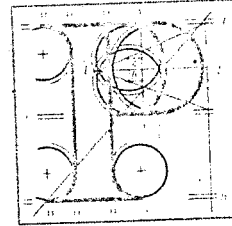


Our Case Number: ABP-318802-24
Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Con & Eileen Twomey
Beechmount
Cobh
Co. Cork
P24 Y448

Date: 02 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. 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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64 Sráid Maoilbhríde
Baile Átha Cliath 1
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64 Marlborough Street
Dublin 1
D01 V902

TO: An Coimisiun Pleanala
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

Con + Kileen Troney

DATE

11/11/25

OBSERVER ADDRESS

Beahmaunt Cobh, Co. Cork
P24 448

OBSERVATION DETAILS

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 development proposed. (Derek Daly, 2017).*

By all 3 Bord Pleanala Inspectors, the **Environmental Impact Statement (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 still continues to be inadequate.

'No site selection assessment has been done since 2001 despite the enormous change that has taken place in the area. It failed the W.H.O. site selection process then and certainly fails it now after 20 years. There is **no renewed site selection assessment** 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 that have *transformed the character of the immediate area in the intervening period since 2000. (Daly 2017).* The only qualification it has is that they own the site.

The site is in a flood risk area. Indaver plans to overcome this problem was to raise the entire area by 4m, which will be an eyesore for all who use this area for recreation. 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 the location of a use that processes and generates hazardous compounds. (Oznur Yukel Finn, 2009)

Indavers submission ignores the fact that part of their site (RY-I-09) is now zoned for marine education and related enterprise and activities. That part of their site is no longer zoned for industry. The proposal is therefore in contravention of the County Development Plan.

Please refuse this planning application on the basis that the site is inherently unsuitable, as concluded by all 3 Bord Pleanala Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017), and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 2028 for this site.

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

I enclose fee of €50

I have already submitted in 2016 so have paid prior fee

Additional pages attached (no of)
(two)

AN COIMISIÚN PLEANÁLA
LDG- 084114-25
ACP- _____
13 NOV 2025
Fee: € 50 Type: cheque
Time: 9.15 By: post

An Coimisiun Pleanala,
64 Marlborough Street,
Dublin 1,
DO1 V902

Eileen and Con Twomey,
Beechmount,
Cobh,
Co. Cork
P24 Y448
11/11/2025

Proposed development by Indaver NV t/a Indaver Ireland case ref: PAO4.318802, Ringaskiddy, Co. Cork

Dear Sir/ Madam,

We wish to offer an observation on the above proposed development. The development is proposed to be sited in an area of natural beauty in Cork Harbour.

Cork Harbour now has a vital place in the development of tourism and offers a unique opportunity to develop community tourism experiences and benefit the local economy. Since the first application 20 years ago development in Cork Harbour has changed dramatically.

Since 2000 Cork Harbour has become an important tourist attraction and is known worldwide.

1. This development will affect the amenities of surrounding areas. Major public and private investment initiatives have transformed the character of the immediate area in the intervening period since 2000 **(Daly 2017)**

According to the Cork County Development plan 2022 (1.7.22) "Ringaskiddy lies within the landscape type, 'City, Harbour and Estuary,' an area of very high landscape value, very high sensitivity and an area of national importance."

On the 4th November 2024 Failte Ireland produced a 5-year development plan. The key objective of Project 2 of this plan is to "Develop Cork Harbour into a world class visitor experience." It states that "Cork Harbour is Cork's greatest natural asset...Each harbour island has significant tourism growth from the expansion of Fota Island, growing visitor levels on Spike Island to developing Great Island and Cobh as a tourism town."

Under Failte Irelands 5-year development plan it states that, "Cork Harbour development is an integral part of the plan. It plans to "develop Cork harbour into a world class visitor experience. The plan states that "The rural and harbour communities are now presented with the opportunity to develop niche community tourism experiences and grow the economic benefit for their locality."

Spike Island opened in June 2016 and attracts visitors worldwide. It is sited across a narrow channel, approx. 1km from the proposed development. In 2017 the prestigious World Travel Awards named Spike Island as Europe's leading tourist attraction.

Camden Fort opened to the public in July 2011. It is sited approx. 3 km from the proposed development. Hawlbowlne Island Amenity Park was opened in 2021 offering 4km of walkways along

the side of the harbour, a 1km jogging circuit and numerous seating areas. It is sited approx. 1km from the proposed site.

Gobby Beach is attached to the proposed site. There is designated Open Space at its access point, Cork County Development Plan (RY-GR-09). According to the Cork County Development plan, "it is important that public access to the water is available and existing facilities are protected and improved to facilitate residents, visitors and local boat and leisure craft owners while taking account of and protecting natural and other heritage resources of the harbour." (1.7.44)

The proposed site will not enhance or protect the current amenities.

2. Sea scape, landscape, Historical and Protected Structures

The seascape of Cork Harbour and its environs has been identified as **High Value Landscape** as per Cork County Development Plan Vol. 4: 2.5.27 which aims to "include maintaining and enhancing views of the harbour".

The proposed application will interfere with **views of the harbour and historical areas of significance**. Onland, the site currently offers views of Cork Harbour, Roches Point, Camden Fort Meagher, Spike Island, Hawlbowl Island and the town of Cobh and Cobh Cathedral. From the sea, this site is one of the most visible sites from any point of the harbour. Its size will have a negative impact on any harbour vista.

GI 14-12 objective of Cork County Development Plan 2022-2028 Vol.1 states: **Preserve the character of all important views and prospects, particularly sea views.....views of historical or cultural significance (including buildings and townscapes) and views of natural beauty** as recognised in the Draft Landscape Strategy.

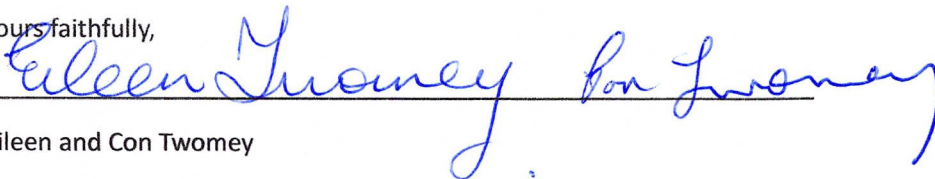
3. The site is in a flood risk area. Indaver plans to overcome this problem by raising the entire area by 4m. which will exacerbate the negative visual impact of the proposed large structure. According to Cork County Development Plan 2022 (1.11.7) the national approach to planning and flood risk management is set out in the 2009 Guidelines for Planning Authorities 'The Planning System and Flood Risk Management' issued by the then Minister for the Environment, Heritage and Local Government and Circular PL 2/2014. The approach is to avoid inappropriate development in areas at risk of flooding and avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off.

To preserve existing tourist amenities and to allow for the future proposed development of the Cork Harbour area the planning application should be refused.

The proposed development is inherently unsuitable and the proposal contravenes the Cork County Development Plan 2022-2028 for this site.

For the reasons outlined above, in the interest of proper and fair planning and in keeping with the Cork County Development Plan 2022-2028, planning permission should be refused for the proposed development.

Yours faithfully,



Eileen Twomey Con Twomey

Eileen and Con Twomey