

**Proposed Waste-to-energy Facility
and Transfer Station at Ringaskiddy,
Co. Cork for Indaver Ireland**



HOGAN ASSOCIATES

**Statement of Evidence of Roddy Hogan,
Planning Consultant, on behalf of Mary O'Leary
and others acting under the title CHASE**

1.0 Introduction.

My name is Roddy Hogan. I hold a degree of Bachelor of Architecture from University College Dublin and a post-graduate qualification in town-planning also from University College Dublin. I am a corporate member of the Irish Planning Institute and a former chairman of the Cork Branch.

I have practiced in Cork as a town-planner and architect for more than 30 years, specialising in private-sector development, particularly large-scale residential and commercial projects. I was a founder-director of McCutcheon Hogan, now McCutcheon Mulcahy, the pre-eminent planning consultancy in the region. I am currently a member of the Urban Forum – a body jointly established by the architectural, engineering, landscape-architects', town-planning and surveyors' institutes to comment on issues relevant to the development of our cities and towns. Over the years I have maintained a particular interest in strategic planning issues in the Cork city region.

This document is prepared on behalf of Mary O'Leary and others acting under the title CHASE.

It examines, firstly, the status of the proposal previously permitted on the site arguing that it is of no relevance to the present enquiry. It then goes on to review general town-planning issues which are relevant to the assessment of the merits of the present proposal.

2.0 Precedent

Many of the issues which now arise were ventilated some five years ago at an oral hearing held by An Bord Pleanála to consider appeals against the planning authority's decision to refuse planning permission to the present applicants for a similar but smaller facility on the same site.

At that time the Board decided to over-rule both the planning authority's decision to refuse permission and the recommendation of its own inspector to endorse that decision. The reasons why it did so are set out comprehensively in the Board Direction of 15th January 2004 which backed its decision to grant planning permission for the proposal.

However there have been significant changes in circumstances in the meantime which dictate that that decision should be set aside as a precedent in determining the merits of any aspect of the present application.

Planning and Development (Strategic Infrastructure) Act, 2006.

The procedures set up under S37 of this new Act are significantly different from those which pertained when the Board considered the earlier proposal.

The Board now receives directly certain applications which it has previously decided to be of particular national or regional importance. These no longer go through the filtering process of a prior application to the planning authority of the area. Out of respect to the by-passed local authority, and having regard to other very significant changes in procedure, it is clearly incumbent that the Board conduct a root-and-branch review of this new project, free of any preconceptions arising from its previous decision.

National policy on waste disposal

The Board based its 2004 decision to grant permission on then current policy documents including the *National Hazardous Waste Management Plan* published by the EPA in 2001, and the national waste management policy framework and strategy statements '*Changing our Ways*' and '*Delivering Change*' published by the DoEHLG in 1998 and 2002 – particularly the preference expressed by the latter documents for thermal treatment with energy recovery over landfill disposal of residual waste (*Board Direction: First Schedule*).

Since then the DoEHLG has published its *National Strategy on Biodegradable Waste* and the Environmental Protection Agency has published a *National Waste Report 2006* and issued a new *National Hazardous Waste management Plan 2008-2012*.

Associated with the issue of changing policy is that of developments which have taken place elsewhere over the period 2004-09, or are planned or committed, and which should now be taken into account in assessing the merits of the present proposal in the context of Government, regional or local policy documents.

Carrigaline Electoral Area Local Area Plan 2005

The Carrigaline Electoral Local Area Plan 2005 is the document which sets out the Council's specific zoning policy for the site. It was adopted in September of that year and has now been formally subsumed into the County Development Plan 2009.

CASP Update

The Cork Area Strategic Plan of 2002, concerned about the unbalanced and generally dispersed car-dependant development pattern of the city region, recommended a policy of directing growth onto a corridor along the existing north-west to south-east rail line from Mallow through the City to Cobh and along the abandoned east-going line to Midleton which it proposed to reopen. A second major strategy to reverse the population decline in the City was the redevelopment of Cork Docklands to accommodate a population of some 12,000 by 2020. This strategy was incorporated into the Cork County Development Plan of 2003.

