Sorcha

Karen Hickey

From: Mairi Henderson <MHenderson@mhplanning.ie>
Sent: Wednesday 8 June 2022 11:10
To: Sorcha Skelly
Cc: Appeals2
Subject: Belvelly Port Facility - ABP-312981-22
Attachments: LTR_220608_Response to Third Party Appeals_Belvelly_as submitted.pdf

Dear Sorcha

I refer to your letter dated 7th June, and hereby submit a response to the 3rd party appeals received from Cllr Marcia D'Alton and Mr Eoin Bell. A copy of the submission is also being posted in hard copy.

Regards,

Màiri

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The Secretary
An Bord Pleanála
64 Marlborough Road
Dublin

8 June 2022

Re: Response to Third Party Appeals – Construction of an agricultural fertilizer facility, and additional port operational use of the jetty to facilitate cargo vessels and associated site works, at Belvelly Port Facility, Marino (Townland), Marino Point, Cobh, Co. Cork. ABP Reference: 312981-22, Cork County Council reference 20/6955

Dear Sir / Madam,

We act on behalf of the applicants, Gouldings Chemicals Ltd and Belvelly Marino Development Company (BMDC), and refer to your letter dated 7 June 2002, which requested a response to the appeals by Cllr Marcia D'Alton and Mr Eoin Bell to Cork County Council's notification of its decision to grant permission for the above development.

This submission has been prepared in collaboration with Malachy Walsh & Partners (traffic, dust, and surface water management) and Damien Brosnan Acoustics (noise impacts).

The primary issues raised by third party appeals relate to seven areas:

- Noise Impacts
- Traffic Impacts
- Seveso
- Dust Impacts
- Surface Water Management
- Alternatives Considered
- Planning Policy

Our response is grouped by these headings.

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1. Noise Impacts

Noise concerns raised by the appellants may be summarised as follows:

a. Generator noise impacts from overnighting vessels
b. Noise impacts from tugs
c. Night-time vessel low frequency noise impacts
d. Impacts from night-time tones and impulses
e. Noise from HGVs on R624
f. Assessment referred to fertiliser site only, and not to jetty
g. Assessment did not take propagation over water into account

a. Generator noise impacts from overnighting vessels

The appellants refer to potential impacts associated with noise emissions from generators on vessels berthed overnight.

Vessel onboard generators will be required to provide power for crew facilities and lighting. Surveys indicate that noise emissions from onboard generators on vessels such as those which will use the proposed jetty are in most cases inaudible beyond 100 m. As an example, general cargo vessels which regularly dock at the Ringaskiddy deep water berth are typically inaudible within the Ringaskiddy terminal during night-time hours. Similarly, vessels which currently use the Tivoli container terminal are also inaudible during night-time hours at receptors at Tivoli, or at receptors across the river at Blackrock. This is confirmed by many surveys undertaken in the vicinity of these facilities by Damian Brosnan Acoustics during night-time hours. A similar situation is expected at the proposed jetty, whereby onboard generator emissions from the majority of vessels are expected to be inaudible beyond 100 m, and thus will be inaudible at Belvelly or across the river at Passage West. It should also be noted that many vessels do not require power while docked, such as tugs and other small vessels. Such vessels do not run onboard generators when berthed.

A small number of vessels may give rise to generator emissions that may be slightly audible beyond 100 m, typically due to older vessel design or increased onboard power requirements. Table 1 presents sound power levels associated with a typical vessel auxiliary engine in the size range 5,000-20,000 t, taken from the DGMR iNoise v2022 database. It should be noted that in this case, a relatively large auxiliary engine is assumed, operating at full load.

Table 1: General cargo vessel auxiliary engine sound power levels. Octave band levels as L_{WA}.

31.5 Hz	63 Hz	125 Hz	250 Hz	500 Hz	1000 Hz	2000 Hz	4000 Hz	8000 Hz	LWA
65 dB	65 dB	79 dB	87 dB	91 dB	94 dB	93 dB	89 dB	83 dB	99 dB

The noise model developed for the proposed facility was used to predict noise levels associated with such emissions. The model output is shown in Figure 1. The highest $L_{Aeq\,T}$ levels received at shorefront properties at Passage West will be 33 dB. Levels will quickly fall to below 30 dB on the hillside above. At the nearest dwellings to the southeast, levels will reach 28 dB at their highest, and will fall below 25 dB further north. Where two vessels are berthed simultaneously, both with similarly large generators

running, predicted levels will increase by 3 dB. In all cases, levels will remain markedly below the 45 dB night-time criterion recommended by the World Health Organisation and the EPA.

