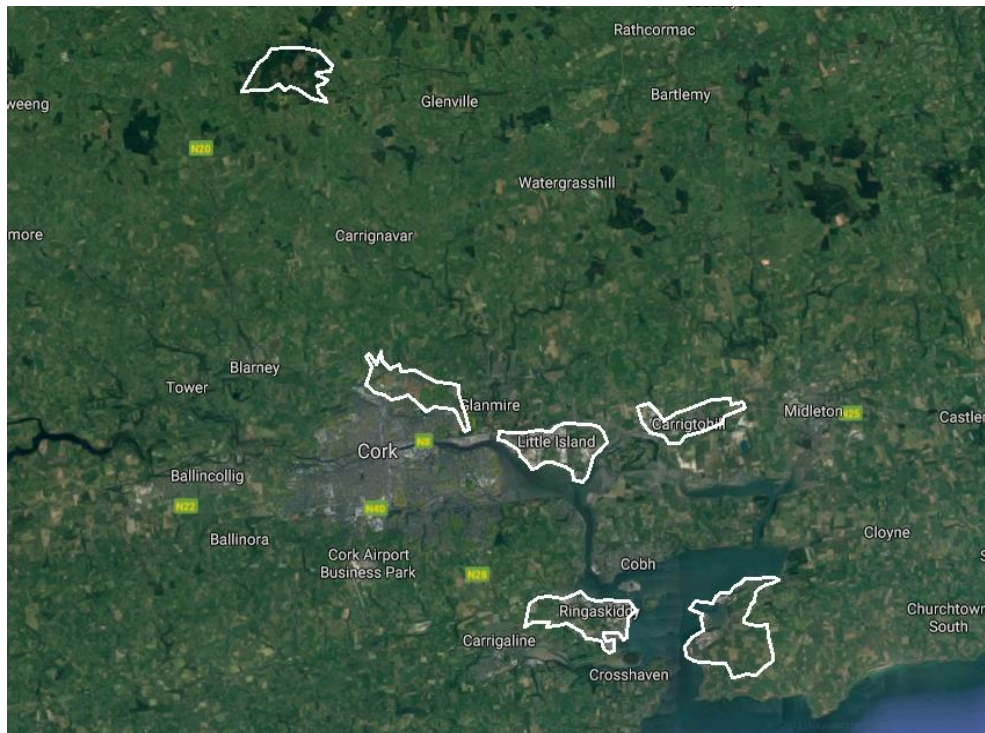


Appendix 3.1

**Planning Report in relation to Industrial Lands
within Metropolitan Cork**

PLANNING REPORT

In relation to
INDUSTRIAL LANDS WITHIN METROPOLITAN CORK



On behalf of

INDAVER




Prepared By

COAKLEY O'NEILL TOWN PLANNING LTD.

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TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
1.0 INTRODUCTION	2
2.0 STRATEGIC PLANNING AND DEVELOPMENT CONTEXT	3
3.0 COMMENTARY ON POLICY CONTEXT	7
4.0 LITTLE ISLAND	9
5.0 CARRIGTWOHILL	13
6.0 RINGASKIDDY	16
7.0 WHITEGATE	22
9.0 BOTTLEHILL	29
10.0 CONCLUSION.....	31

EXECUTIVE SUMMARY

The purpose of this report is to assess a number of locations in the County Metropolitan Area from a planning perspective as to their suitability for a large-scale waste facility.

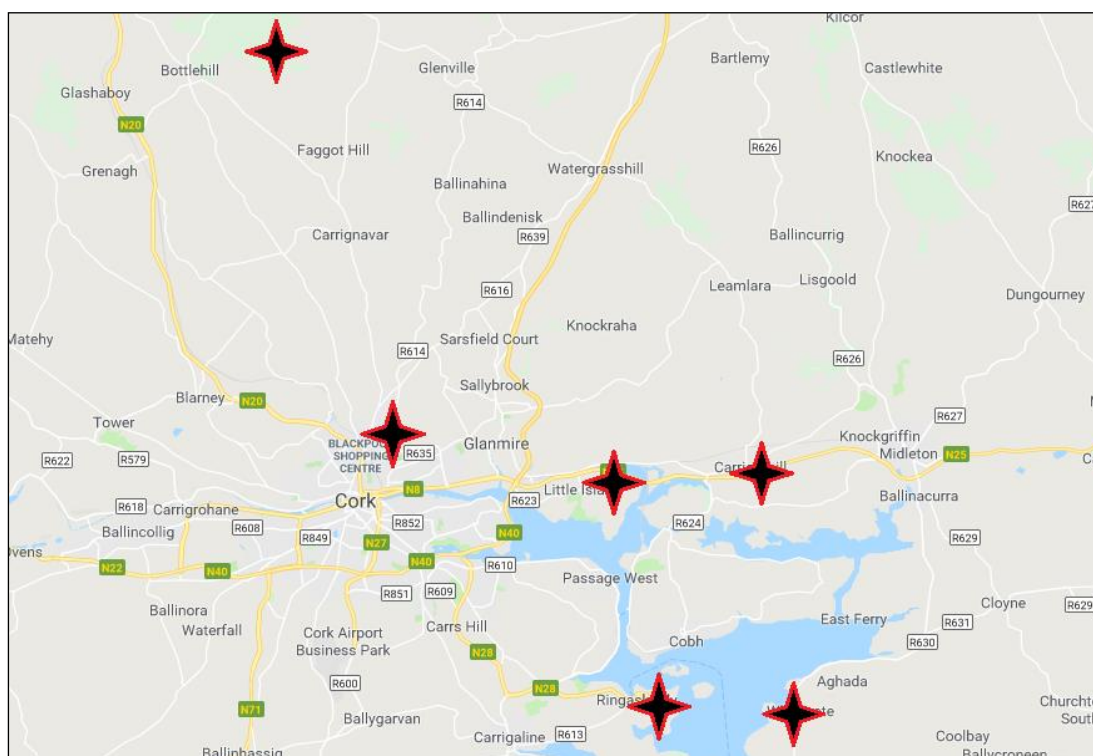
In the County Metropolitan Area, the Cork County Development Plan 2022-2028 identifies Little Island, Carrigtwohill, Ringaskiddy, Kilbarry, and Whitegate as 5no. Strategic Employment Locations. These Strategic Employment Locations are suitable for large scale development. These Strategic Employment Locations are also Industrial Areas. Policy objective ZU 18-16 of the Plan states that the provision of strategic large scale waste treatment facilities including waste to energy recovery facilities will be considered in 'Industrial Areas' designated as Strategic Employment Locations in this Plan.

Bottlehill (which is not listed as a Strategic Employment Area) is also identified in the Plan for uses primarily associated with achieving the aims of the circular waste economy.

The objective is to screen sites in these locations against a set of criteria (Strategic Employment Location, Industrial zoning and size) to identify the reasonable alternative locations for the siting of a large-scale waste facility such as the proposed Ringaskiddy Resource Recovery Centre.

1.0 INTRODUCTION

- 1.1 This report looks at the development potential of industrial lands within 5 Strategic Employment Locations (SELs) in the Cork Metropolitan Area and also Bottlehill for a strategic large-scale waste to energy recovery centre use. Guided by the planning policy and zoning provisions set out in the *Cork County Development Plan, 2022* (hereafter CDP), which direct that large-scale waste to energy recovery facilities should be located on industrially zoned lands within SELs, the assessment focuses on these specific locations within the County Metropolitan Area, in addition to the landfill site at Bottlehill.
- 1.2 The objective is to screen sites against three critical criteria (zoning, size and accessibility) and then to identify all of the reasonable alternative locations for the siting of a large-scale waste facility such as the proposed Ringaskiddy Resource Recovery Centre.
- 1.2 The review set out in this report involved both a desk-top assessment and site visits. It was originally prepared in 2019 and has been updated in 2025. The desk top assessment included a search of planning registers to provide planning history data and a review of policy documents and the relevance of the various conservation, environmental and ecological designations. A visit to the sites was then also undertaken.
- 1.3 With the gathered information, a review of each site was carried out in accordance with the screening criteria outlined in Section 3.13 below to determine whether each site is a reasonable alternative or not. Among the criteria used to identify the reasonable alternative locations (illustrated below) and zoned lands within same were the following: site area, land zoning and development objectives.



2.0 STRATEGIC PLANNING AND DEVELOPMENT CONTEXT

2.1 In terms of waste policy, both EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner, and that waste should be dealt with at, or as close to, source (the proximity principle). Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste.

