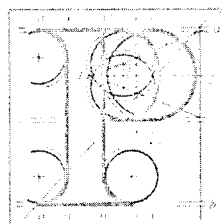


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Catriona Reid
31 Sheraton Court
Hartland's Avenue
Glasheen
Co. Cork

Date: 24 November 2025

Re: Proposed development of a resource recovery centre (including waste-to-energy facility)
in Ringaskiddy, County Cork.

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Commission will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

Teil	Tel	(01) 858 8100
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Ríomhphost	Email	communications@pleanala.ie

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 waste incinerator by Indaver NV, t/a Indaver Ireland.

From: Catriona Gannon-Reid, 31 Sheraton Court, Hartland's Avenue, Glasheen, Cork

And: Cathal Gannon-Reid, 31 Sheraton Court, Hartland's Avenue, Glasheen, Cork
17th November, 2025

To whom it may concern,

My name is Catriona Gannon-Reid and I am a research assistant working in the MaREI Centre, Beaufort Building, UCC. My background and experience is in politics and policy – I studied Government and Political Science in UCC – and my work experience is on various community and stakeholder engagement projects in the MaREI Centre.

My objections regarding this planning application are as follows:

Safety concerns regarding the Beaufort Building

I work in the MaREI Centre in the Beaufort Building, and the proposed development site is visible from the top floor window of my building. I am concerned about the impact that this development would have on the visual amenity from our office. As we are a clean energy and marine research centre, we often welcome project partners from across Europe to our building for project kick-off meetings and workshops, etcetera. It does not give a good impression of our organisation for our prospective project partners to see a waste incinerator running constantly, emitting a hazardous plume, which would be visible from our building. Indeed, the Cork County Development Plan (Vol 4) recognizes the importance of promoting and prioritizing the third level educational facilities in Ringaskiddy (see sections 1.7.23 and 1.7.34-35):

- 1.7.23 There is a need to promote and support the educational facilities available in Ringaskiddy by UCC. These facilities that exist need increased provision for student accommodation and amenities. As UCC further develops its research and teaching facilities at Ringaskiddy, there will be an increased demand for accommodation for students, researchers, and short term visitors. Accommodation in Ringaskiddy is limited with the only available student accommodation being linked to the NMCI. Lack of suitable short term accommodation in the Ringaskiddy area will restrict UCC's ability to attract post graduate researchers and visiting collaborative researchers/lecturers. Any student, staff and short term visitor accommodation should be catered for within the town centre of Ringaskiddy at an appropriate scale.

- 1.7.34 Work has recently been completed of the national Beaufort Laboratory adjacent to the NMCI and this will be extended into a maritime energy, science campus. Additional suitable lands have been identified to allow for the possible expansion of these marine educational related facilities. There is a need to promote Ringaskiddy as an Energy Hub and recognise the role that the Cork harbour region currently plays in facilitating Ireland's existing and future energy demands. (Future energy streams will require new port facilities in deepwater which will be outlined in Port of Cork 2020 -2050 Strategic Plan.
- 1.7.35 The overall effort in the marine research area can be seen as an attempt to build up a critical mass of sector related businesses and skills or Cluster in the Cork area, somewhat analogous to the Cork Harbour Development Plan in the 1970s and UCC's National Microelectronics Research Centre in the 1980s. Such initiatives are necessary if the region is to develop and retain worthwhile sources of competitive advantage. They involve a willingness to commit substantial resources, ahead of potential competitors, and often also to adopt a relatively long term view in relation to results.

Regarding safety concerns arising from being so close to the proposed facility, I am not reassured by the hazard risk assessment (Appendix 6.1 of Indaver's application). Here, I refer to section 1.3.1 *Neighbouring Land Use* of Appendix 6.1 – while other neighbouring land uses are rightfully mentioned, such as the National Maritime College of Ireland (NMCI), Yara, and the Hammond Lane facility, no such mention is made of the Beaufort Building. Indeed a CTRL+F search for “Beaufort Building” or “MaREI” does not yield any results in Appendix 6.1.

