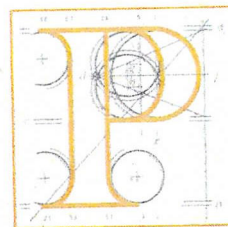


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Joleen Cronin
Blossom Cottage
Church Bay Road
Crosshaven
Co. Cork
P43 AD81

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
Executive Officer
Direct Line: 01-8737263

PA04

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Joleen Cronin
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Church Bay Road
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Co. Cork
P43 AD81

16 November 2025

To:
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Observation on SID Application — Case Ref. PA04.318802
Proposed development of a Resource Recovery Centre (including Waste-to-Energy facility)
at Ringaskiddy, Co. Cork

Applicant: Indaver NV t/a Indaver Ireland

Dear Sir/Madam,

I wish to lodge a formal observation and strong objection to the above Strategic Infrastructure Development application. I live in Crosshaven, overlooking Cork Harbour, and I would be directly and significantly impacted by this development. I use the harbour year-round for sailing, kayaking and open-water swimming, and I am deeply concerned about the risks this proposal poses to public health, wildlife, the harbour environment and the long-term future of our coastal communities. I also formally request an Oral Hearing to ensure full public participation.

1. Site Fundamentally Unsuitable — Size, Erosion and Constraints

Despite updated submissions in August 2025, the site remains fundamentally too small for a development of this scale. Coastal erosion continues to reduce the available footprint on one

side, while the boundary is constrained by the M28 on the other. Inspector Derek Daly (2017) concluded that the usable area is inadequate relative to the proposed facility. Nothing in the updated submission addresses this critical limitation. This is the wrong project on an inherently unsuitable site.

2. Deficient EIS and Incomplete Environmental Assessment

All three Bord Pleanála Inspectors (Jones 2004; Yukel Finn 2009, Daly 2017) have found the Environmental Impact Statement legally adequate in form but deficient in substance. The new submission repeats assertions without providing evidence, fails to include new robust environmental data and does not demonstrate a lawful or thorough Environmental Impact Assessment.

Crucially, the 2025 material does not present a genuine de novo site-selection process. Instead, it depends on Indaver's prior ownership of the land and ignores the fact that the surrounding region has undergone major educational, research, tourism and residential investment since 2000.

3. Flood Risk, Coastal Vulnerability and Unsafe Access

The proposed location is a known flood-risk site, flagged in the Cork County Development Plan (2022–28) and in OPW Flood Info. Raising ground levels to counter flooding would worsen the visual impact while failing to address tidal inundation, storm surge or the rising water table.

More importantly, the access road floods, meaning the site could become inaccessible during severe weather — an unacceptable situation for any critical infrastructure facility that processes hazardous materials. This alone should disqualify the site.

4. Contravention of the Cork County Development Plan (2022–28)

The specific site area (RY-I-09) is zoned for third-level educational expansion, marine-related enterprise, research and development. This zoning is directly connected to the strategic growth of the National Maritime College of Ireland and the MaREI research centre.

The proposed incinerator directly contradicts this zoning and undermines future investment in research, innovation and marine education — sectors which align with national and regional economic strategies. Zoning is not optional; it must be upheld.

5. Climate-Law, Carbon and R₁ Non-Compliance

Ireland is already exceeding its national carbon budgets. The application includes:

- no carbon-budget modelling,
- no ETS analysis,
- no full lifecycle GHG assessment.

Electricity-only incineration of fossil plastics is more carbon intensive than Ireland's future grid and risks displacing renewable energy.

The facility does not meet the legal R₁ efficiency threshold and cannot operate as a recovery facility — only as disposal. There is no heat network, no CHP infrastructure and no possibility of achieving high-efficiency status on this site.

National policy now prohibits new residual-waste capacity. This proposal directly contradicts circular-economy principles.

6. Tourism Strategy, Cork Harbour Vision and Economic Reputation

In November 2024, Fáilte Ireland launched the Cork City, Harbour and East Cork Destination and Experience Development Plan (DEDP) — a five-year sustainable tourism plan specifically designed to develop Cork Harbour as a world-class visitor destination within Ireland's Ancient East. Its stated goals include:

- developing Cork Harbour as a world-class visitor destination;
- harnessing its maritime story, scenery and natural environment as core tourism assets;
- improving sustainable access through blueways, greenways and active travel;
- encouraging visitors to stay longer and spend more in harbour communities.