2.2 In strategic planning terms, one of the National Strategic Outcomes of the *National Planning Framework First Revision 2025* (NPF), NSO9, is the sustainable management of water, waste and other environmental resources. The following is included as one of the key growth enablers for the Cork City region:

Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, water conservation, water reuse and SuDS and the circular economy.
(Pg.45)

2.3 In expanding Chapter 10 of the National Planning Framework (NPF) First Revision, April 2025 states that, having regard to the Circular Economy and Miscellaneous Provisions Act 2022, the new National Waste Management Plan will contain targets for reuse, repair, resource consumption and recycling, and address measures including:

- supporting the development of indigenous waste treatment capacity to reduce reliance on export.
- development of necessary and appropriate hazardous waste management facilities to avoid the need for treatment elsewhere.
- Adequate capacity and systems to manage waste, including municipal and construction and demolition waste in an environmentally safe and sustainable manner and remediation of waste sites to mitigate appropriately the risk to environmental and human health.

2.4 Section 9.1 of the NPF includes adequate capacity and systems to manage waste in an environmentally safe and sustainable manner in seeking to achieve resource efficiency and a transition to a climate neutral economy. Section 9.2 acknowledges that in catering for an additional one million people, increased demand for land is likely to include the identification of suitable locations for waste management, among other uses, while protecting the cultural heritage significance of the historic built environment and cultural landscapes and the conservation and restoration of nature.

2.5 In the context of the European Commission's new circular economy action plan (CEAP), 2020 and the Circular Economy and Miscellaneous Provisions, Act 2022, which are focused on reducing material resource consumption, the prevention and designing out of waste and to effect behavioural change at an individual, household, and business level, National Policy Objective 67 seeks to support the circular and bio economy including in particular through greater efficiency in land and materials management.

- 2.6 According to the NPF, a key future growth enabler for Cork is improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, water conservation, water reuse and SuDS and the circular economy.

- 2.7 More specifically in relation to managing waste, section 9.2 of the NPF states that:

Ireland has actively improved its waste management systems, but we remain heavily reliant on export markets for the treatment of residual, recyclable and hazardous waste. A population increase of around one million people, alongside economic growth to 2040, will increase pressure on waste management capacity, as consumption is still a key driver of waste generation.

While the ultimate aim is to decouple, as much as possible, consumption from waste generation over time, additional investment in waste management infrastructure, and in particular different types of waste treatment, will be required.

In managing our waste needs, the NPF supports circular economy principles that minimise waste going to landfill and maximise waste as a resource.

This means that prevention, preparation for reuse, recycling and recovery are prioritised in that order over the disposal of waste.

- 2.8 In terms of supporting a circular, resource efficient and a low carbon economy, the NPF, through National Policy Objective 76, supports the provision of adequate capacity and systems to manage waste in an environmentally safe and sustainable manner:

National Policy Objective 76

Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.

- 2.9 Volume 1 of the National Waste Management Plan for a Circular Economy 2024-2030 states that there are 2no. dedicated thermal treatment plants with 910,000 tonnes per annum capacity and operating at capacity. The Plan also provides for continued and expanded residual waste treatment capacity within the State to move towards self-sufficiency and reduce the reliance on the export of waste materials. Future development of waste treatment capacity must ensure that circular policies including prevention, reuse/repair and recycling are not compromised by the provision of new recovery infrastructure. Specifically, Targeted Policy TP14.2, supports the provision of 200,000 to 300,000 tonnes of additional dedicated thermal recovery capacity for the treatment of non-hazardous residual wastes nationally, to ensure there is adequate active thermal treatment capacity.

- 2.10 Core Policy 12 of the Plan also recognises and supports the need for nationally and regionally important waste infrastructure, including infrastructure of the type, scale and proximity essential to maintain waste

services and infrastructure that contributes to the ambition and policies of the Plan. This includes dedicated thermal treatment plants with a capacity greater than 100,000 tonnes per annum.

- 2.11 Volume III of the Plan states that the current available rMSW (residual Municipal Solid Waste) treatment capacity in 2023 is circa 1.68 million tonnes, which has increased significantly over the 1.47 million tonnes capacity available in 2022, but a current shortfall in treatment capacity of circa 200,000 tonnes in 2023 remains, with the available treatment capacity declining in the period to 2030.
- 2.12 It is further stated that the EPA waste statistics for 2021 show that circa 400,000 tonnes of rMSW were exported for final treatment indicating that the shortfall in treatment capacity is being managed through exports. Relying on this level of export is neither sustainable nor complies with the principles of self-sufficiency and proximity and the analysis suggests the need for further treatment capacity within the State.
- 2.13 Table 2.1 of the Plan in relation to Expected rMSW treatment capacity changes identifies the Indaver Ringaskiddy waste to energy plant in Ringaskiddy, Co. Cork, as one of a number of pending developments and changes which may contribute to additional capacity to help address this shortfall. The Plan recognises that the capacity is unlikely to be delivered in the timeframe of the Plan by 2030.
- 2.14 Key deliverable 13 of Volume III of the Plan in relation to Thermal Recovery Capacity, states that the Local Government Sector (LGS) supports the provision of additional thermal recovery capacity and the Plan provides guidance as to the capacity required.
- 2.15 Strategy no. 9 of the Regional Spatial and Economic Strategy (RSES) for the Southern Region 2020 seeks to provide infrastructure and services in a sustainable, planned and infrastructure-led manner to ensure the sustainable management of water waste and other environmental resources. Chapter 5 of the RSES states that the Southern Regional Assembly supports the use of smart technologies and innovative approaches to waste management which promotes waste prevention and increased reuse, recycling and recovery of waste, with additional environmental and economic benefits. Policy objective RPO 107 states that it is an objective to support innovative initiatives that develop the circular economy through implementation of the Regional Waste Management Plan for the Southern Region 2015-2021 and its successor, the National Waste Management Plan 2024-2030.
- 2.16 Policy objective ZU 18-16 of the CDP states that the provision of strategic large scale waste treatment facilities including waste to energy recovery facilities will be considered in 'Industrial Areas' designated as Strategic Employment Locations (SELs) in the CDP subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in this Plan.
- 2.17 In this context, paragraph 2.16.5 of the CDP states that within the County Metropolitan Area, Carrigtwohill, Little Island, Ringaskiddy and Whitegate are identified as Strategic Employment Locations suitable for large scale employment development. Policy objective EC: 8-3 in relation to Strategic Employment Locations seeks to:

a) Promote the development of Strategic Employment Locations suitable for large scale industrial developments at Carrigtwohill, Little Island, Ringaskiddy, and Whitegate where any such development must be sensitively designed and planned to provide for the protection of any designated sites. Any development must be compatible with relevant environment, nature and landscape protection policies as they apply around Cork Harbour and the protection of residential amenity.

b) Protect lands in these areas from inappropriate development which may undermine their suitability as Strategic Employment locations.

2.18 The development of strategic large-scale waste to energy recovery facilities is directed therefore, by reference to paragraph 2.16.5 and Policy Objective EC: 8-3 of the Plan, to industrially zoned lands within Strategic Employment Locations.

2.19 The following section addresses the development of large-scale waste to energy facilities on industrially zoned lands within SELs in the Cork Metropolitan Area.

3.0 COMMENTARY ON POLICY CONTEXT

- 3.1 National and regional policy require that additional waste to energy capacity be delivered and with regard to the provision of a new large-scale waste to energy facility, the Cork Metropolitan Area is the area where the greatest need arises outside the well-served Greater Dublin Area.
- 3.2 As discussed in Section 2 above, within the Cork Metropolitan Area the development of such a facility is directed by policy to industrially zoned lands within designated SELs. There are 5 SELs within the Cork Metropolitan Area which contain industrially zoned lands, as follows:
- Little Island
 - Carrigtwohill
 - Ringaskiddy
 - Whitegate
 - Kilbarry
- 3.3 The additional inclusion of Bottlehill in this assessment is a response to the guidance set out in the CDP advising that the Bottlehill landfill facility is a significant piece of existing infrastructure with scope for a specialised role in the area of integrated waste management and waste to energy, primarily associated with achieving the aims of the circular waste economy¹.
- 3.4 In planning policy terms, the SELs are generally of similar status from the perspective of their zoning, strategic function, accessibility (existing or planned), availability of lands, and services infrastructure (existing or planned).
- 3.5 The reality is that there is no significant or outstanding policy credential that can distinguish one SEL from another. That is why they are so designated. However, certain SELs offer advantages over others with respect to the development of a large-scale waste to energy recovery facility.
- 3.6 Policy objective EC:8-3 of the CDP seeks to promote the development of SELs for large scale industrial developments where such development is compatible with the relevant environment, nature and landscape protection policies as they apply around Cork Harbour. It also seeks to protect lands in these areas from inappropriate development which may undermine their suitability as Strategic Employment Locations.
- 3.7 All of the SELs in County Cork are also designated in the CDP as High Value Landscapes. As a consequence, in complying with the land use objectives of the CDP, it is therefore unavoidable that any proposed waste to energy recovery facility will be located in a High Value Landscape area.

