

# Volume 3: Appendices

## Proposed Agricultural Fertiliser Facility and Additional Port Operational Use Environmental Impact Assessment Report (EIAR)

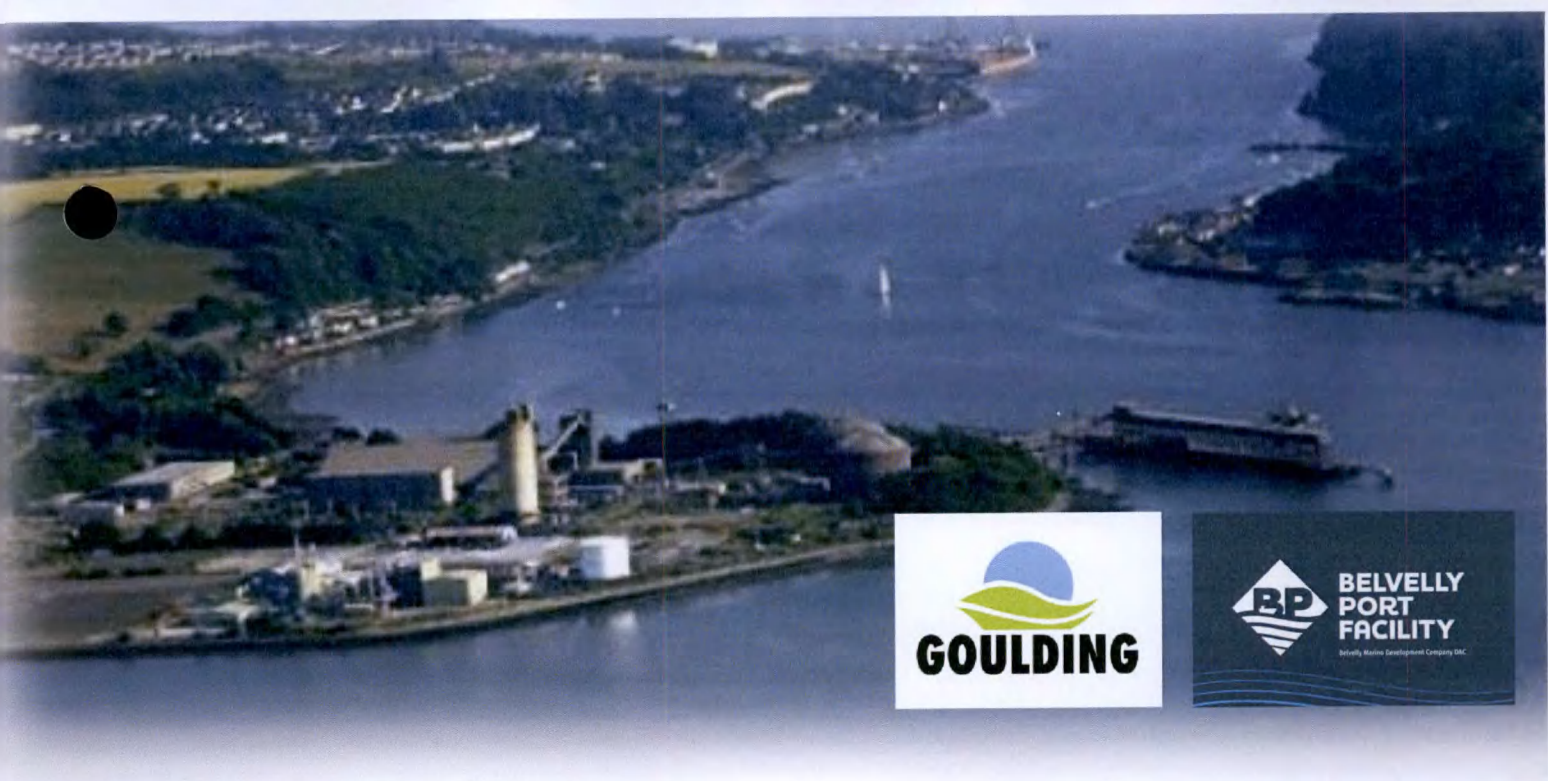
Project No. 21082  
December 2020



206955-22/12/2020-EIAR Volume 3 Appendices Part 1  
( )



**Malachy Walsh and Partners**  
Engineering and Environmental Consultants



## Volume 3: Appendices

### Proposed Agricultural Fertiliser Facility and Additional Port Operational Use Environmental Impact Assessment Report (EIAR)

Project No. 21082  
December 2020



**Malachy Walsh and Partners**  
Engineering and Environmental Consultants



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Engineering and Environmental Consultants

**Volume 3 APPENDICES**

**Proposed Agricultural Fertiliser Facility and Additional Port  
Operational Use at the Belvelly Port Facility, Marino Point,  
Co. Cork**

**Environmental Impact Assessment Report (EIAR)**

**Project No. 21082**

**December 2020**



**Malachy Walsh and Partners**  
Engineering and Environmental Consultants

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## **Appendix 1.1**

### **List of Consulted Bodies**

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**Statutory – by letter**

An Taisce

Commission for Communications Regulation

Commission for Regulation of Utilities, Water and Energy (CRU)

Dept of Agriculture, Food and the Marine

Dept of Business, Enterprise and Innovation

Dept of Communications, Climate Action and Environment

Dept of Culture Heritage and the Gaeltacht

Dept of Housing, Planning and Local Government

Dept of Transport, Tourism & Sport

Environmental Protection Agency

Electricity Supply Boards (ESB)

Failte Ireland

Heritage Council

Health and Safety Authority (HSA)

Inland Fisheries Ireland

Irish Aviation Authority

Irish Water

Office of Public Works (OPW)

Transport Infrastructure Ireland (TII)

**Non – Statutory – by letter**

Arts Council of Ireland

Bat Conservation Ireland

Bird Watch Ireland

Bord Iascaigh Mhara

Cork Chamber of Commerce

Cork City Council

Cobh Chamber of Commerce

Coastwatch

Friends of the Earth

Friends of the Irish Environment

Geological Survey of Ireland (GSI)

Health Service Executive (HSE)

Institute of Geologists Ireland (IGI)

Irish Environmental Network

Irish Landscape Institute

Irish Whale and Dolphin Group

Irish Wildlife Trust

Marine Institute

Royal National Lifeboat Institute Ireland (RNLI Ireland)

Sustainable Energy Authority of Ireland (SEAI)

South West Regional Authority

**Meetings**

Cork County Council – various departments

Electricity Supply Board (ESB)

Gas Networks Ireland

Irish Rail

**By email**

National Monuments Service

National Parks and Wildlife Service - District Conservation Officer



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## **Appendix 1.2**

### **Consultation Letters and Stakeholder Responses**

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# Malachy Walsh and Partners

## Engineering and Environmental Consultants

CORK TRALEE LIMERICK LONDON

Park House, Mahon Technology Park, Bessboro Road, Blackrock, Cork, Ireland, T12 X251  
Tel: +353 (0)21 4536400 • Email: info@mwp.ie • www.mwp.ie

Minister for Culture, Heritage and the Gaeltacht,  
c/o The Manager, Development Applications Unit,  
Department of Culture, Heritage and the Gaeltacht,  
Newtown Road,  
Wexford,  
Y35 AP90

Ref: 21082  
Date: 15<sup>th</sup> January 2020

**Re: Consultation on proposed development of a new agricultural fertiliser facility and additional port operational uses to facilitate passenger and cargo vessels at Belvelly Port Facility, Marino Point, Co. Cork.**

Dear Sir/Madam,

Malachy Walsh and Partners have been retained by Belvelly Marino Development Company (BMDC) and Goulding Chemicals Limited to undertake the Environmental Impact Assessment and the Appropriate Assessment for the development of a new agricultural fertiliser facility and additional port operational uses to facilitate passenger and cargo vessels at Belvelly Port Facility, Marino Point, Co. Cork. The two applicants are seeking joint planning permission to undertake the proposed development. Goulding Chemicals Limited wishes to relocate from their current premises in Cork City to the Belvelly Port Facility. The proposed relocation will involve the construction of a new agricultural fertiliser facility at the Belvelly Port Facility. BMDC wish to use the existing jetty at the site for the docking of medium-sized cruise ships and cargo vessels.

