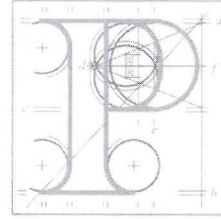


**Our Case Number:** ABP-318802-24



An  
Coimisiún  
Pleanála

Marcia D'Alton  
22 Hillcrest  
Pembroke Wood  
Passage West  
Co. Cork

**Date:** 30 December 2025

**Re:** Proposed development of a resource recovery centre (including waste-to-energy facility)  
in Ringaskiddy, County Cork.

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

The Commission will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

*Kevin McGettigan*

Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

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64 Sráid Maoilbhríde 64 Marlborough Street  
Baile Átha Cliath 1 Dublin 1  
D01 V902 D01 V902

**From:** Marcia D'Alton <outlook\_C093FF156DB8F393@outlook.com> **On Behalf Of** Marcia D'Alton  
**Sent:** Monday 17 November 2025 17:21  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Submission to PA04.318802 - Waste-to-energy facility at Ringaskiddy, Co. Cork

**Caution:** This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it may concern,

Please find attached my submission to the above SID application. I should appreciate if you would discard the submission I sent by email 20 minutes ago.

With thanks and regards,  
Marcia.

---

Marcia D'Alton  
Mobile: 085-7333852

**From:** Marcia D'Alton <[info@marciadalton.net](mailto:info@marciadalton.net)>  
**Date:** Monday 17 November 2025 at 16:57  
**To:** "[laps@pleanala.ie](mailto:laps@pleanala.ie)" <[laps@pleanala.ie](mailto:laps@pleanala.ie)>  
**Subject:** Submission to PA04.318802 - Waste-to-energy facility at Ringaskiddy, Co. Cork

Please find attached.

---

Marcia D'Alton  
Mobile: 085-7333852

22 Hillcrest,  
Pembroke Wood,  
Passage West,  
Co. Cork T12E0CV.

An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1 D01 V902.

17<sup>th</sup> November, 2025.

**RE: Case ref. PA04.318802 - Waste-to-energy facility at Ringaskiddy, Co. Cork.**

Dear Sir/Madam,

I made a submission to Case ref. PA04.PA0045 on 6<sup>th</sup> March 2016. I attended every day of the oral hearing held during 2016 for that same development. At the invitation of the then Board, I made a further submission to the Further Information process on 19<sup>th</sup> July 2017. I was one of many in the community who have given all they have to illustrate to the Coimisiún that even if an incinerator was desirable, this site in Ringaskiddy is the wrong one. Our colloquial knowledge was supported by experts in relevant fields, by politicians at every level, by a Minister, by personnel serving in the Irish Navy, by the Irish Air Corps and by the Department of Defence.

The Board chose to overturn the recommendations of their Senior Inspector and to grant planning permission.

I take little solace from the overturning of that grant of planning in the High Court. That the Board chose to discard the wealth of material illustrating the fundamental unsuitability of this site in Ringaskiddy is disturbing to the core.

This is an appropriate opportunity to respectfully remind the Coimisiún that since Indaver's first planning application in 2001, three Senior Inspectors of the Board, appointed for their qualifications and experience, recommended refusal of an incinerator development on this site. All three gave additional recommendations for refusal but the matter of site unsuitability was a common theme.

There were 7 years between the first (2001) and second (2008) planning applications by Indaver for this site. There were 8 years between the second (2008) and the third (2016). Now there are **9 years** between the third application and its reopening. The volume of material submitted by Indaver and its consultants under Significant Further Information is the equivalent of a new planning application. This is surely an unprecedented situation. I recognise the ruling of the High Court with regard to remittal, yet from a planning perspective cannot understand how reopening a nine year old application can be regarded as best practice in planning.

Site suitability was the principal subject matter of both my written submission of 06/03/2016 and of my presentation to the oral hearing. In its guidance of 1993, the World Health Organisation sets out 10 exclusionary factors that help to identify unsuitable areas for the siting of hazardous waste facilities. On the basis of this guidance alone, Cork Harbour should never have been part of Indaver's site search in 1999. I ask that the Coimisiún would revisit both the written and oral information I presented in this regard.

Having recently completed 20 years as a public representative and having, during that time, taken an active and informed role in the preparation of both Local Area and County Development Plans, this submission primarily comprises an assessment of the proposed development against statutory policy as set out in the Cork County Development Plan 2022-2028. The County Development Plan encompasses Cork County Council's overall strategy for the proper planning and sustainable development of its jurisdictional area. Whilst it is acknowledged that the Coimisiún can overturn this statutory policy in the "national interest", should it choose to do that, the Coimisiún will be sacrificing a selection of other national interests on the altar of one.

Senior Inspector Mr. Derek Daly considered that the proposal constituted overdevelopment of this restricted, cliffside, topographically challenged, strangely-shaped, end-of-peninsula site. The Coimisiún will be aware that this limited site is now even tighter than when Mr. Daly made his informed evaluation. The site area is described in the SFI as being 13.55 ha. In fact Indaver purchased a site of 12.34 ha from Irish Ispat. Roadside verges and a square of land beside the Gobby beach car park have added to the Indaver land parcel but the developable area of the site was ever only 12.34 ha.

Cork County Council have purchased 2.2158 ha of that 12.34 ha from Indaver. Therefore the remaining developable area is only 10.12 ha.

Drawing 1434-106 accompanying the 2016 EIS illustrates the proposed site layout, the red line denoting the boundary of the site for which planning permission is being sought. The Coimisiún will see that on the eastern side, the red line encompasses a significant area of Gobby beach. On the northern side, it extends as far as the other side of the L2545. On the western side it includes land that no longer belong to Indaver. If the proposal constituted overdevelopment in 2016, that has been exacerbated exponentially since.

Being a U-shaped site wrapped around the Hammond Lane scrap metal facility, the incinerator – the primary purpose of this development – is planned for an area of approximately 3 ha between the eastern side of Hammond Lane and the eroding cliff face. Sufficient room must be left to construct an "amenity" walk to the adjacent Martello Tower, to substitute for the statutorily protected right of way.

Indaver's Carranstown plant illustrates that although incineration might be the primary purpose of the development, more would follow. When Indaver was first granted a licence for Carranstown, it was to burn 170,000 tpa of non-hazardous waste. Having benefited from incremental changes to that licence, it now has permission to burn 250,000 tpa of waste, a portion of which may be hazardous. It has permission to accept 30,000 tpa of hazardous ash from third party suppliers for

pre-treatment with its own fly/boiler ash prior to shipping for final disposal. And it has also recently been granted permission to develop a 10 MWe Hydrogen Generation Unit to use steam generated by burning when the plant is prohibited from exporting electricity to the national grid.

Integration in waste treatment is a good thing. Co-locating upstream, downstream and symbiotic infrastructure is an efficient and wise approach and it is appropriately recommended by the site selection guidelines included in the National Waste Management Plan. But the greatest supporters of incineration would have to acknowledge that this kind of integration would never be possible on the restricted Ringaskiddy site. Indaver may claim that it is already proposing co-location insofar as its proposed plant would treat both hazardous and non-hazardous waste. But this is obviously a nonsense. Both feedstocks would be burned in the same grate.