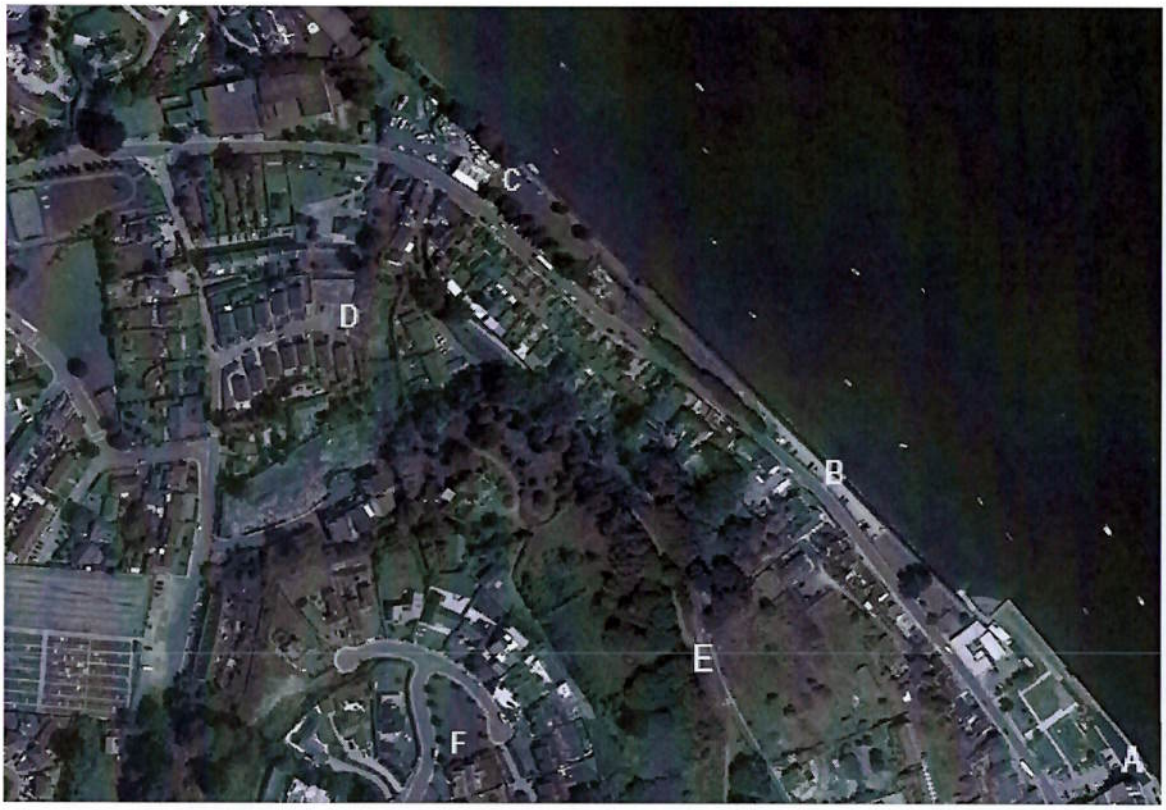
Figure 1: Predicted $L_{Aeq\,T}$ levels from docked vessel generator.

With a view to assessing night-time impacts associated with generators on docked vessels, night-time measurements were carried out by Damian Brosnan Acoustics at Passage West on 05.03.21 while the vessel Finola M was moored at the Marino Point jetty. Specific $L_{Aeq\,T}$ levels attributable to the onboard generator are listed in Table 2. Noise levels at all locations were considerably lower than the 45 dB night-time criterion recommended by the World Health Organisation and the EPA.

Table 2: Finola M generator $L_{Aeq\,T}$ levels at Passage West. Locations are shown in Figure 2.

Ref.	Location	$L_{Aeq\,T}$
A	Steam Packet House	36 dB
B	Carpark 200 m N of Steam Packet House	36 dB
C	Passage West boat yard	35 dB
D	Bellevue Court	31 dB
E	The Back Road	31 dB
F	Ard Chuain	Not detected

Figure 2: Noise stations used during Finola M survey 05.03.21.



Levels presented in Table 2 are 3 dB higher than predicted in Figure 1. The 3 dB difference is due to the Finola M being a different type of vessel – an older design (1988) with minimal noise attenuation, and operating an aging generator. Such vessels are rarely expected at the jetty. The vast majority of vessels docking at the proposed jetty will be of newer design, with quiet onboard generators and noise mitigation factored into the design from the outset. It is nonetheless evident from Table 2 that noise emissions from the Finola M gave rise to noise levels which were considerably lower than criteria recommended by the EPA and World Health Organisation.