More recently an update of CASP was commissioned because of increasing concern that, despite an extended period of unprecedented growth, the adopted policy was not happening on the ground. This document, completed in May last year, showed amongst other deviations the projected growth along the rail corridor was much less than expected. It recommended that this growth be expedited, which has implications for the future development of Cobh, and stressed the importance of economic development in the creation of employment to sustain the increasing workforce, which has important implications for both Cobh and the Ringaskiddy area.

Cork County Development Plan 2009

Cork County Council had the option of incorporating in its 2009 Plan a recognition and acceptance of the 2004 decision of An Bord Pleanála to grant permission for an incinerator on the present site. It did not do so and, as that permission withered and dropped away, the planning authority has restated its long-standing policies in relation to industrial development at Ringaskiddy.

Cobh Town Development Plan 2005-2011

The Cobh Town Development Plan of 2005 has triggered the commissioning of a suite of subsidiary plans designed to reverse the decline of the old town. These include *Cobh: The Path to Renaissance and Resurgence* prepared by Brady Shipman Martin and the *Cobh Urban Design Feasibility Study* prepared by a team headed by Scott Tallon Walker. Together these stress the importance of the harbour in promoting economic regeneration through tourism.

Economic context

In 2004 the economy had been growing at an average rate of some 6.1% of GDP over the previous 5 years. There was at the time a very positive, and perhaps somewhat uncritical, approach to development and investment, encouraged by the Government and facilitated by lending agencies.

Today the State is embroiled in an unprecedented world-wide recession exacerbated by particular problems of our own with GDP forecast by the ESRI to decline by some 9.2% this year. It is generally accepted that Ireland's recovery will be significantly delayed following the beginnings of international uplift.

In response to the dramatically declining tax take the Government's policy is committed to cutting expenditure, including new investment in infrastructure, in an effort to reduce borrowing.

On the one hand this context would welcome the investment of private capital in infrastructural projects, such as is presently proposed, but on the other there is now a need for great care to ensure that existing investment is not threatened by the new. This consideration would very much apply to existing and projected investment in waste-management facilities, and to the need to carefully husband regionally important resources in the form of serviced land with particular attributes. Such issues must now be assessed much more critically than heretofore.

Heritage

With time there has been an increasing perception of the importance of the harbour of Cork not just in relation to recreation and tourism but also in regard to ecological and visual issues and the need to conserve cultural heritage.

This has given rise, for example, to the publication in May last year of the *Cork Harbour Integrated Management Strategy* and to the preparation of a formal and detailed submission this year to the DoEHLG that the City and Harbour of Cork be proposed to UNESCO for designation as a World Heritage Site.

Summary of Issue of Precedent

Despite these significantly changed circumstances there seems to be a misconception that the expired permission Reg. No. 01/6215 enjoys some '*res judicata*' status. For example, the County Manager in his letter to the Board of 12th February 2009 commented (p.2) that '*. . . a detailed comparison with the permitted facility is needed. . . .*' and the Council's Senior Planner in his report of 3rd February to the Mayor and Members of the Council comments that the new photomontages '*. . . are assessed against those submitted with the earlier application 01/6215.*' (p.12).

This misconception is evident elsewhere in the Council's report and is pervasive in the submissions to the Board on behalf of the applicants.

It is true that, despite these changed circumstances, the Board would be obliged to have regard to the existence and terms of the permission it granted in 2004, and the differences between it and the present proposal, if that permission were still alive and sufficient time remained for construction to be completed, or for 'substantial' works to be carried out to the extent that an extension of the permission could be triggered under S42 of the Act.

Neither of these situations applies. The permission expired on 14th January this year and, in accordance with the terms of S40 of the Planning and Development Act 2000, it shall '*cease to have effect*'.

Consequently it is expected the Board will proceed on the basis that its previous decision, and every aspect of it, is irrelevant to its consideration of this new application.

3.0 General Assessment of Proposal

The balance of this submission assesses the general merits of the proposal.

In relation to need, it is noted that the Council in its submission rejects the applicants' case in relation to municipal waste but acknowledges that a hazardous waste incinerator would be in accordance with national policy (report of Paul Murphy, Senior Planner, p.16). The merits or otherwise of this assessment will be decided by the Board but it is the contention of this submission that, whether or not a need is demonstrated, the facility should not be located on this site at Ringaskiddy.