Whilst it is better to recover energy from residual waste than to bury it, incineration is now acknowledged to be as carbon-intensive a form of generating electricity as a coal-fired plant. The only way this pollution could even begin to be considered is if the incineration plant itself were to work at optimal efficiency. Incinerators are at their most efficient when recovering heat. Unfortunately when this site in Ringaskiddy was chosen in 1999, heat recovery was actively dismissed as being not suitable to the Irish situation. The Fichtner report included with the planning application is an attempt to remedy what is now a significant omission. But delivery of steam to nearby industries is not part of this planning application. Should the Coimisiún be mindful of considering the potential of this promise, then it is reasonable that they would also consider the potential of the promise of the transfer station on the "western fields", preparation of the ground for which is part of this planning application. This transfer station featured in the 2001 application, again in the 2008 application and was part of the pre-consultation on the 2016 application until just prior to the application was lodged.

The carbon burden of this proposed development is not adequately assessed in the EIS. Should the Coimisiún be mindful of asking Indaver's consultants to fill this gap, they might equally be mindful of the Communication from the Commission in respect of the place of incineration in a circular economy. The Commission requests that competent authorities in Member States would carry out a life-cycle analysis of the overall environmental impacts of building and running new incinerators relative to exporting to existing, more efficient facilities with spare capacity in other Member States.

To construct another contract incinerator would be a woefully wrong move for sustainable waste management. But for sure, if it is built, we will fill it. Ireland's past record of decades indicates that if there is any easy way out, we will take it. But we will for 30 years and more thereafter be struggling to meet prevention and recycling targets mandated by the European Commission. Should we break the habit of a lifetime and not fill it with Irish waste, waste will be imported to fill it. In either scenario, export of both captured secondary material and waste will continue. Waste is a commodity. This Ringaskiddy proposal is for profit; it is not to assist Irish waste management.

I ask that the Coimisiún would hold an oral hearing on the basis of the Significant Further Information submitted by the applicant. Both the passing of time and the volume of new information mean that this Significant Further Information is essentially a new planning application.

With regards,

*Marcia D'Alton*

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Marcia D'Alton B.E., M.Eng.Sc.

## Assessment of the proposed development against statutory Planning Policy for County Cork

We are all familiar with the “outline of the main alternatives” requirement of Annex IV (2) of the 2011 EIA Directive<sup>4</sup>. Annex IV (3) of the 2014 EIA Directive<sup>5</sup> introduced a new requirement for an EIAR to include “**an output of the likely evolution thereof without implementation of the project**”. The EPA<sup>3</sup> helpfully sets out what this new departure would mean in practice:

*“The ‘do-nothing’ alternative is a general description of the evolution of the key environmental factors of the site and environs if the proposed project did not proceed. It is similar to but typically less detailed than the ‘likely future receiving environment’ description describing the Baseline.”*

It is unfortunate that neither the 2016 EIS nor the 2025 SFI provided for the proposed waste to energy facility includes this. With a 24-year history at this site, since the closing of Irish Ispat (formerly Irish Steel) in June 2001, this part of Cork Harbour has told its own story, illustrating what can happen when extra-special natural attributes are given a chance to blossom. The end of the Ringaskiddy peninsula has become a national centre of learning and research. The National Maritime College of Ireland (NMCI), opened in 2004, runs internationally recognised training programmes for students and professionals across Europe that meet global qualification standards for seafarers. University College Cork’s Beaufort Building, opened in 2015, houses a centre for 150 marine, maritime and sustainable energy researchers and Ireland’s national ocean test facility. This epicentre of Cork Harbour has finally and deservedly become a centre of tourist appeal. PureCork, the official tourism brand and marketing agency for the county, advertises a four-day trip for business and leisure visitors, two of which are spent in this part of Cork Harbour<sup>15</sup>. Merely 500 metres offshore and with visitor numbers trebling to almost 100,000 between 2017 and 2019, Spike Island has achieved first class honours in a number of international travel awards<sup>13,14</sup>.

Visitors to Spike Island leave from Cobh. When awarding this historic town with 'Best Tourism experience' in 2019, the prestigious travel publisher Condé Nast named Cobh as one of the 25 most beautiful small towns in Europe<sup>16</sup>. Two of its top attractions, Cobh Heritage Centre and the Titanic Experience, both located on the water’s edge, won Traveller Choice awards from TripAdvisor, placing them in the top 10% of attractions worldwide. That same year, Cobh was recognised as one of the best cruise liner destinations in the world<sup>11</sup>. Little wonder that this year, Cork Harbour is hosting 107 cruise ships, the largest number of cruise visits across Irish ports<sup>10</sup>.

What two decades ago was an expanding island of toxic waste has now become one of the most popular “people’s parks” on the south side of Cork City<sup>9</sup>. A new pier and slipway opened at Paddy’s Point in May 2019<sup>8</sup>. A fantastic new facility for marine access, it is a destination during the summer and with a useful trailer park, has been used by both the Royal Cork Yacht Club and Monkstown Bay Sailing Club to host visiting sailors during larger dinghy events. The Crematorium on Rocky Island, opened 2006, is the only one of its kind outside Dublin. With a stunning location and sensitive design, it is booked literally back to back<sup>12</sup>.

The multi-faceted evolution of this part of Cork Harbour has been such that in 2009, Fáilte Ireland described it as an area of National Tourism Significance<sup>6</sup>. Fáilte Ireland is now developing a sustainable tourism plan development plan, encompassing Cork City, Cork Harbour and East Cork. The aim is to create a marketable brand similar to the hugely successful Wild Atlantic Way. The

outline of this five year plan was published last year<sup>7</sup> and is currently under consultation with Cork City and County Councils.

*Three strategic pillars form the basis for a spatial destination development approach focusing on Cork city, the harbour area and east Cork. The overarching approach is designed to develop the appeal of Cork City as a leisure tourism hub destination and grow its role as a visitor hub for the rest of the destination. It features a collective ambition to establish Cork Harbour as a world class visitor experience and grow the appeal of East Cork in the domestic and international market. The plan incorporates new approaches to visitor orientation while also ensuring tourism and related cultural activity are considered for integration into future regeneration projects.*

Fáilte Ireland (2024)

That is a snapshot of the evolution of land use to date without implementation of the project. When the applicant purchased this site in November 2000 from Irish Ispat, the steel works on Haulbowline Island was still pumping toxic waste into the heart of Cork Harbour. Spike Island served as a national prison. Annual cruise liner numbers were in single digits. Lands east of the Port of Cork were rough and undeveloped. And whilst the 2008 EIS, the 2016 EIS and the 2025 SFI all list and/or comment on “new developments” since the Indaver purchase, no bullet points can adequately encompass the meteoric metamorphosis enabled by the closure of Ispat and the opening of Spike Island.

