

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

ORAL HEARING

RINGASKIDDY RESOURCE RECOVERY CENTRE

WITNESS STATEMENT OF MR. DAVE COAKLEY

LAND USE PLANNING POLICY

1. Qualifications and Experience

My name is Dave Coakley. I am a Director of Coakley O'Neill Town Planning Ltd based in Cork. I hold Bachelor of Arts and MPhil Masters Degrees from University College Cork and a Masters Degree in Town and Country Planning from The University of the West of England.

I am a member of the Irish Planning Institute and have over 15 years professional experience in public and private sector planning in Ireland. My practice is an independent Cork based chartered town planning consultancy which has extensive experience of the Irish and UK Planning systems.

2. Role in the Project

My role in the project involved undertaking the land use planning policy appraisal of the proposed development. I prepared the Planning and Policy Framework Chapter of the Environmental Impact Statement [EIS] (Chapter 2) and the planning report submitted with the planning application. I have been working on the project since 2015.

2.1 Conclusion of Planning Policy Appraisal

The conclusions of Chapter 2 of the EIS may be summarised as follows:

- EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner, and that waste should be dealt with at, or as close to, source (the proximity principle). Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Waste Framework Directive (WFD) and Environmental Protection Agency's National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management.
- The requirement of the Regional Waste Plans includes 300,000 tonnes capacity for residual municipal waste as well as 50,000 tonnes capacity for hazardous waste and an additional but unspecified capacity for industrial waste. It is highlighted that there is currently a spatial imbalance of suitable recovery capacity outside the Dublin region while a large quantity of residual municipal waste in Munster is being exported for recovery in waste to energy facilities in continental Europe. This is not a sustainable long term option as it infringes the proximity principle and does not meet the objective of moving towards self-sufficiency.
- The NHWMP anticipates that the private sector will develop technically and economically feasible treatment options, including thermal treatment. Similarly, the Southern Region Waste Management Plan notes that the required infrastructure will not be delivered by the Local Authorities as the investment is anticipated from the private sector. The combined approach to the management of residual municipal waste, industrial waste and hazardous waste, proposed by Indaver for the proposed Ringaskiddy Resource Recovery Centre will contribute to the attainment of these objectives.
- In addition, the energy recovery from residual waste at the proposed Ringaskiddy Resource Recovery Centre will help Ireland to achieve its renewable energy targets, with the production of clean energy for connection to the grid.
- Local planning policies and objectives, as set out in the Cork County Development Plan, 2014 and the Carrigaline Local Area Plan (2nd Edition), 2015, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy.
- Section 6.4.11 of the Cork County Development Plan 2014 states that the provision of strategic large scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans.

- Specifically, strategic large scale waste treatment facilities including waste to energy recovery facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas', by reference to the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b).
- Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area.
- The proposed development is a strategic large scale waste treatment facility. It is strategic as it addresses an identified need in the Southern Region Waste Management Plan, and of a large scale that is well within the thresholds for hazardous and non-hazardous waste treatment capacity.
- Therefore, the provision of a strategic large scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Cork County Development Plan 2014 and in accordance with policies for its zoning objective as per ZU 3-7(b) of the Plan.
- In addition, the proposed development is supported by policy objective WS 7-1 of the Cork County Development Plan 2014 in relation to Waste Management, as it is consistent with the provisions of Ireland's national waste policy, and contributes towards the delivery of an effective and efficient waste management service in line with the Southern Region Waste Management Plan 2015. The proposed development is also consistent with the policies of the National Hazardous Waste Management Plan.

3. Submissions and Responses

In preparing this witness statement, I have considered each of the observations submitted to An Bord Pleanála by various parties in relation to the planning policy appraisal of the proposed development. I have addressed each of them below.

3.1 Issue No.1 Submission:

Observations have been made by An Taisce, CHASE and others in relation to the issue of overdevelopment, maintaining that the proposal is the same in total tonnage and substantially the same in scale and impact as the previous 2008 proposal and, in this respect, the applicant has not addressed the Board's reason for refusal relating to 'overdevelopment'.

3.2 Issue No.1 Response:

The total area of the subject site is 13.55 hectares. The footprint of the proposed development has been significantly reduced from that presented in 2008 and from that permitted in 2001. The proposed process building, aero-condensor and turbine is now less than 9,300m² in area compared with the 2008 proposal (14,168m²) or the 2001 proposal (14,117m²). In effect, the footprint of the proposed development has been reduced by a third of that previously proposed. Refer to Figure 1.4 of the EIS for a footprint comparison.

