For example, in the Retail Planning Guidelines, it is acknowledged that the maintenance of the vitality and viability of existing towns are important planning considerations in determining the location and suitability of any large commercial retail development. Commercial developments are often curtailed in size or refused permission in order to safeguard the character of such towns.

The Port of Cork's planning application for Ringaskiddy proposes a similar scenario. Its location, size and scale has offshoot impacts that extend well beyond any economic benefits of extending its operations at Ringaskiddy. I believe these impacts have not adequately been assessed within the CE's report. The report is glaringly deficient in adequately evaluating:

- the concerns of local residents
- the impacts of the proposal in relation to air and noise pollution
- visual impact in the context of the wider Lower Harbour area
- potential detrimental impact on tourism
- potential detrimental impact on amenity value
- potential detrimental impact on fisheries.

It is an additional concern that the potential long-term impact of resigning all port freight traffic to roads has not been assessed at all. Should increasing awareness of climate change issues cause the price of fuel to increase over time, it may cause a sinister impact on the value and affordability of goods imported through Cork's port in the longer term and consequently affect the competitive nature of Cork as a region.

All of these issues hinder prudent sustainable strategic development in that the site choice for the strategic development of a large port should take account of the site's suitability for possible future expansion if and when required. There are simply too many constraints on Ringaskiddy which deserve further examination.



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