All the trends indicate that this transformation will continue. It is supported by statutory policy and strategy. The Cork County Development Plan 2022-2028 sets out policy objectives and overall strategy for the proper planning and sustainable development of the County<sup>2</sup>. Despite the ongoing efforts of Indaver’s consultants, **nothing** about this proposed development aligns with that policy for this part of Cork Harbour. These conflicts will be discussed below as follows:

- 1.1. Aims of the Cork County Development Plan for within Cork Harbour
- 1.2. Aims of the Cork County Development Plan for Strategic Employment Areas
- 1.3. Aims of the Cork County Development Plan for Ringaskiddy
- 1.4. Aims of the Cork County Development Plan for the proposed site
- 1.5. Aims of the County Development Plan for Spike Island, Haulbowline Island and Cobh

Unless otherwise specified, all references to the CCDP following refer to the Cork County Development Plan 2022-2028. It has been published in six volumes, two of which are of special relevance here. Volume 2 is the main policy text for the overall county. Volume 4 contains the specific policies for South Cork; it collects the Local Area Plans for the Municipal Districts of Cobh, Carrigaline, East Cork and Macroom into a single document. A reference to Volume 4 will be specified as Vol 4, CCDP.

### **1.1 Aims of the Cork County Development Plan for Cork Harbour**

Cork Harbour is a unique, strategic asset and a key economic driver within not just the county but nationally and internationally. An important economic entity all of its own, it has a population of 72,000, supports 29,000 jobs with the potential to grow to at least double its economic output by

2040, adding 35,000 population and 21,000 jobs within its spatial area (8.5.1, 8.5.4 CCDP). Home to the county's four Strategic Employment Areas and Ireland's second largest port, it supports marine sector research and development, tourism and marine leisure and is culturally and historically significant for its rich natural environment, built heritage and history (8.5.1, CCDP). A range of CCDP policies cover an even wider range of harbour-related topics from greenways to employment and from recreational access to ongoing development of Cork's Tier 1 port. As examples,

- Para. 8.5.7 of the CCDP describes the cross-Directorate of the Cork Harbour Economy analysis recently undertaken by Cork County Council, the aim of which included attracting and retaining high quality jobs, broadening the base of our economy, building on local distinctiveness that attract companies to invest in an area and planning for climate change and the transition to low carbon, bio and circular economies.
- Para. 10.7.3 discusses the development of Spike Island and Fort Camden/Meagher, the tourist and heritage infrastructure of the harbour and the World War I Cork Harbour Trail produced by Cork County Council in 2018.
- Objective TM12-15 supports the strategic port facilities at Ringaskiddy, Whitegate and Marino Point, including the delivery of their connecting road infrastructure.

Balancing this multi-faceted combination of attributes is key to Cork Harbour's ongoing success. Objective EC 8-1 recognises this and has a policy aim to strengthen its massive role in this regard. It recognises the need to balance growth and development in the harbour with protection of natural, built and cultural heritage, residential amenity, recreational use and environmental assets. Para. 7.6.11 notes how important public involvement in Cork Harbour is to maintaining this balance and commits to further increasing public access to amenities such as coastal fortifications, shoreline cycle and pedestrian routes, marinas and other forms of access to water.

Objective EC 8-1 acknowledges the role that Integrated Coastal Zone Management (ICZM) can give play in maintaining this critical balance. The approach is further endorsed in Objective MCI 7-3:

*Support the development of an integrated approach to coastal zone management in Ireland generally and in particular to foster the application of this concept in appropriate coastal zones throughout the County, including Cork Harbour.*

ICZM had been tested in Cork Harbour with INTERREG funding through both the COREPOINT and IMCORE projects. Co-ordinated through the Coastal and Marine Research Centre (CMRC) of University College Cork (UCC), the initiative brought stakeholders at every level from all over the harbour together to discuss critical development and management issues. Thus informed, the conversation continued with a circle of higher level players represented on the Harbour Management Focus Group. The initiative had tremendous potential to contribute to sustainable planning within the harbour but sadly fizzled out with the end of funding.

Cork County Council advanced the concept in 2011. It commissioned the *Cork Harbour Study*<sup>1</sup> to be undertaken by one of its most senior planners as a dedicated task over an entire year. Referenced at 7.6.7-11 of the CCDP, the Study emphasised that the zoning of harbourside land should not be considered under the same criteria as land elsewhere in the county as it is a finite resource and its

availability is well on the way to exhaustion. It recommended that the kind of development which had no particular need to be beside the water or which could deliver substantial community benefit should be minimised, relative to an alternative location inland.

The proposed waste to energy plant has neither a need to be beside the water nor would it deliver community benefit (other than of the monetary kind which is of a different nature entirely).

*While any longer term projection is subject to considerable uncertainty, there does appear to be a real danger that much of the remaining undeveloped land around the Harbour could be developed in a few decades. In the absence of intervention, the current situation, in which developed areas are set in a predominantly natural context, seems likely to be replaced by one in which remaining natural landscape, farmland and forestry are set in a predominantly developed context.*

*If we wish to avoid this, one necessary step will be to shift the onus of proof in relation to development of Harbour side land. At present, land beside the Harbour is zoned – or not zoned – on much the same criteria as apply in the rest of County Cork. The main existing forms of protection are scenic landscape and routes (on land) and SPA, SAC, NHA and Shellfish designation (mainly on water or in inter-tidal areas). The prospect of development trends resulting in depletion of unprotected areas and putting protected ones under increasing pressure has not so far been explicitly addressed.*

*This needs to change. Where development is proposed on Harbour side land, in addition to the normal issues which would arise and existing protective designations, we also need to ask the question of whether the land use in question has any particular need to be beside the Harbour, or creates any substantial benefit for the community from being there, relative to an alternative location inland. If the answer is no, we should be reluctant to agree to it.*

Cork County Council, 2011<sup>1</sup>

## **1.2 Aims of the Cork County Development Plan for Strategic Employment Areas**

Section 2.16.5 of the CCDP defines Strategic Employment locations as areas suitable for large scale employment development, i.e. large stand-alone uses which require significant amounts of land. The Cork Metropolitan Area Strategic Plan (MASP) recognises these areas as a strategic asset of the Metropolitan Area, in particular suitability for foreign direct investment and indigenous enterprises<sup>19</sup>.

