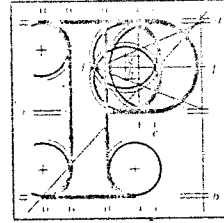


Our Case Number: ABP-318802-24
Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Cork Harbour Cruises
Crosshaven
Cork
P43 W400

Date: 19 November 2025

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

Dear Sir / Madam,

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

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

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

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

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

Yours faithfully,

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

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Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Observation on SID Application – Case Ref PA04-318802

Observer Name – Cork Harbour Cruises

Date 15/11/2025

Address – Crosshaven, Cork P43w400

Reasons for objections

Climate and Carbon-Law Non-Compliance

- * Ireland is already over its carbon budget; this plant would lock in a large new stream of fossil emissions every year.
- * The developer has provided no carbon-budget analysis, no ETS modelling, and no lifecycle GHG accounting, so compliance with the Climate Act cannot be demonstrated.
- * Electricity-only incineration of fossil plastics is higher-carbon than the future Irish grid and would displace cleaner renewable generation.

R₁ Inefficiency and Misclassification

- * The submission is built on the false premise that the plant is “high-efficiency recovery”.
- * Their own data place the plant below the legal R₁ threshold, which means it is disposal, not recovery.
- * There is no heat-recovery infrastructure, and the site cannot support a heat network, making compliance structurally impossible.
- * High efficiency in Dublin depends on CHP; Meath only narrowly clears the threshold and still damages Ireland’s carbon performance. Cork cannot meet it at all.

Waste-Policy and Capacity Contradictions

- * Irish law now prohibits new residual-waste capacity; national policy requires waste reduction, not expansion.
- * The supposed “Southern Region capacity gap” is based on planning structures abolished in 2022; capacity is now national, and Ireland already meets projected needs.
- * Adding new disposal capacity directly contradicts circular-economy policy.

Tourism, Brand, and Economic Reputational Damage

- * Cork Harbour is the third-largest natural harbour in the world, anchored by Spike Island tourism and Cobh’s cruise sector.
- * A single industrial stack permanently alters the harbour’s visual identity; tourism branding is fragile and once damaged cannot be restored.
- * Reputational risk extends to internationally known local brands that depend on clean-water perception, including Midleton Distillery.

Flood-Risk and Site Unsuitability

- * OPW’s updated rules require safe, dry access for critical infrastructure; this location cannot provide it.
- * The access road floods, making the site isolatable during storms and surge events.
- * Raising ground levels does not solve tidal inundation, a rising water table, or coastal surge behaviour.

* The site fails the Sequential Approach and cannot guarantee egress.

Air Quality, Plume Behaviour, and Scientific Omissions

- * Thermal inversions in Cork Harbour can trap emissions at ground level rather than allowing safe dispersion.
- * The application omits PFAS assessment, ultrafine-particle analysis, and key pollutant monitoring.
- * Claims of “safety” cannot stand when these pollutants are unmeasured and the dispersion environment is ignored.

Credibility and Procedural History

- * Three Inspectors have previously found Indaver’s Cork claims incomplete or unproven.
- * The last approval was quashed by the High Court because the evidence was not there.
- * The same deficiencies reappear: missing climate analysis, unverifiable R₁, outdated flood data, and overstated policy claims.
- * This track record undermines confidence in all assurances.

False Claims on Safety and Standards

- * The application claims the highest environmental and safety standards, yet excludes heat recovery, carbon modelling, PFAS/UFP analysis, updated flood data, and a compliant R₁.
- * A proposal missing this many essentials cannot credibly claim high standards.

REBUTTAL: “This plant will deal with industrial waste”

It won’t. This is a municipal-grade burner, not a specialist industrial or hazardous-waste facility. It cannot accept the chemical, pharmaceutical, or high-spec industrial streams produced in Cork. Those already go to dedicated treatment plants with far stricter controls. This project doesn’t replace any of that infrastructure—it simply adds a general waste incinerator that cannot treat the very materials people think it will.