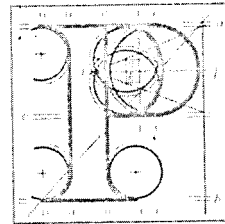


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Gerard Menihane
34 Silver Hill
Herons Wood
Carrigaline
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	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Riomphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

TO: An Coimisiun Pleanala
64 Marlborough Street
Dublin 1, D01 V902

OBSERVATION ON SID APPLICATION - Case reference: PA04.318802, Ringaskiddy Co Cork

Proposed development of a resource recovery centre (including waste-to-energy facility) by Indaver NV
t/a Indaver Ireland

OBSERVER NAME

Gerard Menihane

DATE 17 Nov 2025

OBSERVER ADDRESS

34 Silver Hill, Herons Wood, Carrigaline, Co. Cork

OBSERVATION DETAILS

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 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 3 Bord Pleanala 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 site ownership by Indaver, 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 on a known flood risk area, marked as same 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 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 build 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 - 28)* 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 the 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 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, concluded by all 3 Bord Pleanala Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017) and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site.

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



I enclose fee of €50



I have already submitted in 2016 so have paid prior fee



Additional pages attached (1)

OBSERVER NAME Gerard Menihane

DATE 17 Nov 2025

OBSERVER ADDRESS 34 Silver Hill, Herons Wood, Carrigaline, Co. Cork.

OBSERVATION DETAILS CONTINUED

Naval Base

The location of the planned incinerator is proximate to the Irish Naval Base. It poses a risk to the Naval Base and the Naval operations of the Irish state, should a fire or explosion manifest itself at the incinerator site. While this is unacceptable in any weather conditions, its effects would be magnified in a Southerly (S) or the prevailing South Westerly (SW) wind direction. Such an event would be likely to necessitate the evacuation of Haulbowline Island. This poses several problems:

1. It may not be possible to evacuate by land as this requires personnel (military and civil/public servants), to drive towards the fire/explosion site, in the first instance and secondly pass extremely close to the site to escape. The only alternative is a slow evacuation to Cobh by marine transport.
2. Evacuation of the Naval Base would leave ammunition, weapons and naval patrol vessels unprotected. This is not conscionable. It would result in military authorities and ultimately the Minister of Defence, carrying the risk for ordering personnel to remain behind in a hazardous situation. The alternative would be to abandon the ammunition, weapons and naval patrol vessels.

Outside of the above scenario, helicopter operations to/from the Naval Base would potentially be adversely impacted in the instance of a Southerly or South Westerly wind. This would render any plans for a Forward Operating Base on the Naval Base redundant.

Residents / Schools / Colleges / Businesses

From a further health and safety viewpoint, the prevalence of fog and low-lying cloud in the Cork Harbour area, would keep emissions from the incinerator from rising and dispersing, increasing the risk of ingestion of toxic particles by military / civil service personnel on the island. This equally applies to residents of Cobh, Ringaskiddy, Monkstown and the Greater Harbour area, as well as employees and students at Munster Technological University (National Maritime College) and University College Cork (Beaufort Centre).

Tin addition, the proposed Indaver site is within a few hundred metres of two third level institutions, MTU and UCC. The proximity makes the risk of direct casualties from an explosion at the incinerator site a realistic risk. In addition to this, is the day-to-day risk to the health of employees and students.

It is not clear that a genuinely independent impact assessment of the effects of the health of residents, students and employees in the wider Cork Harbour region has been carried out. It is imperative that this is carried out prior to the incinerator planning process continuing.

Erosion

The site is unsuitable due to the prevalence of erosion on the Goby Beach side of the site and the regular flooding of the site and approach roads to the site. These would render the site unsuitable for any development, much less a hazardous incinerator. The much-publicised remediation of the ISPAT site on Haulbowline demonstrates the degree to which Cork Harbour has been exposed to toxic elements, including heavy metals. The risk of further toxic pollution of Cork harbour, via water or air, is unacceptable. Particular to this, is the prevalence of fog and low-lying cloud in the Cork Harbour area which would keep emissions from the incinerator from rising and dispersing, increasing the risk of transmission to the water, as well as people.

Tourism

Cork Harbour is the second largest natural harbour in the world and many cruise liners travel through the harbour enroute to a stopover in Cobh. Brittany Ferries carries both Irish and French visitors and travels to and from France from Ringaskiddy on a regular basis. This tourism has a huge positive effect on the local economy. A large incinerator belching out smoke and fumes at the mouth of our beautiful harbour would be an eye sore for all visitors and would create a very negative first impression.

Ringaskiddy, once a small, beautiful seaside village has been taken over by industry and factory buildings. To feed this huge 240,000 tonne incinerator it will require hazardous waste to be transported from near and far which will lead to huge volumes of heavy-duty trucks travelling to and from Ringaskiddy on a regular basis. This will lead to a deterioration of the air quality for residents of Ringaskiddy.