Whilst there were five Strategic Employment Areas (SEAs) when the applicant's Planning Report (Appendix 3.1, 2025 SFI) was being prepared, the current CCDP defines four SEAs: Carrigtwohill, Little Island, Ringaskiddy and Whitegate. As all are within the Cork Harbour Area, Policy Objective EC 8-3(a) aims to enable their designated function whilst ensuring developments therein are sensitively designed and planned:

*Promote the development of Strategic Employment Locations suitable for large scale industrial developments at Carrigtwohill, Little Island, Ringaskiddy, and Whitegate where any such development must be sensitively designed and planned to provide for the*

*protection of any designated sites. Any development must be compatible with relevant environment, nature and landscape protection policies as they apply around Cork Harbour and the protection of residential amenity.*

The CCDP's policy objective setting out appropriate use in areas zoned for industry is ZU 18-16\*. The Indaver documentation quotes only part of this Policy Objective (3.3.2.2, 2025 SFI). It is instructive and information to read it in entirety:

*Promote the development of industrial areas as the primary location for uses that include heavy industry, manufacturing, repairs, medium to large scale warehousing and distribution, biomedical, pharmaceutical, bioenergy plants, open storage, waste materials treatment, port related facilities and port related activities and recovery and transport operating centres. The development of inappropriate uses, such as office based industry and retailing will not normally be encouraged. Subject to local considerations, civic amenity sites and waste transfer stations may be suitable on industrial sites with warehousing and/or distribution uses.*

*The provision of strategic large scale waste treatment facilities including waste to energy recovery facilities will be considered in 'Industrial Areas' designated as Strategic Employment Locations in this Plan subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in this Plan.*

*Appropriate Uses in Industrial Areas:*

*Medium to large scale warehousing and distribution, bioenergy plants, open storage, recovery and transport operating centres, strategic large scale waste treatment facilities including waste to energy recovery facilities\*(as per objective above), port facilities and port related activities, logistics, heavy industry, offices ancillary to permitted use, laboratories, food related industry, marine related development, general industry, civic amenity site, plant storage, sustainable energy installation, heavy vehicle park, fuel depot/fuel storage, telecommunication structures, biomedical, pharmaceutical, data centres, childcare facilities, commercial film studio facilities.*

**It is abundantly clear that the CCDP enables waste to energy facilities to be considered in any industrial area in Cork County, including SEAs, subject to national, regional and local planning policy.**

The Planning Report (para. 2.20, Appendix 3.1, 2025 SFI) part-quotes the above Policy Objective as a foundation for a wholly erroneous conclusion: "The development of strategic large-scale waste to energy recovery facilities is directed therefore [by reference in Paragraphs 6.4.11 and 11.7.4 and Policy Objective ZU 3-7(b) of the Plan], to industrially zoned lands within SEAs." (para. 2.21, Appendix 3.1, 2025 SFI)

I have inserted the square parantheses lest the references to the County Development Plan 2014 confuse. The text has been transposed directly into the current County Development Plan 2022. This conclusion, oft-repeated in one guise or another throughout Appendix 3.1 and Chapter 3 of the EIS, is evidently wholly incorrect. By quoting only part of the Policy Objective, it misleads entirely.

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\* Because Indaver's Planning Report was prepared in 2019, it refers to Policy Objective ZU 3-7(b) as per the CCDP 2014.

To further compound its inaccuracy, Section 15.12.14 of the CCDP has a well-defined Policy Objective for Bottlehill. Bottlehill was intended to be a strategic waste management asset for the county, was heavily invested into by the tax-payer and remains largely unused:

*Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy.*

Policy Objective BE 15-15(b), CCDP

In other words, the CCDP makes abundant provision for the location of any waste facility, including waste-to-energy facilities, enabling them to be considered in any industrially zoned area and in Bottlehill, subject to policy and to the development management process. Para. 1.1 opening Indaver's Planning Report (Appendix 3.1) is self-evidently a nonsense: "Guided by the planning policy provisions set out in the Cork County Development Plan, 2014 (hereafter CDP), which direct that large-scale waste to energy recovery facilities should be located on industrially zoned lands within SEAs ..."

Neither the current (2022) nor the previous (2014) CCDP directed any such thing!

### **1.3 Aims of the Cork County Development Plan for Ringaskiddy**

The CCDP has a number of aims for Ringaskiddy, clearly set out in Volume 4 of the CCDP. Ringaskiddy is a Main Settlement in the Carrigaline Municipal District.

- To protect the SEA zoning from inappropriate development that might undermine Ringaskiddy as a strategic centre of employment (Para. 1.7.3 Vol. 4 CCDP).
- To ensure that the quality of life experienced by the residents of Ringaskiddy village and Shanbally will not be compromised by development of Ringaskiddy as a strategic employment location and to the amenity afforded to those communities (Para. 1.7.15, 1.7.22 and RY-GO-06, Vol. 4 CCDP).
- To identify new areas of open space to compensate for any open space/green infrastructure which may have been lost as a result of the construction of the new M28 (Para. 1.7.46, Vol. 4 CCDP).
- To support the development of the Port of Cork (RY-GO-03, Vol. 4 CCDP).
- To facilitate the development of the M28 and thereafter, to upgrade the N28 to provide bus priority and a network of walking and cycling routes (RY-GO-04, 05, Vol. 4 CCDP).
- To promote and support the educational facilities in Ringaskiddy, recognising that they need increased provision for student accommodation and amenities (Para. 1.7.23 Vol. 4 CCDP).
- To recognise the "€52 million state of the art National Maritime College of Ireland (NMCI)", one of "the most sophisticated centres of its kind in the world" (Para. 1.7.33 Vol. 4 CCDP).

- To recognise the national Beaufort Laboratory for which additional suitable lands have been zoned to enable its planned extension into a maritime energy and science campus (Para. 1.7.34 Vol. 4 CCDP).
- To promote Ringaskiddy as an Energy Hub (Para. 1.7.34 Vol. 4 CCDP).
- To recognise the importance of sector-related clustering in the marine research area for development of the region and retaining competitive advantage (Para. 1.7.35 Vol. 4 CCDP).
- To recognise the potential to establish a centre of excellence for marine-related education, research and training in Ringaskiddy, involving the NMCI and UCC, possibly as a marine-related research and innovation park with office accommodation, manufacture and storage for prototype development and testing (Para. 1.7.39 Vol. 4 CCDP).
- To acknowledge that Ringaskiddy provides the only road access to the Irish Naval Service base at Haulbowline Island, whilst recognising the employment opportunities in the tourism and amenity sectors that will result from remediation of Haulbowline Island and future development of the area (Para. 1.7.37 Vol. 4 CCDP).
- To make public water access available, protecting and improving existing facilities (Para. 1.7.44 Vol. 4 CCDP).

Other than the aim towards strategic employment, the M28 and the amenity of existing residents (Para. 6.2, Appendix 3.1), none of these statutory policy objectives appear to be mentioned by the applicant. Land-use planning within the Ringaskiddy area is evidently far more nuanced and holistic than the Indaver documentation would suggest.

Because the SEA approach has been resoundingly successful as an employment provider, the CCCDP has a specific Policy Objective to protect lands in SEAs generally from any development which might undermine the function of the SEA designation. This applies equally in Ringaskiddy, now the main location for Foreign Direct Investment (FDI) in Ireland (8.7.20, CCDP).

*Protect lands in these areas from inappropriate development which may undermine their suitability as Strategic Employment locations.*

Policy Objective EC 8-3(b), CCDP

Apart from a favourable tax rate and the English language, what attracts FDI to Ireland? IDA Ireland, whose primary function is as the State's inward investment promotion agency, will recognise that FDI chooses a place, not just a plot. Once costs and workforce availability are acceptable, image, local amenities, housing for employees, services and other similar "soft" factors become critical. Countries wishing to attract FDI are proud to appear at the top of the annual global "Soft Power Index" where factors such as cultural heritage and sustainability feature loud and proud. Currently in 28<sup>th</sup> place, Ireland is hanging in there<sup>18</sup>.

