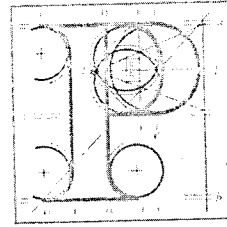


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Felix Butschek
Leeview
Passage West
Co. 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

PA04

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1890 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Observation on the Ringaskiddy Resource Recovery Centre Planning Application

To: An Coimisiún Pleanála

From: Felix Butschek, MSc

Address: Leevview, Passage West, Cork

Email: felix.butschek@gmail.com

Date: 17/11/2025

Planning Reference: PA04.318802, Ringaskiddy, Co. Cork

Subject: Observation on Planning Application – Ringaskiddy Resource Recovery Centre

I hereby submit my formal observation opposing the proposed Ringaskiddy Resource Recovery Centre (RRRC) as outlined in the Significant Further Information submitted in August 2025. This objection is based on planning policy conflicts, environmental and visual amenity impacts, as well as critical safety concerns.

1. Planning Policy Conflicts

The proposed development conflicts with the Cork County Development Plan (CDP) 2022–2028 objectives for coastal amenity, heritage protection, and sustainable placemaking. The site's proximity to Gobby Beach, Martello Tower, and active travel routes on the L2545 is incompatible with the plan's emphasis on preserving visual and recreational assets. Specifically, the incinerator development largely falls into parcel RY-I-09 zoned for educational purposes under the 2022 CDP. The attached map generated using geographical information services using the applicant's own drawings for buildings (digitized by three ground control points see pg. 6 below) clearly shows this conflict. The planning report submitted by Indaver suggests that 'the site is predominantly zoned RY-I-15 and part zoned RY-I-09' (Coakley O'Neill, 2025 - pg. 8). However, Indaver's proposed site layout digitized in the attached map clearly illustrates that the incinerator facility is nearly exclusively built in the RY-I-09 zone, intended for the extension of the marine related education, enterprise, research and development. In fact, of the buildings proposed by Indaver, less than 1% of footprint area will be erected in zone RY-I-15: the south-western corner of the processing hall and a large portion of the fuel tank (totaling 0.913% of total building footprint). The fact that a large proportion of the site owned by Indaver to the south, west and north of Hammond Lane Metal Recycling is zoned for industrial use is immaterial, given that their proposed development clearly leaves that zone largely untouched. The applicant's proposal will thus limit further educational and research development that the land is zoned for. The submitted application hence directly and materially contravenes Cork County Development Plan 2022–2028, which designates parcel RY-I-09 for marine-related education, enterprise, and research (Volume Four, South Cork, Ringaskiddy zoning objectives). The CPD explicitly

supports retention and development of lands for third-level education and research infrastructure (Volume One, Economic Development and Education policies). As a result, Indaver's plans negatively affect my career prospects in the field of marine research and third-level education.

Beyond this personal impact, approval of the Indaver plans will adversely affect the necessary capacity building through marine related education to enable the renewable energy transition in the offshore space. From my professional experience in being selected for An Board Pleanála's expert panel on offshore wind energy licensing, I know that the public service and the Commission itself (as well as industry) are crying out for increased expertise in this field. The Indaver incinerator on a site zoned for 3rd level education to fill exactly this critical need would come at a significant opportunity cost and is thus unaligned with important strategic interests of Ireland to combat climate change through sustainable industry.

2. Visual amenity concerns

The Landscape Design Report (Brady Shipman Martin, 2025, p.15) asserts that the proposed Ringaskiddy RRC will "blend in" with its surroundings and respond to the design of the adjacent university campus. However, this claim is not supported by the scale and massing of the proposed structures. The process building is indicated as reaching elevations of 50 m OD, which is more than twice the height of the tallest element of the iMERC campus. In addition, the proposed stack, at a height of 75 m OD, will visually dominate the surrounding landscape and adjacent educational facilities. This level of visual intrusion is inconsistent with the established character of the area and the visual amenity objectives set out in the Cork County Development Plan (CDP).

The UCC Beaufort Building, located within the iMERC campus, has received national and international recognition for architectural excellence (RIAI Irish Architecture Award 2017; American Architecture Prize 2017). The educational zoning of the subject lands was intended to facilitate campus expansion and development of high-quality educational and research facilities. The introduction of a large-scale industrial facility for waste incineration materially contravenes this zoning objective and undermines the design coherence envisaged for this location.