¹ Cork County Council is proposing to seek expressions of interest for the site (May, 2025 <https://www.irishexaminer.com/news/munster/arid-41626237.html>)

- 3.8 With regard to this, it should be noted that the CDP recognises that landscapes are dynamic and continuously evolving. The objectives of the CDP, with respect to High Value Landscapes, do not attempt to prevent new uses or changes but to manage the change. Rather than prohibiting large scale developments in such landscapes, the CDP specifies that such developments within High Value Landscapes need to be undertaken with considerable care.
- 3.9 Policy objective ZU 18-16 of the CDP states that the provision of strategic large scale treatment facilities including waste to energy recovery facilities will be considered in 'Industrial Areas' designated as Strategic Employment Locations (SELs) in the CDP subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in this Plan.
- 3.10 As noted above, the development of strategic large-scale waste to energy recovery facilities is directed therefore, by reference to paragraph 2.16.5 and Policy Objective EC: 8-3 of the Plan, to industrially zoned lands within Strategic Employment Locations.
- 3.11 Finding an appropriate location within SELs for a development such as waste to energy facility, involves a weighing of competing demands – the desire to have a facility as far removed as possible from sensitive receptors balanced with the demand to be proximate to sources of waste and reduce traffic movements.
- 3.13 The approach was to screen out sites that do not meet the basic key criteria which are listed (in order of priority) below:
- Industrial zoned lands in Strategic Employment Locations
 - Of suitable size for the development of a waste to energy recovery facility, c. 5ha
- The sites that are left can then be considered reasonable alternatives to the existing Indaver-owned site in Ringaskiddy.
- 3.14 The following Sections 4 – 9 summarise this exercise for the areas identified and results in a list of the reasonable alternative locations available.

4.0 LITTLE ISLAND

4.1 Location

- 4.1.1 Little Island is located to the east of Cork City at the northern extent of Cork Harbour. While no longer an Island, it is bounded on its northern side by the N25 national road.
- 4.1.2 The area has a range of commercial, industrial, enterprise and residential uses. It has developed rapidly as an employment location since the 1990s to become one of the the largest industrial and commercial employment areas in the Cork Metropolitan Area.
- 4.1.3 The southwestern side of the Island is dominated by large chemical and pharmaceutical sites. The central area comprises residential areas (including Castlevue, Castle Wood and Fairways) situated along the R623 and adjoining local roads and bounded by two golf courses, one now closed. To the north of these are commercial areas focused on the Eastgate Business and Retail Parks and the Euro Business Park. The Sitecast Industrial Estate and GB Business Park also lies adjacent. The eastern side of the Island is more open with lands in the northeast in agricultural use. The Harbour Point Business Park has been developed to the south and comprises a range of logistics, transport and wholesale uses. The Carrigrennan Wastewater Treatment Plant lies to the extreme southeast of the Island, which was developed in 2004.



4.2 Local Planning Policy Provisions

- 4.2.1 Section 2.6.1 of Volume 4 (South Cork) of the CDP states that Little Island is one of the key employment locations in Metropolitan Cork, designated as a Strategic Employment Area in the 2014 CDP, and designated as a Strategic Employment Location in the 2022 CDP. The main vision for the area is to promote a high-quality workplace environment for the existing and future workforce population along with an expansion of the residential offering and supporting facilities.
- 4.2.2 Section 2.6.4 of the CDP states that Little Island presents a very significant opportunity to sustainably integrate employment and residential uses with public transport due to its rail service and high level of existing employment.
- 4.2.3 Section 2.6.23 of the CDP states that much of the land supply in Little Island is already developed and is identified as Existing Mixed/General Business/Industrial Uses built up area. It is also stated that provision has been made to reserve five areas for industrial development.
- 4.2.4 Section 2.6.27 states that given geographical constraints, vehicular access to Little Island is limited to the N25 interchange and slip roads off the Dunkettle Interchange, with most travel to and from the island during peak period by car. The road network within Little Island itself is also restricted. While a frequent rail service provides access to Kent Station and Midleton, the public transport offering on the island is very limited. As such, and while the Dunkettle Interchange upgrade works have improved vehicular access to and from Little Island, the area suffers from significant peak hour traffic congestion.
- 4.2.5 Relevant Objectives are as follows:

Objective No. LI-GO-06 *To ensure that future industrial development in Little Island does not negatively impact upon the amenity enjoyed by the existing residents of the area.*

Objective No. LI-I-01 (64.48ha) *Part of the site is liable to flooding.*

Industry. This site is located in close proximity to the Cork Harbour Special Protection Area. Screen planting and sensitive landscaping along the northern and eastern boundaries will be required to create a buffer between the SPA and the developed portion of the site and to protect views of Little Island from the N25. Areas within this site may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of same when considering new development proposals in this area.

The south western boundary contains the site of CO 077-025 Castle. This is a Recorded Archaeological Monument. The Zone of Archaeological Potential associated with the medieval castle may be quite extensive. Any development at the south west quadrant of the site will require a detailed Archaeological Assessment to clarify there is no subsurface archaeology within the development site before development can be considered in this area including geophysical survey and licensed archaeological testing.

Objective No. LI-I-02 (3ha)

Industrial estate and/or warehousing and distribution with provision for local access road.

This site is located in close proximity to the Cork Harbour Special Protection Area. Appropriate buffering and screening between new development and the SPA will be required. Areas within this site may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of same when considering new development proposals in this area.

Objective No. LI-I-03 (3.8ha)

Industrial estate and/or warehousing and distribution. In developing the site consideration should be given to the proximity of the NHA at the south-western edge of the site. This site contains an important semi natural grassland habitat of biodiversity value. Development of the site is to retain and protect the biodiversity value of the site as far as possible.

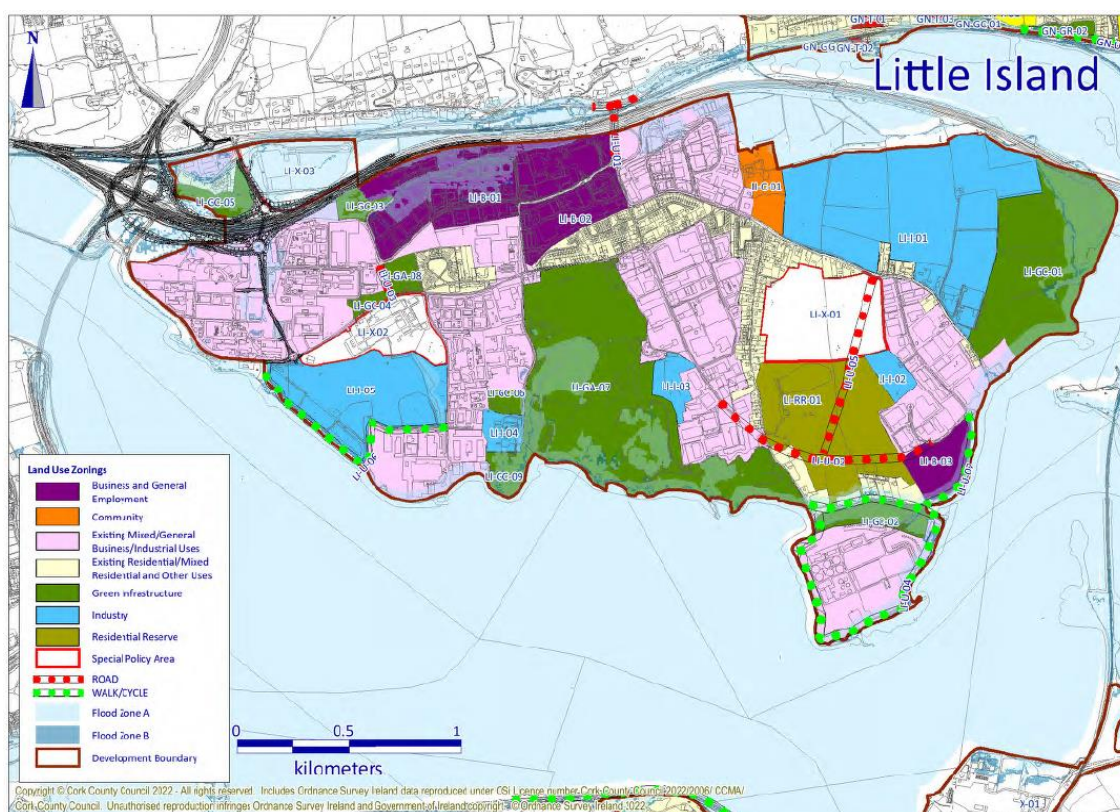
Objective No. LI-I-04 (3.5ha)

Industry

Objective No. LI-I-05 (27ha) Part of the site is liable to flooding.