How would the proposed waste-to-energy facility affect Ringaskiddy's soft power as a desirable location for FDI? Would it, as Indaver would likely claim, be an asset to waste management? Or

would it, as the Soft Power Index potentially indicates, affect the familiarity and reputation of the clean, green image that Ireland presents so powerfully?

If the proposed waste-to-energy plant is as helpful to the Ringaskiddy FDI sector as the Indaver document claims, would the IDA not have jumped at the opportunity of selling or leasing a slice of one of its larger sites for this supposed asset? After all, Indaver's initial search in 1999 was for a site of only 5-8 hectares, merely a fraction of some of the larger IDA lands. But from the outset, the IDA said no.

*“More than 50% of the available land in Ringaskiddy is owned by the Industrial Development Authority (IDA). Indaver Ireland approached the IDA to determine whether they would be in a position to make land available for this project. The IDA responded that they were not in a position to provide any land to Indaver Ireland. As such, all IDA owned land in County Cork was excluded from the remainder of the site selection process.”*

Indaver Ireland, Section 2.6.5, EIS (2001)

#### **1.4 Aims of the Cork County Development Plan for the proposed site**

In discussing Ringaskiddy, the Planning Report (Para. 10.11, Appendix 3.1) comments that “the extent of land zoned for industrial use has been increased in the 2017 Local Area Plan from 353.02ha to 361.32ha. Two new industrial zones have been identified through the change of use of a site previously zoned for community use and the splitting of another site into two separate industrial zoning objectives. Aside from this, all sites zoned remain as they were originally zoned in 2011. There are now a total of 20 sites zoned for industrial use in Ringaskiddy, a series of which are home to large pharmaceutical companies already producing hazardous and non-hazardous industrial waste”.

This paragraph is extraordinarily misleading. There may be 20 industrial zonings in Ringaskiddy but one large area, RY-I-18, is the Port of Cork. Two new industrial zones have not been created. The site previously zoned for community use is that opposite Indaver's proposed site of development, now occupied by the Port of Cork's temporary car park<sup>17</sup>. Although labelled C-01 in 2011, RY-I-19 in 2017 and RY-I-16 in 2022 (i.e. the last three revisions of the Local Area Plan), the objective for its zoning has stayed the same throughout:

*Suitable for the extension of the adjacent Third Level Educational Campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities.*

Table 4.1.17, Vol.4, CCDP

The site described as having been split into two separate industrial zoning objectives includes Indaver's own site! Previously I14 in 2011, it became RY-I-15 and RY-I-20 in 2017 and is currently RY-I-15 and RY-I-09. For clarity, the progression of aims for the lands on which Indaver wishes to build is set out in the table overleaf.

Local Area Plan	Zoning	Policy Objective
Carrigaline Electoral Area Local Area Plan (2011)	I14	Suitable for large stand alone industry with suitable provision for appropriate landscaping and access points and provision for open space buffer to the Martello Tower and its associated pedestrian access. *
Ballincollig-Carrigaline Municipal District Local Area Plan (2017)	RY-I-15	Suitable for large stand alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals shall protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).*
	RY-I-20	Suitable for the extension of the opposite Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities.  This site is considered inappropriate for any short or full time residential accommodation. Any existing access to the nearby Martello tower which crosses this site shall be protected and provision for open space buffer to any existing access shall be provided.*
Carrigaline Electoral Area Local Area Plan in Vol. 4 of the Cork County Development Plan 2022	RY-I-15	Suitable for large stand alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).
	RY-I-09	Suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities.  This site is considered inappropriate for any short or full time residential accommodation. Any existing access to the nearby Martello tower which crosses this site should be protected and provision for an open space buffer to any existing access will need to be provided.*

\* Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area.

So one of the “20 sites zoned for industrial use” is for port use, two are for extensions of the third level campuses and/or associated research and all of the remaining 17 are undeveloped. Not a single one is a “home to large pharmaceutical companies already producing hazardous and non-hazardous industrial waste”. If they were, they would be yellow on the map, i.e. built up area. They are blue, i.e. industrially zoned, because they are available for development!

What is clear from the zoning progressions in both RY-I-16 and RY-I-09 is Cork County Council’s commitment to the “centre of excellence for marine-related education, research and training” and the anticipated expansion of the training and research facilities at and around the NMCI and Beaufort Building. This aim was echoed in the planning application for the Beaufort Building<sup>20</sup>:

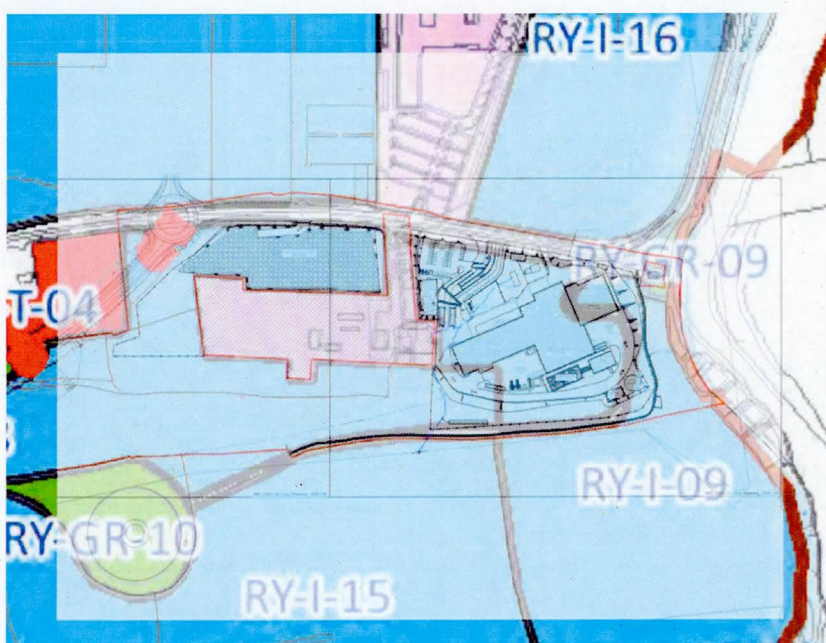
*This application relates to a project to create a focus for such research in a single building housing three related research centres of UCC – HMRC, CMRC and Sustainable Energy Research Group (SERG) ... The building will not only bring together these units in a research cluster to give them potential to create synergies in their innovative work but will also create a world class research and testing facility for Cork located in the Harbour area of Ringaskiddy.*

University College Cork, 2011

As set out in the current Local Area Plan, Cork County Council recognises the benefits this clustering can bring to the SEA, to Cork County and to sustainable energy generally:

*The overall effort in the marine research area can be seen as an attempt to build up a critical mass of sector related businesses and skills or Cluster in the Cork area, somewhat analogous to the Cork Harbour Development Plan in the 1970s and UCC’s National Microelectronics Research Centre in the 1980s. Such initiatives are necessary if the region is to develop and retain worthwhile sources of competitive advantage. They involve a willingness to commit substantial resources, ahead of potential competitors, and often also to adopt a relatively long term view in relation to results.*

(Para. 1.7.35, Vol 4, CCDP)



Sadly, as evidenced in the composite left (credit: Catriona Gannon-Reid), Indaver proposes to put the entire waste-to-energy plant on that part of their lands zoned RY-I-09, thereby diametrically opposing the zoning objective and concept of the centre of excellence for marine related education and research:

An inaccurate mention has been given in Indaver's Planning Report to the second part of the zoning objective for RY-I-09 also. The objective is that the existing access to the Martello tower crossing this site should be protected with provision for an open space buffer to that existing access. The Planning Report interprets this as "*the Martello Tower, a conservation structure, is located to the southwest of the site and access to same must be protected in any development*".