With respect to the tonnages proposed, it is submitted that the basis of the Board's refusal reason in 2011 was that the proposed treatment of residual municipal waste was not in accordance with the local waste strategy in place at the time of the decision. The proposal is now in accordance with the relevant waste management plans. Additionally, the proposal now involves a single line moving grate operation as opposed to the previously proposed double line and the previously proposed waste transfer station has been omitted.

With respect to layout, the proposed development has been designed to address a wide range of factors including the operational requirements of the process and is in line with similar facilities permitted elsewhere. The waste recovery facility at Poolbeg in Dublin is located on a site of 5.5ha and has capacity to treat a significantly higher volume of waste, at 600,000 tonnes. The design of the site meets with all relevant statutory regulations and standards with regard to building design, fire regulations and access for emergency services.

In terms of impacts on its immediate environment, the applicant has demonstrated that truck movements will not result in negative impacts on the road network. The scale of the proposed development and potential for visual impact is addressed by witness John Kelly but it is notable that the main building has been broken down into a series of irregular block shapes that respond to the site's typography and context, with the use of colours to integrate the buildings into the surrounding landscape; the stack has been reduced in height from 85m as previously proposed, to 70m, additional landscaping is proposed and Cork County Council's submission to the Board concludes that the visual impact of the proposed development is acceptable and not overly visually dominant.

Overall, it is considered that the scale of the proposal has been significantly reduced so as to successfully address the Board's previous refusal reason and ensure that the proposed development does not constitute overdevelopment of the site.

3.3 Issue No.2 Submission:

The submission of Cllr. Marcia Dalton contends that Bottlehill in North Cork is a more appropriate location for the proposed development in planning policy terms while the submission of Cork County Council's Environment Section states that the Council do not share the applicant's contention that the Council's planning policy rules out waste to energy proposals at Bottlehill.

3.4 Issue No.2 Response:

It is acknowledged that the Cork County Development Plan states that *the Bottlehill landfill facility is a significant piece of existing infrastructure with scope for a specialised role in the area of integrated waste management and waste to energy.*

In reading the Development Plan as a whole, the development of strategic large-scale waste to energy recovery facilities is directed, 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 Strategic Employment Areas.

The proposed development is strategic (by reference to an identified need in the Southern Region Waste Management Plan), large scale (by reference to the tonnages involved relative to national capacity targets), is located on industrially zoned lands (by reference to zoning objective I-15 of the Carrigaline Local Area Plan) and is within a designated Strategic Employment Area at Ringaskiddy. (See section 2.4.3 of EIS).

The consideration of Bottlehill in paragraph 11.7.5 the County Development Plan must be read in the context of the preceding paragraph (11.7.4) which states that that the provision of strategic large scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas.

Bottlehill is not zoned as an industrial area, nor is it located within a Strategic Employment Area. The Cork County Development Plan aims to support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with integrated waste management activities and including the potential for an eco-park.

Further, Ringaskiddy, unlike Bottlehill, is located in the County Metropolitan Cork Strategic Planning Area, where policy objective CS 4-1(a) of the Cork County Development Plan 2014 seeks to *recognise the importance of the role to be played by Metropolitan Cork in the development of the Cork 'Gateway' as a key part of the Atlantic Gateways Initiative and, in tandem with the development of Cork City, to promote its development as an integrated planning unit to function as a single market area for homes and jobs*'. (EIS 2.4.3.1).

The subject site at Ringaskiddy benefits from closer proximity to producers of hazardous and industrial waste and producers of municipal waste. There are potential users of heat arising from the proposed development at Ringaskiddy which could allow for a possible future district heating network, as is required by the Energy Efficiency Directive.

The subject site's location at Ringaskiddy therefore better supports the proximity principle and the development of the Cork Metropolitan Area as an integrated planning unit in line with the provisions of the Cork County Development Plan 2014.

For these reasons, it is considered that, in planning policy terms, the Ringaskiddy site represents a more favourable and appropriate location for the proposed development.

3.5 Issue No.3 Submission:

Numerous submissions have highlighted to importance of tourism in Cork Harbour and the planning policy provisions set out in the County Development Plan supporting same. The submissions have argued for the incompatibility of the proposed development with these policy provisions.

3.6 Issue No.3 Response:

The tourism potential of Cork Harbour is fully acknowledged. The strategic approach to tourism development in the Harbour, and the range of plans that have been developed, are welcomed and supported by the Applicant. (See sections 2.4.3.1 and 6.3.4.1 of EIS).