Industry. This site is located in close proximity to the Cork Harbour Special Protection Area. Appropriate buffering and screening between new development and the SPA may be required. Areas within this site may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of same when considering new development proposals in this area.

4.2.6 The CDP zoning map is illustrated below showing the areas zoned for industrial development.



4.2.7 The screening assessment for the sites listed above is shown in Table 1 below

Site	SEL	Zoning	Size
LI-I-01	PASS	PASS	PASS
LI-I-02	PASS	PASS	FAIL
LI-I-03	PASS	PASS	FAIL
LI-I-04	PASS	PASS	FAIL
LI-I-05	PASS	PASS	PASS

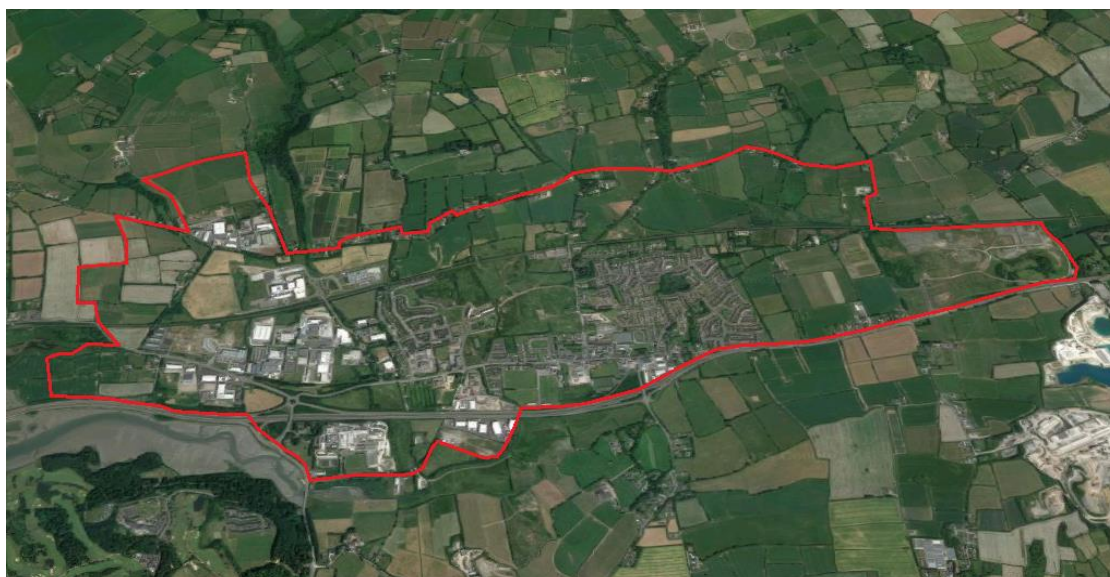
Table 1

4.2.8 As a result of the screening assessment, only two of the five sites are deemed to be reasonable alternatives.

5.0 CARRIGTWOHILL

5.1 Location

- 5.1.1 Carrigtwohill is located approximately 8km to the east of Cork City. The town is situated northern side by the N25 national road and has seen significant growth in population in the recent past.
- 5.1.2 Residential estates are located to the north and east of the main street. Commercial and employment areas are located at the western side of the town, in two large industrial estates, including the Industrial Development Authority (hereafter referred to as the IDA) held lands. Units on these premises are of an industrial scale, with international medical technology and pharmaceutical firms such as Stryker and GE Healthcare based here. Merck Millipore pharmaceutical plant is located to the south of the N25.
- 5.1.3 The Cork-Midleton Rail line runs to the north of the town and the town's new railway station on this line is located off Station Road. To the north of the rail line, substantial areas of agricultural land have been zoned for residential development.
- 5.1.4 Harpers Island, and Cork Harbour Special Protection Area and Great Island Channel Special Area of Conservation are directly south of town on the opposite side of the N25.
- 5.1.5 To the east of the town, the former Amgen site has been zoned for industrial use and is the location of the Ballyadam convertor station (under construction) for the Celtic Interconnector.



5.2 Local Planning Policy Provisions

5.2.1 Carrigtwohill is a Metropolitan Town within the County Metropolitan Strategic Planning Area.

5.2.2 Carrigtwohill is identified as a Strategic Employment Location in the Plan, is one of the primary locations for industrial development and an important location for high technology manufacturing. Carrigtwohill is located within Cobh Municipal District and identified as a Metropolitan Town.

5.2.3 Relevant development objectives are as follows

Objective No. CT-I-01: (c. 30.22ha) Industrial type activities including warehousing and distribution. Part of the site is liable to flooding. Traffic Impact Assessment and Road Safety Audit required.

Objective No. CT-I-02: (c. 29.4ha) Develop this site for industrial type activities giving priority to high quality manufacturing. Traffic Impact Assessment and Road Safety Audit required.

Objective No. CT-I-03: (c. 56.3ha) Industrial Development. The following criteria will need to be addressed in the development of the site:

Road improvements required to the National Primary network including a new grade separated interchange with the N25;

Road improvements to the local road network. These routes should be capable of providing public transport to connect the site with the town centre and railway station and adequate land should be reserved to facilitate likely future traffic growth;

The need to set aside land for a passenger station to serve the proposed development in the medium or longer term, subject to the selection of an agreed location in consultation with Iarnród Éireann;

The need to provide safe, attractive and convenient pedestrian and cycle permeability and connectivity.

The need for sensitive design providing for the retention and protection of the green infrastructure features (including protected species and habitats of high biodiversity value) which are known to occur on site.

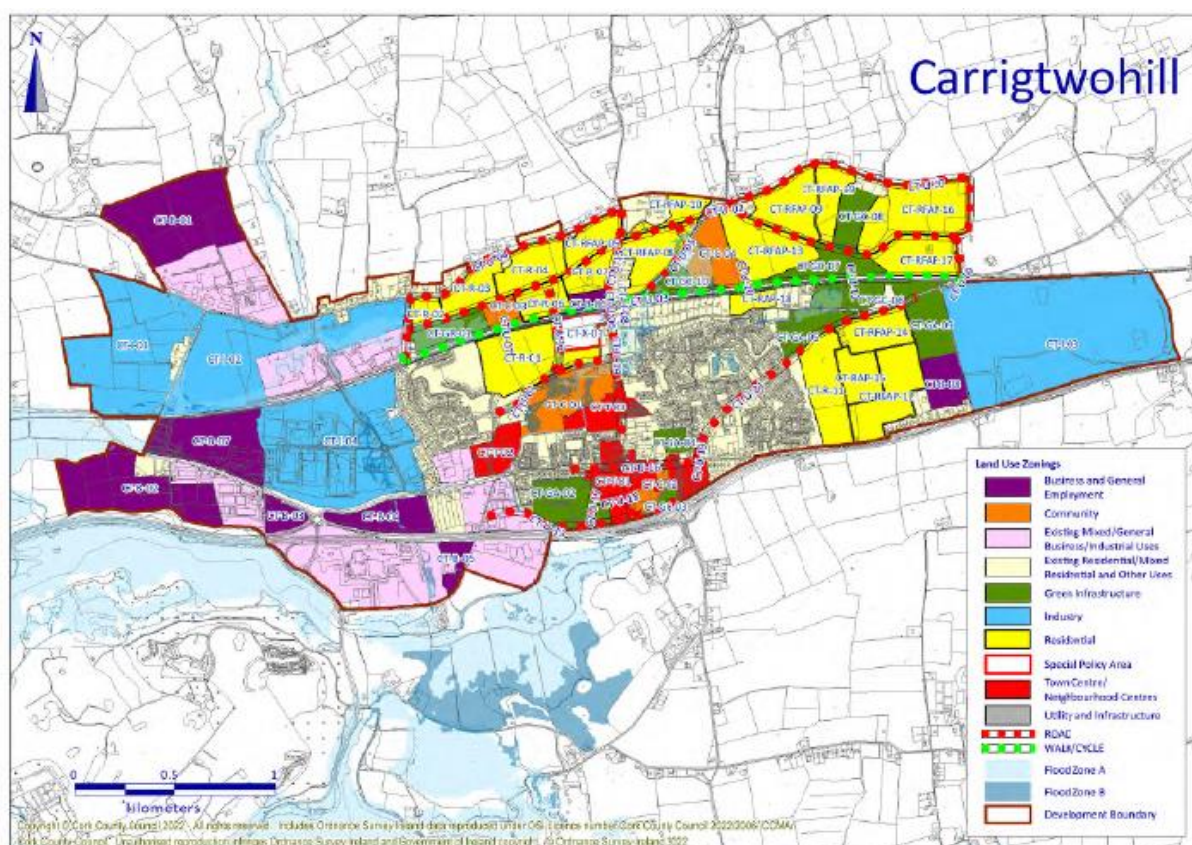
An appropriate landscaping and tree planting scheme will be implemented to enhance the setting of the development; and

A detailed Traffic Impact Assessment (TIA), Mobility Management plan and parking strategy that optimizes modal shift to public transport, cycling and walking will also be required.