Marino Point is a small peninsula located on Great Island, Co. Cork. It is approximately 5 km north of Cobh, 5.5 km south-west of Blackrock, Cork and 10km south-west of Cork City Centre. The eastern boundary is formed by the Cork-Cobh railway and the regional road from Cork to Cobh (R624). The Belvelly Port Facility site is bound by Cork Harbour to the north, south, and west. Passage west is approximately 1 km from the centre of the site on the opposite side of the harbour (west). Cobh Golf Club is located to the east, on the eastern side of the R624. The overall site measures 1.3 km (east west) by approximately 1.5 km (north south).

**EXECUTORS:** Peter O'Donnell BE, CEng, MICE FIEI | Jack O'Leary ME, CEng, FIEI, FConsEI | Peter Fay BScEng, DipEng, CEng, MIEI, MStructE  
Paul Collins BE, CEng, MIEI, MStructE | Declan Cremen BE, CEng, MIEI, MStructE | John Lee BE, CEng, MIEI, HDipSHWW  
Mohammed Rafiq BSc, AHU, CEng, MStructE (Director London)

**ASSOCIATE DIRECTORS:** Sean Doyle BE, CEng, MIEI | Brian Sayers BE, CEng, MSc, MIEI

Reg. Offices: Park House, Mahon Technology Park, Bessboro Road, Blackrock, Cork, Ireland.  
Reg. No.133445. Registered in Ireland. Registered Company: Malachy Walsh & Co. Ltd.





# Malachy Walsh and Partners

## Engineering and Environmental Consultants

**CORK TRALEE LIMERICK LONDON**

Park House, Mahon Technology Park, Bessboro Road, Blackrock, Cork, Ireland, T12 X251  
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Marino Point is in proximity to two Natura 2000 sites; Great Island Channel Special Area of Conservation (Great Island Channel SAC) and Cork Harbour Special Protection Area (Cork Harbour SPA). This SAC is designated for habitats such as mudflats and saltmarsh. Cork Harbour SPA extends to the north and south of Marino Point. Cork Harbour SPA is designated for the protection of wintering water birds.

There are also two buildings which are listed as National Monuments (NM), and one building which is listed under the National Inventory of Architectural Heritage (NIAH) nearby to the proposed development. It is not proposed to alter or remove any of these structures.

The site is located on the former Irish Fertilizer Industries (IFI) facility which manufactured both ammonia and urea. IFI shut their fertiliser operations facility in 2002. The planning application area includes a total of 46ha. 2.74ha of the overall site area is currently occupied by Marinochem Ltd. (formerly Dynea Ireland Ltd.) who operates a facility at the northwest of the site. Marinochem manufacture aminoplast resin adhesives for panel boards (MDF and chipboard) and the firelighter industry. The Company also supply technical grade urea solutions, formaldehyde, and are the largest bulk storage facility for methanol in the Republic of Ireland, supplying the substance in bulk and liquid forms to various industries via tankers and IBCs from the existing Jetty at the site. Apart from Marinochem Ltd. who has operated at the site since mid-1990, the site has since been largely derelict.

The proposed relocation of Gouldings will require the construction and operation of a new agricultural fertilizer facility including a large storage warehouse, a bagging and palleting facility which will connect to the warehouse by a conveyor, an office building to act as headquarters for Goulding Chemicals Limited and external storage bays with associated circulation space, weighbridges, access control and security facilities. The primary use of the facility will be for bagging and mixing of dry bulk materials for storage and distribution.

The additional use of the jetty will involve the berthing of between 10 to 20 small to medium sized cruise ships per annum between April and September and approximately 10 to 20 cargo vessels per annum. The cargo types proposed include logs, woodchip, machinery parts, deep sea maintenance & exploratory vessel engineering cargo and other miscellaneous dry cargo.

Drawings illustrating the site location and proposed site layout plan, in addition to the Natura 2000 sites within 5 km of the site are included with this letter.



**DIRECTORS** Peter O'Donnell BE, CEng, MICE FIEI | Jack O'Leary ME, CEng, FIEI, FConsEI | Peter Fay BScEng, DipEng, CEng, MIEI, MIStructE  
Paul Collins BE, CEng, MIEI, MIStructE | Dedan Cremen BE, CEng, MIEI, MIStructE | John Lee BE, CEng, MIEI, HDipSHWW  
Mohammed Rafiq BSc, AHU, CEng, MIStructE (Director London)

**ASSOCIATE DIRECTORS** Sean Doyle BE, CEng, MIEI | Brian Sayers BE, CEng, MSc, MIEI

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Tel: +353 (0)21 4536400 • Email: info@mwp.ie • www.mwp.ie

While there will be the opportunity to make comments and submissions as part of the planning process, if there are any key issues and concerns which you consider should be addressed in the EIA and AA we would welcome your input at this stage.

We would greatly appreciate your response at your earliest convenience. If you have any queries relating to the project please do not hesitate to call me on 021 453 6400 or email [fergus.doyle@mwp.ie](mailto:fergus.doyle@mwp.ie).

Thank you for your co-operation,

Yours sincerely,

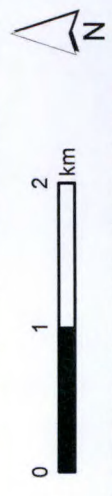
Fergus Doyle B.A., M.Sc., AMIEnvSc

on behalf of Malachy Walsh and Partners



**Legend**

- Site Boundary
- Site Location 5km Buffer
- Natural Heritage Areas (NHA)
- Proposed Natural Heritage Areas (pNHA)
- Special Areas of Conservation (SAC)
- Special Protection Areas (SPA)



**Malachy Walsh and Partners**  
 Engineering and Environment  
 consultants



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**DRAWING REFERENCE**

- BLUE LINE: SITE BOUNDARY
- RED LINE: EXISTING LAGOON
- GREEN LINE: EXISTING WATER METERING STATION
- BLACK LINE: SITE ENTRANCE
- YELLOW LINE: SITE NOTICE

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**CLIENT INFORMATION**

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**ADDRESS:** [Address]  
**CONTACT:** [Phone Number]

**PROJ: [Project Name]**

**DATE:** [Date]

**SCALE:** [Scale]

**DRAWN BY:** [Name]

**CHECKED BY:** [Name]

**DATE:** [Date]

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**CLIENT NAME:** [Name]

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**CLIENT EMAIL:** [Email Address]

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**PROJ: [Project Name]**



# Malachy Walsh and Partners

## Engineering and Environmental Consultants

CORK TRALEE LIMERICK LONDON

Park House, Mahon Technology Park, Bessboro Road, Blackrock, Cork, Ireland, T12 X251

Tel: +353 (0)21 4536400 • Email: info@mwp.ie • www.mwp.ie

Ref: FD/XX/21082

21<sup>st</sup> January, 2020

**Re: Consultation on proposed agricultural fertiliser facility and additional port operational uses to facilitate cruise and cargo vessels at the Belvelly Port Facility, Marino Point, Great Island, Co Cork**

Dear Sir/Madam,

Malachy Walsh and Partners (MWP) has been commissioned by Gouling Fertilisers Ltd. and Belvelly Marino Development Company (BMDC) to undertake an Environmental Impact Assessment (EIA) and prepare a subsequent Environmental Impact Assessment Report (EIAR) relating to plans for the proposed agricultural fertiliser facility and additional port operational uses to facilitate cruise and cargo vessels at the Belvelly Port Facility. Gouling Chemicals Limited wishes to relocate from their current premises in Cork City to the Belvelly Port Facility. The proposed relocation will involve the construction of a new agricultural fertiliser facility at the Belvelly Port Facility. BMDC wishes to use the existing jetty at the site for the docking of small to medium-sized cruise ships and cargo vessels. Details of the proposed project are enclosed.

I am consulting with you on this proposal as it may be of interest of concern to you or your organisation. While there will be the opportunity to make comments and/or a submission on the proposed development as part of the planning process, if there is any key issue which you consider should be addressed in the EIAR we would welcome your input at this stage.

