

STRATEGIC INFRASTRUCTURE DEVELOPMENT
APPLICATION TO AN BORD PLEANÁLA
(REG NO. PL04.PA0045)

ORAL HEARING

WASTE TO ENERGY FACILITY, RINGASKIDDY, COUNTY CORK

WITNESS STATEMENT OF JOHN KELLY

LANDSCAPE AND VISUAL ASSESSMENT

1. Qualifications and Experience

My name is John Kelly. I am an Architect and hold an honours degree (BArch) in architecture from University College Dublin (1991). I am a member of the Royal Institute of the Architects of Ireland (MRIA), and am currently Managing Partner of Brady Shipman Martin.

I have been active in the fields of Landscape and Visual Assessment, Visually-Led Design and of Accurate Visual Representation in the context of design, development and environmental assessment, for 24 years.

I have considerable experience in the areas of planning and design of proposed developments, with particular regard to visual impact, site development strategies and master planning. My experience in Waste to Energy other Energy infrastructure includes:

- Indaver Carranstown, County Meath.
- Poolbeg Waste to Energy, Dublin.
- Indaver Ringaskiddy, Cork.
- BioStream, Little Island, Cork.
- Shannon LNG Terminal, Kerry.
- Corrib Onshore Gas Terminal, Mayo.
- Cork Lower Harbour Energy Group wind development, Cork.
- Huntstown Power Station, Dublin.
- Bord Gais Whitegate CCGT power station, Cork.

2. Role in the Project

My role in the project involved undertaking initial site development strategy in collaboration with the project engineers and client team, and in the context of the site characteristics and context, development of the landscape masterplan for proposed development, and the preparation of the landscape and visual appraisal of the development together with the accompanying photomontages. Work undertaken includes:

- Preliminary and iterative review of process configurations and consideration of relative advantages, in terms of potential massing and visual impact, of different configurations;
- Consultation with Cork County Council, Planning and Architects, with regard to the site development strategy and the selection of view locations for photomontages and visual appraisal, and subsequently with Conservation and Archaeology.
- Site development strategy, in collaboration with project engineers, design and client team, and with particular regard to:
 - inter-visibility between military installations,
 - optimising site layout
 - minimising visual impact
 - site boundary details
 - amenity walkway
- Preparation of initial and final representative photomontages, and using this process to develop mitigation measures with regard to massing, colour and site boundaries;
- Development of Landscape Masterplan, Landscape Design Report, Representative Photomontages, and Landscape and Visual Assessment.

2.1 Conclusion of Landscape and Visual Appraisals

The conclusions of Chapter 13 of the EIS may be summarised as follows:

- The visual effects of the proposed development will generally be within a 0.5km radius of the site from the north, east and south.
- The site development strategy has been informed by sensitivity to the Martello Tower so as to minimise visual impacts on views from the Martello tower. The building footprint is located to the east of the Martello Tower, and is aligned so as not to obstruct inter-visibility between the tower and Fort Mitchel.
- The building level has been reduced as far as possible into the ridgeline and appears to be at a similar or lower height than the Martello tower from most viewpoints.
- Mitigation of the building includes detailed consideration of the form and colour of the building. The overall scale of the building is subdivided into a number of parts through changes in height, set-backs on plan, and the application of a selection of colours that are natural to the surrounding environment. The form of the blocks of the buildings are further defined by raking elevations that reference the form of the larger ships utilising the harbour area.
- Landscape planting at the site boundaries will reduce impact from the closer and adjacent views to provide a managed landscape buffer, and to set back the built elements from publicly accessible areas.
- Direct landscape impacts on the site, namely the planting that is to be removed during construction will be mitigated by replacement and improvement to enhance the longer term biodiversity characteristics of the area.
- The lower harbour area is undergoing a process of growth in its diversity of uses. Other planned and permitted developments in the area at present, spanning industrial, tourism, infrastructural, education, research and energy include the DePuy wind turbine at Loughbeg, M28 Cork to Ringaskiddy Motorway Scheme, redevelopment of the Ringaskiddy Port, development of the IMERC campus, Haulbowline and Spike Islands. It is anticipated that there will be further continued development of industrial, education, energy and pharmaceutical projects in the lower harbour area, as well as significant investment in tourism and destination development. The scale of the overall harbour, and the broad diversity of uses it currently supports, is such that the harbour has the capacity to continue to grow in all areas.
- The cumulative impact of developments on the landscape character may be negative in the short term, but is deemed to be positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. Overall the greater surrounding area is deemed capable of absorbing the development without changing the character of the City Harbour Landscape.