Traffic Impact Assessment and Road Safety Audit required.

Objective No. CT-I-04: (c. 39.7ha) Maintain existing industrial uses. Part of the site is liable to flooding.

5.2.4 The zoning map is illustrated below showing the areas zoned for industrial development.



5.2.5 The screening assessment for the sites listed above is shown in Table 2 below.

Site	SEL	Zoning	Size
CT-I-01	PASS	PASS	PASS
CT-I-02	PASS	PASS	PASS
CT-I-03	PASS	PASS	PASS
CT-I-04	PASS	PASS	FAIL

Table 2

5.2.6 As a result of the screening assessment, three sites are deemed to be reasonable alternatives.

6.0 RINGASKIDDY

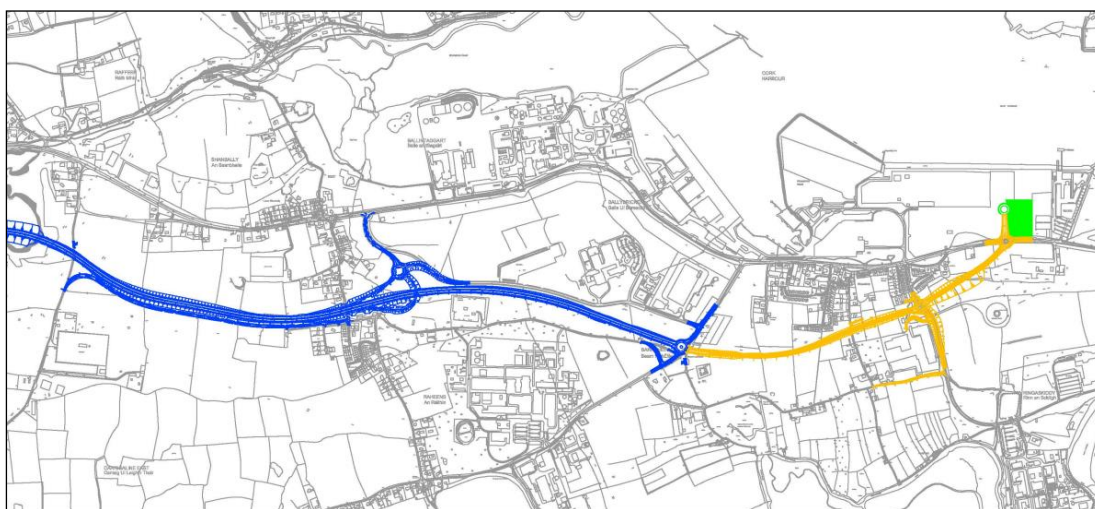
6.1 Location

- 6.1.3 Ringaskiddy is located circa 14km southeast of Cork City, and 5km east of the town of Carrigaline on the western side of the lower reaches of Cork Harbour. It is connected to the wider road network by the N28 National Primary Route which connects up to the Cork South Ring Road (N40) at the Bloomfield interchange at Rochestown.
- 6.1.2 The settlement originally comprised a small fishing village, however, its character was altered by the reclamation of extensive lands for industrial and port related development in the 1970s.
- 6.1.3 The village adjoins the Port of Cork deep-water ferry port facility which provides bulk cargo at Ringaskiddy West and passenger ferry and RoRo traffic at Ringaskiddy East. The wider surrounding area accommodates a series of significant industrial employers and pharmaceutical plants on large sites, including Pfizer, Hovione, Sterling, Johnson & Johnson and Thermofischer. These sites are interspersed between lands generally in agricultural use.
- 6.1.4 To the east of the ferry port, port lands are used for the storage of cars, adjoining the National Maritime College of Ireland. Between the college and Haulbowline Road is the site of the UCC Maritime research facility. Beyond this, at the eastern end of Ringaskiddy, Haulbowline Bridge provides access to Rocky Island and its crematorium, the naval service base on Haulbowline Island, and Haulbowline Island Recreational Park.
- 6.1.5 Approx. 2km northwest of Ringaskiddy on the N28 is the small village of Shanbally, which is also included within the development boundary of the settlement.



6.2 Local Planning Policy Provisions

- 6.2.1 Ringaskiddy is designated as a SEL and acknowledged as one of the key employment locations in Cork County, having the largest concentration of direct employment investment in the country outside of the Greater Dublin Area.
- 6.2.2 The Planning Authority's stated aim is to promote its development as a SEL suitable for large-scale industrial developments which are compatible with relevant environment, nature and landscape protection policies as they apply around Cork Harbour. Lands will be protected from inappropriate development which may undermine Ringaskiddy's role as a SEL. Policy objective RY-GO-01 of the CDP seeks to reaffirm Ringaskiddy's focus on industrial and port related roles which reflects its status as a Strategic Employment Location.
- 6.2.3 It is highlighted that the N28 is a critical piece of infrastructure which needs to be upgraded to dual carriageway and that failure to do so will have severe competitive and economic implications for both the Metropolitan Cork area and the region as a whole. The M28 Cork to Ringaskiddy Road, which is to commence construction, also includes a 1.5km single carriageway protected road linking to the eastern side of Ringaskiddy, which is being undertaken as "advance works" and is already under construction.



- 6.2.4 Relevant development objectives in the CDP are as follows:

Objective No. RY-I-01: (c. 11.42ha) Industry including ancillary uses such as associated offices, laboratories, manufacturing and utilities. Any development on this site will need to take account of the biodiversity sensitivities of the site and area, including the retention and integration of mature hedgerows habitat.

Objective No. RY-I-02: (c. 10.82ha) Industry including ancillary uses such as associated offices, laboratories, manufacturing and utilities. This zoning adjoins the Cork Harbour Special Protection Area and Monkstown Creek proposed Natural Heritage Area. Appropriate buffering and screening between new development and

these sites will be required. Any development on this site will need to take account of the biodiversity sensitivities of the site and area. Part of the site is liable to flooding.

Objective No. RY-I-03 (c. 13.26ha) Industry with provision for appropriate landscaping, along the north western boundary to residential areas.

Objective No. RY-I-04: (c. 14.38ha) Industry, with provision for appropriate landscaping, along the eastern and northern boundary to residential areas.

Objective No. RY-I-05: (c. 24.44ha) Industry, with provision for appropriate landscaping, along the eastern and southern and south western boundaries to residential areas.

Objective No. RY-I-06: (c. 8.3ha) Suitable for industry including small to medium sized enterprises with appropriate measures taken, in consultation with the relevant competent authorities, to take account of the presence of the ring fort on the site. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area.

Objective No. RY-I-07: (c. 3ha) Industry including small to medium sized units. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area.

Objective No. RY-I-08: (c. 51.13ha) Large standalone industry with suitable provision for landscaping and access points from the R613 and provision for appropriate landscape buffering, to all residential areas. This zone is adjacent to Lough Beg which forms part of the Cork Harbour Special Protection Area. Lough Beg and some of the fields in the area are known to be particularly important for field feeding species of bird for which the SPA is designated. It will be necessary to retain a portion of this land in an undeveloped state to avoid negative impacts on the SPA. The southern portion of the zone is known to be of particular importance for wintering birds. Part of the site is liable to flooding. Appropriate buffering and screening between new development and the SPA will be required. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area.

Objective No. RY-I-09: (c.10.19ha) Suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities.

This site is considered inappropriate for any short or full time residential accommodation.

Any existing access to the nearby Martello tower which crosses this site should be protected and provision for an open space buffer to any existing access will need to be provided.

Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area. Part of the site is liable to flooding.

Objective No. RY-I-10: (c. 15.15ha) Industry, with provision for appropriate landscaping along the northern boundary with green infrastructure (RY-GC-06) and to the residential areas to the south and western boundaries of site. Part of the site is liable to flooding.

Objective No. RY-I-11: (c. 14.78ha) Industry, with provision for the maintenance of a planted buffer zone along the southern boundary to nature conservation area, the scale of which will be determined at project level. This zone adjoins the Cork Harbour SPA. Appropriate buffering and screening between new development and the SPA will be required. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area. Part of the site is liable to flooding.

Objective No. RY-I-12: (c. 2.6ha) Industry, with provision for appropriate landscaping along the eastern, southern and south western boundaries to residential areas.

