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Submission to An Bord Pleanála on Indaver Ireland's Planning Application for a Resource Recovery Centre (Waste-to-Energy Facility) at Ringaskiddy, Co. Cork

An Coimisiún Pleanála

64 Marlborough Street
Dublin 1 D01 X321
10 November 2025

Reference: PL04.318802 – Proposed Resource Recovery Centre (including Waste-to-Energy Facility) by Indaver Ireland Ltd., Ringaskiddy, Co. Cork

Case Number 318802-24

Dear Sir/Madam,

I would like to make a submission on behalf of Cork Harbour Alliance for a Safe Environment (CHASE) to the further information Indaver Ireland submitted to An Coimisiún Pleanála in August 2025.

Our submission comes from a large community that is deeply invested in the environmental, social, and economic wellbeing of Cork Harbour. This submission is also on behalf of those people who hadn't the confidence or the ability to submit and who find the Planning Process intimidating and challenging. They are people from all walks of life and all parts of the harbour but the one thing they all have in common, is that Cork Harbour is where they call home

CHASE and other community groups are also submitting a technical submission made up of the expertise in the communities around Cork harbour. These people have given their time after a hard day's work, many rearing families, to submit and pool their knowledge. They are all experts in their own field and they have informed themselves over the years about Indavers planning applications and its inappropriate location on the site in Cork Harbour, that Indaver bought 25 years ago.

What has changed in 10 years

We have made enormous progress in the harbour over the last decade, and the ways in which the proposed incinerator is unacceptable can be summarised under the following points:

- Zoning and Land Use Incompatibility
- New Amenities
- Zoning in CDP
- M28 and site useability reduction
- Ongoing Coastal Erosion
- Adverse Impacts on Local Amenities
- Threat to the Geological Importance of Gobby Beach
- EU Policy on Circular Economy, Sustainability, and Waste-to-Energy (2015–2025)
- Emissions and Health

Zoning and Land Use Incompatibility

Much has changed in the almost 10 years since January 2016 when Indaver made their third application to build their 240,000 tonne incinerator in Ringaskiddy. In those 10 years the use of the area has changed beyond recognition.

New Amenities

We witnessed the remediation of Haulbowline from a legacy hazardous waste facility into a park where thousands of people recreate throughout the year (The contracts for this were signed 10 years ago when Indaver first submitted their planning application). This remediation was at a cost of approximately 35 million euro, coming from European funding. Work still continues on the Victorian buildings in the naval base, with a view to possibly opening a Maritime Museum in future years. The site of the old Irish Steel plant (Ispat) is to be reclaimed and the area brought back into use by the Irish Navy.

The 22 acre park is now complete and is situated in a beautiful part of the lower harbour, looking over at the picturesque and historic town of Cobh. It has a running track, pitches, a coffee dock, areas for bird watching, roosting and feeding areas for birds, and lots of valuable space that we as a community value. It has transformed the lower harbour. We all learnt the value and necessity of open spaces for recreation during COVID. Cork City had only one park, Fitzgerald's Park which during COVID proved to be too small for a growing population in Cork. The Haulbowline park in the harbour is now another space for the communities of Cork to enjoy. It is less than 1 kilometre from the Indaver site and in full view of it if it were built.

Cork County Council have developed a smaller park area at Paddy's Point, where people launch their boats sail and swim. This is about 800 meters from the Indaver site and in full view if it were built.

The footfall to this area has increased beyond anyone's expectation. Gobby beach has become a popular beach for swimming, sailing wind and kite surfing and the area has become a destination for family's schools and universities. Standing on Gobby beach you can throw a stone into the Indaver site

To the southwest of Gobby beach is Luc beach which has also increased in use to the extent that Cork County Council have announced plans to develop it further and put in facilities. It is now a regular beach for rowing

competitions, scout summer camps surfing, and swimming and picnicking. Luc is approximately 8000 meters from the Indaver site

What was once an industrial zone has now changed in line with the vision of the County Development Plan 2022-2028. To reflect that, the zoning in the area in the County Development Plan has changed and part of the Indavers site has been rezoned and included in the zoning since 2017.i.e in two County Development Plans'.(CDP) I respectfully request An Coimisiún Pleanála refuse permission

