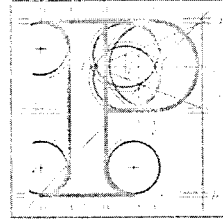


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Clr Úna McCarthy
6 Waterside
Castle Heights
Carrigaline
Co. Cork
P43 F977

Date: 24 November 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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
Executive Officer
Direct Line: 01-8737263

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

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

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1,

D01 V902

OBSERVATION ON SID APPLICATION - Case reference: PA04.318802, Ringaskiddy Co Cork Proposed development of a resource recovery centre (including waste-to-energy facility) by Indaver NV t/a Indaver Ireland

OBSERVER NAME: Cllr. Úna McCarthy

OBSERVER ADDRESS: 6 Waterside, Castle Heights, Carrigaline, Co. Cork P43F977

Dear Sir/Madam,

I wish to formally object to the proposed development at the Indaver site in Ringaskiddy (Indaver Site RY-I-09) and to request an Oral Hearing to ensure full and meaningful public participation in the assessment of this application. The reasons for my objection are outlined below:

1. Site Size and Suitability

Despite the updated information provided in August 2025, the site remains fundamentally inadequate in size for the scale of the development proposed. Its footprint continues to shrink due to coastal erosion on one side and the reduced boundary caused by the M28 on the other. The effective usable area is therefore inadequate to accommodate a development of this nature and scale (Daly, 2017).

2. Deficiencies in the EIS

All three Bord Pleanála Inspectors previously found the Environmental Impact Statements to be substantively deficient, even where legally adequate in form. The information available to the Board was insufficient to support a comprehensive environmental impact assessment or to facilitate an informed decision (Daly, 2017). Despite revisions, the updated EIS documents largely restate earlier conclusions and continue to rely on assertions that are unsupported by new or robust evidence.

3. Lack of De Novo Site Selection

The 2025 submissions do not provide a fresh, objective site-selection process. Instead, they justify the development solely on the basis of Indaver's land ownership. This approach fails to take proper account of the significant public and private investment that has transformed Cork Harbour and its environs since 2000, materially altering the strategic context for any major development (Daly, 2017).

4. Flood Risk and Safety Concerns

The site is located within a known flood-risk zone as identified in Table 4.1.17 of the Cork County Development Plan 2022–2028 and on OPW Floodinfo.ie (Flood Summary IDs 1364, 13082, 12085).

Proposed mitigation measures—requiring construction at elevated levels—would further increase the negative visual impact of the already large structure. In my considered opinion, the site is inherently unsuitable for a development involving the processing and generation of hazardous compounds (Yukel Finn, 2009).

5. Contravention of the Cork County Development Plan

While the wider Ringaskiddy area carries an industrial zoning, the specific site (RY-I-09) is zoned for the expansion of the Third Level Educational Campus and enterprise-related development, including marine-focused research, education, and innovation. This zoning underpins ongoing investment in the NMCI and MaREI campuses and is essential to the growth of this strategically important sector.

The proposed incinerator is therefore **in direct conflict with the Cork County Development Plan 2022–2028** and contrary to the stated development objectives for this area.

6. Significant Change in the Strategic Role of Cork Harbour Since 2016

Since the publication of Fáilte Ireland's **Cork City, Harbour and East Cork Destination and Experience Development Plan (DEDP)**, the strategic significance of Cork Harbour has changed markedly. The DEDP is a five-year sustainable tourism plan focused on enhancing the value of tourism across Cork City, Cork Harbour and East Cork by strengthening the destination's appeal, reducing seasonality, and increasing visitor spend. This plan recognises Cork Harbour as a major tourism asset with strong potential for growth, recreation, marine activity, education, and visitor experience development. The proposed incinerator is incompatible with this direction of travel and

risks undermining major regional initiatives to enhance Cork Harbour's attractiveness as a tourism and leisure destination.

The failure of the application to meaningfully address this strategic shift represents a significant omission.

Conclusion

For the reasons outlined above—and in line with the findings of three independent Bord Pleanála Inspectors (Jones 2004; Yukel Finn 2009; Daly 2017)—I respectfully request that this planning application be refused. The site is inherently unsuitable, the EIS remains deficient, and the proposal directly contravenes adopted planning policy and the evolving strategic role of Cork Harbour.

I also hereby request an **Oral Hearing** to ensure full public participation in the assessment of this application.

Yours faithfully,
Cllr. Úna McCarthy