4.0 Policies of the Planning Authority.

The proposal clearly materially contravenes important policies of the Cork County Development Plan 2009, and the policies of the Carrigaline Electoral Area Local Area Plan which it incorporates, in relation to the prohibition on contract incineration in areas zoned for industrial development and in relation to the reservation of these industrially-zoned lands in Ringaskiddy for large stand-alone industry which will benefit from the particular advantages of the location.

That this is so has been detailed by Andrew Hind, Senior Planner heading the Council's Planning Policy Unit, in the formal submission to the Board on behalf of the planning authority and will be further explained at this hearing by the Council's experts as well as by planning consultant, Hazel McCarthy, on behalf of CHASE.

In prioritising these lands for a particular bracket of industry and enterprise the Council is being consistent with a policy it has maintained for more than 30 years and on foot of which much public investment has been made.

The first strategic plan for the City region, the Cork Land Use and Transportation Study (LUTS) of 1978 nominated Ringaskiddy and Little Island as the two principal areas of employment growth outside the City proper.

Of the two, it calculated Ringaskiddy would evolve more slowly:

'Ringaskiddy will not achieve its full potential until after the Study period, but by 1991 will accommodate an estimated 5,300 jobs. Most of these jobs will be provided however in the latter part of the Study period. The planned development of the deep-water berthage, together with major infrastructural investment, will reinforce Cork's attractiveness as an industrial location. In order to ensure maximum benefits are derived from this investment, industries seeking to locate at Ringaskiddy must be critically examined.'

Much infrastructural investment followed this policy in roads, water supply, effluent disposal, port expansion and land acquisition (LUTS Review, p.29) but, in the event, the Irish economy stagnated during the 1980s and employment growth at Ringaskiddy was very disappointing (LUTS Review 1992, p.20). In reaction a proportion of the reserved land was reallocated in a futile initiative to kick start a tax-free Far Eastern Industrial Park.

Despite the poor take-up the LUTS Review regretted the reduction in land dedicated to specifically water-using/port-related industry saying that *‘much of what was said (in the original study) remains highly relevant.’* and it stressed that *‘the remaining land suitable for such industry must be reserved for that purpose so as to protect the infrastructural investment already made in the area.’*

The LUTS Review was a gloomy document, reflecting the depressing economic situation at the time, but in fact growth during the 90’s particularly in Ringaskiddy became rapid to such an extent that its successor, the Cork Area Strategic Plan 2002-2020 (CASP), commented (p.125):

‘Land supply in Ringaskiddy is becoming scarce. As described previously, the Port’s plans for expansion include land reclamation; however, land in the area should generally be reserved for port-related or complementary uses.’

This policy of reservation for appropriate uses is further stressed elsewhere in the document when it states (p 56) that *‘Port-related industry, port back-up facilities and other uses that complement the port should be located at Ringaskiddy, and other land-uses should be avoided in this area.’*

The recent CASP Update of May last year carries forward the original document’s strategy in relation to industrial development on a number of understandings including that (p.33):

‘Ringaskiddy will continue act as a strategic employment location and indeed should see primarily industrial employment growth based on the relocation of port activity from Docklands.’

It goes on to say (p.39) that this area will with Whitegate/Aghada *‘be the preferred locations for large stand alone industrial uses, with a commensurate limitation on residential growth’*. It sets out the requirements for growth in these areas:

‘Generally, the main issues critical to the success of these strategic employment locations are:

- *Continued availability of suitable land.*
- *Improved public transport services;*
- *Comprehensive water and wastewater infrastructure, as well as access to soft infrastructure, (shops, crèches and other local services).*

Thus the Council is continuing a policy of 30 years standing when in its current 2009 County Development Plan it identifies Ringaskiddy as a Strategic Employment Centre and resolves that sufficient land will be zoned for appropriate uses which will *‘be protected from inappropriate development that would prejudice its long-term potential for these uses’*.

These long-established policies, which are spelt out in more detail elsewhere in the Development Plan and in the Carrigaline Electoral Area Local Area Plan 2005, have been endorsed by successive strategic planning studies for the area and backed by major public investment in infrastructure.