Further, the Non-Technical Summary (Indaver, 2025, p.41) claims that the operational RRC will transform the area "from a slightly unkempt, semi-industrial area to a more developed cluster of industry, energy and education campus style landscape." This characterization is inaccurate. The proposed site is currently mostly rural greenfield and (partly) brownfield land, adjacent to a Martello Tower zoned as passive open space (RY-GR-10, CDP 2022, Volume 4). This area provides ecosystem services, including recreational and hedonic landscape value, and is accessible via a footpath from Gobby Beach car park—an amenity that will be lost if the development proceeds. Far from being "unkempt," the site contributes to the sustainable development objectives of the CDP by supporting tourism and recreation.

The proposed development will not only alter the local landscape character but will also have a significant adverse impact on the visual amenity of Cork Harbour, an area designated

by Fáilte Ireland as being of “National Tourism Significance” (Indaver, 2025, p.30, Non-Technical Summary). The scale and prominence of the RRC are underplayed throughout the applicant’s narrative and conflict with the findings of their own Visual Impact Assessment. The cumulative effect of these changes is incompatible with the CDP’s objectives for sustainable tourism and landscape protection

3. Coastal Risk and Climate Adaptation

The application labels shoreline protection and ground-level raising as “minor” works, yet this claim is inconsistent with the proposed interventions in a zone exposed to coastal recession, sea-level rise, and storm surge. Indaver’s own Coastal Erosion Study (Appendix 13.3) identifies groundwater seepage and overland flow as primary drivers of episodic cliff failures, including the major collapse between Sections F and G. Persistent seepage springs and saturated toe conditions were observed even after prolonged dry periods, confirming that internal hydrological processes—not just wave action—undermine slope stability. Despite this, the proposed mitigation is confined to shingle placement at the toe, with no upslope drainage or surface water management measures. Across the Significant Further Information documents and drawings, Indaver provides full site/road drainage and L2545 attenuation (Drawings C-000-010-015, C-000-080/081; FRA Appendix 13.4), but no upslope/cliff drainage or surface-water interception measures are proposed along the Gobby Beach cliff line. This omission directly contradicts the study’s findings and leaves the most critical failure mechanism unaddressed. Finally, the FRA (Appendix 13.4) proposes raising the entire site platform to 4.55 m OD and finished floors to 5–11 m OD, requiring extensive groundworks across a 13.55 ha coastal site. These works are mischaracterized as “minor” despite their scale, potential alteration of drainage patterns, and visual impact on a sensitive harbour landscape. Such interventions conflict with Cork County Development Plan objectives for coastal amenity and sustainable development, and their cumulative effects have not been transparently assessed.

The Construction Environmental Management Plan likewise contains no scheme for cut-off drains, cliff dewatering, or seepage relief. This omission persists despite Appendix 13.3 identifying groundwater seepage and overland flow as primary drivers of episodic failures. The submission therefore fails to address the very mechanism it identifies as critical to cliff instability.

4. Appropriate Assessment, Biodiversity & Environmental Claims

In the FRA, the applicant further asserts that shingle nourishment will have “no negative impacts” on adjoining areas or Special Protected Area (SPA) features, yet provides no ecological baseline, turbidity controls, sediment-quality standards, or monitoring plan. Trigger points for re-nourishment are purely geomorphic, ignoring ecological thresholds and SPA obligations under the Habitats Directive. Furthermore, while the study acknowledges that nourishment material may migrate in a very dynamic environment during storms, it fails to quantify expected storm-loss volumes and instead presumes that the material will exclusively follow ‘net northward transport’ away from the closest SPA, thus failing to incorporate this key environmental disturbance in their EIAR. Assertions of

environmental compatibility are therefore unsupported and inconsistent with statutory requirements.

Additionally, the Natura Impact Statement relies on limited survey radii (~300 m) for Cork Harbour SPA bird species, which is insufficient given plume deposition footprints extending beyond these ranges. A Zone of Influence (Zoi) approach as mandated by the 2022 EPA guidelines on EIARs has not been sufficiently implemented. This raises concerns about the adequacy of the Appropriate Assessment and potential adverse effects on designated habitats.


5. Fire Safety and Emergency Risk

The developer's submission lacks detailed fire containment strategies for large-scale incinerator fires involving hazardous waste streams. In the event of a major fire or explosion, toxic smoke plumes and dioxins could severely impact air quality and marine ecosystems. Road access via the L2545 could be blocked, hindering evacuation and emergency response for Haulbowline Naval Base, compromising national defense readiness. Thermal plumes reaching up to 136 m above sea level pose risks to Air Corps helicopter operations, which appear to remain unaddressed in the significant further information submitted, despite queries by the defense forces in previous consultation rounds. Additionally, the Maritime College and UCC Beaufort campus, both reliant on clean air and water for research and training, could face contamination risks, disrupting education, research and maritime safety. Evacuation of staff and students at the UCC Beaufort campus is not adequately ensured in the plans laid out by Indaver, and the development could thus pose a personal risk to my safety and wellbeing, as well as fellow students and staff at educational facilities that the site is zoned for.

