



An  
Bord  
Pleanála

## Planning Appeal Online Observation

Online Reference: (NPA-OBS-  
000749)

### Online Observation Details

Contact Name:	Eithne Farr
Lodgement Date:	10/04/2022 16:44:00
Case Number / Description:	312981

### Payment Details

Payment Method:	Online Payment
Cardholder Name:	Ms E Farr
Payment Amount:	€50.00



4 Toureen Terrace,

Passage West

Co Cork

T12 DH92

11 April 2022

The Secretary

An Bord Pleanála,

64 Marlborough Street,

Dublin.1

D01 V902

**Re: Observation on planning appeal reference 312981 –Belvelly Port facility, Marino (Townland), Marino Point, Cobh, co Cork (Cork County Council planning reference no 20/6955**

A Chara,

I wish to make this observation on the appeals of Cllr Marcia D’Alton and Madeline Roberts in relation to the development proposed at Marino Point by Gouldings Chemicals Ltd and Belvelly Marino Development Company.

As a resident of Toureen Terrace in Passage West, which is located **less than 500m** from the jetty at Marino point I have concerns about the level of detail included in the technical information and the EIA submitted with the original planning application.

Previous activity at Marino Point has in the past had serious impacts on me personally and the town of Passage West in general.

The previous fertiliser plant at Marino Point was closed because of SEVESO concerns.

#### **BASIS FOR OBSERVATION**

The jetty that serves the site is used on occasion as a “lay-over berth” for boats when other Port of Cork facilities are full. This results in noise and vibrations both during the day and overnight from ships’ generators etc. I have had to contact the Port of Cork on numerous occasions about this and have also made complaints to the environmental department of Cork County Council.

For some residents, the daytime noise may not be perceived as a problem, but for me it was a major issue when working from home during the recent pandemic as I’m a lecturer in MTU and had to deliver lectures ‘live’ remotely. Some days I had to stop because the noise and vibrations were too loud.

On one occasion I was told by the Business Development Manager of the Port of Cork, that their monitoring system was not picking up any noise.

I could not continue my classes, **even though I have double glazing in my house.**

The environmental report produced with the planning application appears to focus on the site of the bulk storage facility rather than the jetty even though it is acknowledged by the environmental office that the proposed use of the jetty will increase dramatically.

The proposed storage facility and the jetty are not located in the same part of the Marino Point site. The distance from the jetty to Passage West is 490M, **over water** and the distance from the jetty to the proposed facility is 649M **over land**. Therefore my house is nearer to the jetty than the proposed site, so the information regarding noise/ vibration assessment made by the applicant for "the site" do not refer to the jetty.

Noise and vibrations travelling across water may appear amplified.

A public information meeting was held by the Port of Cork a number of years ago, prior to the pandemic. I spoke with an Engineer on the day to express my concern regarding of the proximity of the jetty to my house. He dismissed my concern saying it was not that close, I suggested that he come and stand at my front door and see.

What is proposed in this planning application is the first step in the development of a portside industrial park with multiple operators. I would ask that the board define who will be responsible for the impacts from that park.

As previously stated, I have contacted the environmental department of Cork County Council with noise complaints, I was given a complaint reference number each time, but I never received any follow up information.

In light of the above I attach hereto some extracts from the "SEA of local authority land use plans – EPA recommendations and resources".

I ask the Board to give consideration to my concerns and observations as outlined above.

Is mise le meas,

EITHNE FARR

[REDACTED]  
[REDACTED]

## Extracts from the SEA of local authority land use plans – EPA recommendations and resources

### Noise

In Ireland, the Environmental Noise Directive (END) is implemented through S.I. No. 549 of the Environmental Noise Regulations 2018, as amended in 2021[1]. The END requires Member States to prepare and publish, every 5 years, strategic noise maps and noise management action plans for transport noise sources (roads, rail and airports) and industry. The aim of the END is to provide a common framework to avoid, prevent or reduce the harmful effects of exposure to environmental noise. In this context, as appropriate, the Plan should promote the implementation of the Environmental Noise Directive and associated national regulations. <http://www.irishstatutebook.ie/eli/2018/si/549/made/en/print> & S.I. No. 663/2021 - European Communities (Environmental Noise) (Amendment) Regulations 2021 ([irishstatutebook.ie](http://www.irishstatutebook.ie))

[1] The Environmental Noise Regulations 2018 both revise and revoke the Environmental Noise Regulation 2006 and transpose the common noise assessment methods (CNOSSOS) Directive 2015/996.

5 The LA group is being led by Kildare Co Council (John O Neill) and Limerick City & Co Council (Simon Jennings).

The National Planning Framework <https://npf.ie/> recognises the significance of environmental noise and includes National Policy Objective 65 to ‘*Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.*’ As part of the LA Performance framework (REMCI) reporting priorities, there are two new targets for noise in 2021 (i) NAPs Reporting Deadline, and (ii) Strategic Noise mapping data collection phase. A local authority WG are currently developing a ‘Noise in Transportation - Planning Advice Note’ which is expected to be finalised in May 2021.

The noise action plans (NAPs) involve the identification of measures needed for the prevention and reduction of environmental noise. The LAs are now required to report progress (each year) on the implementation of their NAPs. The Noise Action Plans should be considered and reviewed by Local Authorities as required, to reflect the Plan period and associated development proposals. Consideration should be given to any relevant noise maps, and action plans. Strategic noise maps are designed to assess population noise exposure resulting from major roads, railways and airports. Noise action plans are designed to act as a means of managing environmental noise through land use planning, traffic management and control of noise sources. The fourth round of noise mapping is currently underway in Ireland and the maps should be completed in early 2023. <http://noise.eionet.europa.eu/help.html>.

For larger urban areas, the extra value placed on Quiet areas will be a key priority as part of noise action planning going forward. One of the key messages in the SOER 2020 Noise chapter is that ‘*LAs should promote the value of designating quiet areas in cities for health and wellbeing.*’ <https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/irelands-environment-2020---chapter-4---environmental-noise.php/>. Separately, the SOER 2020 noise chapter also has three key messages around noise that could be relevant. While there have been some positive developments around the designation of quiet areas, it’s an area that could be promoted further. There might be opportunities to link to initiatives and research around green and blue spaces for health and wellbeing. Dublin City Council has designated eight Quiet Areas (QAs) while South Dublin County Council, Limerick City and County Council as well as Kilkenny County Council are all doing some good work on the

identification of quiet areas in their cities. Consideration should also be given to protect designated quiet areas in open country or along the coasts.

## **Human Health / Quality of Life**

In addressing human health and quality of life, the Plan should consider the socioeconomic status of the population within the plan area and in particular should consider any socioeconomic inequalities. This is important to ensure that the Plan does not exacerbate any existing inequalities and ideally promotes and supports the balancing of existing socioeconomic inequalities.

The Plan should ensure provision of adequate and appropriate infrastructure and to serve both the existing community and likely future predicted increases in population within the Plan area. In preparing the Plan, there is merit in exploring current practice and opportunities with respect to promote the protection and, as appropriate, improvement of “Quality of Life”. Where relevant, the application of existing “Quality of Life Indices” would be considered in consultation with relevant statutory and non-statutory bodies/organisations. We also refer you to the relevant aspects already referred to above under water, biodiversity, air, energy as the links between a high-quality environment and improved health and wellbeing are well established.

The EEA have published a report on the environment and health, that may be useful to consider. This report also highlights the importance of access to good quality green and blue space. It can be consulted at: <https://www.eea.europa.eu/publications/healthy-environment-healthy-lives>.