An inspection was undertaken by Damian Brosnan Acoustics at Passage West on 30.07.21, while two Maersk anchor handling supply vessels (AHTS) were docked at the Marino Point jetty. Both vessels are high powered vessels and were reported to generate higher than normal noise emissions while docked. $L_{Aeq\,T}$ levels specifically due to these generator emissions were recorded as 39-40 dB at locations B and C above, 37 dB at location A, and 33 dB at location B. These levels are considered to represent an entirely worst-case scenario, with two high powered vessel generators operating simultaneously, both giving rise to higher-than-normal emissions. Nonetheless, noise levels remained comfortably below the 45 dB criterion at all positions.

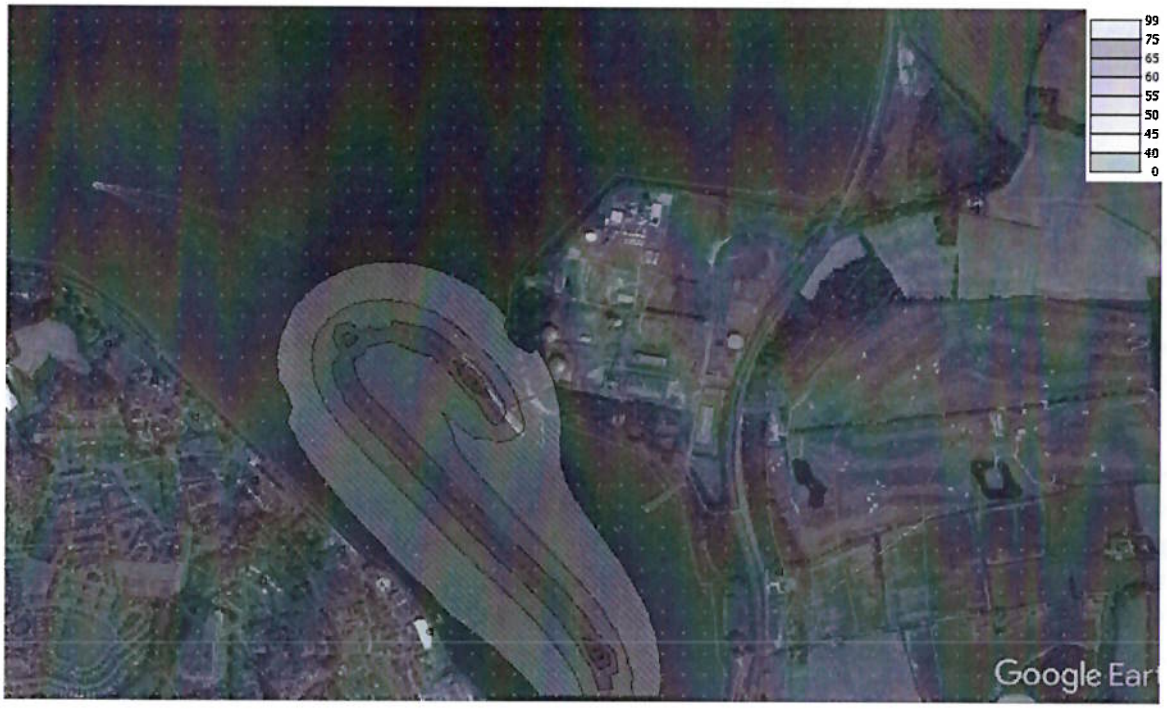
To conclude, it is important to note that the requirements of the European Green Deal/ proposed Fit for 55 legislative package currently includes the obligation for onshore power supply (OPS) in certain circumstances at ports. This legislation is under discussion and is yet to be finalised within Europe. The Port of Cork is committed to implementing OPS in line with the requirements of EU policy/ legislation.

b. Noise impacts from Pilot tugs

Appellants refer to noise emissions from pilot tugs while manoeuvring vessels at the jetty. Such emissions will arise only while tugs assist in vessel docking, and again at vessel departure. Outside of these periods, tug emissions will not arise, apart from occasions when tugs themselves dock at the jetty. It is important to note that tugs will not give rise to emissions while docked, as tugs do not require power for onboard equipment while docked. Thus, tug emissions are likely to arise only at vessel arrival, departure, and when the tugs themselves dock and leave.

During a tug manoeuvring or docking event, noise emissions will arise over 5-15 minutes as the tug approaches the jetty, or as it departs the jetty. Noise emissions associated with a docking vessel such as a tug were assessed in the EIAR. The model output is again presented in Figure 3. The highest $L_{Aeq\,T}$ levels predicted at the Passage West shorefront will be 38 dB. Levels at the nearest receptors to the southeast of the jetty will reach 33 dB. At Horsehead, where the appellant resides, tug noise levels will be 34 dB or less. Where such activity occurs during night-time hours, tug $L_{Aeq\,T}$ levels will be significantly lower than the 45 dB night-time criterion at all receptors. It is reiterated that tug activity when it occurs will be short-term.

