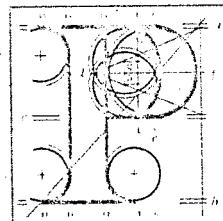


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Dr Elaine Kiely
12 Whitepoint Avenue
Cobh
Co. Cork
P24 HF43

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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D01 V902 D01 V902

Observer:

**Dr Elaine Kiely
12 Whitepoint Avenue
Cobh
Co. Cork
P24 HF43**

To:

**An Coimisiun Pleanála
64 Marlborough Street
Dublin 1

D01 V902**

13th November 2025

Dear Sirs,

OBSERVATION ON SID APPLICATION

Case reference: PA04.318802, Ringaskiddy, Co. Cork

Proposed development: Resource Recovery Centre (including waste-to-energy facility) by Indaver NV t/a Indaver Ireland

OBSERVATION DETAILS

I enclose fee of €50.

Notwithstanding the information submitted in August 2025, the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by the M28 on the other. It is considered that the actual usable area of the site is inadequate in relation to the scale of development proposed (Derek Daly, 2017).

By all three Bord Pleanála Inspectors, the EIS was found to be deficient in substance, even where found legally adequate in form. The information as submitted to the Board is therefore insufficient to enable the Board to carry out an environmental impact assessment in an appropriate manner, and to form a basis for an informed decision on the application (Daly, 2017).

Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence. There is no *de novo* site selection in the material submitted in 2025, but instead a justification based on Indaver's existing site ownership, with inadequate consideration given to major public and private investment initiatives which have transformed the character of the immediate area in the intervening period since 2000 (Daly, 2017).

The site is located in a known flood-risk area, marked as such in Table 4.1.17: *Specific Development Objectives for Ringaskiddy*, and on OPW floodinfo.ie (Flood Summary ID-1364, 13082, 12085). Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.

It is my considered opinion that the site is inherently unsuitable for the location of a use which processes and generates hazardous compounds (Oznur Yukel Finn, 2009).

Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the Indaver site area where the incinerator is proposed (RY-I-09) is zoned as suitable for the extension of the third-level educational campus and enterprise-related development, including marine-related education, enterprise, research and development (RY-I-09, Table 4.1.17: *Specific Development Objectives for Ringaskiddy*, Cork County Development Plan 2022–2028). This is dismissed in the August 2025 information, but it is of critical importance that this zoning be upheld, as it is directly linked to investment in the NMCI and MaREI campus areas and the potential for future growth of this sector.

The proposed incinerator is therefore in direct contravention of the Cork County Development Plan and contrary to the specified objectives for the immediate area.

Please refuse this planning application on the basis that the site is inherently unsuitable, as concluded by all three Bord Pleanála Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017), and because the proposal contravenes the zoning of the Cork County Development Plan 2022–2028 for this site.

I wish to request an Oral Hearing to ensure continued full public participation in this application.

Further Grounds for Objection

1. Conflict with the Cork County Development Plan

The Cork County Development Plan designates Cork Harbour as an area of exceptional ecological, landscape, recreational and tourism value. The Plan requires the protection of Natura 2000 sites, the safeguarding of coastal landscapes, the promotion of sustainable tourism and amenity development, and the prioritisation of circular-economy approaches to waste management.

The proposed development clearly contradicts these objectives.

2. Public Health Impacts

Waste-to-energy incinerators emit fine particulates, NOx, dioxins and ultrafine particles. Cork Harbour's partially enclosed topography increases pollutant entrapment and heightens health risks for surrounding communities, including Cobh, Ringaskiddy, Monkstown, Glenbrook, Passage West, Crosshaven and Carrigaline.

3. Environmental and Ecological Damage

Cork Harbour is internationally important for its protected wetlands, migratory birds, and unique marine biodiversity. The development risks airborne pollutant deposition, habitat disturbance, increased HGV traffic and significant ecological impacts inconsistent with conservation requirements.

4. Impact on Tourism & Amenity Development

Cork Harbour is undergoing major tourism investment, including:

- growth of cruise tourism in Cobh,
- large-scale amenity and greenway projects,
- maritime recreation expansion,
- heritage development at Spike Island and Camden Fort Meagher,
- the Harbour Greenway linking Passage West, Monkstown, Glenbrook and Carrigaline.

A visually intrusive, emissions-producing incinerator at the Harbour's core directly undermines these strategic public and private investments.

5. Climate, Emissions Targets & Circular-Economy Concerns

Ireland is legally required to cut emissions by **51% by 2030**, but the EPA projects only a **23% reduction**, even with full implementation of current policy measures. Both carbon budgets will be exceeded.

A new incinerator would:

- increase national emissions due to the high fossil-carbon content of waste,
 - lock Ireland into long-term combustion-based waste management,
 - undermine recycling, composting and reuse targets,
 - conflict with COP and Paris-aligned climate commitments,
 - hinder progress toward circular-economy goals.
-

6. Site Size & Spatial Constraints (Site Too Small)

The proposed site is physically too small and tightly bounded to safely accommodate a development of this scale. The usable area is constrained by **coastal erosion on one side and the M28 boundary on the other**, resulting in:

- over-intensification of land use,
- inadequate HGV circulation,
- insufficient safety buffer zones,
- compromised emergency access,
- inability to mitigate visual impacts,
- increased environmental and public-health risks.

These constraints make the site unsuitable for a hazardous industrial facility.

7. Cumulative Industrial Burden

The Lower Harbour is already heavily industrialised. Adding a major emissions-intensive facility is incompatible with the region's balanced-development strategy and places disproportionate environmental and social burdens on the surrounding communities.

Conclusion

For all the reasons outlined — including unsuitable site characteristics, zoning conflicts, deficiencies in the EIS, flood risk, public-health dangers, ecological harm, climate-target impacts, tourism conflicts and cumulative industrial pressures — I respectfully request that An Coimisiún Pleanála **refuse permission** for the proposed development and convene an **Oral Hearing**.

**Yours sincerely,
Dr Elaine Kiely**