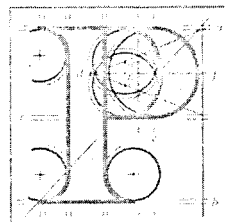


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Clean Coasts Cobh
c/o Tara O'Donovan
Cois Cuain
22 Connolly Street
Cobh
Co. Cork
P24 N270

Date: 26 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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

To:

The Secretary
An Bord Pleanála / Planning Section, Cork County Council

From:

Tara O'Donovan,
"Cois Cuain"
22 Connolly Street,
Cobh,
Co. Cork,
P24N270

Tel: 0861997641

On behalf of:

Clean Coasts Cobh

cleancoast.cobh@gmail.com

Date: 08/11/2025

Re: Objection to the proposed waste-to-energy/incinerator facility at Ringaskiddy, Co. Cork
Case Number: 318802

Dear Sir/Madam,

Clean Coasts Cobh, as a voluntary environmental organisation dedicated to protecting the coastal environment, marine ecology and promoting sustainable community use of our shorelines, hereby lodges this formal objection to the proposed incinerator / resource-recovery facility at Ringaskiddy (application by Indaver Ireland) on the following grounds.

1. Marine safety & navigational/operational impact

- The Ringaskiddy site sits at the entrance of Cork Harbour, one of Ireland's largest and busiest natural harbours, with significant commercial, naval, cruise, recreational and fishing vessel traffic. This year alone, between Ringaskiddy and Cobh Terminal, we have welcomed over 80 cruise ships and that does not include the additional cruise ships who pass through our waters to the city terminal. The addition of a major industrial facility introduces new risk vectors for marine safety: increased heavy traffic (land and sea), potential for runoff or accidental discharge into harbour waters, and interference from industrial stacks/structures (visual, radar, wind shear) that may affect navigation and

operations.

- The operation of a large incinerator/energy facility adjacent to the marine zone increases the risk of marine pollution incidents, for example: process water discharge, cooling-water return, accidental spills, ash or particulate deposition near shoreline or intertidal zones. Such risks are incompatible with the harbour's existing maritime use and open-water character.
 - The presence of an elevated chimney stack (see section 4 below) may create additional visual and atmospheric plume effects that impair navigation sightlines, particularly for smaller recreational craft, and affect the visitor experience of the harbour which is also used for tourism and leisure boating.
-

2. Water use, discharge & marine ecology

- A waste-to-energy / incinerator facility of the scale proposed will require significant volumes of water for cooling, scrubbing, flue-gas treatment, process operations and possibly effluent discharge or stormwater runoff management. Such water usage presents risk in terms of abstraction from local supply or harbour waters, and of discharge back into the marine environment.
 - The nearby waters of Cork Harbour support shellfish beds, aquaculture, intertidal and sub-tidal habitats, and are part of ecologically sensitive zones. Any thermal, chemical or particulate discharge could adversely alter local water quality, turbidity, temperature, salinity or nutrient balance, with direct negative implications for marine biodiversity.
 - The facility's siting close to the shoreline and intertidal zone increases the risk of surface-water runoff or contaminated drainage reaching the marine environment. Given our remit with Clean Coasts, we emphasise that the coastal zone must not become a "sink" for industrial effluent under the guise of proximity to water.
-

3. Biodiversity, protected habitats and species

- The Ringaskiddy peninsula and adjacent shoreline fall within the wider Cork Harbour network that is designated under the EU Birds Directive as a Special Protection Area (SPA) and under the Habitats Directive (via Special Areas of Conservation or candidate sites) for its rich biodiversity, including migratory and overwintering bird species (such as Brent Geese, Redshank, Curlew, Dunlin) and intertidal/coastal habitats.

- The proposed development will cause irreversible habitat loss, disturbance, light and noise pollution, increased industrial traffic and general industrialisation of an area that currently retains substantial ecological and amenity value.
 - Any large-scale stack and facility footprint will reduce the quality of adjacent shoreline habitat (feeding/roosting zones for birds; littoral flora/fauna; coastal grasses) and may interfere with the ecological functioning of the area (for example by altering microclimate, shading, wind flow, particulate deposition).
 - The site is also adjacent to a proposed new zoning of Green Infrastructure (RY-GC-14) in the Carrigaline Municipal District part of the County Development Plan which specifies that the area “lies within Monkstown Creek pNHA and Cork Harbour SPA. This area is not suitable for development.”
[volume-four-proposed-amendments-to-volume-four-south-cork-18th-january-2022-part-a-chapter-1-carrigaline-md-and-chapter-2-cobh-pdf.pdf](https://www.corkcoco.ie/sites/default/files/2022-04/volume-four-proposed-amendments-to-volume-four-south-cork-18th-january-2022-part-a-chapter-1-carrigaline-md-and-chapter-2-cobh-pdf.pdf)
-

4. Flood risk, climate vulnerability and visual amenity

- The site is located in a coastal area subject to tidal influence, storm surges and sea-level rise. The applicable policy in the Cork County Development Plan 2022-2028 (Vol.1) states that “development should **avoid** locations at risk of flooding; apply the sequential approach (avoid-substitute-justify-mitigate) and where the Justification Test fails, the development must not proceed.”
<https://www.corkcoco.ie/sites/default/files/2022-04/volume-one-proposed-amendments-to-volume-one-main-policy-material-18th-january-2022-part-b-chapters-11-19-pdf.pdf?>
- The Plan (Objective WM-11-XX) requires a flood-risk assessment for sites in Flood Zones A or B, and screening or full FRA for sites in Zone C in the context of climate change.
<https://www.corkcoco.ie/sites/default/files/2022-04/volume-one-proposed-amendments-to-volume-one-main-policy-material-18th-january-2022-part-b-chapters-11-19-pdf.pdf?>
- The raised ground levels, flood-mitigation bunds/embankments and associated works necessary to make the site “safe” will substantially increase the height/scale of the facility and its chimney stack, contrary to the visual amenity objectives of the harbour and its tourist/visitor role.
- The facility’s visual intrusion — a tall industrial stack rising above the coastal skyline — is wholly at odds with the context of the harbour, and would detract from the scenic and

recreational value of the area. Tourism and heritage values must be weighed.