As we know, incinerators are dangerous facilities. At Indaver's facility in Antwerp, Belgium, an explosion occurred in 2016 and then again in 2018, the latter of which sadly ended in the loss of a life¹. It is deeply concerning that a similar facility could be built in Ringaskiddy so close to housing, so close to amenity sites on Gobby Beach and Luc Beach and Spike Island, and educational/research institutions such as the NMCI and MaREI. The only access route in or out of the Beaufort Building is the L2545 – however, our evacuation would be blocked by the incinerator itself if an accident was to occur.



Figure 1: Antwerp facility explosion in 2018

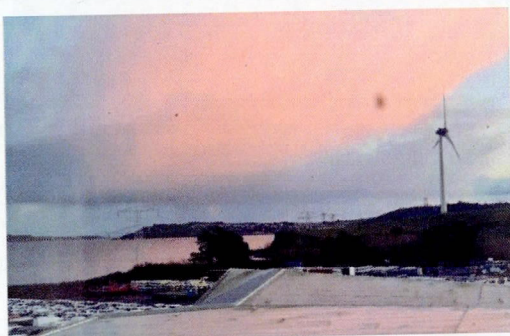


Figure 2: The Indaver site viewed from 4th floor of Beaufort Building

¹ <https://www.brusselstimes.com/50713/death-after-explosion-in-antwerp-waste-treatment-firm>

Policy considerations and flood risk

The Cork County Development Plan (Vol 4) recognises the importance of “ensuring the amenity and quality of life experienced by the residents [of Ringaskiddy] will not be compromised” (section 1.7.15). Similarly, in section 1.7.22, the Plan emphasises that “greater recognition will be given to the needs of the established resident community.” As this is one of the longest running planning disputes in Irish legal history, I would argue that the stress and fatigue caused by repeated applications by Indaver on the same site has already done huge damage to the local population’s mental health – and that the best way to prioritise the residents’ quality of life is to halt the proposed development.

- 1.7.15 Whilst the Plan does not intend to provide for any significant additional population growth it does aim to maintain the current population of the settlement whilst also ensuring that the amenity and quality of life experienced by the residents will not be compromised by development of Ringaskiddy as a strategic employment location.
- 1.7.22 While it is the Councils intention to develop Ringaskiddy as a Strategic Employment Location within Metropolitan Cork, there is a need to protect the amenity afforded to the existing communities of Ringaskiddy village and Shanbally. Balancing these two requirements is a challenge which will require much consideration. While Cork County Council will continue to promote the employment role of Ringaskiddy greater recognition will be given to the needs of the established resident community.

Furthermore, this site is unsuitable for this development as the 2021 Strategic Flood Risk Assessment deems that the proposed development site (RY-I-09) is at risk of flooding and development should be avoided (SFRA pg. 75)².

Zoning

The proposed site in question lies between two sites in the County Development Plan – these are sites RY-I-09 and RY-I-15. The zoning objectives for these sites are as follows (pgs. 64-65 of CDP):

RY-I-15	<p>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).</p>	28.84
RY-I-09	<p>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.</p> <p>This site is considered inappropriate for any short or full time residential accommodation.</p> <p>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.</p> <p>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. *</p>	10.19

With regards to zoning, there are several points worth making.

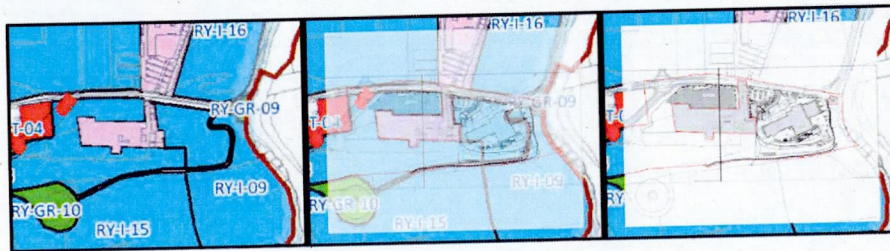
Firstly, although the proposed incinerator site does indeed cross over between two different zones (RY-I-09 and RY-I-15), the actual *incinerator* is built almost entirely on RY-I-09, which is

² <https://www.corkcoco.ie/sites/default/files/2022-04/updated-strategic-flood-risk-assessment-october-2021-pdf.pdf>

zoned for educational use. The remainder of Indaver's land, zoned RY-I-15, is left undisturbed. However, In Indaver's Planning Report (pg. 8), it states that: "the site is predominantly zoned RY-I-15 and **part** zoned RY-I-09" [emphasis added]. This leads the reader to believe that only a **small** portion of land zoned for educational use (RY-I-09) will be occupied by the incinerator, when in fact the incinerator will be built almost **entirely** on this land. Additionally, the incinerator would make it more difficult for the rest of site RY-I-09 to be used for its intended educational purpose, as not only would the location of the incinerator make access to the site challenging but the plume and dioxin deposition would make it an unattractive place to build an educational facility.

