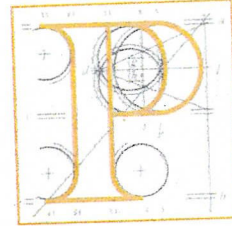


**Our Case Number:** ABP-318802-24  
**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Johanna Keating  
7 Whitepoint Drive  
Cobh  
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](http://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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## **Formal Objection to PL04.PA0045 – Ringaskiddy Resource Recovery Centre**

I am a Cobh resident along with my husband and our three daughters we live in Whitepoint in very close proximity to proposed incinerator. I have sought planning advice on the proposed incinerator from a University friend who is an Environmental Scientist & Urban Planning expert with 25 years of experience. Based on her findings and advice, I wish to object to the above application on a number of grounds which you can find in the following submission.

Johanna Keating

7 Whitepoint Drive,

Cobh

## **Formal Objection to PL04.PA0045 – Ringaskiddy Resource Recovery Centre**

I wish to object to the above application on the grounds that the proposed development is contrary to Irish and EU law and fails to comply with principles of best-practice planning and sustainable development.

Although I am not a local resident, I am a frequent visitor and am familiar with the site's long and contentious planning history. Local residents have lived under the threat of such a facility since at least 2001.

I hold a BSc in Environmental Science and Policy, an MBA in Environmental Management, and a Certificate in Urban Planning, with over 25 years' experience as an Environmental Planner and Manager. I am qualified to provide an objective assessment of the Planning Report and Environmental Impact Assessment (EIA).

While I support sustainable development and recognise the need for industry, including potentially harmful activities- this proposal and associated EIA do not meet the necessary standards for environmental or social responsibility, as outlined below.

### **Inadequate Environmental Assessment**

Although the EIA prepared for this proposal meets the minimum statutory requirements, it falls significantly short of best-practice expectations for a development of this scale and potential harm.

The EIA Directive (2011/92/EU, Articles 3–5) and the Planning & Development Act 2000 require developers to identify, describe, and assess the direct and indirect effects of a project on human health, biodiversity, soil, water, air, climate, cultural heritage, and the interactions between these factors.

These obligations are not merely procedural; they are fundamental safeguards to ensure that decisions are informed by a complete understanding of environmental and social risks.

Having worked on numerous industrial projects, including port developments, I have supported proposals where robust social and environmental analysis was undertaken.

In this case, however, Indaver has not provided sufficient evidence to demonstrate beyond reasonable doubt that the development will avoid negative outcomes. The gaps in the EIA are substantial and undermine confidence in its conclusions.

### **Cumulative Impacts**

One of the most critical deficiencies lies in the cumulative impact assessment. The EIA confines its analysis largely to existing industrial facilities in Cork Harbour, neglecting to account for planned port expansions, anticipated growth in pharmaceutical and chemical industries, and the traffic implications of the M28 motorway project.

By limiting its spatial boundaries to the immediate Ringaskiddy area, the assessment ignores the broader Cork Harbour ecosystem and fails to consider long-term cumulative effects beyond the operational life of the project, which could extend well into 2050 and beyond under evolving climate scenarios.

Baseline data for marine biodiversity, air quality trends, and human health indicators are sparse, and there is no integrated modelling of combined emissions from multiple sources over time. Nor does the EIA employ GIS-based spatial analysis or scenario modelling, both of which are considered industry best practice.

Socio-economic impacts, including tourism, amenity loss, and community health, are treated superficially, with no integrated analysis of visual and traffic impacts on local communities.

These omissions place the assessment well below the standards set by the International Finance Corporation (IFC) for cumulative impact management, which emphasise a broader spatial and temporal scope, multi-project interaction modelling, and resilience planning under different growth scenarios.

### **Analysis of Alternatives**

The analysis of alternatives is equally inadequate. It relies on outdated site selection studies from 1999–2000 and fails to conduct a new, comprehensive assessment despite significant changes in land use, including the development of educational campuses and heritage tourism assets.

Article 5(1)(d) of the EIA Directive obliges developers to outline reasonable alternatives and justify their preferred option. This requirement has not been met.

The EIA does not consider policy-driven alternatives aligned with EU Circular Economy targets, such as scenarios where higher recycling rates reduce residual waste. Nor does it examine demand-side scenarios that reflect future waste generation trends under climate and resource efficiency policies.

Technological alternatives are addressed only superficially, with a cursory note that Best Available Techniques (BAT) will be applied. There is no detailed comparative lifecycle analysis of emissions, energy efficiency, or climate resilience for different thermal technologies.

Critically, the EIA fails to provide quantitative comparisons of greenhouse gas emissions, air quality impacts, and biodiversity risks across alternatives, or scenario modelling for long-term climate adaptation implications of each option.

## **Public Health Risk**

The Health Risk Assessment (HRA) asserts that “no significant risk” to public health will occur under normal operating conditions. However, it does not address what may happen in abnormal circumstances, which is the primary concern of local residents.

Normal operation can be disrupted by equipment malfunction, flue gas cleaning system failure, control system errors, extreme weather events, grid outages, or even fire and explosion risks. These scenarios are not hypothetical; they are foreseeable risks that must be assessed.

While dispersion modelling has been conducted to estimate ground-level concentrations at sensitive receptors such as homes and schools, it relies on general population health statistics for the Cork region rather than site-specific baseline data.

There has been no biomonitoring or cumulative health impact analysis with other industrial sources, and no long-term epidemiological monitoring plan is proposed.

Furthermore, the EIA does not clearly demonstrate how BAT will be applied, which techniques will be used, how emission limits will be achieved and monitored, or how compliance with BAT-AELs will be ensured.