In February 2024, Fáilte Ireland, Cork City Council, Cork County Council and the Port of Cork also announced a dedicated Cork Harbour Tourism Plan to position the harbour as a “world-class sustainable visitor destination” and a “must-visit destination”, explicitly highlighting its unique natural setting and maritime character as the foundation for future development.

Cork Harbour is described in that context as one of the largest natural harbours in the world, currently under-utilised from a leisure-tourism perspective and holding “huge potential” for sustainable visitor growth through on-water experiences, harbour-island visits and coastal communities.

A large waste-to-energy incinerator on a prominent coastal site directly undermines this nationally backed strategy. It conflicts with:

- the vision of Cork Harbour as a world-class sustainable visitor destination,
- the emphasis on clean, accessible blueways and greenways,
- the need to strengthen Cork's image as a high-quality maritime and nature destination,
- the objective to integrate tourism as a key element of future strategic development in the harbour.

Approving this project would send the opposite message to visitors and investors: that Cork Harbour is a suitable location for large-scale waste incineration rather than for sustainable, nature-based, recreation-based tourism. It would jeopardise the very tourism framework that Fáilte Ireland, the local authorities and the Port of Cork are now committed to implementing.

7. Air Quality, Plume Behaviour and Missing Health Analysis

Cork Harbour is prone to thermal inversions, which trap air at low level due to the basin-like topography. This affects how emissions disperse and increases public-health vulnerability.

The application fails to assess:

- PFAS ("forever chemicals"),
- ultrafine particles,
- modern plume modelling for inversion conditions,
- independent health impacts on residents, schools or workers.

Given the planned capacity of 240,000 tonnes of waste burned per year, the absence of rigorous health assessment is unacceptable.

8. Procedural History and Lack of Confidence in the Evidence

All previous Inspectors have deemed this site unsuitable.

The most recent approval was quashed by the High Court in 2021 due to objective bias.

The same recurring deficiencies remain: missing climate analysis, unverifiable R₁ classification, outdated flood data, insufficient site-selection justification and overstated policy claims.

After more than two decades of scrutiny, the core issues have *never* been resolved — because they cannot be resolved on this site.

9. Misleading Claims About “Industrial Waste Treatment”

The facility is not designed for pharmaceutical or chemical industrial waste. It is a municipal-grade burner that cannot handle the hazardous waste streams produced by Cork’s industries.

These materials already go to specialised facilities with far stricter controls.

This proposal simply adds a new general-waste incinerator — something Ireland’s national policy does not support.

10. Wildlife, Natura 2000 Sites and Ecological Impact

Cork Harbour is an internationally significant ecological site, designated as the Cork Harbour Special Protection Area (SPA) under the EU Birds Directive and recognised as a Ramsar wetland of international importance. It supports more than 20,000 wintering waterbirds, including internationally important populations of species such as Black-tailed Godwit and Redshank, as well as several Annex I species requiring strict protection. ([Fáilte Ireland](#))

Sensitive intertidal mudflats, feeding grounds and migratory patterns are at risk from pollutant deposition, light spill, noise, industrial traffic and accidental releases.

Under Article 6(3) of the Habitats Directive, the Board must be certain beyond reasonable scientific doubt that there will be no adverse effects on these protected sites. That standard is not met here. The precautionary principle demands refusal.

11. Recreational Use, Public Amenity and Harbour Community Impact

Cork Harbour is one of Ireland’s premier locations for sailing, kayaking, swimming and marine recreation. As a resident of Crosshaven and a regular user of the water, I will be directly affected.

Even the *perception* of water contamination or air pollution is enough to deter residents, visitors, families and clubs from engaging with the harbour — with real consequences for wellbeing, community life and local economies.

This project is fundamentally incompatible with a harbour that has built its identity on clean water, outdoor recreation and world-class sailing.

12. Long-Standing Community Opposition

For 24 years, communities across Cork have rejected this project as unsafe, unsuitable and unnecessary. Cork Harbour has evolved into a vibrant hub of education, research, tourism, recreation and coastal living. An incinerator is incompatible with that future.

Conclusion

For all the reasons above — the unsuitable and diminishing site; the deficient EIS; the flood risks; the zoning conflicts; the climate-law failures; the threats to public health, wildlife, recreation and the harbour economy; and the consistent findings of unsuitability by every Inspector to date, as well as the direct conflict with Fáilte Ireland's vision for Cork Harbour as a sustainable, world-class visitor destination — I respectfully request that An Coimisiún Pleanála REFUSE this application.

I also formally request an ORAL HEARING to ensure transparency and full community engagement.

Thank you for considering my submission.

Yours faithfully,



Joleen Cronin
Crosshaven, Co. Cork