Objective No. RY-I-13: (c. 14.5ha) Industry, with provision for the maintenance of a planted buffer zone along the southern boundary to nature conservation area. Appropriate buffering and screening between new development and the SPA will also be required. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area. Part of the site is liable to flooding.

Objective No. RY-I-14: (c. 14.99ha) Industry with provision for appropriate landscaping, in particular along the western boundary.

Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).

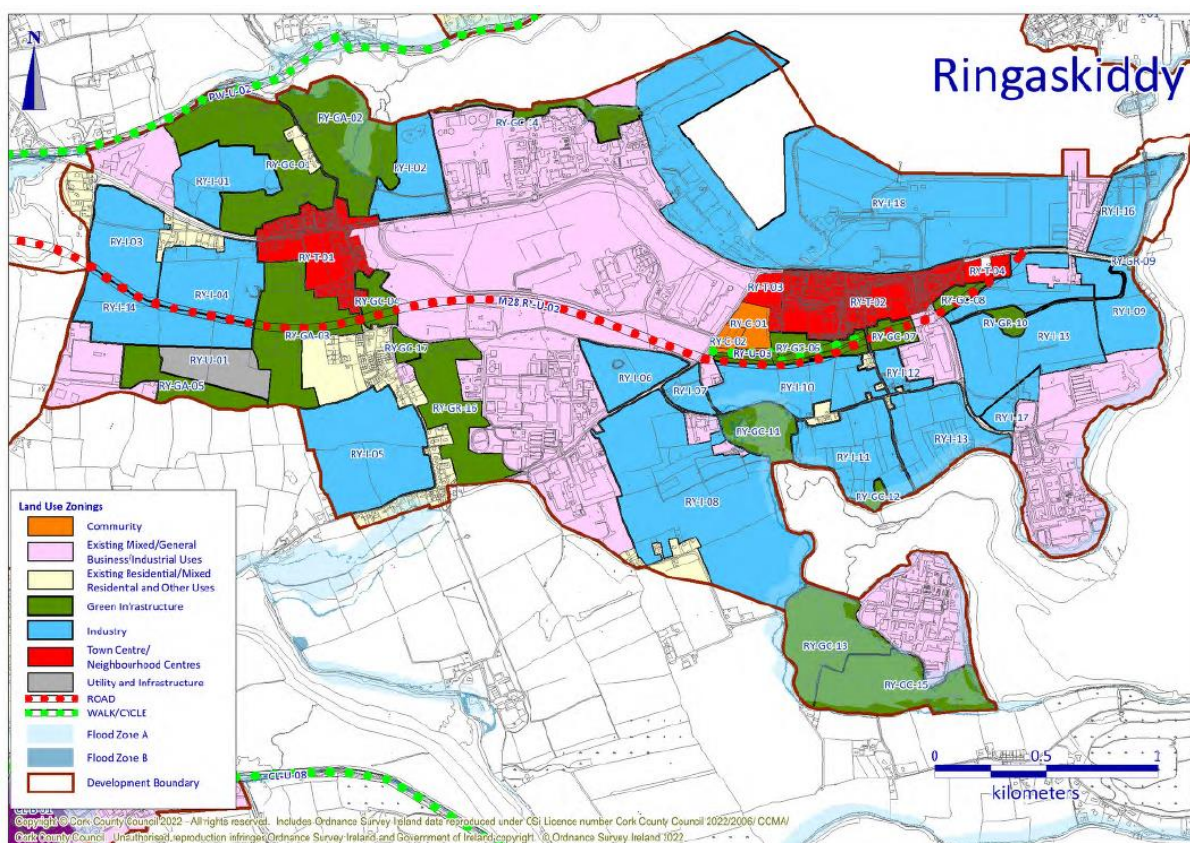
Objective No. RY-I-16: (c. 9.5ha) Suitable for the extension of the adjacent Third Level Educational Campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities.

This site is considered inappropriate for any short or full time residential accommodation. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area. Part of the site is liable to flooding.

Objective No. RY-I-17: (c. 3.12ha) Port related industry with appropriate landscaping where necessary. This area may be used as a feeding ground by bird species for which Cork Harbour SPA is designated. Appropriate buffering and screening between new development and the SPA will also be required. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area.

Objective No. RY-I-18: (c. 92.67ha) Port Facilities and Port Related Activities. This zone is adjacent to the Cork Harbour SPA and Monkstown Creek proposed Natural Heritage Area pNHA. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area. Part of the site is liable to flooding.

6.2.8 The CDP zoning map is illustrated below showing the areas zoned for industrial development (those areas illustrated in light blue).



6.2.9 The screening assessment for the sites listed above is shown in Table 3 below.

Site	SEL	Zoning	Size
RY-I-01	PASS	PASS	PASS
RY-I-02	PASS	PASS	PASS
RY-I-03	PASS	PASS	PASS
RY-I-04	PASS	PASS	PASS
RY-I-05	PASS	PASS	PASS
RY-I-06	PASS	PASS	PASS
RY-I-07	PASS	PASS	FAIL
RY-I-08	PASS	PASS	PASS
RY-I-09	PASS	PASS	PASS
RY-I-10	PASS	PASS	PASS
RY-I-11	PASS	PASS	PASS
RY-I-12	PASS	PASS	FAIL
RY-I-13	PASS	PASS	PASS
RY-I-14	PASS	PASS	PASS
RY-I-15	PASS	PASS	PASS
RY-I-16	PASS	PASS	PASS
RY-I-17	PASS	PASS	FAIL
RY-I-18	PASS	PASS	PASS

Table 3

6.2.10 As a result of the screening assessment, three of the sites were screened out and of the remaining thirteen sites (note RY-I-09 & RY-I-15 in the above table are where the current Indaver-owned site is located), all are deemed to be reasonable alternatives.

7.0 WHITEGATE

7.1 Location

- 7.1.1 Whitegate is located circa 18km southeast of Cork City centre, and 5km south of the town of Midleton on the eastern side of the lower reaches of Cork Harbour. Beyond, to the south, lies Roches Point at the mouth of the harbour. Whitegate is connected to the wider road network via the R630 regional road which connects to the N28 National Primary Route at Midleton.
- 7.1.2 The settlement comprises four main areas of development: Rostellan, Farsid, Aghada and Whitegate. It is home to Ireland's only oil refinery and three power stations, including the Aghada Power Station, the largest in the country and thus plays an important role in the country's energy sector.
- 7.1.3 The refinery and associated industrially zoned lands are located to the south of Whitegate village, while the power station and associated lands are located to its north. The old village is focused on the shoreline at Whitegate Bay with new residential development on higher ground to the rear.
- 7.1.4 Approximately 1.8km northeast of Whitegate is the village of Aghada, comprising upper and lower parts, and which area also included with the development boundary of the settlement. The wider area, including a site zoned for a future energy park, are in agricultural use.



7.2 Local Planning Policy Provisions

- 7.2.1 Similar to Ringaskiddy, while the amenity of existing residents is to be protected, the development of the area's industrial and harbour roles takes primacy in local planning policy provisions. The CDP states:

3.8.1 The overall strategic aim for Whitegate and Aghada is to promote its role as a location for the storage and processing of strategic energy resources, consolidating its industrial and harbour related roles within this sensitive coastal setting and with limited expansion of residential uses. Whitegate has been designated as a Strategic Employment Location in this plan suitable for large scale employment development, i.e., large stand-alone uses which require significant amounts of land.

- 7.2.2 Whitegate's importance to the country's energy sector is highlighted, producing 25% of national energy and holding 90% of the national oil reserves:

3.8.10 Whitegate has a nationally important role in the energy sector being the location of the country's only oil refinery and also accommodating three power stations. Between fuel and energy production the Whitegate area can deliver 25% of the country's energy needs. The designation of the settlement as a Specialist Employment Centre in the Plan is recognition of the importance of this role.

- 7.2.3 Relevant development objectives are as follows:

WG-I-01: c. 30.2ha. Development of small to medium scale energy related uses, including research and development, maintenance and transport uses. Any development proposals shall provide for the upgrading of the county road adjoining the site up to the junction with the R630 regional road.

WG-I-02: c. 2.8ha. Development of uses ancillary to the adjoining established industrial area such as car parks, staff facilities, administration buildings or the storage of non-hazardous materials. Special attention will be paid both to the design and siting of any large structures or buildings and to the provision of appropriate structural landscaping. This zone is adjacent to the Cork Harbour Special Protection Area. Development proposals must provide for sufficient stormwater attenuation and may require the provision of ecological assessments.

WG-I-03: c. 4.5ha. Development of uses ancillary to the adjoining established industrial area such as car parks, staff facilities, administration buildings or the storage of non-hazardous materials. Special attention will be paid both to the design and siting of any large structures or buildings and to the provision of appropriate structural landscaping.