3. Submissions and Responses

In preparing this witness statement, I have considered each of the observations submitted to An Bord Pleanála by various parties in relation to the landscape and visual impact appraisal of the Ringaskiddy Resource Recovery Centre. I have addressed each of them below.

3.1 Landscape and Tourism

The suitability of the site for the scale of proposed development in the context of planned tourism development is questioned by a number of submissions, including CHASE and Cllr. Marcia D'Alton

Issue #1: Landscape and Tourism

Submission:

The suitability of the site is questioned, in the context of the harbour landscape and planned tourism development, for the scale and nature of the proposed development.

Response:

The landscape of Cork Harbour is described in *Section 11.3 Receiving Environment* of the EIS. Fundamentally, the harbour is both a living and a working landscape, and has evolved and responded to the needs of the community over time, and as one of Ireland's major employment hubs since the early 1900s.

The harbour is a complex and diverse landscape comprising natural and built elements, as well as historic and more contemporary interventions.

Additions to the harbour include settlements, military installations, on-shore and water-based amenity, port-related activity, tourism, heavy industry and energy production, as well as pharmaceutical plants and energy transmission facilities. Additions to the harbour are diverse in scale, and some of them, historic and more recent, more prominent than others. Each addition over time contributes to the evolving character of the harbour.

As a tourism destination, the appeal of Cork Harbour is underpinned by its vast scale, and by the diversity of uses it encompasses. Visitor experience of the harbour as a destination, either on land or on water, is of an authentic living and working harbour, and of a natural and built landscape and seascape. The co-existence of heritage, landscape, industry, settlements, energy infrastructure, amenity, tourism, the harbour and the port, is what makes Cork Harbour so compelling to visit.

Visitors to Cobh experience the heritage town itself and its iconic Cathedral, but also the vast harbour that is constantly alive with movement and activity - movement of tugs, container ships and small vessels carrying people and goods; the arrival and departure of vast cruise ships, and alongside them smaller sail boats, fishing and amenity craft. In the background, the natural and working landscape and seascape are on display – from Rostellan, Aghada, Whitegate, Carlisle Fort and Roches Point on the left, to Curraghbinny, Ringaskiddy and Monkstown to the right. Spike Island and Haulbowline sit prominently in the middle ground.

The massive resource that is Cork Harbour has continually demonstrated its capacity over time for intensification and co-existence of all uses. It is that intensity and diversity of uses that will continue to ensure Cork Harbour is positioned as an authentic, compelling and dynamic visitor destination, ensuring the success of investment in tourism, as well as continuing to be a successful working and living harbour.

The proposed development is another part of the evolution of Cork Harbour, and part of a continual process of change. In particular, it is consistent with the recent and planned developments on the Ringaskiddy peninsula itself, including the 150m high wind turbines, IMERC, the Beaufort buildings, upgrade of the Haulbowline Bridge, and the upgrade and expansion of the Port of Cork. All of these developments have been planned and developed in parallel with significant investment in tourism projects at Spike Island and at Haulbowline.

It is notable that the Chief Executive of Cork County Council has deemed the proposals, in the context of emerging and potential tourism facilities, to be acceptable in principle, and that the visual impact is acceptable and not overly visually dominant having regard to the site context and setting. The Planning Report submitted by Cork County Council to An Bord Pleanála also states that the proposal is acceptable and will not be overly visually dominant.

3.2 An Taisce

In its submission on the application, An Taisce raises a number of concerns in relation to Landscape and Visual (and Heritage) impacts.

Issue #1: Adverse Visual and Landscape Impact

Submission:

The main facility extends to the eastern end of the peninsula with inadequate buffering. The photomontages submitted by the applicant provide for a scale of development structure to the east of the original proposal and with significantly greater impact on amenity, including views across the harbour from Cobh. The application fails entirely to mitigate these impacts.

Response:

The proposed development is located slightly further west than the previous proposal, and the access roadway is now substantially further west than before. The access road in the previous application continued around the eastern side of the building and extended much closer to the cliff edge. This change was directly in response to the concerns raised by the inspector with regard to coastal erosion and keeping back from the cliff.

The current proposals incorporate substantial mitigation measures, in direct response to concerns raised by the inspector previously, and made possible by the single line nature of the process now proposed. These include:

1. Reduced building and development footprint;
2. Reduced excavation towards the southern boundary;
3. Consolidation of the higher structures into a single line process building;
4. Omission of the landscape berms directly behind Hammond Lane;
5. Sub-division of the overall process building into distinct parts, differentiated by height variation, set-backs and colour, that collectively present as being of a smaller scale than before.

