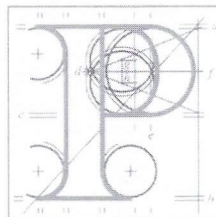


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Rob Bateman
22 Hillcrest
Pembroke Wood
Passage West
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.

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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Glao Áitiúil 1800 275 175
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64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

Paid 2016

PA0045 ✓

From: Rob Bateman <robbateman@outlook.ie>
Sent: Monday 17 November 2025 16:59
To: LAPS <laps@pleanala.ie>
Subject: Objection to PA04.318802

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.

Please find the attached objection...
I have previously submitted an objection in 2016

Thank you,

Rob Bateman

Mr. Rob Bateman,
22 Hillcrest,
Pembroke Wood,
Passage West,
Cork

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

17/11/2025

Re: PA04.318802

Proposed Waste-to-Energy Facility at Ringaskiddy, Co. Cork

Dear Sir / Madam,

I wish to object in the strongest possible terms to the above proposal.

1. Overall position

I previously objected to earlier iterations of this project. Having reviewed the current proposal, my position remains unchanged:

- This is fundamentally a **profit-driven private development** being presented as if it were a project of overriding strategic national necessity.
- The **location** at Ringaskiddy is dictated by the promoter's commercial convenience, not by any evidence-based national siting plan.
- The proposal is **incompatible** with the evolved uses, character, and economic direction of Cork Harbour.

Ireland may require thermal treatment capacity.

That does not mean that this operator, at this site, must be granted permission.

2. Strategic infrastructure status

The proposal's acceptance under Strategic Infrastructure provisions is questionable.

National waste and circular economy policy supports the waste hierarchy and targets reduced landfill. It does **not** identify Ringaskiddy—or any specific site—as a mandatory or priority location for thermal treatment.

If capacity is genuinely needed in the southern region:

- the **State** should lead a transparent, criteria-based national site selection exercise;
- candidate locations should be compared on environmental, transport, safety, amenity and economic grounds; and
- the outcome should be a publicly defensible national decision, not a developer-led choice.

3. Visual, landscape and tourism impacts

The proposed facility would remain a **dominant and intrusive structure**, highly visible from:

- the National Maritime College of Ireland (NMCI),
- Haulbowline Park,
- Spike Island,
- Cobh,
- cruise liners approaching deepwater berths, and
- residential areas throughout the harbour.

Cork Harbour has undergone major positive transformation since earlier applications:

- NMCI and its research, innovation and enterprise clusters,
- Spike Island's award-winning redevelopment,
- the Haulbowline remediation and public park,
- a successful cruise liner industry, and
- expanding marine leisure and tourism uses.

Superimposing a large industrial incineration stack into this gateway is contrary to every stated ambition for Cork Harbour's regeneration and identity.

4. Incompatibility with campus and innovation uses

The proximity of the proposed facility to the NMCI campus, incubator units and research facilities is particularly inappropriate.

No amount of architectural mitigation alters the underlying reality: a modern, high-value maritime education and research cluster would be forced to coexist with a large-scale waste combustion and ash-handling operation on the same access corridor.

This is a **land-use contradiction** with long-term reputational and practical consequences for the harbour's development.

5. Governance, independence and the whiff test

Since the last application, extremely serious governance concerns have arisen regarding the planning appeals system:

- a criminal conviction for failure to declare interests by a **former Deputy Chair of the Board**;
- a High Court finding of **objective bias** in respect of the previous Ringaskiddy incinerator decision, due to historic professional links between a senior Board member and consultants acting for the applicant;
- two critical reviews by the Office of the Planning Regulator (Phase 1 and Phase 2), containing **34 governance and transparency recommendations**; and
- the statutory restructuring of An Bord Pleanála into **An Coimisiún Pleanála** under the Planning and Development Act 2024.

Inspector recommendations and High Court quashing:

Across all three previous iterations of this proposal (2001, 2009 and 2016), the Board's own Inspectors recommended **refusal** on planning, environmental and risk grounds. On at least two occasions the Board proceeded to **override** those professional recommendations. The most recent approval, in 2016, was subsequently **struck down** by the High Court for objective bias, arising from a senior Board member's prior professional links to consultants acting for the applicant.

This pattern — consistent Inspector-level refusals, Board-level overrides, and ultimately a quashed decision — significantly elevates the burden on the newly reconstituted Commission to demonstrate **scrupulous independence, transparency and procedural integrity** in handling the present application.

The whiff test:

In this context, the present application must satisfy not only statutory requirements, but also the **whiff test**: the process must not only be impartial, but also be seen to be impartial by any reasonable observer.

6. Health, cumulative impacts and risk

The harbour community lives with the legacy of former industrial and contaminated sites, transport corridors, and cumulative environmental and visual pressures.

The EIAR must therefore be supplemented by a **comprehensive Health Impact Assessment (HIA)** or equivalent standalone “population and human health” chapter that:

- uses appropriate baseline public health data,
- examines cumulative environmental burdens,
- sets out full pathways of exposure,
- assesses credible worst-case accident scenarios, and
- proposes transparent monitoring and mitigation frameworks.

Planning cannot be delegated entirely to EPA licensing.

7. Conclusion and request for oral hearing

For the reasons above, I respectfully request that **An Coimisiún Pleanála refuse permission** for this development at this location.

Given:

- the scale of the proposal,
- the history of legal challenge,
- the governance context, and
- the level of public concern,

I request that an **oral hearing** be held so that all issues may be fully and transparently explored.

Yours sincerely,

Rob Bateman