The objective does not require replacement for the access, rather maintenance of the existing access. The proposed development diametrically opposes this part of the site's zoning objective too.

Does the proposed development respond to the zoning objective for the rest of the site, i.e. RY-I-15 for large, stand-alone industry? This is the zoning objective assigned to SEA lands because large scale employment development generally represents a large, stand-alone user requiring significant amounts of land.

- In the site search carried out in 2001, land identified in the then County Development Plan for a large stand-alone industry to the east of Carrigtwohill was investigated. The site was discarded because the number of jobs that would be created by the proposed waste-to-energy plant would not be sufficient to meet Council requirements. (Section 2.6.5, 2001 EIS)
- In that same search, a large site north of the Charleville railway station was investigated. It too was zoned for a medium/large stand-alone industry. Indaver discarded that site also on the grounds that "*it was considered that the proposed development is not a medium/large stand-alone industry due to the number of potential jobs (57 No.) that would be created*". (Section 2.6.6, EIS 2001)

Therefore according to the applicant themselves, as it is not a large stand-alone industry, the proposed development does not meet the zoning objective for RY-I-15 either.

### **1.5 Aims of the Cork County Development Plan for Spike Island, Haulbowline Island and Cobh**

Spike Island is 500 metres to the east of the Indaver site, closer than the centre of Ringaskiddy village (800m) (Section 4.2.4, 2025 SFI). Those 500 metres being from the edge of the cliff face, the entire bulk of the building would be presented from the western shore of Spike Island. CCDP policy for Spike is therefore critical and unmentioned in the SFI.

Haulbowline Island is 850 metres north of the Indaver site. The only road to Haulbowline goes past the Indaver site. Haulbowline is just over 400 metres from Spike Island. CCDP policy for Haulbowline Island is equally critical and unmentioned in the SFI.

Being both historically and currently the ferry departure point for both islands, intrinsically linked with them economically, culturally and visually and only 500 metres from Haulbowline, CCDP policy for Cobh is also critical and unmentioned in the SFI.

Cork County Council's vision for Spike Island is to "Maintain its world class visitor attraction to complement the existing groups of heritage and tourism attractions in Cork Harbour ...". (Para. 2.20.1, Vol. 4, CCDP) To this end, a Masterplan was commissioned by consultants towards the further development of the island as a unique cultural heritage and activity destination. The stated purpose of the visitor experience is to "focus on the natural and built heritage assets of the island and its location in Cork Harbour". (Para. 2.20.5, Vol. 4, CCDP) [My emphasis]

This is summarised in Specific Development Objective X-01. The objective applies to the entire of the island, not just to Fort Westmoreland/Mitchell:

*"The promotion of the continued development of the island as a major tourism attraction and unique cultural heritage and activity destination in accordance with the recommendations of the masterplan. It is vital that the future development complements the character and grain of the existing structures and protects the unique environment of the island."*

Cobh Municipal District, Vol. 4, CCDP

The primary land uses on Haulbowline Island are institutional, educational and recreational. The headquarters of the Irish Naval Service has over 1,000 personnel. In 2021, following remediation of the toxic landfill created by Ispat and its predecessor, an 8.5ha public park was opened on the site of the East Tip. Tremendously popular both for amenity and as a vantage point from which to view the entire harbour, completion of the park was yet another step towards achieving the Masterplan for the island commissioned in 2015 and endorsed by statutory policy (2.19.6, Vol 4, CCDP).

There are strong links between the Naval Service, the NMCI and UCC's Beaufort Building that are critical to the development of the wider educational campus. In this context, the CCDP describes the Beaufort, NMCI and iMERC as "significant developments". (2.19.9 Vol. 4, CCDP).

The special built heritage of Haulbowline Island, its designated Architectural Conservation Area, their opportunity to present offer new and beneficial public uses, interconnectivity between the Navy in the new educational/research campus and, above all, a safe and well-operating naval base are all enshrined in a Specific Development Objective for Haulbowline Island:

*The principal function of Haulbowline is to continue to provide a safe and well operating naval base. Therefore, it is essential that protection of the Irish naval service within a defined secure boundary to the west side of the island is preserved. Development of a secure naval promenade along the north-south axis, allowing for unbroken Naval Service access to the marine basin should be considered.*

*The existing vacant and partially derelict limestone warehouse buildings adjacent to the former ISPAT / Irish Steel site are of exceptional importance in terms of architectural heritage and present an opportunity to accommodate new uses. A range of uses could be considered in these buildings, such as research/cultural/civic uses, café, and other tourism related uses subject to normal planning considerations. The area surrounding the limestone buildings can be developed to accommodate a high quality accessible landscaped area.*

*The centre of the island containing the former ISPAT / Irish Steel site offers the opportunity to deliver a high quality civic space, subject to remediation, which would complement the newly opened Haulbowline Park.*

*Provision should be made for the expansion of IMERC facilities/uses on the island in conjunction with the campus at Ringaskiddy.*

Cobh Municipal District, Vol. 4, CCDP

Cobh town is the point of embarkation for visitors to Spike Island. The Cobh cruise terminal operated by the Port of Cork attracts over 100 cruise liners a year. A second cruise terminal is planned. A maritime town for centuries with strong associations to world-renown events such as the sinkings of the Titanic and Lusitania, Cobh's own built heritage encompasses the industrial, military and ecclesiastical. Set into one of the steep sides of the bowl of Cork Harbour, the town's topography has created a unique sense of place with narrow streets and stacked terraces punctuated by impressive buildings resulting in 5 Architectural Conservation Areas and 370 Protected Structures.