The mitigation measures incorporated in the design of the proposed development are effective in reducing visual impacts and impacts on amenity including views from across the harbour and from Cobh. These are clearly shown in *Figures 11.1 to 11.37*, and from Cobh in particular in *Figures 11.13 to 11.18*.

It is notable that in its Planning Report to an Bord Pleanála, Cork County Council also states that the proposal is acceptable and will not be overly visually dominant.

Issue #2: Adverse impact on Martello Tower Protected Structure

Submission:

An Taisce has stated that notwithstanding the design alterations on the previous application, the inspector's conclusions on 04.PA0010 remain valid.

Response:

The Martello Tower, including its inter-visibility with Fort Westmoreland on Spike Island, informed the site development strategy, and directly addresses the concerns raised by the inspector with regard to severing the visual relationship. The line of sight from the Martello Tower to the northernmost extent of the 2nd bastion of Fort Mitchel, measured at ground level from both the eastern doorway of the tower and from immediately north of the tower, establishes the geometry of the site. The main process building is aligned with this line and off-set northwards from it, there-by ensuring the inter-visibility between the Martello Tower and the full extent of the outer defence walls of Fort Mitchel. The alignment is shown in the Landscape Design Report, in *Figure 1 Site Context*, and *Figure 3 Landscape Plan of Waste to Energy Facility Site*.

3.3 Department of Arts, Heritage and the Gaeltacht (DAHG)

In its submission on the application, DAHG raises a number of concerns in relation to Landscape and Visual (and Heritage) impacts.

Issue #1: Visual Impact Assessment from Martello Tower undertaken from ground level

Submission:

The function of the tower was to provide views from the top of the tower to the surrounding landscape and seascape.

Response:

The significance of the view from the top of the tower is fully acknowledged, however, by developing and presenting views from ground level at the tower, from the eastern doorway and from immediately north of the tower, the worst case scenario in terms of visual intrusion or obstruction has been demonstrated. Viewpoints from ground level at the tower are from a lower level than the parapet of the tallest part of the process building, and as such, that parapet breaks the skyline - as shown in *Figures 11.3 and 11.4*.

From the top of the tower, to which we could not gain access and which I understand has not been accessible for c. 30 years, the vantage point would be more elevated. As such, the parapet of the proposed development would appear lower in the view and less likely to break the skyline. Views from the top of the Martello Tower would also incorporate substantial amounts of nearby development - not visible from the base of the tower - such as IMERC, the Beaufort building, Hammond Lane, the Haulbowline bridge and other infrastructure. In only presenting ground level views from the tower, the visual impact of the proposed development is presented in isolation of any other adjacent built development. If viewed from the top of the tower, the proposed development would be viewed in the context of additional built development, and its own impact would be reduced by virtue of being part of an emerging trend.

In any event, the lines of sight between the tower and Fort Mitchel described above, whether from ground or parapet level of the tower, are fully secured and inter-visibility between them fully retained.

Issue #2: Intrusive nature of development with regard to visual amenity from Spike Island

Submission:

The proposed main building, though located south of the Martello Tower when viewed from the landing pier on Spike Island, will dominate the view, as will the stack, and serve to overshadow and thus negate the military function of and negatively impact on the heritage value of the Martello Tower.

Response:

The main process building and stack are located some 360m from the Martello Tower. The North West Elevation shown on *Cross Section B, Figure 11.40* clearly shows the relative position and heights of the tower and the proposed development. The parapet of the Martello Tower is some 3.0m higher than the tallest part of the proposed development, and will not overshadow the tower.

When viewed from the pier on Spike Island, *Figure 11.36A.2*, the proposed development does not dominate the view. It has been aligned on site such that the short (eastern) elevation faces Spike Island thereby minimising the extent of the development visible. The sub-division of the building and selection of colours, assists in integrating the building with the terrain behind it. The building is less prominent than the wind turbine, the waterbody and the foreshore visible in the view, and the part of the building that is seen against the sky is no greater than that of the Beaufort Building. Inter-visibility between the Martello Tower and landing point is fully maintained. In addition, this view presents only about 20% of the overall panorama from the pier which also includes, moving from left to right, the immediate attraction of Spike Island itself, Ringaskiddy, Haulbowline, Cobh, Cork Harbour, Aghada and Whitegate. From this location, there is a vast range of landscape, seascape and building forms and uses to be seen that are characteristic of the harbour, and that will inform visitor experience. The location must be considered in its entirety.