Figure 3: Predicted $L_{Aeq\,T}$ during vessel manoeuvre such as docking tug.



c. Night-time vessel low frequency noise impacts

Low frequency noise emissions may be generated by vessel main engines. Such emissions typically contain increased acoustic energy in the frequency range 20-100 Hz. Extensive surveys undertaken previously by Damian Brosnan Acoustics in the vicinity of Ringaskiddy, Monkstown, Passage West and Tivoli indicate that, although such low frequency emissions may be clearly audible while a vessel passes or manoeuvres, the emissions are typically not tonal when assessed using the one third octave band objective analysis method set out in British Standard BS 4142:2014+A1:2019 Methods For Rating And Assessing Industrial And Commercial Sound (2019) and EPA document NG4 Guidance Note For Noise: Licence Applications, Surveys And Assessments In Relation To Scheduled Activities (2016).

At the proposed jetty, main engine low frequency emissions will arise only when a vessel approaches and docks at the jetty, and again during departure. Following vessel docking, the main engine is typically shut down within 10-20 minutes. The main engine is typically restarted 15-30 minutes prior to departure. During these events, although low frequency noise emissions may arise, these emissions are highly unlikely to be prominent or tonal.

While docked at the jetty, onboard vessel power (where required) will be supplied by a vessel's generator. Noise emissions from generators are considerably lower than those from main engines, with minimal low frequency content. As an example, reference may be made here to the frequency spectra recorded at Passage West during night-time hours on 05.03.21 while the Finola M was docked at the jetty. Spectra recorded at locations A-E (see Figure 2 above) are shown in Figures 4 to 8. Vessel emissions were not

detected at location F. Spectra show marginal increases in energy in the 40 Hz band at location A, and the 100 Hz band at locations B, C and E. The highest increase was recorded at location C. However, the prominence here was 4 dB, and thus considerably lower than the 15 dB required to be tonal. The figures show that, while the Finola M generator included low frequency content, this energy was minimal. As mentioned above, the Finola M is a relatively old vessel with little onboard acoustic attenuation, and this vessel therefore represents a relatively worst-case scenario. Generator emissions from modern vessels contain less low frequency energy, and benefit from acoustic attenuation incorporated at vessel design stage.

Figure 4: Finola M spectrum 05.03.21 at location A.

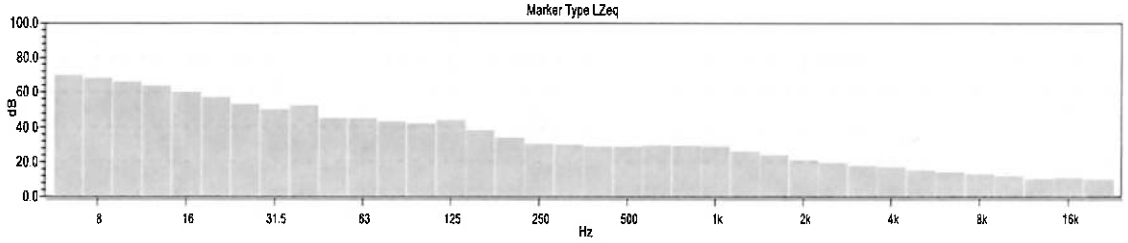


Figure 5: Finola M spectrum 05.03.21 at location B.

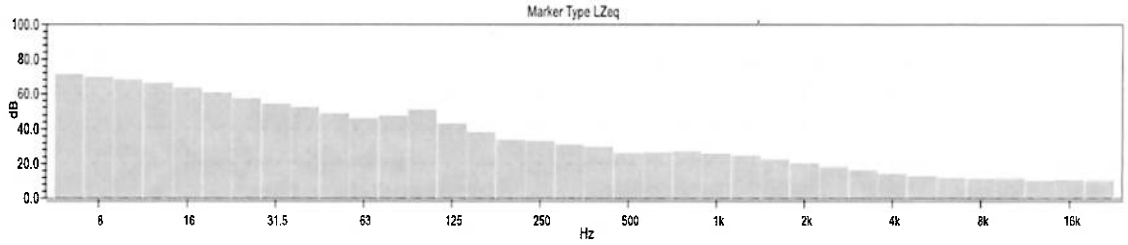


Figure 6: Finola M spectrum 05.03.21 at location C.