Should you require additional information or wish to further discuss the proposal, please contact me by email at info@mwp.ie or by post to Malachy Walsh and Partners, Park House, Bessboro Rd, Mahon, Cork.

Yours sincerely,

---

Fergus Doyle B.A., M.Sc., AMIEnvSc  
on behalf of Malachy Walsh and Partners



**DIRECTORS:** Peter O'Donnell BE, CEng, MICE FIEI | Jack O'Leary ME, CEng, FIEI, FConsEI | Peter Fay BScEng, DipEng, CEng, MIEI, MIStructE  
Paul Collins BE, CEng, MIEI, MIStructE | Declan Cremen BE, CEng, MIEI, MIStructE | John Lee BE, CEng, MIEI, HDipSHWW  
Mohammed Rafiq BSc, AHU, CEng, MIStructE (Director London)

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## Fergus Doyle

---

**Sent:** Tuesday 1 December 2020 14:58  
**Subject:** FW: : Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork

---

**From:** INFO [<mailto:Information@tii.ie>]

**Sent:** Friday 8 May 2020 16:33

**To:** Info

**Cc:** 'NationalRoadsDivision@dttas.gov.ie'

**Subject:** RE: : Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork

**Re: EIAR Scoping in relation to proposed agricultural fertiliser facility and additional port operational use to facilitate cargo vessels at the Belvelly Port Facility, Marino Point, Cobh, Co. Cork**

A chara,

Transport Infrastructure Ireland (TII) wishes to advise that it is not in a position to engage directly with planning applicants in respect to proposed developments. TII will endeavour to consider and respond to planning applications referred to it given its status and duties as a statutory consultee under the Planning Acts. The approach to be adopted by TII in making such submissions or comments will seek to uphold official policy and guidelines as outlined in the Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012). Regard should also be had to other relevant guidance available at [www.TII.ie](http://www.TII.ie).

The issuing of this correspondence is provided as best practice guidance only and does not prejudice TII's statutory right to make any observations, requests for further information, objections or appeals following the examination of any valid planning application referred.

With respect to EIAR scoping issues, the recommendations indicated below provide only general guidance for the preparation of an EIAR, which may affect the national road network.

The developer/scheme promoter should have regard, *inter alia*, to the following;

- Consultations should be had with the relevant local authority/National Roads Design Office with regard to locations of existing and future national road schemes in the vicinity,
- TII would be specifically concerned as to potential significant impacts the development would have on the national road network (and junctions with national roads) in the proximity of the proposed development; N25, national road, and local/regional road junctions with the N25, in particular, N25 Junction 3 (Tullagreen) should be included in assessments. A recent An Bord Pleanála decision under An Bord Pleanála case ref. PL04.303155 may be of assistance.
- The developer should assess visual impacts from existing national roads,
- The developer should have regard to any Environmental Impact Statement and all conditions and/or modifications imposed by An Bord Pleanála regarding road schemes in the area. The developer should in particular have regard to any potential cumulative impacts,
- The developer, in preparing EIAR, should have regard to TII Publications (formerly DMRB and the Manual of Contract Documents for Road Works),
- The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006),
- The EIAR should consider the Environmental Noise Regulations 2006 (SI 140 of 2006) and, in particular, how the development will affect future action plans by the relevant competent authority. The developer may need to consider the incorporation of noise barriers to reduce noise impacts (see *Guidelines for the Treatment of Noise and Vibration in National Road Schemes* (1<sup>st</sup> Rev., National Roads Authority, 2004)),
- It would be important that, where appropriate, subject to meeting the appropriate thresholds and criteria and having regard to best practice, a Traffic and Transport Assessment (TTA) be carried out in accordance with relevant guidelines, noting traffic volumes attending the site and traffic routes to/from the site with reference to impacts on the national road network and junctions of lower category roads with national roads. TII's TTA Guidelines (2014) should be referred to in relation to proposed development with potential impacts on the national road network. The scheme promoter is also advised to have regard to Section 2.2 of the NRA/TII TTA Guidelines which addresses requirements for sub-threshold TTA,
- The designers are asked to consult TII Publications to determine whether a Road Safety Audit is required,



- In the interests of maintaining the safety and standard of the national road network, the EIAR should identify the methods/techniques proposed for any works traversing/in proximity to the national road network,
- In relation to haul route identification, the applicant/developer should clearly identify haul routes proposed and fully assess the network to be traversed. Separate structure approvals/permits and other licences may be required in connection with the proposed haul route and all structures on the haul route should be checked by the applicant/developer to confirm their capacity to accommodate any abnormal load proposed.

Notwithstanding, any of the above, the developer should be aware that this list is non-exhaustive, thus site and development specific issues should be addressed in accordance with best practise.

I trust that the above comments are of assistance in your EIAR preparation.

Yours sincerely,

**Michael McCormack**

**Senior Land Use Planner**



[www.tii.ie](http://www.tii.ie)

[info@tii.ie](mailto:info@tii.ie)

+353 (0)1 646 3600

**From:** National Roads Division <[NationalRoadsDivision@dtas.gov.ie](mailto:NationalRoadsDivision@dtas.gov.ie)>

**Sent:** 22 April 2020 11:24

**To:** Landuse Planning <[LandUsePlanning@tii.ie](mailto:LandUsePlanning@tii.ie)>

**Cc:** SHANNON Sylvia <[SylviaShannon@dtas.gov.ie](mailto:SylviaShannon@dtas.gov.ie)>; GALLAGHER Roisin <[RoisinGallagher@dtas.gov.ie](mailto:RoisinGallagher@dtas.gov.ie)>;

HARRINGTON Paul <[PaulHARRINGTON@dtas.gov.ie](mailto:PaulHARRINGTON@dtas.gov.ie)>

**Subject:** FW: : Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork

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Folks

FYI

**Mary Galligan**

National Roads Division

**Roinn Iompair, Turasóireachta agus Spóirt**

Department of Transport, Tourism and Sport

na Liosain, Baile Átha Cliath D02 TR60

Leeson Lane, Dublin 2 D02 TR60

T +353 (0)1 604 1366

[Marygalligan@dtas.gov.ie](mailto:Marygalligan@dtas.gov.ie) [www.dttas.gov.ie](http://www.dttas.gov.ie)

**From:** TRAYNOR Jacqui

**Sent:** 22 April 2020 11:12

**To:** Airports Division Mailbox; Aviation Services Division; MRCC DUBLIN; IRCG DIVISION; Maritime Safety Policy Division; Maritime Services Division; Maritime Transport; National Roads Division; PTCoord; Regional and Local Roads Division; SRA

**Subject:** : Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork  
Colleagues,

Please find attached Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork consisting of the construction and operation of an agricultural fertiliser facility and additional port operation use at the existing jetty to facilitate cargo vessels at the Belvelly Port Facility, Marino Point, Great Island, Co. Cork. The planning application for the proposed development will be lodged in early May 2020 and there will be the opportunity to make comments and/or a submission on the proposed development as part of the planning process. Any comments/obs including a NIL response on any issues you consider should be addressed in the EIAR and/or NIS at this stage should be returned to the **GCU mailbox** no later than close of business on **Tuesday 28<sup>th</sup> April 2020**.

Regards

Jacqui

**Jacqui Traynor**  
*Reform Communications and Emergency Planning*

**An Roinn Iompair, Turasóireachta agus Spóirt**  
*Department of Transport, Tourism and Sport*  
Lána Liosain, Baile Átha Cliath, D02 TR60  
Leeson Lane, Dublin, D02 TR60

T +353 (0)1 604 1177

[Jacquitraylor@dtas.gov.ie](mailto:Jacquitraylor@dtas.gov.ie) [www.dttas.gov.ie](http://www.dttas.gov.ie)

\*\*\*\*\*

Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

Tá ár Ráiteas Príobháideachta le fáil ar [www.dttas.gov.ie](http://www.dttas.gov.ie)

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Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtear leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do [postmaster@tii.ie](mailto:postmaster@tii.ie), le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.



EXCELLENCE AWARD 2017



OVERALL WINNER - ENGINEERING PROJECT OF THE YEAR  
REDEVELOPMENT OF PAIRC UI CHAOIMH, CORK

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Registered Office: Park House, Mahon Technology Park Bessboro Road, Blackrock, Cork, Ireland.

