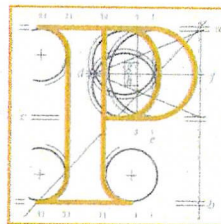


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Malores MacCarthy
Béal Bawn
High Road
Cobh
Co. Cork
P24 NW98

Date: 25 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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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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

**OBSERVATION ON SID APPLICATION - Case reference: PA04.318802, (ABP-318802-24)
Ringaskiddy Co Cork**

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

OBSERVER NAME: Malores MacCarthy

DATE: 17/11/25

OBSERVER ADDRESS: Béal Bawn, High Road, Cobh, Co. Cork, P24 NW98

OBSERVATION DETAILS:

Location

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 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 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.

Climate Action Plan Policy Considerations

The construction of the proposed waste to energy (incinerator) is in direct contravention of the published Government of Ireland climate action plan 2025.

The development will hugely increase the unnecessary generation of greenhouse gasses (GHG) both in the burning of the thousands of tonnes of waste and the transportation of the waste to the site by trucks.

As reported by Indavers own carbon management plan 1 ton of waste = 1 ton of CO2 as quoted below -

“Neutral emissions The CO2 emissions from thermal waste treatment plants is, in principle, easy to calculate: 1 tonne of waste = 1 tonne of CO2 emissions”

Therefore 240,000 tons of waste will produce 240,000 tons of CO2 per annum, adding an extra almost **1million tons of carbon emissions over a 4 year period!** when as per section 1.5 of the Ireland climate action plan quoted below Ireland is legally bound to reduce carbon emissions by at least 55% before 2030 (in 4 years time)

“1.5 Taking Action in Ireland Under the Climate Action and Low Carbon Development (Amendment) Act 2021, Ireland’s national climate objective requires the State to pursue and achieve, by no later than the end of the year 2050, the transition to a climate-resilient, biodiversity-rich, environmentally sustainable, and climate-neutral economy. The Act also requires a reduction of 51% in GHG emissions by 2030, compared to 2018 levels”

Climate action plan 2025 section 19.3.3 Waste does not include incineration in the waste reduction plan, it refers to the circular economy and waste prevention as a priority and that Ireland met it’s targets for reducing the waste sent to landfill (1999/31/EC)

Section 19.3.6 of the climate action plan for Ireland also includes the measure as per below, circular economy principles does not include incineration

Reduce waste sent to landfill and/or incineration

We will continue to transform our approach to waste in line with modern, circular economy principles

The transportation of these 240,000 tons of waste materials to the site and the return journey of the transportation trucks is calculated below

An articulated HGV will emit 0.9kg of CO2 per Km under an average load

At 20 ton average load it will take 12,000 journeys to transfer the required 240,000 tons to the site, Assuming the waste is collected from the greater Cork area and for calculation purposes we take distance from the city centre to the proposed site in Ringaskiddy (19km as per google maps), we can calculate that a 38km round trip for each load is $38 \times 12000 = 456,000$ km’s travelled – this equates $456000 \text{ km} \times 0.9\text{kg CO}_2 = \mathbf{410,400\text{Kg of CO}_2}$ generated just to transport the waste to the site.

Please read and include the Government of Ireland Climate Action Plan 2025 as reference material when considering your decision on the application.

It does not include Incineration as part of the country's Plan and actually promotes diverting waste away from incineration!

Impact on The Cork Harbour Tourism Economy

Since 2001 there has been considerable public and private investment in tourism and heritage in the harbour area, including the development of Spike Island, Fort Camden and Haulbowline Island Park. Fáilte Ireland in its recent (November 2024) five-year sustainable tourism plan for Cork City, Harbour and East Cork provides a clear vision and direction for projects to maximise the potential of Cork harbour as a world class tourism destination. Tourism has become crucial for the economic health of rural and coastal areas like Cobh, East Cork and the Harbour. It is estimated that cruise tourism in Cobh contributes €17 million to the local economy. More than 100 cruise ships visit Cobh annually and this boosts local trade and tourism through the influx of passengers and crew, but also from visitors to Cobh to view cruise ships in Cork Harbour. The incinerator plume stack and emissions are projected to be visible from almost every corner of the harbour and the plume stack higher than the largest cruise ships visiting Cobh dominating the harbour landscape. The proposed incinerator is in direct conflict with tourism and heritage investment and direction, and will negatively impact on the visual amenity of the harbour, on its reputation and economy.

Public Health Concerns

Over the last 24 years, Cork Harbour has become a vibrant amenity enjoyed by coastal communities and visitors for open water swimming, coastal rowing, kayaking and sailing. The ongoing efforts by the Cork Lower Harbour Drainage Project to maintain and provide a clean and healthy environment and ecosystem for all to enjoy will be negatively impacted by the proposed incinerator site. The production of hazardous compounds and situation of the site on a known flood area poses grave concerns for water and air pollution. Simulation of the stack plume by <https://plumeplotter.com> indicate emissions can spread within a 40-mile radius. Shang, Wu, Zhou, Zhang, Zhong, An & Qian (2019) in the Journal of Hazardous Materials states that "Fine particles (PM2.5) emitted from municipal solid waste incineration (MSWI) contain high amounts of toxic compounds and pose a serious threat to environment and human health."

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 that the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site and Government of Ireland climate action plan 2025.

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

Regards

Malores MacCarthy