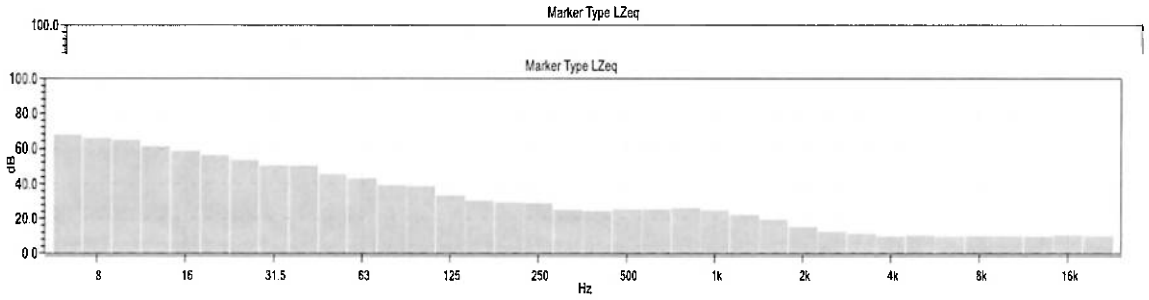
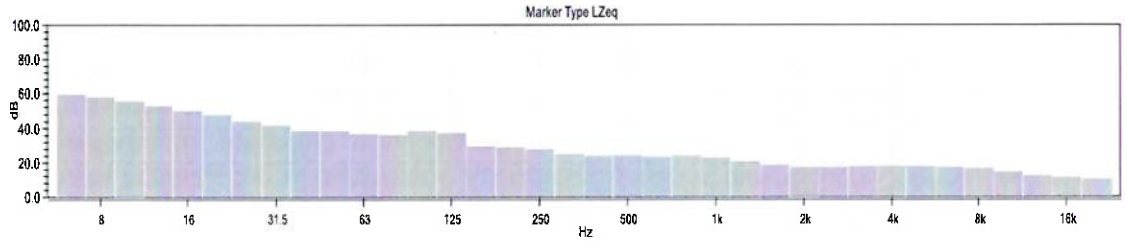


Figure 7: Finola M spectrum 05.03.21 at location D.

Figure 8: Finola M spectrum 05.03.21 at location E.



A similar situation was observed with respect to the Maersk vessels inspected on 30.07.21 as described above. Spectra were not recorded on this occasion. However, field notes indicate that low frequency energy was slightly audible at locations A, B and C, with a marginal signal at 50 Hz. The signal prominence was considerably lower than the 15 dB criterion. This energy was slightly audible only, and not intrusive or tonal. As noted above, this is also considered to represent a worst case scenario i.e. two vessels emitting simultaneously, both of which gave rise to higher than normal noise emissions from their generators.

On the basis of the above, it is considered than low frequency noise emissions are unlikely to arise from vessels docked at the jetty. While increased low frequency noise may arise from main engines during berthing and departure, these emissions will be sporadic and temporary.

d. Impacts from night-time tones and impulses

As discussed above, noise emissions from vessel generators are highly unlikely to be tonal, as confirmed during inspections of the Finola M and Maersk vessels. No tonal night-time emissions are expected from vessels or any other activity at the jetty. Jetty operations will in general take place during the period 0700-1900 h Monday-Saturday, with limited activity outside this period. On rare occasions, jetty operations may be required outside this period for various operational or safety reasons. However, any such operations are highly unlikely to give rise to tonal emissions.

Any emissions arising at the jetty are unlikely to be impulsive. At port facilities, impulsive emissions are typically associated with container operations. Such operations are not proposed at the facility. Appellants refer to impulsive emissions associated with scrap metal handling at a quay in Passage West, which is not associated with the Port of Cork / BMDC. This activity will not occur at the Belvelly facility.

Operations at the proposed fertiliser facility will be confined to daytime hours throughout most of the year. During the period February to April, peak production may continue to midnight. No operations will occur after midnight. Noise emissions from fertiliser production will not be tonal or impulsive, as confirmed by measurements made at the existing Gouldings facility in Cork on 30.01.20, as presented in the EIAR. Most operations will be confined internally in the proposed buildings.

The appellants refer to tonal and impulsive noise emissions from plant reversing alarms. Plant operating at the fertiliser facility will be fitted with flat spectrum alarms, and emissions from these will not be audible at any offsite receptor. Similarly, plant operating at the jetty will also be fitted with such alarms. It is reiterated that such plant activity is highly unlikely to occur at the jetty during night-time hours.

e. Noise from HGVs on R624

Appellants expresses concerns with increased noise levels in the vicinity of a dwelling adjacent to the R624 close to Belvelly Bridge. The traffic impact assessment included in the EIAR calculates the percentage increase in annual average daily traffic (AADT) volumes resulting from the proposed development when operational. The increases are calculated by comparing (a) future traffic volumes without the development, based on TII growth forecasts, and (b) these future volumes in addition to the proposed development. Increases calculated with respect to Belvelly Bridge are shown in Table 3. Increases after 2023 will reach a maximum of 1.1 %.