Registered in Ireland. No. 133445

---

**From:** Manager DAU [<mailto:Manager.DAU@chg.gov.ie>]

**Sent:** Friday 26 June 2020 11:47

**To:** Info

**Subject:** Belvelly Port Facility

A chara,

Attached please find the heritage recommendations of the Department of Culture, Heritage, and the Gaeltacht for the above mentioned planning application.

Mise le meas,

**nnor Rooney**  
*Executive Officer*

---

**An Roinn Cultúir, Oidhreacht agus Gaeltachta**

*Department of Culture, Heritage and the Gaeltacht*

**Aonad na nIarratas ar Fhorbairt**

*Development Applications Unit*

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Tá an t-eolas sa ríomhphost seo faoi rún, chomh maith le gach comhad atá ceangailte leis, agus i gcomhair úsáid an duine nó an chórais a bhfuil sé dírithe air amháin. Má fhaigheann tú an ríomhphost seo trí bhotún, cuir scéal chugainn ag [webmaster@chg.gov.ie](mailto:webmaster@chg.gov.ie). Tá an ríomhphost seo arna sheiceáil ag scanóir víreas agus dealramh air go dtuairiscíonn sé go bhfuil sé glan.

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**Ms. Olivia Holmes**  
**Malachy Walsh & Partners**  
**Park House**  
**Mahon Technology Park**  
**Bessboro Road**  
**Blackrock**  
**Cork**

**Our Ref: 170 - 2020**

**Re: Proposed development at Belvelly Port Facility, Marino Point, Cobh, Co. Cork  
– Public Consultation.**

Dear Ms Holmes,

I refer your letter dated 20<sup>th</sup> April 2020 addressed to this office in connection with the above proposed development.

The Office of Public Works (OPW) would like to make the following comments in response to your consultation letter:

1. There is no impact arising from the proposed development on any plans in preparation by the OPW for flood relief schemes in this area.
2. It is noted that it is proposed that a flood risk assessment is to be part of the documentation supporting the application for planning permission for the development.
3. This flood risk assessment should be a detailed site specific flood risk assessment in accordance with the Ministerial Guidelines “The Planning System and Flood Risk Management” published in 2009. The flood risk assessment should not rely (primarily or solely) on the flood extent mapping which has been made available by this Office to implement the requirements of the EU Flood Directive 2007/60/EC.
4. It is further noted that a considerable portion of the area denoted as ‘External Product Storage Area’ appears to be at risk of flooding in a 1 in 200 year or 0.5% Annual Exceedance Probability Tidal Flood event, in the current scenario (i.e. not allowing for the anticipated impacts of Climate Change), as well as more severe floods.
5. This may well be an adverse issue for the developer of this development in terms of the impact of flooding on the proposed infrastructure and buildings to be constructed, as well as the proposed business to be carried out on the site. The possible inundation by tidal floodwaters of stored materials by tidal flood



waters could be an adverse impact for the environment generally in the area including the Natura 2000 sites close to the site.

Yours sincerely,

---

**Karen Donovan**  
**Engineering Services Administration**  
**5<sup>th</sup> May 2020**

Malachy Walsh and Partners,  
Park House,  
Bessboro Rd,  
Mahon,  
Cork.

1 May 2020

**Re: EIAR Scoping Request - Consultation on the proposed agricultural fertiliser facility and additional port operational use to facilitate cargo vessels at the Belvelly Port Facility, Marino Point, Great Island, Co. Cork.**

Dear Sir/Madam,

Irish Water (IW) acknowledges receipt of your request in respect of the Environmental Impact Assessment Report (EIAR) scoping for the proposed agricultural fertiliser facility and additional port operational use to facilitate cargo vessels at the Belvelly Port Facility, Marino Point, Great Island, Co. Cork.

Please see attached our suggested scope in relation to Water Services. On receipt of the planning referral, Irish Water will review the EIAR as part of the planning process.

Queries relating to the terms and observations above should be directed to [planning@water.ie](mailto:planning@water.ie)

Yours sincerely,

Signed on behalf of Irish Water:

Maria O'Dwyer  
Connections and Development Services

Uisce Éireann  
Bosca OP 6000  
Baile Átha Cliath 1  
D01 WA07  
Éire

Irish Water  
PO Box 6000  
Dublin 1  
D01 WA07  
Ireland

T: +353 01 89 25000  
T: +353 01 89 25001  
[www.water.ie](http://www.water.ie)

## Response to EIAR Scoping Report Requests

IW currently does not have the capacity to advise on scoping of individual projects. However, in general we would like the following aspects of Water Services to be considered in the scope of an EIAR where relevant;

- a) Impacts of the development on the capacity of water services (do existing water services have the capacity to cater for the new development if required). This is confirmed by IW in the form of a Confirmation of Feasibility (COF). If a development will require a connection to either a public water supply or sewage collection system the developer is advised to submit a Pre Connection Enquiry (PCE) enquiry to IW to determine the feasibility of connection to the Irish Water network. All pre-connection enquiry forms are available from <https://www.water.ie/connections/get-connected/>
- b) Any up-grading of water services infrastructure that would be required to accommodate the development.
- c) In relation to a development that would discharge trade effluent – any upstream treatment or attenuation of discharges required prior to discharging to an IW collection network
- d) In relation to the management of surface water; the potential impact of surface water discharges to combined sewer networks & potential measures to minimise/stop surface waters from combined sewers
- e) Any physical impact on IW assets – reservoir, drinking water source, treatment works, pipes, pumping stations, discharges outfalls etc. including any relocation of assets
- f) If you are considering a development proposal, it is best practice to contact us in advance of designing your proposal to determine the location of public water services assets. Details, where known, can be obtained by emailing an Ordinance Survey map identifying the proposed location of your intended development to [datarequests@water.ie](mailto:datarequests@water.ie). Other indicators or methodologies for identifying infrastructure located within your lands are the presence of registered wayleave agreements, visible manholes, vent stacks, valve chambers, marker posts etc. within the proposed site.
- g) Any potential impacts on the assimilative capacity of receiving waters in relation to IW discharge outfalls including changes in dispersion /circulation characterises
- h) Any potential impact on the contributing catchment of water sources either in terms of water abstraction for the development (and resultant potential impact on the capacity of the source) or the potential of the development to influence/present a risk to the quality of the water abstracted by IW for public supply.
- i) Where a development proposes to connect to an IW network and that network either abstracts water from or discharges waste water to a “protected”/sensitive area, consideration as to whether the integrity of the site/conservation objectives of the site would be compromised.
- j) Mitigation measures in relation to any of the above

*This is not an exhaustive list.*

Please note

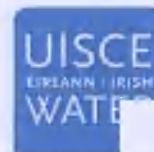
- The Confirmation of Feasibility from IW, to the applicant, should be issued prior to applying for planning permission.

Uisce Éireann  
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 Bale Átha Cliath 1  
 D01 WA07  
 Éire

Irish Water  
 PO Box 6000  
 Dublin 1  
 D01 WA07  
 Ireland

T: +353 01 89 25000  
 T: +353 01 89 25001  
[www.water.ie](http://www.water.ie)

- Irish Water will not accept new surface water discharges to combined sewer networks



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[www.water.ie](http://www.water.ie)



**From:** Michael McPartland <Michael.McPartland@fisheriesireland.ie>  
**Sent:** Sunday 26 April 2020 16:43  
**To:** Info  
**Subject:** Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork. FAO: Olivia Homes

---

Olivia

Thank you for your recent email

IFI considers that the following list(not exhaustive) of items need to be considered in the EIS:

Potential conflicts with other water users and uses e.g. existing fisheries and fishermen, recreational users etc  
Treatment and disposal of ballast waters and the potential for the introduction of alien species  
General vessel biosecurity.  
Prevention of escapement of fertilizer or other products to waters either at the loading/unloading stage or from general site surface runoff  
Treatment and disposal or any on site waste materials.

Regards

Michael McPartland  
Inland Fisheries Ireland  
Macroom  
Co.Cork  
026-41221

---

**From:** Info [<mailto:info@mwp.ie>]  
**Sent:** Tuesday 21 April 2020 16:46  
**To:** Michael McPartland  
**Subject:** Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork.