They have been put in place because Cork as a City Region must compete with other regions in the State, and internationally, in seeking to attract major industrial investment, usually FDI, which would be contemplating setting up in Ireland and/or the Cork area.

In doing so, it has very significant advantages over the other Irish Gateways. It has a certain critical mass, being by a margin the largest gateway outside Dublin, and has a university and institute of technology and a large and skilled labour pool. It has its airport and railway communications, a regional hospital, and a city core with a cosmopolitan population and wide cultural activity. It has a strong sporting tradition and at hand the outstanding recreational areas of its harbour and the coasts and villages of West and East Cork.

However, these advantages will be of no effect if there is not available a range of sites with the essential infrastructure and other advantages which such an undertaking would consider important.

The particular attractiveness of this site is its location within an established pharmaceutical cluster, access to infrastructure and the port, and an excellent environment and outlook which would facilitate a quality building attractive to its staff and would complement the image of the company.

The availability of this site could at any time be critical to the attraction to the Cork area of an important industry – important in terms of employment, the consolidation of an existing cluster or the incubation of a new.

This is why the Council's policy considers it vital to retain the present site for incoming stand-alone industry which needs and would benefit from its particular advantages. It is why the policies would oppose the displacement of this option by an undertaking which has no particular need to be there, disimproves the image of the area and has significant collateral disadvantages.

For these reasons we consider that the long-established planning policy for the area is well-founded, is reasonable, and should be supported.

5.0 Conflict with the proper planning and development of the area.

In addition to conflict with the policies of the development plan the proposal is also demonstrably in conflict with the proper planning and development of the area by virtue of its adverse impact on Cork Harbour – a vital resource – and on Ringaskiddy and Cobh.

Before looking at these in more detail it is worthwhile to reflect on the size and scale of the proposed building, and on its location in the harbour.

Fig. 1 below shows its size relative to the best-known large building in the area and there can be no doubt it will be enormous.

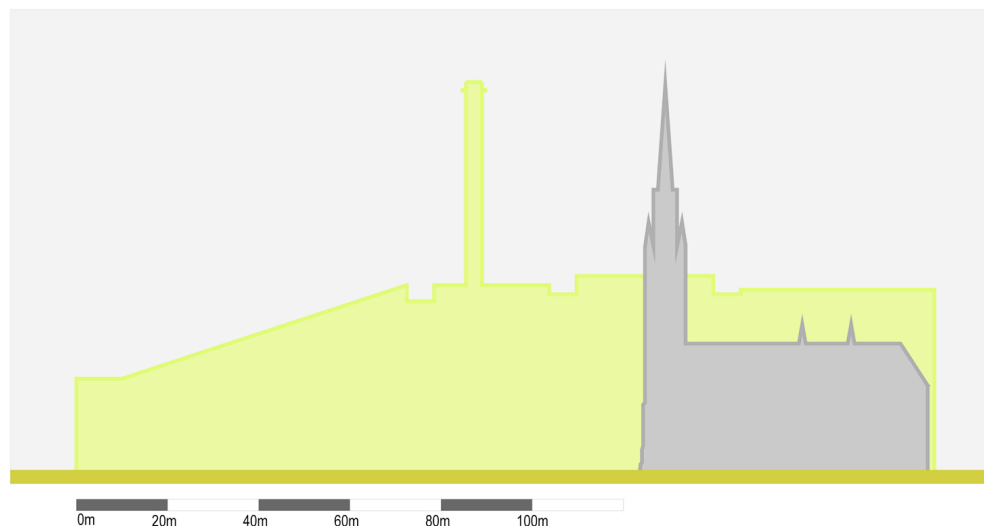


Fig 1: Scale of proposed building (yellow) compared with Cobh Cathedral.

However, this proposal also occupies a close, central and focal position when viewed from probably the two most important and sensitive locations in the harbour – from the town of Cobh and from Spike Island in the context of the surrounding complex of historic fortifications. Additionally it will adversely affect Ringaskiddy village.

It is accepted that the architects for the building, and the landscape architects and visual analysts, have devoted much commitment and high expertise in seeking to diminish the visual impact of the development. They have worked hard on its shape, materials, colours and landscaping but it is clear that the scale and bulk of the main process building presented them with an impossible task and to disguise or diminish that reality of the building is not feasible.