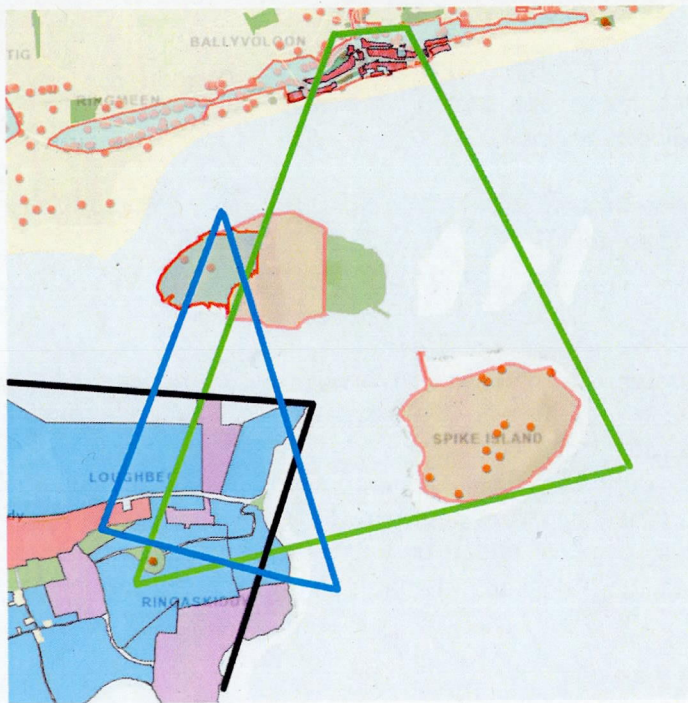
It is therefore natural that policy recognises the key role tourism offers for the economic future of Cobh town and quality of life of its residents. The CCDP supports the proposed second cruise terminal, particularly as part of an integrated tourism product (Para. 2.5.50, Vol. 4, CCDP):

*"The greatest potential for economic and employment growth in Cobh lies in developing the tourism function and this is multi-faceted. Cobh's harbour setting is a key natural asset of the town, providing opportunities for recreation and marine leisure activities while the town's rich historical heritage and relationship with Spike Island and the other military fortifications within the harbour, also offers significant tourism potential."*

(Para. 2.5.48, Vol. 4, CCDP)

Policy is very clear that the future of Spike Island, Haulbowline Island and Cobh are intrinsically linked, not just with each other but with Cork Harbour. Policy for Spike speaks specifically to the "island's location in Cork Harbour" and its complement to "the existing groups of tourism and heritage in Cork Harbour". Policy for Cobh links it to Spike Island and "the other military fortifications within the harbour". Both those military fortifications and policy for Haulbowline Island tie them all with Ringaskiddy.

One of the key difficulties for the proposed development on this particular site is that it lies in the intersection of three different land use policy areas. Approximated on the diagram overleaf, the black line represents the industrial policy aim of Ringaskiddy, the blue line represents the research/educational aim of Ringaskiddy/Haulbowline whilst the green line represents the tourism/heritage aim of Spike/Cobh/Haulbowline. Recent policy shifts in land use planning for Haulbowline, RY-I-16 and in particular, RY-I-09, aim to smooth the transition between these juxtaposing functions. A waste-to-energy plant on the edge of the cliff at RY-I-09 with a 50m high block of a building and a 75m high stack simply cannot sit at the intersections of these policy triangles. It would irretrievably damage all three land use policy aims.

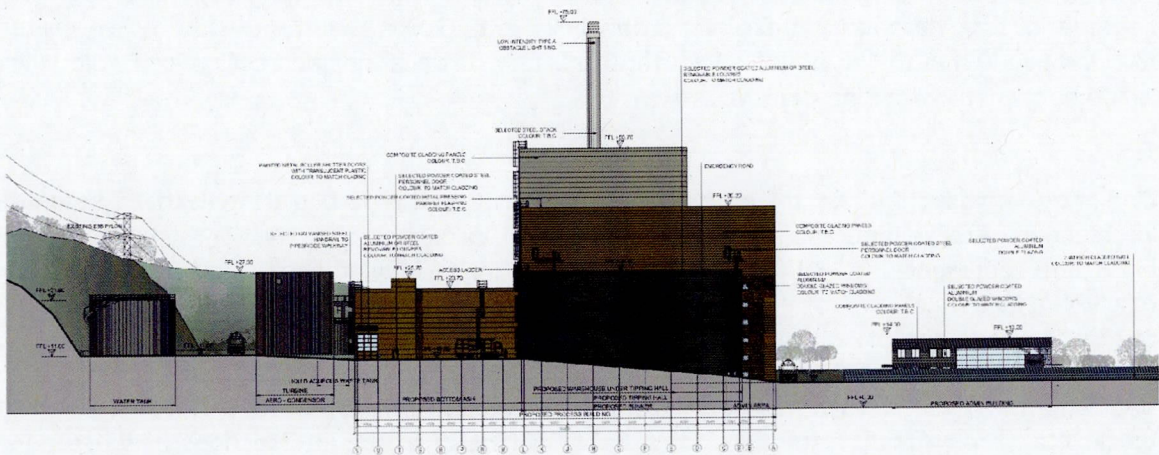


Black line represents the Strategic Employment/industrial policy aims of the Ringaskiddy area

Blue line represents the research and educational aims of the Ringaskiddy-Haulbowline Island areas

Green line represents the tourism and heritage aims of Spike Island, Cobh and Haulbowline Island.

It is fair to say that it is the size of this proposed development which is particularly jarring with County Development Plan land use policy. Its visual impact would be immense. The size of the building would obliterate the natural harbour topography whilst its location on the edge of the Ringaskiddy cliff would render any attempted buffer zone useless. The visual offence of its bulk would be magnified yet further by the plume from the proposed 75m stack. In this regard, I refer to a very recent article from the BBC reporting on local residents' complaints about the visibility of the plume from a new Indaver waste-to-energy plant in Rivenhall, Essex. In this particular case, the plant had been conditioned to heat the stack such that the plume would be invisible on exit: <https://www.bbc.com/news/articles/c5yvz9zz0qno>.



Composite north-east elevation (Source: Indaver Ireland)

The landscape of Cork Harbour is defined as being of High Value, very high sensitivity and national importance (Appendix F, CCDP). Chapters 3 and 11 of the SFI are correct in saying that the policy objective for High Value landscape is to manage rather than prohibit change, “ensuring that the past remains visible for future generations” (14.8.10, CCDP).

One cannot be proscriptive about landscape; each proposal in each location is different. However the CCDP does attempt to guide, advising that:

*“Developments which are likely to create a significant environmental and particularly visual impact will best be absorbed in areas where the landscape is robust, i.e. has the capacity to absorb development without significantly changing its character.”*

(14.8.11, CCDP)

Since the material contravention that enabled their construction, planning applications frequently attempt to justify big projects by reference to the harbour’s wind turbines. At a height of 150m, they are taller than just about every other feature in the landscape. Public opinion varies; from an FDI perspective not merely do they function as clean and green, they promote it.

It is relevant that because of its special landscape designation, CCDP policy did not encourage commercial wind development in Cork Harbour. It still does not. Figure 13.3 of the CCDP illustrates that Cork Harbour lies within a “Normally Discouraged” area. However, para. 13.7.2 clarifies that “proposals for the generation and consumption of electricity in a single premises will be considered on their merits in all areas of the County, including the Strategic Employment Areas around Cork Harbour”. Therefore blocks of wind farm development are not encouraged whereas one-off erection is considered less invasive in the landscape. Each proposal was assessed individually at the project level. For clarity, the Variation to Objective INF 7-4 of the CCDP 2009 in 2011 was:

*It is an objective to support existing and established businesses and industries who wish to use wind energy to serve their own needs subject to proper planning and sustainable development. In particular, because of the potential for wind generated electricity to reduce the reliance of large scale industry on fossil fuel generated electricity, proposals located within the areas identified as suitable locations for large scale industrial development in Objective ECON 3-2 of this plan will be considered on their merits and subject to compliance with Article 6 of the EU Habitats Directive.*

Being “highly sensitive”, the landscape of Cork Harbour is clearly not robust. What it does allow is assimilative capacity by virtue of its size. **So what is critical for development is that a combination of its size and location does not exceed the landscape’s limitations** (14.8.5, CCDP). Just because wind turbines were individually permitted for specific purposes for established industry and assessed against those limitations does not mean everything else tall or large has the green light. In fact, that light may not even be amber!