WG-I-04: c. 56.3ha. Provision for the extension of the adjoining established industry area including new port related activities and bulk liquid storage. Special attention will be paid both to the design and siting of large structures or buildings and to the provision of appropriate structural landscaping. Proposals for the development of this site shall include proposals for the provision of long term structural landscaping on site WG-O-16. Proposals on this site shall also include adequate measures for the protection of recorded monuments on site.

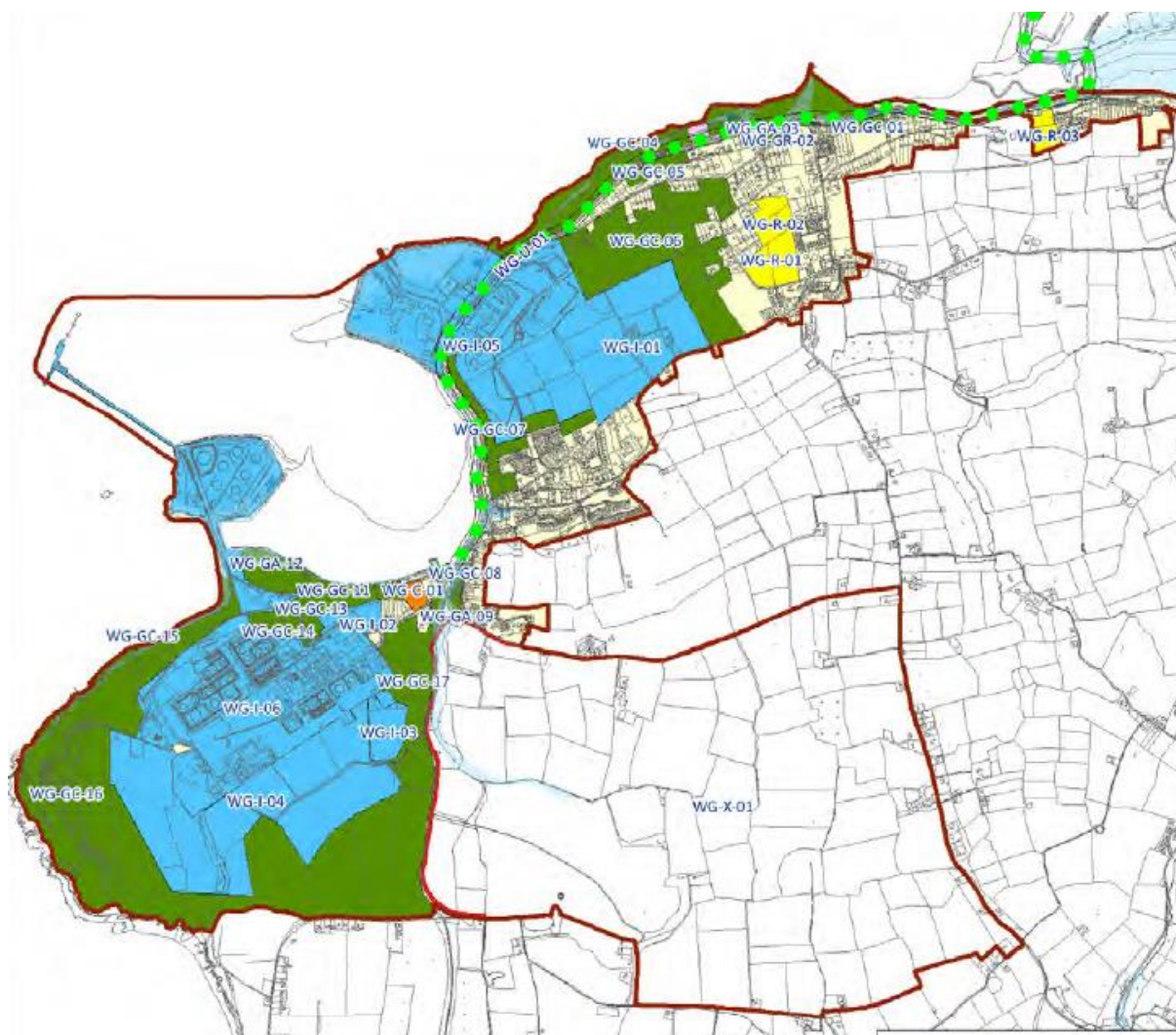
WG-I-05: c. 66.6ha. Maintain existing industrial/ electricity generation uses. Any new development on the site shall pay special attention both to the design and siting of any large structures or buildings so as to minimise the visual impact of development, including on longer distance views from the Cobh area, and shall include the provision and maintenance of structural landscaping to the western and southern site boundaries. The site contains Recorded Monument CO088-030 – Castle unclassified and CO088-105 & 106 – Shell Middens. Any development in this area should take this into account and may require an archaeological assessment. Part of this site is liable to flooding.

Sustainable Urban Drainage Systems (SUDS) and sufficient storm water attenuation will be required for any development which may be permitted in this area. This zone is adjacent to Whitegate Bay which forms part of the Cork Harbour Special Protection Area. Account will be taken of this when assessing new development proposals in this area. Buffering or screening may be required between new development in this zone and the SPA.

WG-I-06: c. 88ha. Maintain existing refinery/ industrial uses. Any new development on the site shall pay special attention both to the design and siting of large structures or buildings and to the provision of appropriate structural landscaping. The site contains a Recorded Monument CO088-029 – Burial Ground. Any development in this area should take this into account and may require an archaeological assessment.

Sustainable Urban Drainage Systems (SUDS) and sufficient storm water attenuation will be required for any development which may be permitted in this area. This zone is adjacent to Whitegate Bay which forms part of the Cork Harbour Special Protection Area. Account will be taken of this when assessing new development proposals in this area. Buffering or screening may be required between new development in this zone and the SPA. Part of this site is liable to flooding.

- 7.2.4 The CDP zoning map is illustrated below showing the areas zoned for industrial development (those areas illustrated in light blue).



7.2.5 The screening assessment for the sites listed above is shown in Table 4 below.

Site	SEL	Zoning	Size
WG-I-01	PASS	FAIL	-
WG-I-02	PASS	FAIL	-
WG-I-03	PASS	FAIL	-
WG-I-04	PASS	FAIL	-
WG-I-05	PASS	FAIL	-
WG-I-06	PASS	FAIL	-

Table 4

7.2.6 All of the sites identified in Whitegate do not pass the screening assessment as the zoning objectives do not support the development of a large scale waste to energy recovery facility, either being specifically identified as being to support small to medium scale energy related uses, or suitable ancillary to the oil refinery use, or an extension to the adjoining industrial area. Therefore, there are no reasonable alternatives available in this area.

8.0 KILBARRY

8.1 Location

- 8.1.1 The Kilbarry Strategic Employment Location is located on the northside of Cork City to the immediate north of Blackpool and west of residential estates in the Ballyvolane area. It is approximately 5km from Cork City Centre and extends over an area of c. 77ha.
- 8.1.2 The IDA Ireland owns the SEL, the southern parts of which are already developed and form part of the Kilbarry Business Park. Existing companies occupying the Park are largely focused on the manufacturing, technology and international services sectors. These southern areas slope steeply, are traversed by overhead power lines and overlook the Blackpool Valley. The northern areas are topographically level, undeveloped and currently in agricultural use.
- 8.1.3 The lands are accessed via Dublin Hill which is a steeply sloping urban road leading into Blackpool and providing access to the N20. The Cork-Mallow rail line runs along the southern boundary where the disused Kilbarry rail station is located.
- 8.1.4 Lands to the east and south form part of the built-up urban area. The residential estates of Glenthorn, Thorndale and Kinvara are accessed off Dublin Hill. Beyond these are more low-density residential uses at Dublin Pike. To the west, lie the Delaney's GAA complex and lands zoned for residential use. To the south is the Blackpool Valley, incorporating a large number of commercial uses, including Blackpool Shopping Centre and Blackpool Retail Park.



8.2 Local Planning Policy Provisions

8.2.1 Objective 10.78 of the Cork City Development Plan, 2022 seeks to support the compact growth and development of Blackpool/Kilbarry Expansion Area as a strategic City expansion area, as identified in the Core Strategy. All development shall be designed, planned and delivered in a coordinated and phased manner, using a layout and mix of uses that form part of an emerging neighbourhood integrated with the wider area.

8.2.2 The Core Strategy set out in the CDP states:

Consolidate and enhance by providing a mix of new neighbourhood uses in suitable underutilised locations. Prioritise walking, cycling and public transport access. Deliver uses, layouts and densities that enhance existing local character. Deliver high quality sustainable transport orientated development in combination with high frequency bus routes, the new commuter station at Blackpool (Kilbarry) and prioritised cycling and walking routes set out in CMATS.