The Council's Senior Architect has comprehensively analysed the scale, bulk and design of the building and its intrusion into important viewsheds and we would support his conclusions. We note too that the building does not reveal any windows or other elements which might indicate its actual scale. It will simply appear as an intimidating closed shelter of gargantuan proportions and no discernable connection with people.

The large number of photomontages which have been prepared and submitted on behalf of the applicants are appreciated, as well as the comprehensive analysis of the different character areas of the harbour. Nevertheless it is not possible to accept the conclusion of Mr. John Kelly to this hearing (p 12) that *'in the context of such a large and varied setting, the currently proposed development will not be significantly more intrusive than the complexity of uses and built and natural forms which already occupy the harbour area.'*

That stance might be arguable if the proposal were located in a relatively remote part of the harbour where from all important viewpoints it would be seen at a remote distance. The reality, however, is that it proposes to occupy a focal position in the harbour where it will be central and close-up to probably the two most sensitive viewing positions, that is from Cobh and from Spike Island, and will also intrude strongly into views from the areas of the harbour most used for amenity and recreation, and will also significantly disadvantage the village of Ringaskiddy which it virtually adjoins.

6.0 Impact on Cork Harbour.

Cork Harbour is the largest natural harbour in Europe, is accessible in any weather conditions, and has been from Norse times an important trading port with continental Europe. More recently, from the late 17th to the early 20th centuries, the City and Harbour of Cork has played an important part in the expansion of European peoples westward. There are many layers to this role: as a simple merchantile trading port, as an last departure point to America for European and Irish emigrants, as a provisioning centre for British armies and navies, as an important naval base and as a stopping point for large passenger liners, most famously the Titanic.

Its importance to Cork of its harbour has been succinctly summarised in CASP where it says (p 27):

'The overall quality of life as expressed in the natural, social and cultural environment is one of the key attributes that attracts new businesses and skilled workers to a developing region. The quality of life available in Cork is both a major marketing strength and a highly prized asset recognised nationally and internationally. The natural environment and in particular the spectacular harbour area are without comparison elsewhere in Europe. Protecting this asset and the social and cultural assets in all their manifestations is therefore vital to the future success of the area.'

Outside the ambit of strategic and statutory planning there has been an increasing appreciation of the importance of the cultural heritage embedded in the harbour and the necessity of its conservation. This has given rise to the publication last year of the *Cork Harbour Integrated Management Strategy* designed to pull together and co-ordinate the policies and aspirations of the many different stakeholders.

This increasing concern and interest in the cultural heritage of the harbour has also manifested itself in the preparation of a formal submission to the Government for inclusion on the Irish tentative list for designation by UNESCO as a World Heritage Site. The submission document was prepared in collaboration with a number of parties and in consultation with relevant statutory bodies including the Port of Cork. It is a particularly good fit with the changing parameters for designation as a world heritage site which tend to stress the significance of a building or complex in the wider human development rather than as a stand-alone structure, however beautiful.

It is, of course, accepted that Cork Harbour is a working port and it should properly continue to develop as such, due regard being paid to avoiding undue or avoidable adverse impact on other aspects of its heritage and amenity.

In this context probably the most serious impact of the proposed development will be its intrusion into the historic complex of fortifications which are of considerable significance in their own right but perhaps more so as a manifestation of the importance of the harbour as a base for the British navy.

The EIS gives an excellent description of the archaeological and military features in the lower harbour but analyses only the impact of the proposal on the Martello tower close by the southern boundary of the site, and then only in relation to physical damage, finding no significant problem.

In fact the impact on the Martello tower should have been analysed in a much wider context – a deficiency which has been remedied in a most scholarly and compelling manner by the submission to this hearing by Marcia d’Alton. In her conclusions she lists the very serious impacts the proposal will in fact have on the Martello tower, its surroundings and its attendant grounds.

However, the impact of the proposed structure should perhaps have been assessed by the EIS in a still wider context – that of the potential impact on the cohesion and interpretation of the whole complex of fortifications in the lower harbour and on their potential as an important tourism resource.

The focal location of the proposed development within the complex composed of the three forts, two Martello towers, the powder magazine on Rocky Island and the storage buildings on Haulbauline Island is shown in Figure 2 below.