Section 11.5.2.1 of the SFI describes the anticipated impact of the waste-to-energy plant from the Whitepoint area of Cobh:

*“The main process building will be however of much larger scale than the NMCI or Beaufort buildings. The views will be clear and direct, and the proposed development will become the most prominent element in this direction extending above the existing ridgeline. The stack, with an occasional visual plume, will also appear as one of the highest elements in the surrounding area appearing taller than the Martello Tower, although light coloured and similar in vertical form to the wind turbines (De Puy and Thermo Fisher Scientific) and electricity pylons which are existing along the top of the ridge.”*

Section 11.7 describes the anticipated impact from those areas closest to the site that so important to the future set out by land use policy – Spike Island, Haulbowline Island, the NMCI, the Beaufort Building, the nearby military fortification of the Martello tower :

*“The landscape and visual effects of the proposed development will generally be greatest from the north, south and east particularly within a 0.5km radius to the north and east (including Rocky Island), within areas of Cobh at White Point, from the Martello Park Road as it passes adjacent to the proposed development site (including the residential property to the northwest of the proposed development site), the National Maritime College car park, Gobby Beach and Ringaskiddy Martello tower.”*

Whilst the evaluation of that impact is clearly objective rather than subjective, it seems nothing less than extraordinary that it could be considered to be anything other than wholly incompatible with land use policy and strategy for this part of Cork Harbour. Indaver can – and does – continually refer to the “*industrial landscape*” of Ringaskiddy. Yet Spike Island is both physically, visually and topographically closer to Indaver’s site than most of the industrial developments in Ringaskiddy will ever be.

#### **1.6 Summary of land-use policy assessment**

- The location of this proposed waste-to-energy plant diametrically opposes land-use policy aims for Ringaskiddy, Spike Island, Haulbowline Island, Cobh and for its own site.
- It is not a Strategic Employment development.
- It has the potential to negatively impact on the SEA designation of Ringaskiddy.
- It conflicts with the educational/research zoning aims for the site.
- It conflicts with the educational/research policy aims for this part of Ringaskiddy.
- It conflicts with the tourism/heritage destination policy aims for Spike Island.
- It conflicts with the tourism/heritage policy aims for Cobh.
- It conflicts with the institutional, educational and recreational policy aims for Haulbowline Island.
- It is incongruous in what is a transition zone between the designated SEA of Ringaskiddy and the tourism/heritage aims of the Spike/Haulbowline/Cobh area.

I trust the Commission can see that “*the likely evolution*” of Ringaskiddy, Spike and Haulbowline Islands, Cobh and this part of Cork Harbour “*without implementation of the project*” asked for by Annex IV(3) of the 2014 EIA Directive is not just set out in policy but is evidenced in real-life, on the ground. After the decades of steelworks at this epicentre of Cork Harbour, it is a pride and a joy

to behold. Sold as the site was to Indaver by Irish Ispat, this proposed waste-to-energy plant is a legacy of that time. Should the Commission consider that its development would not impact on the aim for and progression of this local statutory policy, it would be sorely and tragically mistaken.



New signpost at the new roundabout where the M28, N28 and L2545 meet at the eastern end of Ringaskiddy village.

## References

1. Cork County Council (2011). *Cork Harbour Study*.
2. Cork County Council (2022). *Cork County Development Plan 2022-2028*.
3. Environmental Protection Agency (2022). *Guidelines on the information to be contained in Environmental Impact Assessment Reports*.
4. European Commission (2011). Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment.
5. European Commission (2014). Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.
6. Fáilte Ireland (2009). *Determination of Waters of National Tourism Significance and Associated Water Quality Status*. At [https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3\\_Research\\_In\\_sights/3\\_General\\_SurveysReports/48014-Failte-Ireland-Water-Quality-Status-Report-\(Screen\).pdf?ext=.pdf](https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_In_sights/3_General_SurveysReports/48014-Failte-Ireland-Water-Quality-Status-Report-(Screen).pdf?ext=.pdf)
7. Fáilte Ireland (2024). *Draft Cork Harbour and East Cork, Destination and Experience Development Plan*. At <https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Irelands%20Ancient%20East/cork-city-harbour-east-cork-dedp.pdf>
8. <https://afloat.ie/port-news/cork-harbour-news/item/48379-new-paddy-s-point-slipway-is-a-major-marine-leisure-boost-in-cork-harbour>
9. <https://afloat.ie/port-news/cork-harbour-news/item/53238-amazing-transformation-as-cork-harbour-s-remediated-haulbowline-island-celebrates-first-birthday>
10. <https://afloat.ie/port-news/cruise-liners/item/66946-2025-cruise-season-begins-with-arrival-of-ms-ambition-in-cork>
11. <https://www.irishexaminer.com/business/arid-30937692.html>
12. <https://www.irishexaminer.com/news/arid-20019539.html>
13. <https://www.irishtimes.com/news/ireland/irish-news/cork-s-spike-island-wins-second-international-major-tourist-award-1.4074859>
14. <https://www.irishtimes.com/news/ireland/irish-news/spike-island-named-europe-s-leading-tourist-attraction-1.3239959>
15. <https://www.purecork.ie/plan-your-trip/inspiration/cork-s-harbour-forts-castles>
16. <https://www.rte.ie/lifestyle/travel/2019/06/19/1056315-cobh-named-as-one-of-the-most-beautiful-small-towns-in-europe/>
17. Port of Cork (2022). Planning ref. 22/4356 for a new vehicular entrance off the L2545, the temporary use of lands (for a period of 10 years) for open storage of port related cargo, and all ancillary works including road / kerbside re-alignment and security fencing at Haulbowline Road, Loughbeg and Ringaskiddy (Townlands), Ringaskiddy, Co.Cork.

18. Gopal Soft Power Index 2025 (Brand Finance) at  
([https://www.ucg.ac.me/skladiste/blog\\_45671/objava\\_195259/fajlovi/Global%20Soft%20Power%20Index%202025.pdf](https://www.ucg.ac.me/skladiste/blog_45671/objava_195259/fajlovi/Global%20Soft%20Power%20Index%202025.pdf))
19. Southern Regional Assembly (2020). Cork Metropolitan Area Strategic Plan. Part of the Regional Spatial and Economic Strategy for the Southern Region.
20. University College Cork (2011). Planning ref. 115487 for Construction of a Maritime Research and Testing Centre on lands 1.82ha. adjacent to the National Maritime College of Ireland (NMCI) at Haulbowline Road, Ringaskiddy, Co. Cork.