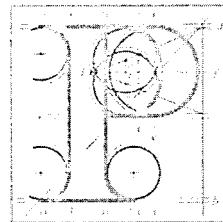


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Ian Venner  
Carrigeen  
Crosshaven  
Co. Cork  
P43-H489

**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](http://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

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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	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**

**SUBMITTED BY:**

Ian Venner  
Carrigeen  
Camden Road  
Crosshaven  
Co. Cork  
P43 H489

**OBSERVATION DETAILS**

**Site development**

The development of the site as proposed represents gross overdevelopment.

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).

This is further evidenced through the applicant's own photomontage, which shows unacceptable visual massing from the road (and similarly the beach) - see below. Other facilities in the area (particularly on the Northern side of the road, such as NMCI and UCC Beaufort Building) are set back much further and of much greater architectural merit .

It should be noted the application states that "*The landscape objectives of the site are as follows; • The creation of a quality, 'campus' style landscape which will be an appropriate scale and setting for the buildings within the site.*" It is difficult, if not impossible, to see how the applicant's own plans meet these objectives.



Plate 3: Proposed Development Site from the L2545 adjacent to Hammond Lane Metal Recycling



Figure 17 Proposed view from L2545 road close to the NMCI entrance

The applicant also seems to think they will improve the area “from a slightly unkempt, semi-industrial area to a more developed cluster of industry, energy and education campus style landscape”. The industry, energy and education style landscape already exists in that vicinity, the applicant seeks to develop a waste burning facility within that environment.

## Zoning

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.

It would appear a key reason for site suitability is the fact that "*The chosen site in Ringaskiddy is in the ownership of Indaver - Indaver purchased the proposed development site in or around December, 2000*". This should have no relevance whatsoever to the planning decision - indeed ownership, or legal rights to develop, is required to apply for planning permission.

### **Flood risk & other environmental considerations**

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)"* - the applicant has not demonstrated in this updated application how this conclusion can be overcome.

Further, the geophysical attributes conditions in Cork Harbour make it particularly prone to thermal inversion. Historically, this would have resulted in very poor air quality in the harbour area, with domestic fires being a significant source of PM2.5 and other pollutants at ground level due to the inversion.

While still prone to the meteorological phenomenon, the improvement noted since the coal ban was introduced and then extended has been dramatic. An industrial incinerator as proposed would not be miraculously exempt from these environmental conditions and the applicant has not given adequate consideration to such conditions in their application.

### **Tourism/Amenity impact**

The application itself notes that *"The lower harbour contains a number of important military fortifications such as Spike Island, Fort Davis, Fort Camden, Cobh Fort and Ringaskiddy Martello tower, which contribute to the rich heritage and character of the harbour."*

Since this site was first proposed, a number of very material changes to the surrounding areas have taken place. Spike Island has been established as a premium tourism offering, located 800m from the proposed site. Notwithstanding its pre-existing historical and archaeological importance, it is now an international tourist attraction with 100,000 visitors annually, and was named "Europe's leading tourist attraction" at the 2017 World Travel Awards, beating competitors like the Eiffel Tower and the Colosseum.

Camden Fort Meagher is internationally recognised as being "One of the finest remaining examples of a classical Coastal Artillery Fort in the world, and since the original concept of an incinerator on the site has been developed as a tourist attraction. The proposed development is directly visible from the viewing balcony and key gunnery emplacements, 2.8km to the NW. 28,000 visitors attend annually, and this is forecast to increase following significant investment.

The Port of Cork liner trade has also increased substantially, now hosting approximately 100 cruise ship visitors annually, 180,000 visitors with their economic impact approaching €20m.

In 2021, Haulbowline Island Recreational Park was opened to the public, transforming industrial wasteland and a toxic legacy into a 22 acre green oasis situated in the middle of Cork's natural harbour, accessible by public and private transport. This park is only accessible past the proposed development, and within 1km of it.

This is simultaneously acknowledged in the application and ignored as to the proposed development's impact on it - *"Haulbowline Island Park on the former Irish Steel East Tip site was opened to the public in 2020 and is a well-used, recreation amenity with expansive views throughout the harbour (Figure 11.11.0)."* It is notable that this was an active industrial dump connected to Irish Steel at the time of the first application for this proposed development, with Irish Steel not ceasing operations until 2001.

The harbour has long been a natural amenity for watersports of many types, and this continues to date. However, again since the development was first proposed, there are now several companies providing harbour tour services (Ocean Escapes, Cork Harbour Boat Hire, Cork Sea Safari and Cork Harbour Cruises to name the key ones) and which would transit within 400m of the proposed development.

In 2011, the community in Lower Aghada along with the Port of Cork and Cork County Council established a marine leisure pontoon in the Eastern end of the harbour.