To whom it may concern,

Please find attached Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork consisting of the construction and operation of an agricultural fertiliser facility and additional port operation use at the existing jetty to facilitate cargo vessels at the Belvelly Port Facility, Marino Point, Great Island, Co. Cork. We are hoping to lodge the planning application for the proposed development in early May 2020. While there will be the opportunity to make comments and/or a submission on the proposed development as part of the planning process, we would greatly appreciate your feedback on any issues you consider should be addressed in the EIAR and/or NIS at this stage.

Please do not hesitate to contact me with any questions you may have.

Regards,

Olivia Holmes  
for Malachy Walsh and Partners

---

**Malachy Walsh and Partners**  
**Engineering and Environmental Consultants**

Park House, Mahon Technology Park,  
Bessboro Road, Blackrock, Cork.

T12 X251

Tel: 021 4536400

Mob: if required

E: [info@mwp.ie](mailto:info@mwp.ie)

W: [www.mwp.ie](http://www.mwp.ie)



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D'fhéadfaí go bhfuil an ríomhphost seo agus ceangaltáin ar bith atá in éineacht leis faoi rún agus iad beartaithe d'úsáid an duine a bhfuil a s(h)eoladh air amháin. Dearcthaí nó tuairimí ar bith atá curtha in iúl ann, baineann siad leis an údar amháin, agus ní chaithfidh go n-aontaíonn lascaigh Intíre Éireann leo. Mura tusa faighteoir beartaithe an ríomhphoist seo, ná déan rud ar bith mar gheall ar an méid atá ann, ná é a chóipeáil ná é a thaispeáint do dhuine ar bith eile. Déan teagmháil leis an seoltóir, le do thoil, má chreideann tú go bhfuair tú an ríomhphost seo trí earráid.

---



Olivia Holmes  
Malachy Walshe and Partners  
Park House  
Mahon Technology Park  
Bessboro Road  
Blackrock  
Cork  
T12 X251

27 April 2020

**Re: Consultation on proposed agricultural fertiliser facility and additional port operational use,  
Belvelly Port Facility, Marino Point, Great Island, Cork**

**Your Ref: FD/ED/21082**

**Our Ref: 20/83**

Geological Survey Ireland (GSI) is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration, groundwater/site investigation boreholes, karst features, wells and springs. Please see our [website](#) for data availability and we recommend using these various data sets, when undergoing the EIAR, planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland.

Dear Olivia

With reference to correspondence of 20 April 2020, concerning the proposed development and additional port use at Marino Point, Great Island, Cork, Geological Survey Ireland (a division of Department of Communications, Climate Action and Environment) welcomes the opportunity to make the following comments:

#### **Geoheritage**

County Geological Sites (CGS), as adopted under the National Heritage Plan are now included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. CGSs can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). The audit for County Cork is yet to be completed but a full list of unaudited sights can be viewed by accessing the GSI map viewer [here](#).

**GSI would like to advise that there are no county geological sites listed in the area covered by the proposed development.**

Please contact Dr. Clare Glanville, Senior Geologist and IGI Lead for the Geological Heritage Programme (at [clare.glanville@dcae.gov.ie](mailto:clare.glanville@dcae.gov.ie), 01-678 2837) for further information.

#### **Natural Resources (Minerals/Aggregates)**

Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process. Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website.



The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#). **Our Aggregates Potential Map records crushed rock potential as ‘very high potential’ in the vicinity of the proposed Development and consideration to aggregate potential sterilisation should be included as part of the EIAR and planning process.**

### **Geological Mapping**

Geological Survey Ireland (GSI) geological mapping programme creates maps that depict the rocks (Bedrock Mapping) and subsoils (Quaternary & Physiographic Mapping) of the onshore area of Ireland. We collect new data by field surveying and borehole drilling, and combine them with existing mapping to produce map products at various scales and levels of complexity. GSI maintains online data sets of bedrock and subsoils geological mapping that is reliable, accessible and meets the requirements of all users. These data sets include depth to bedrock data and subsoil classifications. We would encourage you to use this data in the EIAR ad planning process.

### **Groundwater**

Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected. Through our [Groundwater Programme](#), GSI provides advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI’s National Aquifer and Recharge maps on our [Map viewer](#) to this end.

### **Geohazards**

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent of these hazards. Geological Survey Ireland has information available on past landslides for viewing as a layer on our [Map Viewer](#). Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and GWFlood Groundwater Flooding, and in international projects, such as the Tsunami Warning System, coordinated by the Intergovernmental Oceanographic Commission of UNESCO. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.

### **Geothermal Energy**

Geothermal energy harnesses the heat beneath the surface of the Earth for heating applications and electricity generation, and has proven to be secure, environmentally sustainable and cost effective over long time periods. Geothermal applications can range in depth from a few metres below the surface to several kilometres. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online through Geological Survey Ireland’s Geothermal Suitability maps for both domestic and commercial use. We recommend use of our [Geothermal Suitability maps](#) to determine the most suitable type of ground source heat collector for use with heat pump technologies in your county. Ireland also has recognised potential for deep geothermal resources. GSI currently supports and funds research into this national energy resource.

### **Geotechnical Database Resources**

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our



[Geotechnical Map Viewer](#). We would strongly recommend that this database be consulted as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of the proposed development area. This information may be beneficial and cost saving for any site-specific investigations that may be designed as part of the development.

GSI notes specific geotechnical site information pertaining to Marino Point is available and can be directly accessed [here](#).

**Other Comments**

*Geological Survey Ireland would much appreciate a copy of reports detailing any further site investigations carried out. The data would be added to GSI's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Beatriz Mozo, Geological Mapping Unit, at [Beatriz.Mozo@gsi.ie](mailto:Beatriz.Mozo@gsi.ie), 01-678 2795.*

I hope that these comments are of assistance and we look forward to receiving a copy of the EIAR report in due course. If we can be of any further help, please do not hesitate to contact me Emily Murray-Farrugia ([EmilyMurray.Farrugia@dccae.gov.ie](mailto:EmilyMurray.Farrugia@dccae.gov.ie)) or my colleague, IGH Programme Lead, Dr. Clare Glanville ([clare.glanville@dccae.gov.ie](mailto:clare.glanville@dccae.gov.ie))

Yours sincerely

**Emily Murray Farrugia**  
Planning and Geoheritage Programmes

I acknowledge receipt of your email below. The Authority is aware of the planned move of Goulding Chemicals which is a lower tier establishment under the Control Of Major Accident Hazards (COMAH) Regulations. The COMAH Regulations along with the Planning Regulations require planning controls on the siting of such new establishments. You do not mention that the site is a lower tier COMAH establishment in your report. Further information on COMAH is available at the below link.

<https://www.hsa.ie/eng/Chemicals/COMAH/>

The Authority will provide technical advice to the planning authority if/when formally requested during the planning application process.

Please note for all future planning related queries on, or in the vicinity of, or new COMAH establishments, please use [landuseplanning@hsa.ie](mailto:landuseplanning@hsa.ie) for correspondence. This will ensure a more efficient response from the COMAH unit.

Kind regards,  
Ita

**Ita Daly**  
**Inspector, COMAH Chemical Production & Storage**

Tel: 01-7997880  
Mobile: 087-7538253  
Email: [ita\\_daly@hsa.ie](mailto:ita_daly@hsa.ie)  
Web: [www.hsa.ie](http://www.hsa.ie)

Health and Safety Authority  
3<sup>rd</sup> Floor  
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---

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**From:** Info <[info@mwp.ie](mailto:info@mwp.ie)>  
**Sent:** Tuesday 21 April 2020 16:42  
**To:** WCU <[wcu@hsa.ie](mailto:wcu@hsa.ie)>  
**Subject:** Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork.

To whom it may concern,

Please find attached Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork consisting of the construction and operation of an agricultural fertiliser facility and additional port operation use at the existing jetty to facilitate cargo vessels at the Belvelly Port Facility, Marino Point, Great Island, Co. Cork. We are hoping to lodge the planning application for the proposed development in early May 2020. While there will be the opportunity to make comments and/or a submission on the proposed development as part of the planning process, we would greatly appreciate your feedback on any issues you consider should be addressed in the EIAR and/or NIS at this stage.