Zoning in CDP

Under the Cork County Development Plan 2022-2028 (Volume 4: South Cork, Cobh Municipal District), Indaver's site now spans two objectives: Objectives RY-I-15 large stand-alone industry, and RY-I-09 enterprise and educational, including marine education /research, ancillary offices and laboratories (10.19 ha total)

While the zoning in the western side of Indaver's site remains the same (RY-1-15, suitable for stand-alone industry) the eastern part of the site has been rezoned (RY-1-09). The zoning prioritizes high-value sectors like pharmaceuticals and marine R&D, e.g. extensions of UCC and MTU Cork, and not residual waste treatment that could undermine the Strategic Employment Location's focus on innovation and job quality targeting 1,500–2,000 skilled roles by 2028.

This rezoning for enterprise and education compliments the existing Beaufort Institute and the National Maritime College and will help an educational hub to expand in the lower harbour. This is the vision our local authority and the people of Cork have for the lower harbour. Granting permission now would jeopardise this vision and reward persistence over any policy compliance. I respectfully request An Coimisiún Pleanála refuse permission

M28 and site useability reduction

The construction of the N28 is under way and is adjacent to Indaver's site on the western side. M28 construction cuts across and reconfigures the western/northwestern portions of the site ,which were acquired by Cork County Council for the construction of the M28. (currently registered to Cork County Council, being folio CK192956F). It reduces the effective area for development and possibly necessitates layout adjustments to the eastern side. There has been no recognition of this in Indaver's updated information, which is misleading. This means the footprint of the site is smaller than reported by Indaver. The site is reduced in useability on the western side, while the eastern side the area is inadequate in relation to what was proposed. ACP's own inspectors cited over-development and excessive scale on the original 13.3hectre. This area has now been reduced further, yet Indaver do not acknowledge it in their further information. This eastern part of the site is now also rezoned as discussed earlier and I respectfully request An Coimisiún Pleanála refuse permission.

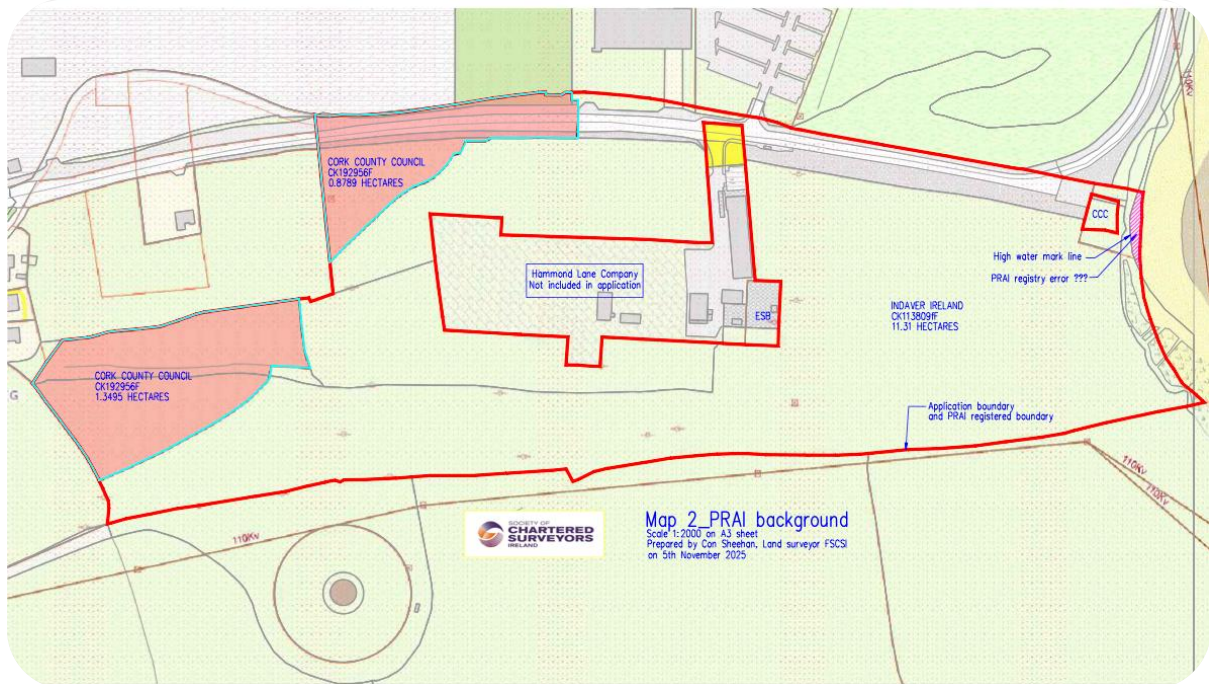


Figure 1: Map of proposed incinerator site, showing areas obtained by Cork County Council since 2015 in red.