8.2.3 Further, the Development Plan, in terms of the development objectives for Kilbarry, states:

Objective 10.79:

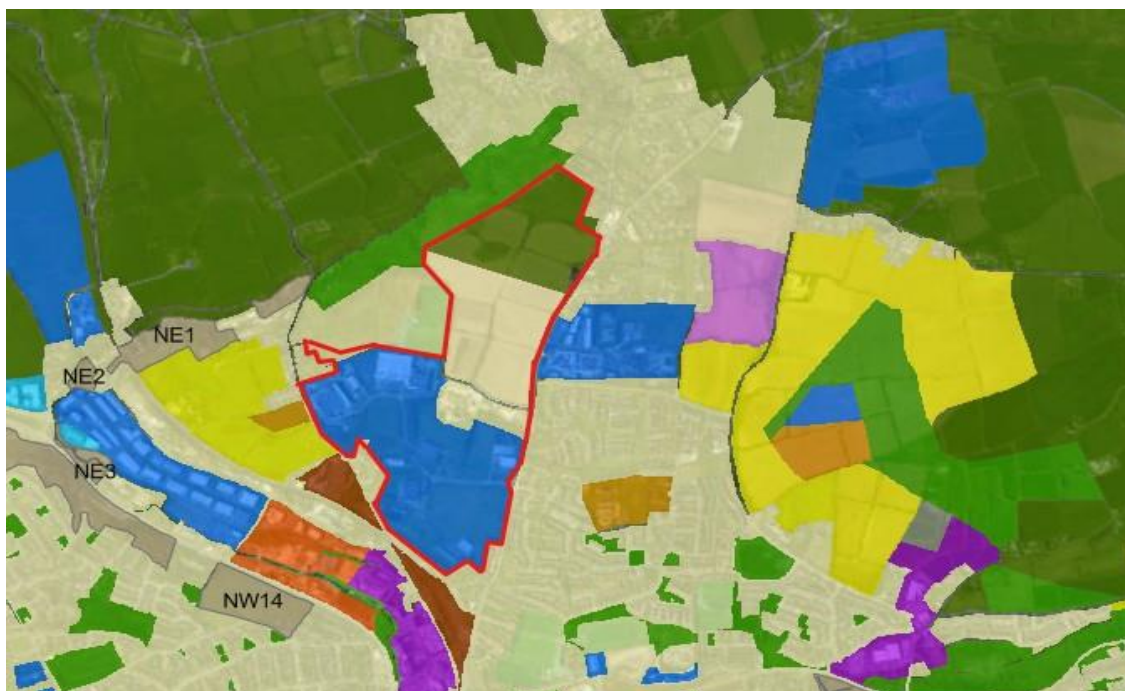
Blackpool / Kilbarry Framework Plan

Cork City Council will produce a Framework Plan for the development of the Blackpool / Kilbarry area. The coordinated provision of services, infrastructure, mix of land uses, transport and mobility, quality urban design and development will form part of the overall framework.

Objective 10.81:

- a. *To create a high quality, vibrant, distinct and accessible mixed-use urban centre in Blackpool, serving as an attractive northern gateway to the City and a desirable destination for northside suburban communities, encompassing a mix of retail, employment, residential, community and recreational uses.*
- b. *To facilitate the development of an integrated public transport interchange centred on the creation of a new commuter rail service and connecting bus services. To encourage and support sustainable residential and employment development in the Kilbarry area along with upgrades in public transport and roads infrastructure.*
- c. *To respect and enhance the built heritage and architectural character of the area, through the creation of a high quality public realm and high standards of building design.*
- d. *To preserve and enhance the sensitive and distinct landscape, visual character and biodiversity of the area and in turn provide for recreational uses, open space and amenity facilities.*

8.2.4 The City Development Plan zoning map is illustrated below showing the areas zoned for Light Industry and Related Uses (areas illustrated in light blue). Subject site illustrated in red.



8.2.5 The relevant land use zoning objective is as follows:

Zoning Objective Z09 - Light Industry & Related Uses:

To provide for light industry and related uses.

8.2.6 Relevant development objective is as follows:

Objective 7.15, Light Industry: To protect areas zoned for light industry for such uses in order to maintain an adequate supply of light industrial space and employment in order to help ensure a diverse range of employment opportunities in the city.

8.2.7 The screening assessment for this site is presented in Table 5 below.

Site	SEL	Zoning	Size
Z09	PASS	FAIL	-

Table 5

8.2.8 It can therefore be concluded that there are no reasonable alternative sites in the Kilbarry SEL.

9.0 BOTTLEHILL

9.1 Location

- 9.1.1 Bottlehill, as designated in County Council planning policy, is located approximately 18km north of Cork city centre, 9km to the southeast of the town of Mallow and to the northeast of the village of Burnfort and the N20 national roadway.
- 9.1.2 It is located in an upland rural area where the predominant land uses are agriculture and forestry with dispersed one-off residential dwellings along local roads in the wider area. The access roadway from the N20 has been constructed to the site entrance.
- 9.1.3 The area extends over c.590ha on lands within the townlands of Tooreen South. Coom (Hudson) Coom (Fitzgerald) and Glashaboy North.
- 9.1.4 Planning permission was granted in 2004 for the development of a landfill facility with associated road access infrastructure. Although developed, it has not become operational due to a surplus of existing landfill space in Cork and EU levies on landfill facilities. Approximately 660,000 tonnes of landfill space has been built, from a total estimated available space of 5,400,000 tonnes. Cork County Council has recently sought expressions of interest for the sale/reuse of the site.
- 9.1.5 Large parts of the designated area are in use as forestry plantations with both mature and semi-mature trees.



9.2 Local Planning Policy Provisions

9.2.1 Section 15.12.14 of the CDP states that:

The Bottlehill Landfill site has been subject of considerable strategic investment to date by Cork County Council. This significant piece of infrastructure has approximately 660,000 tonnes of landfill space built, from a total estimated available space of 5,400,000. As a result of national and regional policy, which included the introduction of a landfill tax, there has been a shift away from the use of landfill, resulting in the Bottlehill Landfill site not becoming operational. However, it is recognised that Bottlehill could be reconfigured to meet other waste management infrastructural needs to deliver the aims of the Circular Economy Action Plan with scope for a specialised role in the area of integrated waste management and waste to energy. Across Europe there are established integrated waste management developments, including waste to energy, which combine a number of facilities on a single site.

9.2.2 Policy Objective BE 15-15b) in relation to Waste Prevention and Management of Waste Facilities seeks to:

b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy.

8.2.9 The screening assessment for this site is presented in Table 6 below.

Site	SEL	Zoning	Size
Bottlehill Landfill	PASS	PASS	PASS

Table 6

9.2.3 It can be concluded from the assessment that Bottlehill site is a reasonable alternative.

10.0 CONCLUSION

- 10.1 The proposed development is a strategic large-scale waste to energy recovery facility. It is strategic as it addresses an identified need in the National Waste Management Plan. The development of strategic large-scale waste to energy recovery facilities is directed, by reference to paragraph 2.16.5 and Policy Objective EC: 8-3 of the CDP, to industrially zoned lands within Strategic Employment Locations.
- 10.2 The assessment has identified 19no. reasonable alternative sites, as set out below:

Little Island – 2no. sites

Site	SEL	Zoning	Size
LI-I-01	PASS	PASS	PASS
LI-I-05	PASS	PASS	PASS

Carrigtwohill – 3no. sites

Site	SEL	Zoning	Size
CT-I-01	PASS	PASS	PASS
CT-I-02	PASS	PASS	PASS
CT-I-03	PASS	PASS	PASS

Ringaskiddy – 13no. sites (in addition to Indaver's own site (RY-I-09 and RY-I-15))

Site	SEL	Zoning	Size
RY-I-01	PASS	PASS	PASS
RY-I-02	PASS	PASS	PASS
RY-I-03	PASS	PASS	PASS
RY-I-04	PASS	PASS	PASS
RY-I-05	PASS	PASS	PASS
RY-I-06	PASS	PASS	PASS
RY-I-08	PASS	PASS	PASS
RY-I-09	PASS	PASS	PASS
RY-I-10	PASS	PASS	PASS
RY-I-11	PASS	PASS	PASS
RY-I-13	PASS	PASS	PASS
RY-I-14	PASS	PASS	PASS
RY-I-15	PASS	PASS	PASS
RY-I-16	PASS	PASS	PASS
RY-I-18	PASS	PASS	PASS

Kilbarry – no sites

Whitegate - no sites

Bottlehill – 1no. site

Site	SEL	Zoning	Size
Bottlehill Landfill	PASS	PASS	PASS