Please do not hesitate to contact me with any questions you may have.

om: planning applications [<mailto:planning.applications@failteireland.ie>]

**Sent:** Friday 24 April 2020 09:28

**To:** Info

**Subject:** RE: Fáilte Ireland::Consultation letter and details of a proposed development in Marino Point, Great Island, Co. Cork. Email No :0100463001849

Hello Olivia,

Our customer support service sent on your email regarding proposed development in Marino Point, Great Island, Co. Cork.

Please see attached a copy of Fáilte Ireland's Guidelines for the Treatment of Tourism in an EIS, which we recommend should be taken into account in preparing the EIAR. The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

Just for you information, Fáilte Ireland has a dedicated e-mail address for planning information, applications, documentation, consultation etc. So, for all future planning related information please send by e-mail to [planning.applications@failteireland.ie](mailto:planning.applications@failteireland.ie)

This will ensure the information/notifications will get to the Environmental & Planning Unit Team and reviewed in a timely manner.

Regards,

Yvonne

**Yvonne Jackson**

**Product Development- Environment & Planning Support** | Fáilte Ireland

Áras Fáilte, 88/95 Amiens Street, Dublin 1. D01WR86

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**Fáilte Ireland**

National Tourism Development Authority

## **EIAR Guidelines for the Consideration of Tourism and Tourism Related Projects**



An tÚdarás Náisiúnta Forbartha Turasóireachta  
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Baile Átha Cliath 1  
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National Tourism Development Authority  
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## 1. Introduction

Tourism is a growing sector and substantial part of the Irish Economy. It contributes to both urban and rural economies in every part of the country. The impact and interaction of tourism with the environment is complex and the assessment of environmental impacts is of utmost importance to creating a sustainable tourism economy and protecting the natural resources that are so often a tourism attraction.

The purpose of this report is to provide guidance for those conducting Environmental Impact Assessment and compiling an Environmental Impact Assessment Reports (EIAR), or those assessing EIARs, where the project involves tourism or may have an impact upon tourism. These guidelines are non-statutory and act as supplementary advice to the EPA EIAR Guidelines outlined in section 2.

This guidance document has been prepared by Cunnane Stratton Reynolds on behalf of Fáilte Ireland to update their EIA guidelines in line with changes in legislative requirements.

## 2. Background to this Document

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately **260,000 people**, an economic contribution of **€8.4 billion**, and exchequer revenue of **€1.78 billion** in 2018, which helps fund other key public services.

In 2018 Ireland welcomed **10.6 million overseas visitors**.

Fáilte Ireland is the National Tourism Development Authority. Fáilte Irelands role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. They provide a range of practical business supports to help tourism businesses better manage and market their products and services.

Fáilte Ireland also work with other state agencies and representative bodies, at local and national levels, to implement and champion positive and practical strategies that will benefit Irish tourism and the Irish economy.

Fáilte Ireland promotes Ireland as a holiday destination through a domestic marketing campaign (DiscoverIreland.ie) and manage a network of nationwide tourist information centres that provide help and advice for visitors to Ireland.

Tourism related projects cover a broad range of plans, programmes and developments, from the Wild Atlantic Way to a single hotel conversion. These guidelines apply to projects involving or impacting upon tourism. A tourism plan, strategy or programme where it is part of the statutory plan making process under the Planning and Development Acts (as amended), may be more appropriately assessed by a Strategic Environmental Assessment (SEA) as discussed in the next section.

It should be borne in mind that EIA is required where there is anticipated to be a significant impact on the environment, where tourism projects are of a prescribed type or meet thresholds identified below.

Where Natura 2000 Designated Sites are potentially affected by tourism development Appropriate Assessment must be carried out by the appropriate authority in accordance with Article 6(3) of the EU Habitats Directive.

### **3. Legislation and Statutory Guidance**

Environmental Impact Assessment is a procedure that ensures that the environmental implications of decisions are taken into account before planning based decisions are made. The assessment results in a report, called an Environmental Impact Assessment Report (EIAR).

#### ***Legislation***

These guidelines are produced under current EIAR legislative requirements, having regard to Directive 2011/92/EU (known as 'Environmental Impact Assessment' – EIA Directive), as amended by Directive EU 2014/52 which came into effect in May of 2017. These requirements were transposed into Irish Law on 1 September 2018 as most of the provisions of the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) came into effect. The principle of both Directives is to ensure that plans, programmes and projects likely to have significant effects on the environment are made subject to an environmental assessment, prior to their approval or authorisation.

#### ***Statutory Guidance***

In response to the changes to the EIAR requirements under Directive EU 2014/52, the Environmental Protection Agency (EPA) developed Draft guidelines on the information to be contained in Environmental Impact Assessment Reports in August 2017. At the time of this document the guidelines have not been adopted from draft.

In addition to the EPA statutory guidance, the Department of Housing has produced Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment in August 2018.

The process of EIA is set out in the EPA EIAR Guidelines, which this document should be read in conjunction with and used as supplementary guidance to. The process for ascertaining whether an EIAR is required is known as 'screening' and the process to determine the breadth and scope of an EIAR is known as 'scoping'. Guidance on this can be found in Section 3.2 of the EPA Guidelines.

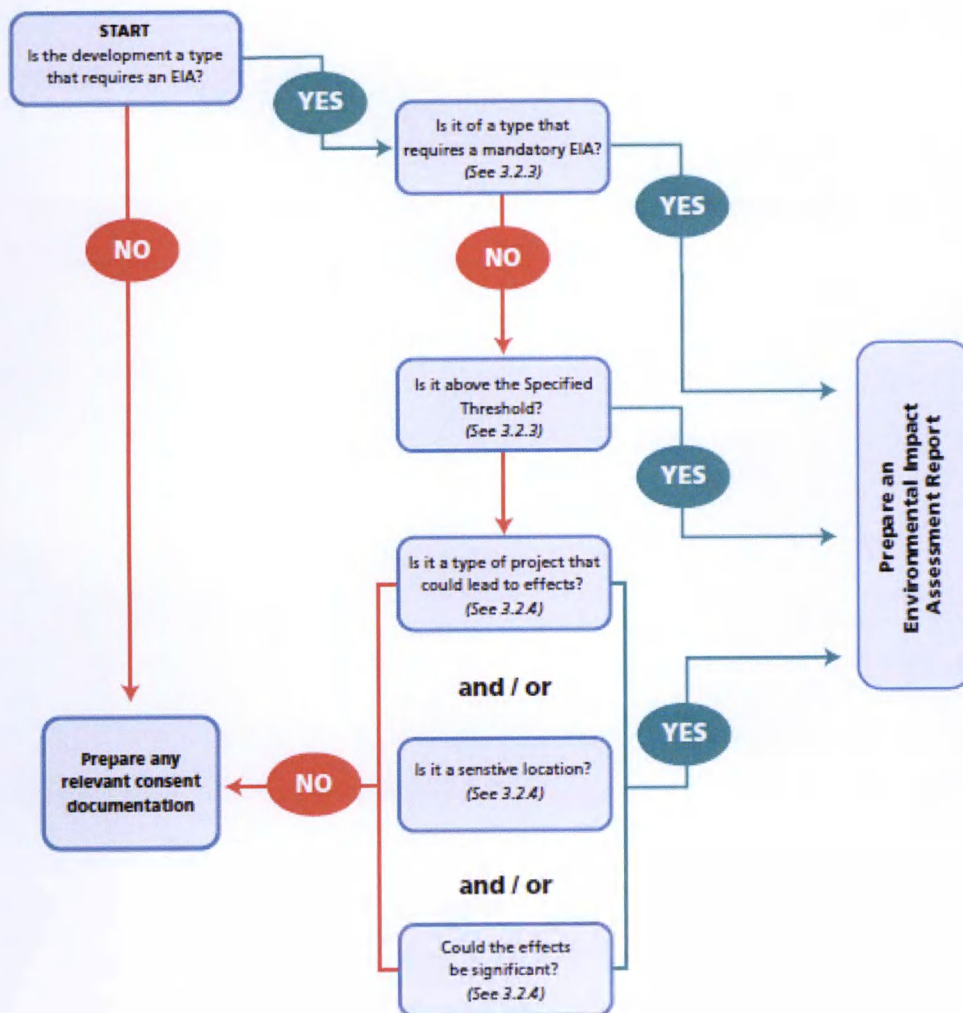
#### ***Screening***

Through EIAR Screening, developments are either considered as requiring an EIAR due to the project type or because they exceed a threshold level. The screening process begins by establishing whether the proposal is a 'project' as understood by the Directive (as amended).