Ongoing Coastal Erosion

The coastline has changed dramatically over the last 10 years. Much of the eastern site along the coast has suffered erosion. We have witnessed chunks of the cliff slumping onto the beach over the years and then witnessed the mud/shale/sand dissolving into the tide. Indaver's average rate of erosion of 0.5 m/yr is super conservative, as erosion does not take place uniformly and at the same yearly rate.

One storm could take away several meters of the cliff, which is what we have witnessed at this site over the last ten years. Storms are becoming more frequent, more severe and with sea level rising, this will accelerate the rate of erosion far faster than stated by Indaver. At their conservative rate of 0.5 meters / year along the coast they have lost 5 meters of land at a minimum, in the last 10 years. The fact that their site has reduced by this amount is not accounted for in their application.

The placing of shingle as sacrificial material will surely add to the rate of erosion as it will be dashed up against the cliff and further contribute to erosion. The EIS acknowledges coastal recession and slumping risks but downplays hydrogeological vulnerabilities, including groundwater pollution from leachate or fire-fighting or accidental spills that could accelerate erosion and contaminate aquifers. This could also possibly cause contamination in the near-by Cork Harbour SPA (approx. (500m)

The placing of shingle would interfere with the integrity of the geological heritage of the area and also the use of the area as an amenity. I respectfully request An Bord Pleanála refuse permission



Figure 2: High tide at Gobby Beach on the 6th November at 17:42. Photo taken at 19:10 shows that the tide is still at the cliff face of Indaver's site (arrow) 1.5 hours later.

Adverse Impacts on Local Amenities

Contrary to claims of amenity enhancement, the facility would severely degrade the lower harbour populations quality of life. The 75m stack and emissions would introduce visual blight, dominating harbour views and eroding the area's recreational and aesthetic appeal. No one could say that seeing the incinerator in Poolbeg pouring out emissions 24/7 x 365 improves the aesthetics of Dublin bay. This incinerator is also built on a prominent site, on the shores of a harbour

Bord Failte have recently announced a plan to make Cork harbour a destination. This will involve the spending of millions of Euros developing tourism in the lower harbour The success of this economic investment of public money will be adversely affected by the blight of an ugly incinerator building pumping out emissions 24/7. The cultural and historical heritage of the harbour is beyond doubt and the imposition of the incinerator can but only undermine the success of this new plan. I respectfully request An Bord Pleanála refuse permission.

Failte Ireland – Cork City, Harbour and East Cork Destination and Experience Development Plan.

Threat to the Geological Importance of Gobby Beach

Gobby Beach, adjacent to the site, is a designated County Geological Site (CGS CK077) under the Geological Survey Ireland's heritage audit (completed 2023). This features rare coastal exposures of Upper Devonian Old Red Sandstone and Carboniferous rocks—spanning 40 million years of geological history. Prominent boulders, cliffs, and foreshore outcrops provide critical insights into alluvial shifts and tectonic events, supporting educational and research uses tied to RY-I-09 zoning. Development would fragment this heritage asset, breaching GSI protections and the Plan's biodiversity objectives. Past inspector reports flagged these issues, yet Indaver's mitigations (e.g., buffers) are inadequate for a site prone to sea-level rise. Preserving Gobby Beach aligns with Ireland's National Geoscience Plan, not incineration. I respectfully request An Bord Pleanála refuse permission

EU Policy on Circular Economy, Sustainability, and Waste-to-Energy (2015–2025)

Over the last decade, EU policy has moved decisively from incineration-centric models to prevention and circularity, which makes this project obsolete. The 2015 Circular Economy Action Plan (CEAP) introduced 54 measures prioritizing waste reduction and recycling over recovery. The waste hierarchy is given binding effect through Section 7(3) of the Circular Economy and Miscellaneous Provisions Act 2022 and through the National Waste Management Plan 2024-2030