This lack of clarity raises serious doubts about compliance with the Industrial Emissions Directive (2010/75/EU), Articles 11 and 14.

## **Natural Environment**

The Natura Impact Statement (NIS) concludes that there will be “no adverse effect on site integrity with mitigation measures in place.” While the NIS follows EPA guidelines, the EU Habitats Directive (92/43/EEC), Article 6(3) requires evidence that removes all reasonable scientific doubt. In this case, such evidence is lacking.

Mitigation measures may not be adequate to prevent risks from arising, and there is no adaptive strategy for sea-level rise or storm surge beyond 2050. Post-construction monitoring is mentioned but is not clearly linked to adaptive management or thresholds that would trigger additional mitigation action.

Subtidal and benthic communities receive limited attention, and there is no biomonitoring program to track potential impacts on human health from marine contamination.

Failure of design and operational mitigation measures could result in dioxins, heavy metals, and other pollutants being leached into the water, posing risks to both ecosystems and public health.

## **Climate Change**

The EIA references EU and EPA guidance on integrating climate change considerations but does not substantiate this with data. The Climate Change Risk Assessment is high-level and barely meets the minimum standard under the Climate Action and Low Carbon Development Act 2021.

The assessment emphasises electricity displacement and landfill avoidance but fails to account for upstream emissions, alternative waste treatment scenarios, and future waste reduction trends.

It assumes constant waste volumes and energy displacement benefits without modelling how reductions in waste generation could undermine the incinerator's efficiency and climate benefit.

The claim of a "net positive" climate impact is unsubstantiated. There is no full lifecycle carbon emissions analysis for plastics and hazardous waste, and the EIA does not quantify CO<sub>2</sub> equivalent emissions against EU 2030 targets.

This is critical, as incineration of plastics emits more CO<sub>2</sub> per tonne than coal, directly conflicting with Ireland's Climate Action Plan and the EU Green Deal.

While the EIA mentions potential for heat recovery, it treats this as optional rather than integral, failing to quantify additional greenhouse gas savings if district heating were implemented.

## **Heritage and Amenity**

The proposal acknowledges "moderate negative" effects on views from the Ringaskiddy Martello Tower but downplays long-term cultural heritage impacts. Limited photomontages have been provided, and there is no 3D modelling of cumulative visual impacts with existing turbines and port infrastructure.

The Martello Tower is listed in the Record of Protected Structures and the National Inventory of Architectural Heritage and lies within its Zone of Archaeological Potential.

The Planning & Development Act 2000 requires protection of architectural heritage and cultural landscapes, and the EIA Directive mandates assessment of effects on cultural heritage. Failure to adequately address these impacts is a valid ground for refusal.

From an amenity and tourism perspective, the facility's scale- an eight-storey building and a 70-metre chimney- has the potential to alter views across Cork Harbour, including from Cobh and Spike Island.

Fáilte Ireland and local authorities aim to transform Cork Harbour into a world-class tourism destination, focusing on maritime heritage, greenways, blueways, cruise tourism, and cultural trails.

Highly visible industrial development could undermine these objectives, reducing the area's appeal for leisure and heritage tourism and causing economic harm to local communities.

### **Traffic and Transport**

Traffic impacts are another area of concern. The EIA considers Port of Cork traffic but does not fully integrate other major projects, such as the M28 motorway upgrade and future industrial expansions in Ringaskiddy.

No combined scenario modelling for peak construction periods has been undertaken, nor any robust modelling of worst-case congestion scenarios during emergencies or simultaneous deliveries.

The facility will require continuous delivery of waste streams of up to 240,000 tonnes per year- resulting in dozens of heavy goods vehicle trips daily, alongside additional traffic for chemicals, maintenance, and staff transport.

These movements will strain the L2545 and M28 routes, which already serve port operations, industrial facilities, and residential traffic.

Mitigation measures rely heavily on the M28 upgrade, which has been plagued by delays, and there is no contingency plan for traffic management under current infrastructure provisions.

Traffic-related emissions and noise impacts are mentioned but not fully integrated into the health risk assessment, and there is no cumulative analysis with existing industrial traffic and port operations.

Narrow roads and sharp bends on the L2545 increase the risk of HGV conflicts and delays for emergency services, raising serious safety concerns.

### **Economic Value**

The economic benefits cited by the proponents are unsubstantiated. While the facility is expected to create up to 320 temporary jobs during construction and 63 full-time jobs when operational, these numbers are insignificant in the context of the potential environmental, health, and amenity costs.

Assertions that the development will reduce waste management costs and support the local economy through increased investment and tax revenue are unquantified and therefore unconvincing.

## **Legal Context and Precautionary Principle**

Both legal precedent and the precautionary principle must guide the assessment of this development.

The European Court of Justice has made this clear in cases such as *Sweetman v An Bord Pleanála* (C-258/11) and *Friends of the Irish Environment v An Bord Pleanála* (C-254/19).

These rulings affirm that where there is reasonable scientific doubt regarding potential adverse effects on protected habitats or public health, consent must not be granted.

The precautionary principle, enshrined in both EU and Irish law, requires decision-makers to err on the side of caution where significant harm is possible and scientific certainty is lacking.

## **Conclusion**

Given the weight of legal precedent and the unresolved risks not fully identified or addressed in the EIA, the only responsible course is to refuse this application.

Furthermore, to provide certainty for the community and uphold the integrity of the Law and planning system, the potential for further similar applications at this site should be definitively ruled out.

Yours sincerely,

Victoria Brown

150 Boode Croft,

Stockbridge Village

Knowsley

Liverpool

L284EH

14.11.25