Table 3: Predicted AADT increases in traffic at Belvelly Bridge resulting from operational development.

Year	2023	2028	2038
Peak fertiliser production period Feb-Apr	1.2 %	1.1 %	1.1 %
Off peak fertiliser production period May-Jan	1.0 %	0.9 %	0.9 %

An increase of 1 % in traffic volume corresponds to an increase of less than 0.1 dB in traffic noise levels. This increase may be assessed by reference to guidance set out in the Design Manual for Roads and Bridges (UK Highway Agency, 2011), presented in Table 4. Included in the table are impact categories listed by the EPA in their 2017 document Draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports.

Table 4: DMRB and EPA assessment guidance.

Increase	Subjective reaction	DMRB impact	EPA impact
0 dB	None	No change	Neutral
0-3 dB	Imperceptible	Negligible	Imperceptible to not significant
3-5 dB	Perceptible	Minor	Not significant to slight
5-10 dB	Up to a doubling of loudness	Moderate	Slight to moderate
>10 dB	Doubling of loudness or greater	Major	Significant to profound

On the basis of the scheme presented in Table 4, it is concluded that a traffic noise increase of 0.1 dB resulting from the proposed development will be negligible, resulting in a neutral impact.

f. Noise impact assessment referred to fertiliser site only, and not to jetty

Potential noise impacts associated with the proposed jetty use were assessed in the EIAR. Sections 14.3.2.3 and 14.3.2.4 assess these impacts. In addition, six of the seven scenarios assessed in the noise model include jetty activity. In all cases, it is concluded that impacts will be neutral at distant receptors, increasing to slight adverse during evening or night-time arrival/departure of larger vessels and will comply with EPA guidelines / industrial best practice.

g. Noise assessment did not take propagation over water into account

The DGMR iNoise v2020 software model used to predict offsite noise levels assumes that bodies of water provide an acoustically 'hard' surface, with a ground absorption factor G of 0. This represents best

practice with respect to acoustic modelling and is consistent with guidance set out in International Standard ISO 9613-2:1996 Acoustics: Attenuation of Sound During Propagation Outdoors – Part 2 General Method of Calculation (1996).

It should be reiterated that there are no receptors in immediate proximity to the jetty. While receptors at Passage West will have clear views towards the site, the nearest receptors here lie 0.5 km from the jetty. While noise emissions from the jetty propagated across the river towards these receptors will not benefit from ground absorption, the emissions will nonetheless attenuate due to geometrical divergence, which is fundamentally based on propagation distance. Emissions will also be attenuated by atmospheric absorption, which is again related to distance.

2. Traffic Impacts

Appellant's statement that the suburban R624 is *"already unsafe"* is not supported by the Road Safety Authority recorded accident collision data and Government's Design Manual for Urban Roads and Streets (DMURS). The Appellant references to *"blind"* horizontal curves along the suburban R624 are not consistent with DMURS.

The Road Safety Authority's (RSA) recorded accident collision data for the suburban R624, between the north end of Belvelly Bridge and the proposed development site, for the available years 2005 to 2016, provided on their website https://www.rsa.ie/road-safety/statistics/collisions indicates that there were no fatal, or serious collisions; and no collisions involving a heavy vehicle, pedestrian or cyclist. All RSA collisions recorded on the suburban R624, between the north end of Belvelly Bridge and the proposed development site, were minor collisions involving cars, and all occurred during the years 2005 to 2011, inclusive.

The R624 at Belvelly Bridge and south of Belvelly Bridge has a posted speed limit of 60 km/hour and is a suburban road, on the basis of DMURS. DMURS details *"a revised set of reduced SSDs"* (Stopping Sight Distances) that *"should be applied"* (reference: DMURS section 4.4.4). DMURS identifies that *"reduced forward visibility increases driver caution and reduces vehicle speeds"* (reference: DMURS section 4.4.4 Table 4.2).

Design mitigation measures are proposed for the suburban R624. All proposed measures are signage and road markings in accordance with the Department of Transport Traffic Signs Manual. No non-standard measures are proposed. The measures include a proposal that northbound vehicles would yield to southbound HGVs and PSVs (buses and coaches) at Belvelly Bridge. This is consistent with the existing informal yielding at Belvelly Bridge.

In order to reduce the impact during peak traffic hours, the applicants propose to enter into an Operational Traffic Management Plan (OTMP), to be agreed with Cork County Council prior to the commencement of the development.