There are emerging proposals to develop an tourist attraction – the economic importance of which is described below - based on an interpretative centre on Spike Island which would be accessible by boat via the landing stage at the northwestern corner.

However, the panorama of the fortifications from that viewpoint will be substantially dominated by the proposed process building as will be evident from a study of photomontage No. 17b submitted with the EIS. From that viewpoint the important Ringaskiddy Martello tower will be obscured and from elsewhere on the Island the impact will be no less adverse.

The effect will be to substitute this dominant building, of vast scale, as the principal point of interest rather than the historic structures which were intended to be the focus of an important tourist experience.



Fig. 2: Location of site in context of principal fortifications in lower harbour.

7.0 Impact on Ringaskiddy Village

The EIS submitted with the application implies that property values in Ringaskiddy will be unchanged once construction of the new facility is completed:

‘As there are a number of large process plants and two hazardous waste incinerators in operation in the Ringaskiddy area already, the impact of property prices, if there is any, is expected to be minor and prices are expected to recover once the plant is operational.’

The assessment of the impact of a development on the property values of an area is necessarily subjective but this statement seems quite unrealistic.

The visual impact of the development as seen from the village, which the EIS itself assesses as moderate, permanent and negative (Figs. 12.1b and 2b of the EIS), must have a depressing effect on values, particularly on properties at the eastern end. These will be further depressed by the perception that there may be long-term impacts on health. There will also be the adverse effect of a heavy traffic of waste-carrying vehicles through the village for an unknown period before the realignment of the N28 is implemented.

Additionally the intimidating presence of a very large and 'blind' industrial building in close proximity to Gobby beach will seriously damage this important amenity for the village.

The net effect of these impacts will make Ringaskiddy a significantly less attractive place to live and will consequently reduce property values, and diminish the appearance and vitality of the village and the quality of the 'soft' infrastructure it will be able to generate and which the CASP Update considers important to successful growth of the surrounding industrial complex.

In this context the report of GB Richard Ellis which has been submitted in support of the EIS assessment of no change is rejected because:

- It refers to a municipal incinerator in Dublin which will be handling only non-hazardous waste;
- It refers to the impact on property values of a proposed, rather than a recently completed, facility. The writer's experience is that positive or negative impacts on property become fully manifest only when a source is completed;
- We are not informed of how the 'bespoke' indices of house price trends were calculated for the six specific areas said to be 'adjacent' to the proposed plant (but note that the nearest existing house is almost 1km distant from the site).
- It refers to an incinerator proposal which would be little-noticed given its location between the Pigeon-house generating station with its pair of iconic chimneys, a waste-water treatment plant, a tank farm and a second generating plant.

8.0 Impact on Cobh

The town of Cobh has had a difficult time. From a high point probably before the first world war it has steadily declined parallel with the loss of its passenger shipping and the closure of its centres of employment at Verolme dockyard, IFI and Ispat. More recently the substantial growth of new development in its northern environs, with its own shopping and other facilities, has tended to leave the old town with its fine architectural heritage without any economic function and in a state of decay.

This situation was identified as long ago as the 1978 LUTS study which stressed (p 194) that the future development of Cobh *‘must include the renewal of the older part of the town’* noting that in some cases *‘immediate action is required to prevent further building loss due to physical decay.’* It commented that *‘the tourism and recreational potential of Cobh is seen as an opportunity for sensitive restoration of the historic core. . . ‘ - an approach to the problems of the town which has been repeated in many studies since.*

The LUTS Review noted that Cobh is a town with considerable potential which has not to date been realised adding that *‘Cobh is most likely to succeed as a tourist location.’* In the promotion of tourism it proposed a waterbus circuit linking a number of attractions in the harbour, including Spike Island and Fort Camden (Fig 4. below).