The same is true of the view from the 2nd bastion of Fort Mitchel some 1.1km from the proposed development, see *Figure 11.35.2*, in which the wider context, from left to right, includes Carlisle Fort, the main harbour channel, Camden Fort, Curraghbinny Woods, Lough Beg to the left, Haulbowline Island and Cobh to the right, as well as the bastion walls of Fort Mitchel in immediate proximity to the viewer. Inter-visibility between the Martello Tower and the full extent of the 2nd bastion of Fort Mitchel is fully secured by virtue of the site layout.

The mitigation measures adopted in the design of the proposed development afford substantial mitigation with regard to the issues raised by An Taisce, and as identified in the inspectors report, relative to the previous proposals, and are considered to be effective.

The Applicant is nonetheless mindful of the current dis-used status of the Martello Tower. Given the proposed development includes the establishment of an amenity walk leading from Gobby Beach to the tower, the Applicant would be happy to discuss with the community and other stakeholders how the Community Fund could contribute to the repair of the tower so that it might be made accessible again and perhaps opened to the public.

3.4 Kieran O’Flaherty, St. Josephs Terrace, Ringaskiddy

Issue #1: Proximity to dwelling and visual impact

Submission:

The dwelling is less than 1km from the proposed development and the occupant has concerns in relation to visual impact.

Response:

The dwelling is less than 1km from the development, and located on the western side of Shamrock Place (Loughbeg Road). The properties face west, and the rear of the property faces east in the direction of the development. While these properties were considered for potential visual impact, the roadside screening along Shamrock Place, and the presence of dwellings at Martello Park and intervening tree planting, is such that any views from this location will be partial views that are consistent with other industrial development in the area.

3.5 Vevay Family, Kenver, Old Church, Cobh, County Cork.

Issue #1: Visual obtrusion on the landscape of Cork Harbour

Submission:

The visual obtrusion of this plant will be yet another blot on the landscape of Cork Harbour. The cumulative effect of all the industry, port infrastructure, wind turbines and other skyline obtrusion must be considered and a halt called before Cork Harbour is irreparably damaged.

Response:

The proposed development will not be obtrusive on the landscape of Cork Harbour.

Chapter 11 of the EIS, *Section 11.3.1* describes the receiving environment of Cork Harbour and identifies the complexity and diversity of the landscape, comprising natural and built elements as well as historic and more contemporary interventions. This diversity is an important characteristic of the harbour and underpins its success and appeal across the wide range of land uses it supports.

Section 11.5.3.2 describes the context and impacts from Cobh. The scale of the proposals relative to existing development is noted, and the operational stage impact from Cobh in general will be moderate, permanent and neutral, increasing at White Point to moderate, permanent and negative.

3.6 Mamie Bowen, Glenville, Monkstown, County Cork.

Issue #1: Negative Visual Impact on Harbour and Monkstown

Submission:

There will be a permanent negative visual impact on all areas within a 360° range, including Monkstown which is an Architectural Conservation Area.

Response:

Section 11.5.3.3 of the EIS describes the context and impacts from Monkstown. Monkstown is an attractive settlement on the western side of the Lower Harbour and is a designated Architectural Conservation Area. Its character is strongly defined by its traditional buildings, material finishes, spaces and streetscapes, and its landscape setting is informed by the context of Cork Harbour.

The immediate landscape setting of Monkstown includes Verome Dockyard and the Pfizer facility across the Monkstown/Raffeen creek at c. 350m distance; Ringaskiddy Port and its permitted expansion at c. 1.0 to 2.0km distance; and Haulbowline at 2.0km distance. The proposed development will be further again at 2.6km distance. The visual impact from Monkstown will be moderate, permanent and neutral once operational as shown in *Figures 11.24 to 11.27*.

3.7 Cobh Action for Clean Air

Issue #1: Gobby Beach

Submission:

Gobby Beach will be reduced in size, and the loss of Gobby Beach by rendering the landscape unsightly will make it unavailable for public enjoyment.

Response:

The beach nourishment works will not reduce the area of Gobby Beach. Beach nourishment will replenish the shingle above the foreshore on Gobby Beach but will not reduce the area of the beach. The primary purpose of the beach nourishment is to limit coastal erosion and to protect the cliff, but the nourishment will also provide a better and more accessible surface above the foreshore for people using the beach.