- The Plan emphasises sustainable development and avoidance of increased risk from climate change and flooding — this project conflicts with those objectives given the coastal location and scale of mitigation proposed.
-

5. Tourism, amenity, visual landscape & community impact

- Cobh and the wider Cork Harbour region are internationally recognised for their scenic beauty, maritime heritage, recreational boating, ecotourism and cruise-ship visits. The natural harbour setting is a central part of the visitor experience.
 - The proposed incinerator's height, industrial character, heavy traffic and plant operations would compromise the visual character of the harbour entrance, reduce the attractiveness of the area for visitors, affect property values and undermine efforts to brand the region as a high-quality coastal and marine tourism destination.
 - The zoning (see Section 6) designates the site for educational/research use, consistent with a more sustainable community-oriented future rather than heavy industrial use. The incinerator is fundamentally out of step with that vision.
 - The presence of such a facility may discourage marine recreational use, boating, kayaking, wildlife tourism and other coastal-amenity activities which rely on a well-maintained, clean and attractive marine environment.
-

6. Planning policy and zoning – incompatibility with the County Development Plan

- The Cork County Development Plan 2022-2028 was formally adopted April 25 2022.

<https://www.corkindependent.com/2022/06/08/cork-county-development-plan-is-officially-adopted/>

- In a Local Area Plan amendment for the Carrigaline Municipal District (including Ringaskiddy) the Plan proposes a new zoning RY-GC-14: "Green Infrastructure" for an area within Monkstown Creek pNHA and Cork Harbour SPA – the text states: "Protect

this area ... This area is not suitable for development.”

<https://www.corkcoco.ie/sites/default/files/2022-04/volume-four-proposed-amendments-to-volume-four-south-cork-18th-january-2022-part-a-chapter-1-carrigaline-md-and-chapter-2-cobh-pdf.pdf?>

- Media reporting confirms that the land in the Ringaskiddy area has been rezoned for educational/research use (from industrial) under the Local Area Plans adopted by Cork County Council. <https://www.echolive.ie/corknews/arid-40179141.html?>
- In earlier commentary it is stated that the proposed incinerator would “materially contravene” the County Development Plan zoning objectives. <https://www.irishtimes.com/news/cork-incinerator-would-contravene-county-plan-1.760008?>
- The Plan emphasises protecting coastal and marine environments, avoiding inappropriate industrial uses in sensitive coastal zones, supporting sustainable tourism, education, research and amenity uses which align with the region’s strengths.
- Therefore the proposed waste-to-energy / incinerator facility — a heavy industrial use generating emissions, heavy transport, large structures and requiring extensive mitigation works — is **incompatible** with the land-use zoning, the zoning objectives for the site, and the wider strategic aims of the County Development Plan.

7. Bat Conservation and Omission of Irish Bat Society Consultation

Indaver’s Environmental Impact Assessment Report (EIAR) claims that the company “consulted with the Irish Bat Society” during the ecological assessment process. However, no details or findings of that consultation appear anywhere in the over 4,000-page submission, representing a significant omission in their environmental documentation.

This is deeply concerning given that:

- Bats are legally protected under the Wildlife Acts 1976–2023, the EU Habitats Directive (92/43/EEC), and the Bern Convention.
- Cork is uniquely rich in bat diversity — it is the only county in Ireland that supports all nine native bat species, including the Lesser Horseshoe Bat (*Rhinolophus hipposideros*), a species of European conservation concern.
- Bats serve essential ecological functions: they are key insect predators, controlling agricultural pests and maintaining ecological balance in both rural and urban landscapes. They also act as bioindicators — their population health reflects overall

ecosystem quality.

The proposed incinerator site includes mature hedgerows, treelines, and coastal scrub, all potential bat commuting routes and foraging zones. The introduction of intense artificial lighting, heat emissions, and heavy vehicular activity would disrupt nocturnal habitats and could lead to localised population decline.

Failure to transparently report the findings of bat surveys or the consultation with the Irish Bat Society constitutes non-compliance with the EIAR requirements for ecological assessment under both Irish planning law and the EIA Directive (2011/92/EU as amended by 2014/52/EU).

Clean Coasts Cobh urges that:

- A comprehensive bat survey be made public before any planning decision is considered.
- The Irish Bat Society's consultation input be formally documented and independently reviewed.
- The precautionary principle be applied: no development should proceed in the absence of full transparency regarding impacts on nationally protected species.

8. Summary & request

For all the reasons set out above — marine safety risks, water use/discharge and marine ecology, biodiversity and protected habitats, flood risk and climate vulnerability, visual landscape and tourism impact, and fundamental incompatibility with zoning and planning policy — Clean Coasts Cobh strongly objects to the proposed incinerator at Ringaskiddy.

We submit that the planning authority should **refuse permission** for this development. Furthermore, we request that the site be retained for educational, research, marine-heritage, amenity or low-impact uses in line with the zoning and strategic vision for the harbour area.

We respectfully ask that this submission be acknowledged, and that the planning authority accord full weight to the ecological, visual, community and marine-safety ramifications of this proposal.

We further request that an oral hearing is granted to allow these significant and impactful areas to get into the public domain.

Yours sincerely,

Tara O'Donovan, Brenda Murphy, Ruben Keane,
On behalf of Clean Coasts Cobh