Conclusion

For the reasons outlined above, I respectfully request an oral hearing. On the balance of all evidence, I believe that An Coimisiún Pleanála will arrive at the same conclusion as all three of its inspectors (Jones 2004, Yukel Finn 2009, Daly 2017) to refuse permission for the proposed development. My observation opposing the development is supported by planning policy considerations, visual amenity, environmental protection requirements, and public safety imperatives. Notwithstanding the potential need for more incinerator capacity in Ireland (which itself may be questioned based on the Circular Economy Strategy 2022 and Climate Change Strategy), the proposed site remains too small and in the wrong location for such a large-scale development. The proposed development materially contravenes zoning objectives, poses unresolved environmental and safety risks, and undermines strategic national interests in education and climate resilience.

Yours Sincerely,

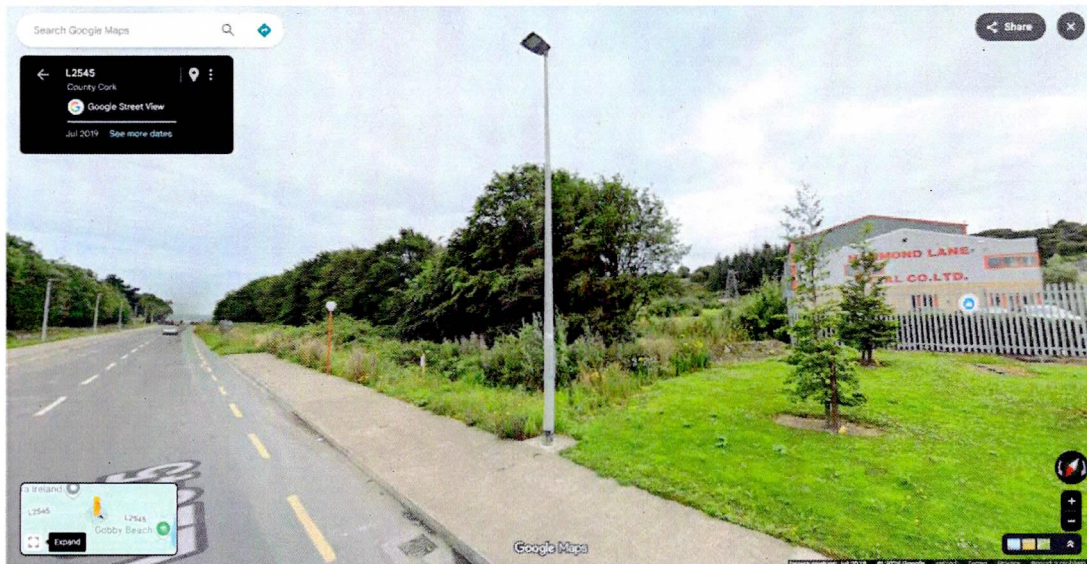


References Used:

1. Cork County Council (2022) Cork County Development Plan 2022–2028
 - a. Volume One: Main Policy Material
 - b. Volume Four: South Cork
2. Indaver Significant Further Information Submission (August 2025)
 - a. Appendix 13.3 – Coastal Erosion Study
 - b. Appendix 13.4 – Flood Risk Assessment
 - c. Natura Impact Statement
 - d. Environmental Impact Statement and EIS Non-Technical Summary
 - e. Brady Shipman Martin Landscape Design Report
 - f. Coakley O'Neill Final Planning Report
 - g. Drawings C-000-010-015, C-000-080/081, and 300-302
3. EPA (2022) Guidelines on the information to be contained in Environmental Impact Assessment Reports
4. An Bord Pleanála Inspector Reports:
 - a. Jones 2004
 - b. Yukel Finn 2009
 - c. Daly 2017

Attachments:

1. Google photos street view of the proposed site



2. Map of the site showing CDP parcel zones, see overleaf



N
 Map title: Indaver Site superimposed by Cork County Development Plan (CDP) 2022-2028
 0 40 80 160 m

Spatial Reference: IRENET95 Irish Transverse Mercator
 Creator: Felix Butschek, MSc
 Sources: Indaver 2025, CDP 2022, Open Street Map
 Indaver Landscape Plan digitized using 3 GCPs

Relevant Land Use Zone Parcels

RY-GR-10	RY-I-09
CDP 2022-2028 Parcel ID	RY-I-15
Existing ID	Incinerator Buildings
RY-GR-09	