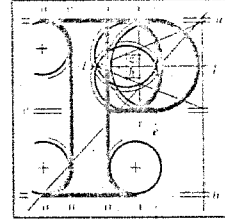


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Crosshaven GAA Club
c/o Brian Cahill
Crosshaven
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

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Submission / Observation to Cork County Council

Planning Reference: Indaver Ireland Ltd — Proposed Resource Recovery Centre (Waste-to-Energy / Incinerator), Ringaskiddy, Cork Harbour

Submitted by: Crosshaven GAA Club, Crosshaven, Co Cork

Date: 17/11/2025

Fee enclosed: €50

1. Introduction

Crosshaven GAA Club is an active community sports organisation with hundreds of members — children, youth, adults and families — who participate weekly in Gaelic games, coaching, fitness and wellbeing activities.

Our club grounds overlook Cork Harbour and are integral to the community's physical and mental health. We promote clean air, outdoor exercise and respect for the natural environment.

We therefore strongly object to the proposal by Indaver Ireland Ltd to construct and operate a large-scale incinerator at Ringaskiddy, Cork Harbour.

2. Fundamental Unsuitability of the Site

Notwithstanding any updated information submitted by the applicant in August 2025, the site remains fundamentally too small for the proposed development.

As noted by Planning Inspector Derek Daly (2017), the site “continues to reduce in size, with coastal erosion on one side and boundary reduced by the M28 on the other,” leaving the usable area inadequate for the scale of facility proposed.

Furthermore:

- All three previous An Bord Pleanála Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017) found the Environmental Impact Statement (EIS) to be deficient in substance, even where legally adequate in form. The material submitted was therefore insufficient to enable a proper Environmental Impact Assessment or informed decision.
- The 2025 revisions repeat earlier assertions without new evidence, failing to address previously identified deficiencies.
- There is no de novo site-selection process — the only justification offered is Indaver's land ownership. No meaningful alternative locations were assessed, despite the transformation of the area since 2000 through major public and

private investment in research, education and marine technology infrastructure (NMCI, MaREI Campus).

- The site lies in a known flood-risk zone, identified in both Table 4.1.17 of the Cork County Development Plan 2022–2028 and in the OPW flood database (Flood Summary IDs 1364, 13082, 12085).
- Raising the development to mitigate flood risk would further exacerbate the visual intrusion of the proposed stack and structures across the harbour landscape.

As concluded by Inspector Oznur Yukel Finn (2009), the site is “inherently unsuitable for a use which processes and generates hazardous compounds.”

3. Conflict with Zoning and County Development Plan

Although the wider Ringaskiddy area is zoned industrial, the specific site in question — RY-I-09 — is designated for:

“Extension of the Third Level Educational Campus and enterprise-related development including marine-related education, enterprise, research and development.”

(Table 4.1.17 – Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 – 2028)

The Indaver proposal directly contravenes this zoning, undermining strategic investment in the NMCI and MaREI campuses and conflicting with the County’s stated objectives for sustainable, knowledge-based, low-impact development in this area.

4. Health, Wellbeing and Community Impact

As a community sports club, we must emphasise the importance of health and wellbeing. The proposed incinerator would:

- Operate 24 hours per day, 7 days per week, emitting visible plumes and pollutants into the air over Cork Harbour;
- Pose potential health risks to our members — especially children and youth — who train outdoors year-round;
- Degrade air quality and public confidence in the safety of local recreation spaces;
- Generate constant visual and light intrusion into the harbour landscape that defines our club’s setting and identity.

The stack and emissions would be clearly visible from our pitches, and prevailing winds could carry output directly toward our grounds and the wider Crosshaven community. This runs counter to all principles of community wellbeing and the promotion of healthy lifestyles.

5. Visual, Environmental and Amenity Impact

The facility's industrial scale — including the proposed high-rise stack and continuous operations — would irreparably alter the visual character of Cork Harbour.

Our club, like many others, draws immense pride from the harbour's natural beauty. It is a visual and emotional backdrop for generations of players and families.

A 24/7 industrial incinerator with a permanent plume contradicts this environment, diminishing the quality of life, recreational experience and tourism appeal of the region.

6. Flood Risk and Coastal Stability

The site's documented flood risk (OPW Floodinfo IDs 1364, 13082, 12085) and ongoing coastal erosion create unacceptable environmental and operational hazards.

Raising structures above flood level would magnify visual impact, while the risk of flooding or coastal instability at a site handling hazardous material presents an unacceptable threat to the harbour ecosystem and surrounding communities.

7. Procedural and Environmental Deficiencies

By the findings of Inspectors Jones (2004), Yukel Finn (2009) and Daly (2017), there remains insufficient and unreliable information to permit proper environmental assessment.

The updated 2025 EIS does not remedy these deficiencies and continues to rely on assertions rather than evidence.

Given the project's scale and potential cumulative impacts, the Board cannot rely on this material to meet the requirements of proper Environmental Impact Assessment under Irish or EU law.

8. Request for Oral Hearing

In the interests of full public participation, transparency and natural justice, Crosshaven GAA Club formally requests an Oral Hearing to allow local residents, sports

organisations and community stakeholders to present their concerns directly.
The health and amenity interests of hundreds of local families must be fully heard.

9. Conclusion and Request

For all the reasons above, we respectfully request that Cork County Council refuse this planning application.

The proposed Indaver incinerator at Ringaskiddy:

- Occupies a site that is inherently unsuitable, as repeatedly concluded by An Bord Pleanála Inspectors;
- Contravenes the Cork County Development Plan 2022 – 2028, including the specific zoning RY-I-09;
- Would result in negative health, environmental and amenity impacts on our community;
- Would visually degrade the harbour environment central to our club's identity and the wellbeing of its members;
- Presents unacceptable flood and coastal erosion risks.

Crosshaven GAA Club stands for the health, wellbeing and sustainable future of our community. We therefore urge the Council to reject this proposal in its entirety.

Yours sincerely,

Brian Cahill

Juvenile Chairperson, Crosshaven GAA Club

On behalf of the Officers and Membership

Brian Cahill

42 Drakes Point,

Crosshaven

Cork

087-6420285