The prescribed development types and thresholds are set out in Annex I and II of the EIA Directive as transposed into Schedule 5 of the Planning and Development Regulations 2010-2018 (as amended). Development which do not exceed these thresholds but may require an EIAR are called sub threshold. Sub-Threshold considerations are outlined in Schedule 7 of European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018) as transposed from Annex III of the Directive. The Guidelines on Environmental Impact Assessment Reports note that projects at first glance may not appear to come under the Schedule

but on closer examination when the process is further examined, they may do so because of the sensitivity or significance of the receiving environment etc. Sub threshold developments require an EIAR if they are likely to have significant environmental impacts and must undergo assessment for likely significant impacts through an EIAR screening report. The contents of a screening report for subthreshold development are contained in Annex III of the EIA Directive.

Figure 1: EIAR Screening Process



(Taken from Fig 3.2 of the EPA Guidelines)

Tourism locations should be identified as sensitive receptors in screening assessments for particular impacts, depending on scale and sensitivity, as they would in a full EIAR. Section 6 below can act as guidance for Screening Reports as well as for full EIAR.

The screening process for considering where an EIAR is necessary, is summarised below in Figure 1 (excerpted from Figure 3.2 of the EPA Guidelines).

Strategic Environmental Assessment (SEA) is a more strategic level of environmental assessment that examines plans, policies, objectives and programmes specifically rather than projects. For some tourism developments it may be more appropriate that they be examined through SEA, while individual projects or specific proposals are likely to be more assessed through EIAR. If a project is part of a plan, programme or policy/objective assessed by SEA there will still be a requirement for an EIAR for that development.

## *EIAR Scoping*

Scoping an EIAR is an opportunity to look at the breadth of issues and ensure that any areas of possible significant impact are assessed. Identifying sensitivities and stakeholders should take account of tourism facilities and consider Fáilte Ireland in scoping requests where necessary.

### **4. Assessing Tourism**

There is no legal definition of 'tourism' in Irish legislation. The UNWTO definition of sustainable tourism is "*Tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities*". This is widely accepted as a key definition of tourism as we move to a more sustainable future.

Tourism assessments are frequently carried out by economic consultants and by specific tourism consultants. It is always advisable, particular for tourism projects, that suitably qualified and experienced personnel are used to determine the impact of tourism related projects or to assess the impact of more general proposals on a tourism asset identified in a particular location. There is a requirement for EIAR under current legislation to contain a statement of competency within all EIAR documents, including screening and scoping reports.

#### ***Projects which involve a tourism element***

Tourism projects are wide ranging and diverse. While there are some projects which cater to tourism and are easily identified as such - Hotels, Museums, etc. there are other projects where tourism is a key service or element, but which may not be immediately obvious - forest trails, community facilities and others. EIAR conducted for developments containing tourist elements should be completed in accordance with the current guidance from the EPA.

Projects which include a tourism element have potential particular environmental effects which differ from a non-tourism development. These impacts can be intermittent, event related, inconsistent, dependent on weather, temporal, temporary or seasonal. This is considered within the prescribed environmental topics for EIAR outlined in Section 7 below.

#### ***Projects which may have an impact upon tourism***

While tourism projects may be diverse, the projects which can impact tourism are considerably more wide ranging, from large infrastructural developments to local energy developments. Disruption to or suppression of a tourist resource or amenity can have very local or more strategic impacts, directly or indirectly- for example energy projects in a rural area can have both a negative and positive impact in different regards. There can be temporary, periodic or even seasonal impacts occurring during construction or operational periods.

According to the Fáilte Ireland Tourism Facts 2018 Report, the most important factors in determining the attractiveness of tourism destinations for visitors to Ireland are;

- Beautiful Scenery and Unspoiled Environment
- Hospitality
- Safety
- Nature, Wildlife and Natural Attractions
- History and Culture
- Pace of Life

These factors used for the promotion of tourism in Ireland are also barometers of sensitivity to change in tourism sensitive or dominant locations where development may have an impact upon the tourism asset. The potential for development to impact these sensitivities, and the environmental criteria under which they can be considered, are identified in section 7 of the guidelines.

## **5. Guiding Principles of EIAR**

As outlined in the EPA Draft EIAR Guidelines, the fundamental principles to be followed when preparing an EIAR, including screening and scoping, are:

- Anticipating, avoiding and reducing significant effects
- Assessing and mitigating effects
- Maintaining objectivity
- Ensuring clarity and quality
- Providing relevant information to decision makers
- Facilitating better consultation.

Environmental assessment should be undertaken in accordance with the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

## **6. Consideration of Competency and Qualifications**

As per Section 2.5 of the EPA Guidelines, EIAR is required to be completed by 'competent experts'.

Contributors to the preparation of environmental impact assessment reports, including screening and scoping assessments, should be qualified and competent. Sufficient expertise, in the relevant field of the project concerned, is required for the purpose of its examination by the competent authorities in order to ensure that the information provided by the developer is complete and of a high level of quality so that a full and proper assessment can be undertaken.

For tourism related projects, or projects likely to affect tourism assets, competent experts in the area of tourism should be utilised in the environmental assessment.

The competency of all involved in the production of an EIAR or any related report (eg. Screening and scoping) is required to be stated at the beginning of the EIAR report with further details as necessary in each following chapter.

Where tourism projects involve for example heritage or cultural components, input from heritage consultants, conservation architects, or historians may be required.

## **7. EIAR Requirements**

The following are the key requirements for an EIAR under the current guidance. This is not a definitive list and should be read in conjunction with regulations.

- project description;
- assessment of alternatives considered;

- baseline assessment;
- impact assessment;
- cumulative impact
- interaction of impacts
- mitigation.

### ***Project Description***

Project descriptions are required to describe the whole project including site, scale, design and key factors. It is important that the EIAR and design team have a consistent understanding of the development description in full. The key requirements are outlined in section 3.5 of the EPA Guidelines however they identify the following;

- the location of the project
- the physical characteristics of the whole project
- the main characteristics of the operational phase of the project
- an estimate, by type and quantity, of the expected residues and emissions

The location of the project should include identifying key sensitive receptors (including tourism receptors). In the operational phase of the project any tourism based, or potentially tourism related activity, should be identified.

### ***Assessment of Alternatives***

The assessment of alternatives is a requirement of EIAR

Where tourism projects are location dependent the assessment of alternatives should consider alternative methods and technologies, detail the key considerations culminating in the selection of the design, the reasoning for these and the environmental effect of these decisions. This is particularly important for tourism projects which are often location tied. The developer is expected to consider reasonable alternatives. What is considered reasonable may vary from case to case.

### ***Baseline Assessment***

Baseline descriptions are evidence based, current descriptions of environmental characteristics with consideration of likely changes to the baseline environment evidenced in planning histories, unimplemented permissions, and applications pending determination. Baseline assessments should identify any tourism sensitivities in the zone of influence of a development. This zone of influence of a development is highly dependant on its **Context, Character, Significance, and Sensitivity**, as outlined in the Draft Guidelines. These characteristics apply to both the development and the environment.

For example, in a tourism context;

The location of sensitive tourism resources that are likely to be directly affected should be highlighted, and other premises which although located elsewhere, may be the subject of in combination impacts such as alteration of traffic flows or increased urban development.

The character of an area from a tourism perspective should be described and the principal types of tourism in the area. Where relevant, the specific environmental resources or attributes in the existing environment which each group uses or values should be stated and where relevant, indicate the time, duration or seasonality of any of those activities.

The significance of the tourism assets or activities likely to be affected should be highlighted. Reference to any existing formal or published designation or

recognition of such significance should be. Where possible the value of the contribution of such tourism assets and activities to the local economy should be provided.