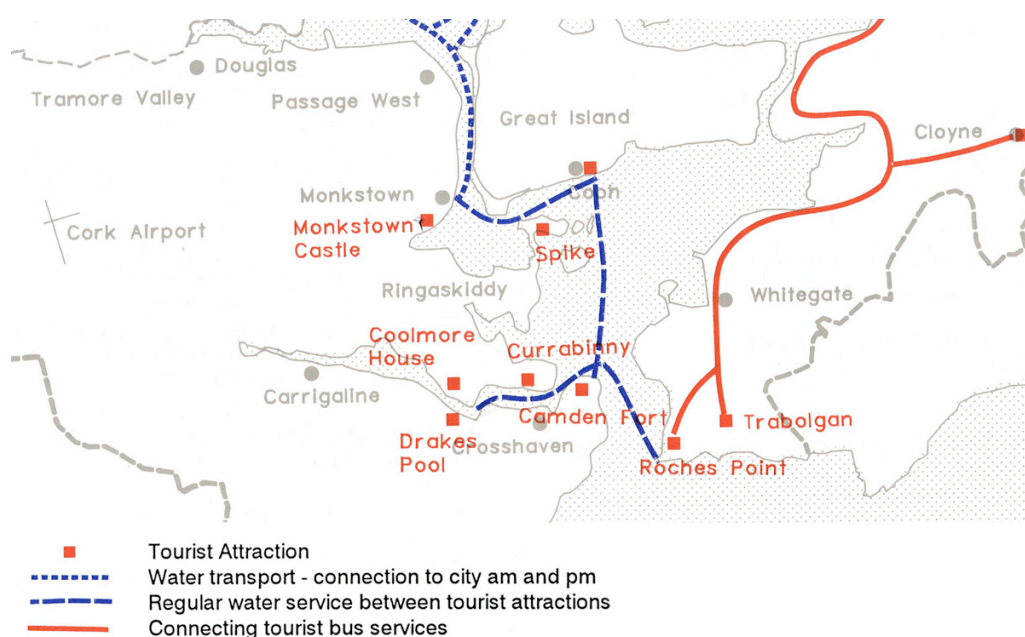


Fig. 3: Extract from Fig. 3.1 of LUTS Review 1992 (Harbour Transport and Tourism Development.

CASP said (p. 57):

‘Visitor access should be improved and Cobh, Crosshaven and Monkstown be promoted as premium leisure sailing destinations. Specific developments in Cobh should include the creation of a distinctive ambience through enhancement and restoration of streetscapes and features, including interpretation of the Cathedral and other landmarks. In the longer term, consideration should be given to the development of tourist and leisure facilities on Spike Island if it is compatible with the development of a new container berth at Curlane Bank and vintage train operation between Cork and Cobh. Greater emphasis should be given to promoting and developing the harbour as a facility for water-based sport and leisure activity.’

The Midleton Local Area Plan of 2005 notes that one of the main issues for Cobh is how to capitalize on the potential of the harbour as major leisure and recreational facilities and going on say (p.27) that *‘Cobh is the natural strategic location for such (harbour) tours and there is sufficient potential for these to be expanded to include tours of Spike Island and the forts as part of an overall tourism strategy for Cork Harbour.’*

The CASP Update also comments (p 51) on *‘the potential for an iconic tourism product at Spike Island’* and this option is further developed in the more recent studies *Cobh: The Path to Renaissance and Resurgence* prepared by Brady Shipman Martin and the *Cobh Urban Design Feasibility Study* prepared by a team headed by Scott Tallon Walker.

In summary, there is a growing consensus and urgency that Cobh must depend on tourism for the revival of its economy and consequent conservation of its architectural heritage – and that this depends on realizing in a responsible way the potential of the harbour.

It is clear however that the current proposal will impact negatively on these imperatives.

The EIS does not consider the impact of the proposed undertaking on property values in Cobh but it will be evident that the outlook from existing properties in the town, which overlook the harbour, will be significantly diminished by the intrusion of a very large incinerator building, with consequent reduction in values. These will be further reduced by the connection between the visual image and the perception, rational or otherwise, that this plant may be a generator of an unknown health hazard.

A view from within the site looking outwards (Fig. 2 below) will demonstrate that the proposed development will be visible from a very large number of properties in the old town. The potential impact is therefore cumulatively substantial.



Fig. 4: View of Cobh looking north from southern boundary of site behind proposed process building

There is also the adverse impact on the enjoyment and appreciation of the harbour views for visitors and tourists, and the significant impact noted above on the potential for a successful tourism development on Spike Island.

Overall therefore the effect of the proposed development must be, to a greater or lesser extent, a negative effect on the value of residential and commercial properties in the town, which in turn will have an impact on the conservation of the architectural heritage of the town.

