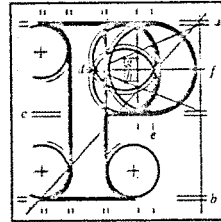


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Cllr. Peter Horgan
63 Lissadell
Maryborough Hill
Cork

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

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

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Dublin 1, D01 V902

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**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**

I write in reference to the application no PA04.318802

I wish to strongly object to the continuance of the application, which has been rejected by the community for a myriad of reasons over the years

I represent the Cork City South East Ward in Cork City Council, Part of that Ward takes in the beginning of the Lower Harbour. Along with Senator Laura Harmon I am opposed to this incinerator.

I have significant concerns on the impact of additional traffic Movement across the city if this is granted permission. Differential plume tracking shows that communities I represent across Blackrock Douglas and Rochestown would be significantly impacted by air deterioration.

The additional Traffic movements would end up rat running off the motorway at different times of day causing more congestion hardship on communities I represent.

Before being elected to Cork City Council I worked as an adviser to then Minister for Research and Innovation Seán Sherlock TD

There is a policy context for the allocation of European Union Money, to be divested for Research purposes, particularly for Maritime Research.

In line with Government policy, Science Foundation Ireland, under the National Research Prioritisation Exercise designated Marine Renewable Energy as a key driver for meeting Ireland's Renewable Energy Targets beyond 2020.

Cork Harbour is a designated beneficiary under this policy.

The then Minister for Research & Innovation, launched the SFI Research Centre – MaREI, which is located at the IMERC Campus in Ringaskiddy.

This €29 million centre, funded through the Department of Jobs, Enterprise and Innovation and Science Foundation Ireland, incorporating 45 industry partners, is positioning Ireland at the forefront of Marine Renewable Energy globally.

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This €29 million centre, funded through the Department of Jobs, Enterprise and Innovation and Science Foundation Ireland, incorporating 45 industry partners, is positioning Ireland at the forefront of Marine Renewable Energy globally.

The significant taxpayer investment in this facility is with a view to ensuring that Cork Harbour becomes a global reference point for “device design and modelling, energy conversion and storage, novel materials and structural testing, operations and decision support, energy policy and modelling and environmental monitoring” in the Marine Renewable Energy Space.

I remain concerned that the construction of an incinerator in close proximity to this site will compromise further inward investment in MaREI and Beaufort.

There is a masterplan for the creation of a public amenity and innovation space to create jobs in the clean-tech sector.

The people of the Lower Harbour area are adamant in their view that the future of the Lower Harbour, their Harbour, is based on renewal and rebirth and a clear movement away from industries that are perceived to be deleterious to their health and wellbeing and towards a Lower Harbour that sees inward investment in marine renewable energies.

As well as the MaREI and Beaufort Centres, the State also secured a €30 million investment in wind turbines through the Cork Lower Harbour Energy Group. This investment helps that help to protect the 4,000 jobs located in Cork Harbour.

I believe that the Indaver proposal runs contrary to the wishes of the people.

I believe that it contradicts a clear Government policy over successive governments that has designated the lower Harbour as a global reference point for positive economic growth through Research & Development in the Maritime sector.

Notwithstanding the information submitted in August 2025, the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by M28 on the other. It is considered that the actual usable area of the site is inadequate in relation to the scale of the development proposed. (Derek Daly, 2017).

By all 3 Bord Pleanála Inspectors, the EIS was found to be deficient in substance even where found legally adequate in form. The information as submitted to the Board is therefore insufficient to enable the Board to carry out an environmental impact assessment in an appropriate manner, and to form a basis for an informed decision on the application. (Daly, 2017).

Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.

There is no de novo site selection in the material submitted in 2025, but instead a justification based on site ownership by Indaver, with inadequate consideration given to major public and private investment initiatives which have transformed the character of the immediate area in the intervening period since 2000. (Daly 2017)

The site is located on a known flood risk area, marked as same in Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW floodinfo.ie, (Flood Summary ID-1364, 13082, 12085). Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.

It is my considered opinion that the site is inherently unsuitable for location of a use which processes, and generates hazardous compounds. (Oznur Yukel Finn, 2009)

Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the Indaver site area where the incinerator build is proposed (RY-I-09) is zoned as suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. (RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28)

This is dismissed in the August 2025 information but it is of critical importance that this zoning be upheld as it is directly linked to the investment in the NMCI and MaREI Campus areas and the potential for future growth of this sector. The proposed incinerator is therefore in direct contravention of the County Development Plan and contrary to the specified objectives for the immediate area.

Please refuse this planning application on the basis that the site is inherently unsuitable, concluded by all 3 Bord Pleanála Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017) and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site.

I wish to request an Oral Hearing to continue full public participation in this application.

Kind Regards,

Cllr Peter Horgan
63 Lissadell
Maryborough Hill. Cork.