In 2019, the Port of Cork opened additional dedicated marine facilities at Paddy's Point, providing a key gateway for marine leisure users to the water of Cork Harbour. Consisting of a substantial slipway and pontoon, this facility lies 400m from the proposed development.

*The historical visitor locations such as Cobh Cathedral, Fort Mitchell on Spike Island and Fort Camden at Crosshaven. The latter two sites have been undergoing significant development as part of a wider tourism development initiative in the lower harbour* The environs of Cork Harbour have been subject to many generations of heavy industrial use, and local government, port authorities communities across the harbour have invested substantially in transforming them over the past 25 years as set out above.

The submission states *"The proposed development is compatible with other Cork Harbour activities. It is notable that the Commission, in granting permission for the relocation of Port of Cork facilities to Ringaskiddy (Ref: 04.PA0035), concluded it would not compromise the amenities of Cork Harbour in terms of tourism, heritage and recreation."*

Firstly, to state an overscale, waste burning plant is "compatible" with other Cork Harbour activities, particularly those set out above, is risible. The reference to the Port of Cork application is beyond tenuous, where cargoes (and in particular those moving downstream from Tivoli) comprise of containerised freight and Offshore Renewable Energy support services - the very antithesis of burning 240,000 tonnes of waste annually.

The application further states *"The Cork Lower Harbour landscape has undergone significant change in recent years with the construction and opening of the expanded Port of Cork deepwater berth and container cranes/storage area."* To anyone who is familiar with that area, the expansion of facilities in that area are largely below the road/set back from the roadside, or below the visual line of the hill from the Cobh/ Monkstown viewpoints. The proposed Indavar application is none of those things.

The application goes further and attempts to "tourism-wash" a short footpath to the Martello tower. *"The proposed development will also enhance the provision of tourist facilities in the area by the amenity walkway including viewing point. The dedicated viewing point will enable*

*tourists to appreciate the natural, built and cultural heritage of Cork Harbour.*" The applicant seeks to promote a minor, though important, coastal defence feature while simultaneously detracting from emplacements of much greater historical and touristic importance. It is questionable whether anyone would desire to take a walk around the boundaries of the proposed industrial buildings to "appreciate" the view - there are many greater options available as set out above.

To now permit the application for the proposed development would set back the development of the area by several generations. The facility is clearly out of keeping with the character of the area and would materially injure public amenities.

### **Renewable energy**

The applicant also makes claims that the development of the facility will substantially contribute to the country's renewable energy agenda - "*the export of surplus electricity to the national grid (18.5MW) will have a direct benefit in terms of preventing greenhouse gas emissions from the production of that electricity in a fossil fuel-based power station*". This assumes the generation displaced will be fossil-fuel based.

Since this development was first proposed, renewable energy penetration in Ireland has significantly increased, with renewables meeting around 40-54% of electricity demand in recent months, largely due to wind power. Ireland's 2030 target is to generate 80% of its electricity from renewable sources, which is a major increase from 36% in early 2024.

It is therefore entirely likely that any additional generation will displace renewable energy sources rather than act as an offset to fossil fuels.

The application also states that "*Landfills produce methane which is twenty-eight times more powerful than carbon dioxide as a greenhouse gas, and by diverting waste from landfill, the negative effect of the production of methane is avoided.*" It is notable that while that is the case, Cork City Council and Naturgy have captured such methane and used it for power generation in Tramore Valley Park for many years - again confirming that such methane capture and avoidance is already available within the country and does not require the construction of the proposed facility.

### **Environmental Impact Study**

As a lay submitter, my ability to assess the details of the applicant's EIS is limited. However, in reviewing it, two points were immediately obvious to me:

- The EIS made no mention of UCC's Beaufort Research Laboratory, a key National maritime research facility
- The EIS, in the Site context, referenced iMERC (the Irish Maritime and Energy Resource Cluster)

The Beaufort Research Laboratory is the largest integrated maritime and energy research center in the world and home to Lir, the National Ocean Test Facility. It opened in 2015.

iMERC ceased operations in 2017. The omission of these very obvious facts from the EIS suggests that no material update was performed on the EIS submitted. The very obvious question this raises is what else has been omitted or ignored from this "updated" EIS.

As noted by all 3 Bord Pleanala Inspectors in assessing all prior applications, 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, omit material updated facts and provide assertions without evidence.

### **Conclusion**

Please refuse this planning application on the basis that the site, including the related environmental conditions, is inherently unsuitable, as previously 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 - 28 for this site.

Further grounds for refusal include:

- The visual impact of the development
- Overdevelopment of the site
- injury to public amenities immediately adjacent to the proposed site (ashore and afloat)
- adverse impact on the extensive harbour tourism sector that has been established since first application,
- an apparent failure to adequately update the EIS for current context
- A clear attempt at “tourism-washing” and “greenwashing” by the applicant