For illustrative purposes I have created a deck of composite photos where I have layered an image of the site as proposed by Indaver over an image from the County Development Plan to show the exact placement of the incinerator in relation to sites RY-I-09 and RY-I-15:

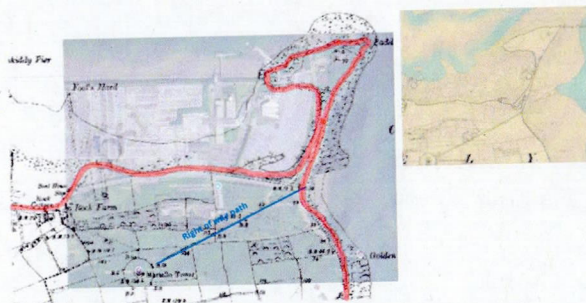
Composite map of Indaver site showing that the incinerator would be almost entirely built on land zoned for education (RY-I-09).
by Catriona Gannon-Reid



Left: Ringaskiddy zoning map (County Development Plan)
Middle: Composite map
Right: Incinerator site as proposed by Indaver

Secondly, the zoning objective for RY-I-09 states that: "Any **existing** [emphasis added] 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." Here, there are two points which I wish to address:

Diagonally crossing the Indaver site is a right of way path connecting the Martello Tower to Gobby Beach. This path was used by British soldiers to carry supplies back and forth between the tower and the beach when the tower formed a crucial part of a defensive network in the nineteenth century, and this pathway has remained a walkway in the years since. In the image below, I have overlaid an image from Google Maps with an image from the 1897 OSI map showing how the right of way path crosses directly over the Indaver site. If built, the incinerator would not be consistent with this aspect of the zoning objective as it would destroy the right of way path.



Indaver provide for a new amenity walkway in their application – however, this new pathway is also not sufficient to meet this aspect of the zoning objectives as Indaver cannot guarantee the new walkway will not be impacted by coastal erosion causing the cliff face to recede. In Chapter 13 of the Environmental Impact Statement, Indaver say the following:

However, the study found that there could be a risk of an impact on a small section of the proposed development after 40 years however this would be confined only to the amenity walkway and viewing platform outside of the security fence line.

If the incinerator is built, the *existing* right of way path will be destroyed and replaced with an amenity walkway – however, Indaver cannot guarantee this new walkway will not also be eroded over time, which would completely and permanently destroy the access between the Martello Tower and Gobby Beach which has been in place since the nineteenth century.

In conclusion, I sincerely request an oral hearing to ensure proper public participation in this process – and I request that An Coimisiún Pleanála denies permission to Indaver on the grounds I have outlined above.

Sincerely,

Catriona Gannon-Reid

My name is Cathal Gannon-Reid and I am an environmental scientist with previous work experience in the MaREI Centre based in the Beaufort Building in Ringaskiddy and currently I am the fieldwork lead on an EPA funded project with the Geography Department in UCC. I have some strong concerns about the pending application from applicant Indaver for building a resource recycling centre on the coast edge in Ringaskiddy. I don't believe Indaver have done due diligence or presented comprehensive enough information to inform the public about their development in the harbour.

Coastal Protection proposed measures:

Firstly I am concerned about Indaver's planned use of sacrificial shingle as a coastal protection plan for the glacial till cliffs. The main concerns are potential negative impacts on the local environment, the stability of the glacial till cliff face, and the accessibility to Gobby Beach. Firstly I am concerned that the shingle to be placed on the beach has no clear origin point. A point that is massively important for placing material at the coast is that it is compatible with the local material. In none of Indaver's documents do they say where the material will be sourced from. They only claim that it will be "shingle of appropriate size and rounded shape with high density and resistance to abrasion". In my opinion this is not good enough. They should have a clear origin point stated for where the material will be coming from. If they do not know this at this point I would be incredibly hesitant to grant any planning permission to allow this to happen with such a blanket statement like this. The company could bring in material that fits that description but it materially not suited to the beach. This is especially troubling as it is an environment comprised of glacial materials. Glacial till is unsorted, not well consolidated material. Adding unknown/unspecified material to that environment could disrupt the natural processes ongoing on the beach. If the wrong material is added, it could also become a risk to the glacial till, especially in the instances of storms with easterly winds. If the wrong material is chosen, suitably high waves could pick up and use that material to further damage the cliff face or cause a public risk by throwing the rocks onto the road and damaging public amenities. The transport of the material further north along the coast will also likely negatively impact the areas where it is predominantly sand on the north end of Gobby beach. Indaver admit that the sacrificial material will have to be upkeep and added to as the "the beach nourishment material is likely to move towards the north in the medium and long term". It is widely accepted in environmental circles that major storm events like current 1 in 200-year storms will become more frequent in the future including hurricane events similar to Ex-hurricane Ophelia (Haarmsa, 2021).

Criticism and rebuttal to location of High Water Mark

In the documents where the property extent of the OSI PLACE map from 2001 is used to denote both the High Water Mark and the edge of Indavers property. This map is incorrect based on literature about sea level rise and work done in Cork. According to documents published by the EPA, sea level rise has massively accelerated in recent years, especially since 2000. In Figure 1, is it clear to see that the records from Cork with data sourced from Met Eireann the average sea level in 2025 is notably higher than it was in 2000.

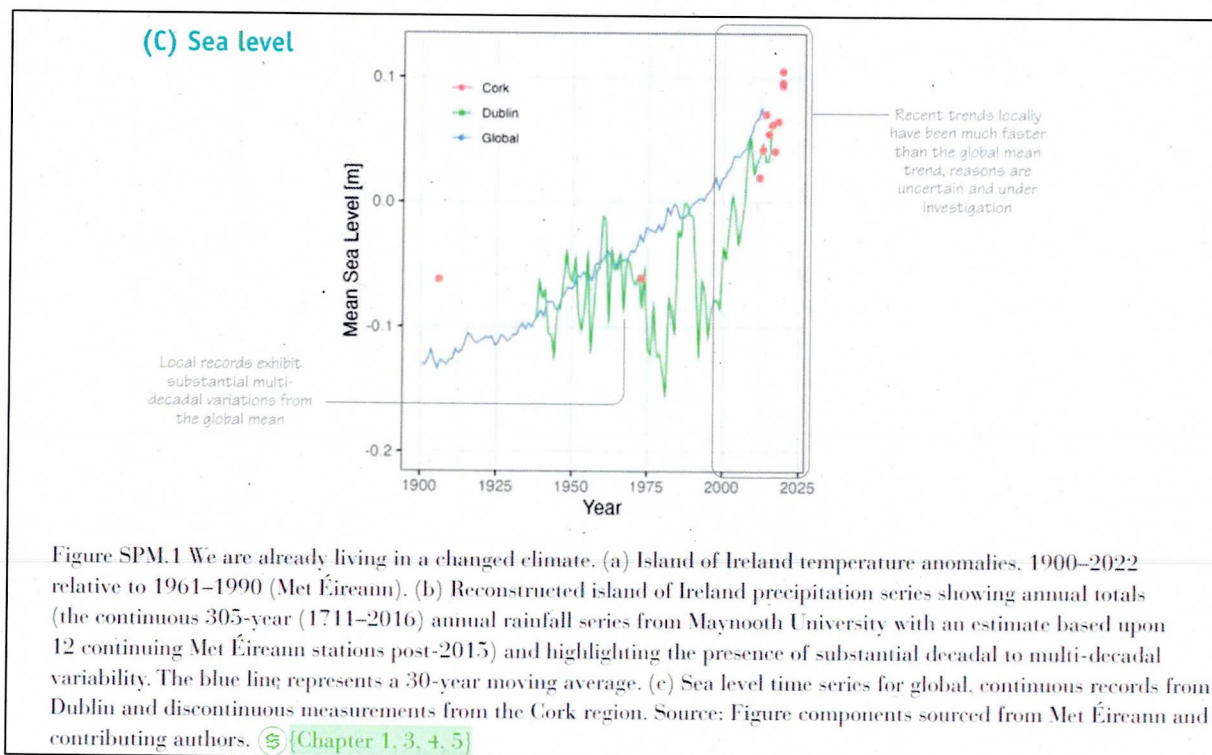


Figure 1: Screenshot taken from EPA, 2023. *Ireland's Climate Change Assessment. Volume 1: Climate Science – Ireland in a changing world. Summar for Policy Makers.*