The development of a walkway along the cliff overlooking the beach and harbour, together with a dedicated viewing platform, will enhance the amenity offer of Gobby Beach. The eastern end of the main process building will face the beach. The building will be some 25 - 30m west of the site boundary, rising from 10 - 15m above the perimeter landscape berm, and will itself screen the taller element of the process building located further west – see *Figure 11.7.2*. While the operation impact will be significant, permanent and neutral, it is considered that the presence of the building at this location in the manner proposed will not undermine the amenity value of the beach. The primary aspect of the beach is to the east and north, and the building will be behind the beach and intervening landscape.

3.8 CHASE

Issue #1: Visual Impact

Submission:

Building will be a blot on the landscape, visually eliminating the vista of the headland from Cobh, and dominating the landscape at Gobby Beach.

Response:

The EIS, *Section 11.5.3.2*, together with *Figures 11.13 to 13.18*, describes the context and impacts from Cobh. The impact from Cobh will be moderate, permanent and neutral, increasing to moderate, permanent and negative at White Point. The impact on Gobby Beach is dealt with above under item 3.7.

4. Conditions Recommended by Cork County Council

Cork County Council has recommended the attachment of a number of suggested conditions which are contained in its Report received by the Board on 5th April 2016. The applicant is generally in agreement with the approach taken by the Council in relation to Condition 4 recommended, which for ease of reference, is set out below:

4	All landscaping works shall be in accordance with the detailed landscaping plan submitted and the details contained in the accompanying EIS. All landscaping works required in accordance with this condition shall be implemented on completion of construction works.	In the interest of visual amenity.
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In relation to Condition 4, the application details, in the *Landscape Design Report*, proposed the structuring of construction contracts to allow for the early completion of landscape areas so as to facilitate the early establishment of planting and the establishment of the overall site. This approach would also assist in mitigating construction stage impacts, particularly along the L2545, Gobby Beach and the southern site boundary.

A suggested rewording of this condition, not prescriptive and subject to adaptation as appropriate, has been set out below.

Condition No. 4 Suggested Alternative Wording

4	All landscaping works shall be in accordance with the detailed landscaping plan submitted and the details contained in the accompanying EIS. A programme for implementation of all landscaping works shall be submitted to the Planning Authority prior to the commencement of development identifying early stage implementation proposals, in particular along the L2545, Gobby Beach and the southern site boundary, and the implementation of all other landscaping works required in accordance with this condition upon completion of construction works.	In the interest of visual amenity.
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5. Conclusion

In summary, I wish to emphasise that full consideration was given from the very outset of the project design to the specific concerns raised in the Inspectors Report in the last application, and also the site specific constraints.

In particular, with regard to the Martello Tower, the site development strategy and site layout have been informed by the sightlines between the tower and military installations. The building is aligned to minimise visual impact on the Martello Tower, and also not to obstruct the important visual connections between the Martello Tower and Fort Mitchel

The proposed development will be set at a reduced level within the existing site, maximising the screening value of the terrain itself to integrate the development. The scale of the proposed buildings will be visually reduced by virtue of being subdivided into a series of blocks of different sizes – further differentiated by the application of a range of colours that are compatible with and compliment the adjoining landscape context.

The visual effects of the proposed development will generally be within a 0.5km radius of the site from the north, east and south. Site and boundary planting proposals will provide a buffer between publicly accessible spaces and the site itself, and a degree of visual separation. Boundary landscape treatment along the access road to the north, together with raising the levels of the road, will enhance the overall presentation of the roadway in a manner that is compatible with the emerging transition from a semi-industrial approach to a more campus style environment.

The Lower Harbour area has and will continue to undergo change in its visual and landscape character in the short, medium and long term. Since the assessment of the previous application in 2008, the local context of this development site has changed to include the erection of three 150m high wind turbines, the completion of the Beaufort Buildings in the IMERC Cluster, and the development of the Biomarin biopharma plant. In addition, permission has been granted for expansion of the Port of Cork and relocation of the existing container facility from Tivoli to Ringaskiddy.

The cumulative impact of these developments on the landscape character will be negative in the short term, but is deemed to be positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be an extension of this landscape.

Overall, the Lower Harbour is deemed capable of absorbing this and other developments without changing the character of the City Harbour Landscape, and together with planned and emerging tourism facilities within the harbour, will continue to ensure the diversity that underpins the identity and appeal of the harbour as a living and working harbour, and also as a destination.