9.0 Conclusion.

It seems clear that this project is in unarguable conflict with the planning authority's development plan for the area by eliminating a site of regional importance which ought properly to be reserved for a single stand-alone industry which needs and would benefit from the particular advantages of the location, thereby damaging the competitive position of the regional economy.

It further seems clear that the policies with which it is in conflict are themselves soundly-based and reasonable.

It will be evident too that that the proposal conflicts with the proper planning and development of the area by virtue of its adverse impact on Cork Harbour – a vital resource – and on Ringaskiddy and Cobh.

It will damage Cork Harbour by the gross visual intrusion of a non-harbour related structure into a focal location thereby impacting on its status as a working port, diminishing its recreational and amenity value and, most particularly, breaking the cohesion of the historic complex of fortifications.

It will damage the attractiveness of Ringaskiddy village as a place to live, thereby depressing property values and inhibiting the ability of the village to fulfill its role as a service centre for the surrounding industrial complex.

By its general damage to the cultural and amenity recreational value and potential of the harbour and particularly by its adverse impact on the potential of Spike Island as a major tourist attraction, it will inhibit the economic growth of Cobh.

By virtue of this adverse economic impact, and the damage to property values in the town generally, with consequent diminution of funding available for the conservation of its architectural heritage, the proposal is in conflict with the proper sustainable development of that area.

For all these reasons it is evident that this proposal should be refused. To grant permission would impose significant collateral damage as outlined above but would also, with its associated status as a precedent, undermine the long-established policies of the planning authority in relation to the proper development of the Ringaskiddy strategic industrial area. This ought not to be triggered at this time of great economic uncertainty and shifting values and policies.

By seeking a permission of 10 years duration for a project with the EIS states will be completed comfortably within the normal 5 year span the applicants are implicitly acknowledging this uncertainty. The bar chart below shows that they are seeking the option of a wait of up to seven and a half years before they would have to commit to the project.

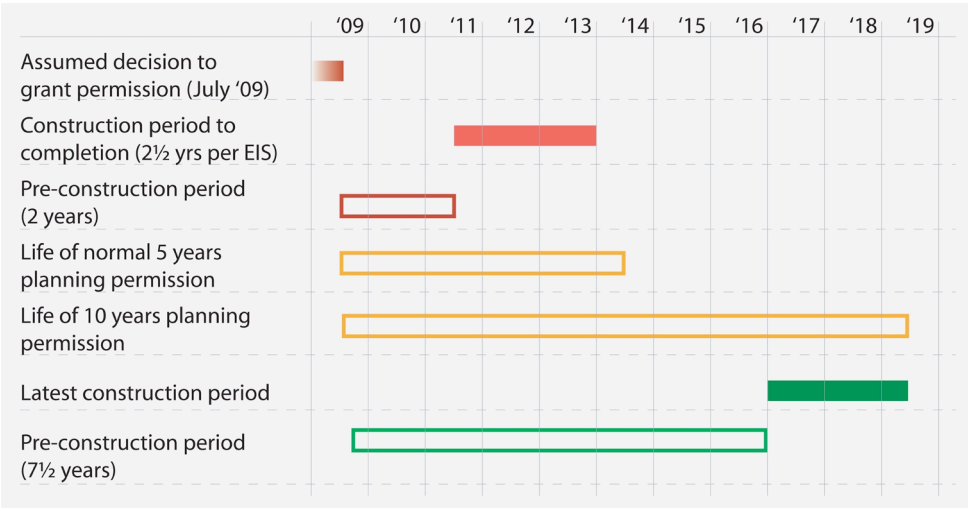


Fig 5: Comparison of 5 year and 10 year permissions

This is clearly unreasonable as such an overhanging permission would inhibit the emergence of a proper and sustainable alternative and might if commenced at that time be in very serious conflict with then established national planning and waste-disposal policies.

The Board could overcome such an eventuality by granting a permission with a normal 5 year life. We suggest that, instead, they agree with the applicants that now is an inopportune time to take a decision to embark on this project and issue a comprehensive refusal.

 Roddy Hogan, BArch.,DipTP.,MRIAI.,MIPI.