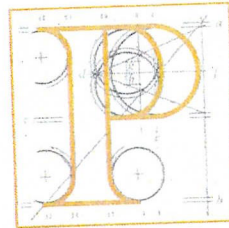


Our Case Number: ABP-318802-24
Planning Authority Reference Number:



An
Coimisiún
Pleanála

Judith Cuppage
9 Granary Wharf
Glenbrook
Passage West
Co. Cork
T12A393

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

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Ríomhphost

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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: Judith Cuppage

OBSERVER ADDRESS: 9 Granary Wharf, Glenbrook, Passage West, Co. Cork, T12A393

DATE: 16th November 2025

OBSERVATIONS

Inadequate site size

Notwithstanding the information submitted in August 2025, the site is essentially 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.”* (Inspector’s Report, Derek Daly, 2017).

Deficient EIS

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.”* (Inspector’s Report, Derek Daly, 2017). Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.

Contrary to transformed character of Cork Harbour

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”*. (Inspector’s Report, Derek Daly, 2017).

In the decades since 2000, there has been substantial investment in tourism, recreational, educational, and research facilities around the harbour, including in the immediate vicinity of the proposed development. For example,

- Spike Island is now an award-winning tourism and heritage centre, having earned the accolade of ‘Europe’s Leading Tourist Attraction’ in the prestigious World Travel Awards in 2017. Fort Mitchell on Spike Island is one of several star-shaped forts in the lower harbour, and Camden Fort Meagher in Crosshaven is now also open to the public after major public and private investment. This latter fort is considered one of the finest remaining examples of a classical Coastal Artillery Fort in the world. Other such forts

include Fort Davis, opposite Camden, and Cobh fort. The proposed development is greatly at odds with and will undermine current and future investment in and enjoyment of these heritage and tourism sites.

- Haulbowline Island People's Park was opened in 2021 in the middle of Cork Harbour, a public amenity with pathways, jogging circuit, playing pitches and seating areas. This amenity provides a major boost to recreational facilities in the harbour area, but the proposed development will be the most impactful structure and operation visible on the approach to the park and from within it.
- Bord Failte's *Cork City, Harbour and East Cork Destination and Experience Development Plan* (Cork DEDP) presents a strategic tourism plan for Cork Harbour, with the ambition to establish Cork Harbour as a world class visitor experience. The location and size of the proposed development by Indaver are contrary to this ambition, and the sight of and effect of emissions from the facility can only act as a deterrent to tourist and recreational visits.

Flood risk and erosion

The site is located on a known flood risk area, marked as same in Cork County Development Plan 2022-2028, 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"*. (Inspector's Report, Öznur Yücel-Finn, 2009).

In addition, the site is gradually eroding from the seaward side, from the action of the sea and also from rain water flooding gradually eroding the cliff from the top down.

Site zoned for educational, enterprise, research and development

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 2022-2028). 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 National Maritime College of Ireland (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.

Summary

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

€50 included with this submission.

Oral Hearing request

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