However, it is submitted that developing the Harbour's tourism potential is a long established objective of Cork County Council and not, as suggested, a new policy objective or initiative. Chapter 7 of the 1996 County Plan addressed '*The Amenity and Tourism Role of Cork Harbour*'. Planning policies for tourism and amenity in the Harbour were set out in Chapter 8 of the 2003 Plan. The 2009 Plan was first to recognise the potential for Spike Island to become an internationally recognised tourist attraction and provide policy support to further develop marine leisure in the Harbour.

Concurrently, these plans have also acknowledged both the importance of the Harbour area to the economic and industrial development of the Cork Region through being a focus for key industries and the need to manage, in a balanced way, the mix and diversity of land uses within the harbour.

Similarly, paragraph 6.6.1 of the 2014 Cork County Development Plan specifically recognises the diversity of uses in Cork Harbour and policy CS 4-1 (d) seeks to establish an appropriate balance between competing landuses to maximise the area's overall contribution to Metropolitan Cork. It is in this context that Development Plan policies for tourism in the area are set out.

Within the Harbour area, the Ringaskiddy peninsula is largely industrial in use, with a number of pharmaceutical companies having large manufacturing facilities in the area, in addition to Port of Cork facilities. Recent additions to the area include three 100m hub-height wind turbines on industrial sites. A fourth turbine has received planning permission. A further turbine is subject to a current planning application. The Port of Cork has been granted permission for the expansion of their facilities at Ringaskiddy, while current TII proposals for the M28 propose the development of a motorway services area opposite the subject site. In this regard, it is submitted that the proposal is located in an area generally characterised by existing industrial type land uses and will read as part of the established large stand-alone industrial landscape of the Ringaskiddy area.

The primary intended land use on the Ringaskiddy peninsula is defined as industrial by reference to the relevant zoning objectives set out in the Carrigaline Local Area, 2015. The Plan's Strategic aims for Ringaskiddy are to reaffirm its strategic industrial and port related roles and seek to promote its potential for large-scale stand-alone industry. The Plan further states in paragraph 2.2.23 that it is envisaged that Ringaskiddy will continue to adequately meet the needs of the pharmaceutical industry and other large stand-alone activities.

The Council's submission to the Board in this instance concludes that the proposal is not contrary to the tourist policy designation or vision for Spike Island, noting that its success in terms of tourism development is dependent on investment, product development and marketing.

It is further noted that the proposed development will not impact on activities in the harbour area as there is no physical element proposed that will affect the use of the harbour for leisure, amenity or tourist activities, as is the case with existing pharmaceutical plants.

Tourism in the immediate Ringaskiddy area is not a key economic driver of this primarily industrial area. That said, the proposed development will include additional tourism infrastructure in the form of a public amenity walkway and viewing platform to attract additional visitors to the Ringaskiddy area, and to improve the variety of the tourism offer in wider Cork Harbour. Proposed works to the public roadway will improve accessibility to existing and proposed amenities in the area, including the proposed park at Haulbowline. (Also see sections 6.5.7.3 and 11.5.4.10 of EIS).

With respect to the location at Ringaskiddy, it is notable An Bord Pleanála, in granting permission for the relocation of Port of Cork facilities (Ref: 04.PA0035), concluded it would not compromise the amenities of Cork Harbour in terms of tourism, heritage and recreation.

In this regard, it is submitted that the proposed development supports the objective of policy CS 4-1(d) of the Cork County Development Plan, 2014 which seeks to establish an appropriate balance between competing land uses in Cork Harbour to maximise the area's overall contribution to the sustainable development of the Metropolitan Cork region.

3.7 Issue No.4 Submission:

The submission of Cllr. Marcia Dalton makes reference to the subject site's coastal location with reference to its incompatibility with Paragraph 4.9.4 of the Cork County Development Plan, 2014, (which highlights increased pressure for development of recreational uses in coastal and marine areas and enhanced recreational access to Cork Harbour) and policy EE6-2, which seeks to protect harbour side land for industrial and marine related developments dependent on access to deep water.

3.8 Issue No.4 Response:

The proposed development does not restrict access to Gobby beach and incorporates a public amenity walkway leading towards the Martello Tower and a viewing platform overlooking the Harbour.

The coastal area where the proposed development is located is not a deep water area and therefore does not result in the loss of harbour side land for industrial and marine related developments dependant on access to deep water.

4. Conclusion

In summary, having regard to the provisions of the national, regional and local waste management policy frameworks and strategies, regional and local planning policies and objectives, the planning history of the site together with the revised development scheme now proposed, it is considered that the development of a strategic large scale waste treatment facility on the subject, industrially zoned, site within a strategic employment area would be in accordance with the proper planning and sustainable development of the area.