It is proposed that the principles of the OTMP will be that additional BMDC uses of the jetty will not generate any HGVs along the R624 during peak hours, from 8.00 a.m. to 9.00 a.m. and from 4.00 p.m. to 6.00 p.m. All HGVs generated by the BMDC uses will operate during the off-peak traffic hours only. The OTMP will also agree HGVs generated by Gouldings' business activities during peak hours.

All HGV arrival and departure times will be recorded at the proposed development site and records will be submitted to Cork County Council. Prior to the commencement of the development, the applicants will agree an Operational Traffic Management Plan (OTMP) with Cork County Council on the basis of their customer data, operations, and baseline conditions. This plan can be reviewed in the event of future planned upgrade works being undertaken to the R624 and Belvelly Bridge.

3. Seveso

Appellants request to include Belvelly residents in all emergency plans going forward for Seveso.

The Qualitative Risk Assessment for Land use Planning report, submitted with the planning application provided detailed consequence modelling of the main scenarios that could affect the nearest off-site receptors. In its response to the application the Health & Safety Authority did not advise against the granting of planning permission in the context of major accident hazards. The applicants will comply with all safety and consultation requirements as specified by the Health & Safety Authority.

4. Dust Impacts

Goulding Fertilisers Limited have provided details on the types and physical nature of the raw bulk materials which will be imported at the Belvelly Port Facility jetty. These details have been submitted to Cork County Council under planning reference 20/06955. Considering the size, granular nature and bulk density of the raw materials proposed, there is no potential for the generation of dust during offloading of these raw bulk materials at the jetty. The images shown in the appeals from Cork City Quays relate to a mineral product and are not a fertiliser product. The planning conditions by Cork County Council limit unloading of materials to those specified in the application process. These do not include the mineral product illustrated in photographs submitted by appellants.

As noted in the EIAR, the dry bulk materials will be delivered to the site's existing jetty on ships. The bulk materials will be unloaded into a hopper using a clamshell grab prior to discharge into trailers. The clamshell grab will be operated in accordance with the company's cargo handling procedures to further minimise dust emissions. The trailers used to transfer bulk fertiliser ingredients from the jetty to the processing building will have covers to prevent any product loss and protect the product from rain. No dust will emanate from the transfer of bulk fertiliser ingredients from the jetty due to the granular nature and bulk density of the raw materials.

All unloading activities at the Belvelly Port Facility jetty will be undertaken in accordance with the Operational Environmental Management Plan (OEMP) which will be agreed with Cork County Council prior to the commencement of operations. A draft OEMP has been submitted with the RFI response submitted on 8th October 2021.

The Natura Impact Statement (NIS) notes that considering the environmental controls proposed and the implementation of the OEMP, it is considered unlikely a significant impact on the conservation objectives of Cork Harbour SPA will occur.

5. Surface Water Management

There is a dedicated fully contained surface water management system proposed for the jetty at the Belvelly Port Facility. This surface water management system will be constructed as part of the enabling works planning permission (Planning Authority Ref. 19/06783) (Board Order ABP-307938-20, dated 23rd February 2021) and will be fully operational before the proposed Goulding fertiliser facility is operational.

The jetty surface water management procedures are set out in the draft Operational Environmental Management Plan (OEMP), as submitted in the RFI response to Cork County Council and to be agreed in writing with the Council prior to the operation of the storm water system. The jetty drainage network will be operated to ensure no release of contaminated water into the harbour takes place.

The draft Operational Environmental Management Plan (OEMP) outlines the following procedure:

Under normal circumstances, where there is no risk of a contamination event, surface water will pass through the oil interceptor and the TOC monitoring chamber via gravity flow before discharge to the harbour waters. The surface water will be tested using continuous TOC monitoring to the satisfaction of the planning authority. The outlet will have automatic shut off valves and divert to the retention tank in the event the trigger limits are exceeded. All trigger limits and actions will be agreed with the planning authority prior to operation. In the event a trigger limit is exceeded, the surface water will be pumped to the retention tank for testing prior to discharge or disposal as deemed appropriate.

Once the surface water in the tank has been tested for contaminants, it will either be transferred through the oil interceptor to the outfall if compliant with trigger limits or will require collection and appropriate disposal off site. The necessary management and disposal of the contaminated surface water will be overseen by the Terminal Manager, who will ensure that any contaminated surface water is appropriately treated / disposed of by the individual jetty user. The stored water will be dealt with within two days so that the retention tank is available for the next user of the jetty.

6. Alternatives Considered

Appellants states that no alternatives were considered as part of the project development.