This means using any imagery or claims about the sea level from 2001 is a gross mishandling of geographic information and shows little to no due diligence done to assess if the claim about the foreshore was accurate or not. This claim to the high water mark is significant because it is the underpinning to the coastal protection plan proposed by applicant Indaver. They claim that the coastal protection plan in the form of sacrificial shingle will be entirely placed above the foreshore. The foreshore is defined as “the bed and shore, below the line of high water of ordinary or medium tides, of the sea and of every tidal river and tidal estuary and of every channel, creek, and bay of the sea or of any such river or estuary;” (Sourced from the Foreshore Act 1933).

This is a misrepresentation of the facts. I conducted walking surveys on the beach to verify this claim to the foreshore due to in the past having a strong familiarity with the area and verified the line to be very incorrect. Using a GPS app on my phone I conducted a walk at the high tide on November 12th with a colleague to determine what the high water mark actually is. My colleague started a walk of the high water mark at 10:38am, right as high tide was occurring, and I conducted a walk at 10:52am. We determined that the High Water Mark used by Indaver was wrong by a significant degree and as a result I ask that their section on coastal defence and wave and erosion modelling are thrown out as we can no longer trust they did any valid scientific work to model this.



Figure 2: Image showing my walk along Gobby beach at high tide on November 12th 2025 showing the actual high water mark in blue, compared to what applicant Indaver claims in red. They doubled down on using their 2001 high water mark in presenting what the sacrificial material would look like in transects of the beach.

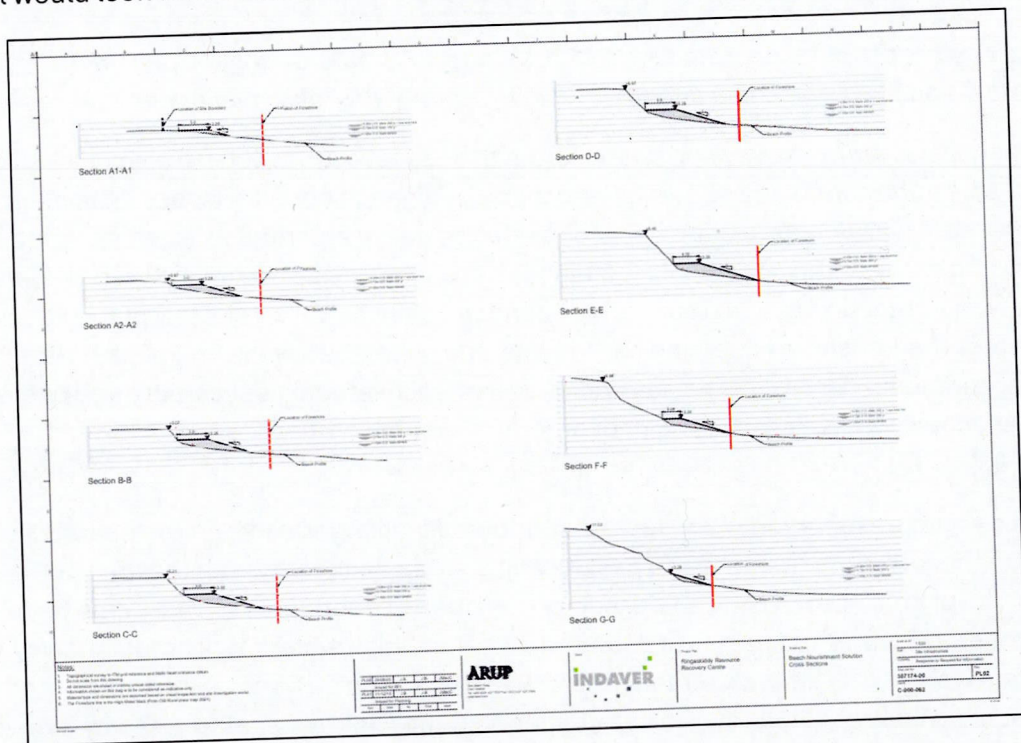


Figure 3: Screenshot from Appendix 13.3 from the EIS submitted by applicant Indaver.