If there are any significant concerns or opposition to the development known to exist among tourism stakeholders and interest groups, this should be highlighted. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened or impacted.

In addition, the baseline should include any methodologies employed in the study to obtain information, if particular databases are used to locate sensitive receptors they should be acknowledged. In relation to tourism information, the suggested information sources at the end of this document are a non-exhaustive list which may be of assistance in identifying tourism receptors.

### ***Impact Assessment***

The topics for consideration of impact are prescribed in the EIA Directive and transcribed into Irish law by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 (S.I. No. 296 of 2018). Impact assessment should contain the likely significant effects of a development arising from both construction and operation of a development. Advice on describing the effects is contained within the Draft Guidelines and includes the **quality, significance, extent, probability, type** and **duration** of the effect, with particular descriptors for each. In describing effects upon tourism receptors these descriptors should take account of the particular aspects and sensitivities of tourism, for example a temporary annual effect from a development may have different impacts upon tourism if it falls at peak season rather than off-peak.

Impact assessment should be carried out as per EPA guidelines and the best practice for that prescribed topic. It may be considered appropriate to consider impact on tourism assets under the 'material assets' topic below.

#### Population and Human Health

The consideration of tourism projects within the Population and Human Health is extensive, with impacts ranging from rural employment population impacts of seasonal tourism, to the health impact of air pollution from increased traffic in urban areas.

The impact upon tourism can be considered within this section through the sensitivities of Hospitality, Safety and Pace of Life. Changes in population can impact the perception of pace of life or safety in a particular location. Impacts upon these issues in areas which rely heavily on tourism or have a particular sensitive tourism generator should be considered in this section.

#### Biodiversity

Particular tourist activities can have a significant impact upon biodiversity. Landscapes which are 'unspoiled' can be attractors of tourism. However, the disturbance to ecology must be managed to minimise impact. Biodiversity is also a tourism asset and should be protected as such from other development and should be provided for in proposals where possible.

#### Land, Soils and Geology

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however particular activities or facilities which use geological features may have an impact upon soils and geology, such as mountain biking trails, recreational uses of old quarries etc. Indirect impacts such as material use for extensive landscaping and public realm should also be considered.



#### Water

Tourism uses can be water intense, depending on development type. Recreational use of a surface water feature, water-based leisure centres etc have different impacts to standard development.

#### Air Quality and Climate

Tourism impact upon air quality is dependent on activity proposed and sensitivity of the location.

#### Noise and Vibration

A link between tourism and this prescribed environmental factor, beyond the normal development impacts, is rare, however the impact upon tourism of issues of noise and vibration can be significant. Construction adjoining hotels for example should consider the sensitivity of the development and ensure mitigation is in place.

#### Material Assets; Traffic and Transport

The different transport patterns associated with tourism activities is a key impact of tourism and should be considered especially for tourism projects. These produce temporal and seasonal changes on the norm and specialist consideration and interpretation should be given. Tourism proposals should, where possible, be well served by public transport and should be accessible by modes other than the car. The impact of traffic on tourism assets can be substantial and can vary in severity according to season, the weather, etc. The impact of construction traffic can be a particular concern in tourism sensitive areas in terms of noise pollution and visual impact. The construction programme of developments should work to avoid peak tourism periods in tourism areas and should consider planned or anticipated tourism events and festivals.

#### Cultural Heritage

Cultural heritage can be a key component of tourism projects and the impact of tourism on the maintenance of cultural heritage should be given the utmost consideration, whether positive or negative. As a tourism attraction, cultural heritage should be strongly considered in non-tourism developments and the impact upon tourism considered as a potential impact.

#### Archaeology

Archaeology can be of tourism interest and can be an attractive or key component of tourism projects. Archaeology can be a tourism attractor but is generally not kept in situ except in key cases which could also be considered under cultural heritage.

#### Material Assets; Waste Management

Tourism is a resource heavy activity and can impact waste streams and waste segregation. Impacts here should be considered strongly and with knowledge of the variation that arises from the particular tourist activity. Waste and Waste disposal issues can also impact the perception of an unspoiled environment, effecting tourism, which should be considered.

#### Material Assets

Material assets are utilities and infrastructure. Tourism itself could be considered a material asset as its impact upon the economy and the infrastructure in place to support it is a material consideration in assessing economic impact.

#### Landscape

The visual impact of a tourism development, especially in locations which are visually sensitive or renowned for their scenic or landscape beauty, should be considered carefully. A

development intended to utilise or enjoy a particular vista or environment should minimise impact upon that environment.

### ***Major Accident and Natural Disaster***

There is a requirement for tourist developments to describe expected significant effects on the environment of the proposed development's vulnerability to major accidents and/or natural disasters relevant to it. Where appropriate measures should be identified to prevent or mitigate the significant adverse effects of such accidents or disasters, including resulting from climate change, on the environment and detail the preparedness for the proposed response.

### ***Interaction of Effects***

Where two or more environmental impacts combine or interact they should be considered under the prescribed topics. It is best practice to provide a table of interactions within an EIAR or EIAR Screening Report.

### ***Mitigation***

Mitigation should follow the hierarchy of minimisation in descending order of preference- Avoid, Reduce, Remedy

*Avoid* sensitive tourism resources- such as views, access and amenity areas including habitats as well as historical or cultural sites and structures.

*Reduce* the exposure of sensitive resources to excessive environmental impact

*Reduce* the adverse effects to tourism land uses and patterns of activities, especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance.

*Remedy* any unavoidable significant residual adverse effects on tourism resources or activities.

Mitigation measures must be measurable and achievable within the bounds of the project.

### ***Cumulative Impact***

The cumulative impact is that of the project combined with any known likely project which will interact or compound an environmental impact.

### ***Transboundary Impact***

Transboundary impacts should be included in EIAR. In the case of tourism, especially international travel, the transboundary impacts may not be proximate to the EIAR site.

## **8. Sources of information on Tourism**

### ***Information available online***

#### ***Fáilte Ireland***

Fáilte Ireland offers detailed research analysis and insights into the Irish Tourism Industry. The National Tourism Development Authority has a portfolio of research across a number of areas including facts and figures, briefing papers and reports and visitor feedback. The Fáilte Ireland website has a dedicated research library which can be accessed [here](#)

### *Tourism Ireland*

Tourism Ireland is responsible for marketing the island of Ireland overseas as a holiday and business tourism destination. Tourism Ireland publishes a range of research documents including; visitor facts and figures, seasonal updates and industry insights which are accessible [here](#)

### *Local Authorities*

Local Authorities are an invaluable source of information. They produce tourism strategies and audits of tourism assets within their jurisdiction. Local authorities will also produce landscape and seascape studies. Protected views and prospects as well as the record of protected structures and other designated protected buildings are contained within the Statutory Development Plans.

### *Regional Authorities*

Regional Authorities can also be consulted on high level strategic tourism and potential Regional Spatial and Economic Strategies (RSEs) should be consulted.

### *Central Statistics Office*

The Central Statistics Office (CSO) is Ireland's national statistical office and their purpose is to impartially collect, analyse and make available statistics about Ireland's people, society and economy. The Tourism and Travel Section of the Central Statistics Office is the major source for tourism statistics in Ireland and is updated regularly.

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**From:** O'Riordan, Brenda [<mailto:oriordan@bim.ie>]

**Sent:** Friday 1 May 2020 11:26

**To:** Info

**Cc:** Hardiman, Rachel; Lawler, Ian

**Subject:** Development at Marino Point

Dear Olivia,

I am aware of several fisheries that are active in this area. The inshore vessels at Cobh and South Cork Harbour and The Cork & District Draft Net & Inshore Fishermen Association.

In this area of Cork Harbour a number of key fisheries exist as outlined in the Cork Harbour Survey 2005 , undertaken in conjunction with the South Western Regional Fisheries Board (photo's attached).

The Cork & District Draft Net & Inshore Fishermen Association have been in contact with the Port of Cork regarding Marino Point development & the impact it may have on their fishery and fishing grounds, traditional fishing methods & potential income loss.

If I can be of any further assistance please let me know.

Kind regards