As detailed in the Environmental Impact Assessment Report (EIAR) which accompanied the planning application, the Port of Cork's Strategic Development Plan Review (2010) considered several sites, including Marino Point, as potential new port facilities. Several criteria were assessed including:

- Access to deep water,
- Shelter from sea and weather conditions,
- Geographically within reasonable distance of existing port locations to ensure effective communications and efficient operations.
- Geographically within reasonable distance to service effectively the main areas associated with the Port of Cork's customer base.
- Able to be linked to main transportation networks.
- Not represent a fundamental conflict with planning policy or environmentally sensitive designated areas.

The review concluded that the primary location for the relocation of port activities from the upper harbour should be Ringaskiddy for container related cargo, with Marino Point emerging as the most suitable location for additional bulk / general cargo. Ringaskiddy Deep Water Berth terminal does not have sufficient land side capacity to accommodate the Gouldings Fertiliser facility and the terminal is already close to its maximum capacity.

The EIAR also notes that the Belvelly Port Facility has been subject to a detailed and iterative master planning process to identify the optimum use and layout of the site. A number of concept plans were considered and along with the characteristics of the site, used to inform a site analysis to identify suitable locations within the Belvelly Port Facility site for potential future development proposals. The preferred Belvelly Port Facility masterplan layout is shown in Appendix 2.1 of the EIAR.

During the consideration of the planning application, Cork County Council sought further information related to the alternative cargo handling systems and were satisfied that the proposed unloading / loading procedures were appropriate and would not pose an environmental risk.

7. Planning Policy

Appellants state that to activate Marino Port without a primary reliance on its rail connection in advance of upgrading of the R624 is not in compliance with local, regional, national, or European policy.

In response, we would note that the proposed development does not prevent the future use of the Belvelly Port Facility for industries that may require rail connectivity. The development permitted under 19/06783, ABP-307938-20, provides for site infrastructure improvements, including the provision of a new rail connection from the main Cobh to Cork rail line, approximately 500m in length and running along the eastern boundary of the site. The original rail sidings in the northern annexe will also be reinstated. The provision of this rail connection will enable future developments to benefit from freight rail linkage to the Belvelly Port Facility should the demand arise.

As presented at the Oral Hearing for the Strategic Infrastructure Development at Ringaskiddy, reference PA0035, at present none of the customers of the Port are rail connected and they are dispersed widely throughout the region. While a customer need for rail connectivity may arise in the southern region, this would be most likely related to a niche cargo. The volumes of product shipped from the Port of Cork are generally low and the distances travelled relatively short for a feasible rail operation which the National Ports Policy Statement 2013 (NPPS) suggested is greater than 300km. It is an objective of European TEN-T policy, that ports will have a high level of international connectivity and by 2030 be connected to the core European rail and road network. There is no requirement in European policy that requires all port related development to be transported by rail. The works permitted under 19/06783, ABP-307938-20, provide for rail connectivity and this capacity will be available at Belvelly Port Facility. However, the NPPS recognises that, due to the restricted rail network in Ireland, and dispersed nature of port customers, that "*...most freight will continue to be carried by road.*" (NPPS, p. 46)

Marino Point is zoned for '*port related industrial development*' in the existing Cobh Municipal District Local Area Plan 2017. The Draft County Development Plan 2022, due to come into effect in June 2022 retains this zoning objective and does not restrict development proposals to industries which require both rail

and sea links. The primary policy objective is to ensure that development at Marino Point is '*port related*' and has a requirement for sea-based connectivity.

The National Planning Framework sets out key future growth enablers for Cork, which include delivering ambitious large-scale regeneration projects for the provision of new employment, housing and supporting infrastructure in Cork Docklands (City Docks and Tivoli) as integrated, sustainable developments, including the relocation of two 'Seveso' sites from the City Docks. The relocation of Gouldings' facility from the City Docks is therefore entirely in keeping with national planning policy. The Regional Spatial and Economic Strategy (RSES) for the Southern Region also identifies the sustainable development of port facilities, including Marino Point as being critical to enable the regeneration of the Cork Docklands. The RSES recognises the potential for rail connectivity at Marino Point, but this does not require all proposed development to be rail connected.

The proposed development is, therefore, entirely consistent with local, regional, national, and European policy.

Conclusion

Thank you for the opportunity to respond to the third-party appeals. As noted in the planning application, the development of additional port capacity at Marino Point, and the relocation of Gouldings' existing fertiliser facility from Cork Docklands, are of strategic importance to the future development of the region. We therefore look forward to a decision from An Bord Pleanála at the earliest opportunity.

Yours faithfully

Màiri Henderson

Màiri Henderson
McCutcheon Halley