All these maps in Figure 3 I would say, based on my beach walks are misleading and do not truly represent where the foreshore line is, and should be ignored totally. In all the above, the foreshore denoted by Indaver with a red line, is actually in the middle of each of the cross sections at a minimum.

Plans for L2545:

In the document published by applicant Indaver, Appendix 13.4, they want to raise the road level by over 1 metre of 190 metre length of road adjacent to proposed plant incinerator location when there has just been significant work done on it in the last 2 years. This will also change the aspect and make driving more uncomfortable for funeral processions, the navy and average people wanting to walk on Haulbowline park. Concern also arises here as there is no drawings or proposed prediction imagery to show what this will look like. According to Indavers documentation they do not own any more of the road L2545 that runs north out towards Haulbowline Island. There is also no specification that I can find about exactly what length of the road there will be this work done on nor any mention of impacts on public transport or public accessibility to Gobby Beach or Haulbowline Island for the duration of the work. These details are key to give the public enough information to be considered sufficiently informed.



Figure 4: Image showing the outline of land subject to planning permission. Included 190 metre section of L2545 from EIS Volume 3 – Figures. Photomontages, p. 159.

I also do not see any documentation or modelling on what impact raising the road by 1 metre would have on the areas adjacent such as the MaREI Centre and the road to the bridge to the Navy base or amenities park on Haulbowline island in the case of a flooding event or if the proposed raising of the road will have any positive outcome on any of the area surrounding. Absent any protection plans or mentions of cooperation with local authorities such as Cork County Council there is no reason to believe any consideration has been given to these areas.

Conclusion:

Based on the lack of consideration or proposed drawings of the impact of road works on the L2545, the apparent lack of due diligence in the proper mapping of the coast and the high water mark, the lack of details about where the sacrificial shingle will come from nor any modelling of any up coast impacts the material may have, I see no good reason to accept this application from Indaver. Unless they address and thoroughly plan for all these circumstances I don't believe any planning should be granted for the site. I sincerely request that An Coimisiún

Pleanala reviews the material evidence submitted by all objections to this application and reject Indavers application.

Sincerely,

Cathal Gannon-Reid.

Citations:

- Haarsma, R., 2021. European windstorm risk of post-tropical cyclones and the impact of climate change. *Geophysical Research Letters*, 48(4), p.e2020GL091483. Available at: <https://agupubs.onlinelibrary.wiley.com/doi/full/10.1029/2020GL091483> (Accessed 17 November 2025).
- Noone, C., McClean, D., Gallagher, D., McElwain, J., and Thorne, P., 2023. *Ireland's Climate Change Assessment. Volume 1: Climate Science – Ireland in a changing world. Summar for Policy Makers*. Environmental Protection Agency. Available at: https://www.epa.ie/publications/monitoring--assessment/climate-change/irelands-climate-change-assessment-volume-1.php?_gl=1*1utxxz1*_ga*Njg0MzIzMDkyLjE3NjI4Njc4MzM.*_ga_TPK2CK9KEX*czE3NjMzNzg2OTckbzQkZzAkdDE3NjMzNzg2OTckajYwJGwwJGgw (Accessed 17 November 2025).
- Indaver. Environmental Impact Statement Volume 4 Appendices. Appendix 13.3. Available at: https://ringaskiddyrrc.ie/wp-content/uploads/Appendix%2013.3_Issue%202025.pdf (Accessed 1 November 2025).
- Indaver. Environmental Impact Statement Volume 4 Appendices. Appendix 13.4. Available at: https://ringaskiddyrrc.ie/wp-content/uploads/Appendix%2013.4_Issue%202025.pdf (Accessed 1 November 2025).
- Indaver. Environmental Impact Statement Volume 3 – Figures. Vol. 3 Photomontages. Available at: https://ringaskiddyrrc.ie/wp-content/uploads/Volume%203%20-%20Photomontages_Issue%202025.pdf (Accessed 1 November 2025).
- Irish Statute Book, Foreshore Act 1933. Available at: <https://www.irishstatutebook.ie/eli/1933/act/12/enacted/en/print.html> (Page viewed 14 November 2025).