Indaver's facility still does not achieve the R1 classification and represents the lowest tier of the waste hierarchy, disposal D10. Once a facility is classified as D10, consent is precluded as a matter of law. It cannot be treated as recovery, it cannot contribute to the circular economy and locks society into linear habits. The project, first proposed over two decades ago, is fundamentally misaligned with contemporary priorities for waste reduction, recycling, and true circularity. It perpetuates a linear waste model at odds with 10 years of policy progress emphasizing reduction over incineration. This is dealt with in other submissions in more detail. I respectfully request An Bord Pleanála refuse permission

Emissions and Health

The air quality modelling in the EIS still underestimates nano-particulates and dioxins in this new information. The MARI man, according to our experts, is still starving with a diet of 1000 calories / day. If given a proper diet, the MARI man and his family's Tolerable Weekly Intake (TWI) would be excessive. (Ref Dr Reid's submission as CHASE expert.)

The flawed health assessments also ignores cumulative exposures in the harbour's microclimate. It ignores the fact that we get thermal inversions in the harbour which trap emissions horizontally sometimes for days. Today as I write here in Cork harbour, is day 3 of such conditions (12th Nov) , as can be evidenced in Figure 3

Furthermore the air modelling was yet again done at Cork airport 12 kilometres away and situated on a hill, not at Roches point which was recommended by one of your expert inspectors in a previous refusal.



Figure 3: Photographs taken from East Hill, Cobh (November 10th 2025) showing thermal inversion above Cork Harbour, where the fogbank is held like a “lid” over the harbour. (photo credit: Joe Weston)



Figure 4: Packed halls at recent public meetings in both Cobh and Ringaskiddy (November 2025).

Conclusion

Planning policy, zoning objectives, local amenity protections, health implications geological heritage safeguards, and evolving EU directives on circular economy and sustainability will be dealt with in more detail by the experts who are submitting on behalf of CHASE.

Indaver's proposal contravenes local planning precedents, zoning safeguards, amenity protections, geological heritage, and EU's transformative shift toward genuine circularity. Approving it would undermine Cork's sustainable growth ambitions and expose communities to irreversible harm. I respectfully request An Bord Pleanála refuse permission.

Residents report heightened anxiety over cancer and health risks, with incinerators increasingly being linked to health and respiratory issues and the inequitable burdens on communities. This sentiment and the fact that the people of Cork are angry about this application, was evident in the packed public meetings, held over the last four weeks.(Fig 4) Many people want to object yet many do not have the confidence or know how to do so. The 50 euro that has to be paid to submit, was also a challenge for some students and pensioners or those on low income.

To that end CHASE prepared a template letter for people to use to give them a voice. We trust in the spirit of good planning, where major facilities have to have public acceptance, that ACP will recognise their voices and value the fact that 100s of people submitted, in this format. They have said loud and clear, that this application will never be accepted in Cork harbour. I respectfully request An Bord Pleanála refuse permission

Mary O'Leary, B.Sc. Dip.Env.Sc.

Chairperson

CHASE

Mary O'Leary B.Sc. Dip.Env.Sc., Chairperson, CHASE

I hold a B.Sc. Biochemistry Zoology. University College Cork and Post Graduate Diploma in Environmental Science.

I worked as a Pollution Officer in Longford County Council where I established an environmental laboratory for chemical and biological monitoring of water and waste water. I set up a baseline study of lakes and rivers in the county and an on-going monitoring regime for monitoring pollution.

I was involved in aquaculture and ran my own oyster farm in Co. Clare for several years

Since moving to Cork I was a member of the Steering Committee for the Remediation of East Tip on Haulbowline Island, Cork Harbour.

I am a representative of the Environmental Pillar on the Cork Local Community Development Committee (LCDC) and Local Action Group (LAG). I have submitted to Local Action Plans, Cork Area Strategic Plan, County Development Plans, County and National Waste Management Plans, Hazardous Waste Management Plans and presented to the European Parliament on two occasions.

I am a founder member of Cobh Zero Waste and CHASE and its Chairperson for over 20 years.