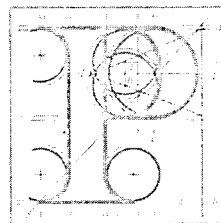


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Mary Poulter and Others
5 Woodfield
Knocknagore
Crosshaven
Co. Cork
P43 AK25

Date: 20 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

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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: Mary & Jeff Poulter, Eileen Dore, Aoife & Ellen Poulter

Date: 14/11/2025

Observer address; 5 Woodfield, Knocknagore, Crosshaven, Cork P43 AK25

Email: Marydore2013@gmail.com

To whom it may concern,

Subject: Formal Objection to the Proposed Incinerator Development

I am writing to lodge a formal objection to the proposed incinerator development in the Crosshaven/Cork Harbour area. This development poses significant and unacceptable risks to the health, wellbeing, and long-term sustainability of the local community, environment, and economy. My concerns include but are not limited to the following:

1. Decrease in Health and air quality:

The proposed incinerator poses significant risks to public health and local air quality. Incinerators can emit harmful pollutants, including fine particulate matter, dioxins, and nitrogen oxides, all of which are linked to respiratory and cardiovascular problems. Vulnerable groups—children, older adults, and those with existing conditions—would be especially at risk. Approving this development would compromise the long-term health and wellbeing of the entire community.

2. Damage to Biodiversity and Local Ecosystems

Cork Harbour is internationally recognised for its ecological value and supports a wide range of flora and fauna. The construction and operation of an incinerator threaten:

- sensitive habitats
- pollinator populations, including bees, which are already under severe pressure
- migratory and resident bird species
- marine life due to potential emissions, runoff, and general environmental disturbance

Any project that risks undermining this delicate ecosystem is incompatible with the environmental commitments and conservation goals of the region.

3. Negative Impact on Tourism and Natural Beauty

Cork Harbour is known both nationally and internationally for its scenic beauty, maritime culture, and recreational opportunities. Tourism is a vital part of the local economy, and visitors arrive specifically to enjoy the natural landscape, coastal views, and heritage.

The presence of a large industrial incinerator—visually intrusive and potentially odorous—would severely undermine the attractiveness of the harbour.

Cruise ship passengers, sailing visitors, and holidaymakers would see an industrial complex where they expect unspoiled coastline. This could lead to long-term, irreversible damage to the local tourism sector.

4. Safety Concerns for Young People and Recreational Users

The harbour is a hub for youth sailing programmes, rowing, kayaking, fishing, and a wide range of outdoor activities.

An incinerator located so close to these activities introduces:

- increased risks for young sailors and water-based users
- reduced usable space due to industrial traffic and exclusion zones
- concerns over air quality during outdoor training sessions

The proposal is fundamentally incompatible with the harbour's role as a safe and vibrant space for youth development, sport, and healthy recreation.

5. Increased Traffic and Public Safety Risks

The roads serving Crosshaven and the wider harbour area are already heavily congested, particularly during peak hours and tourist season. The introduction of frequent heavy-goods vehicle (HGV) traffic associated with an incinerator would dramatically worsen this situation. This raises serious concerns regarding:

- road safety for residents, cyclists, and pedestrians
- delays for emergency services
- deterioration of already overstressed road infrastructure

The increased traffic load would fundamentally and negatively affect daily life in the area and place additional burdens on an already strained transport network

6. Long-Term Impact on Community Identity

Crosshaven and the wider harbour region have a distinct identity built on natural beauty, maritime heritage, environmental stewardship, and community wellbeing.

The introduction of a large-scale industrial incinerator would represent a profound shift in how the area is used, perceived, and valued.

This development risks undermining decades of progress in education, tourism,

environmental protection, and community engagement.
Once the character of the area is changed in this way, it cannot be undone.

Conclusion

For all these reasons—Health and air quality deterioration, traffic impacts, risks to biodiversity, threats to tourism, safety concerns for recreational users and irreversible changes to the identity of the region—I strongly object to the proposed incinerator development.

The costs and risks far outweigh any claimed benefits and I urge the relevant authorities to reject this proposal in the interests of public safety, environmental health, and the long-term wellbeing of the community.

Yours sincerely,

Jeff and Mary Poulter, Eileen Dore , Aoife & Ellen Poulter

5 Woodfield, Knocknagore, Crosshaven, Cork P43AK25

Date: 14/11/2025

Email: Marydore2013@gmail.com

The following are FREQUENTLY ASKED QUESTIONS – WHY THIS PROJECT SHOULD BE REFUSED

- Flood and Coastal Safety

- o Is the site flood-safe?

No. It lies inside mapped Flood Zones A and B, meaning it is “high probability” for tidal and coastal flooding. OPW and Council flood maps show that both the ground and its access road are exposed to storm-surge and sea-level-rise risk. National guidelines forbid placing vulnerable infrastructure in such zones unless no safer alternative exists—which was never proven. Approval would breach the 2009 Flood-Risk Guidelines and the National Adaptation Framework 2024.

- o Can the risk be engineered away?

The applicant proposes to raise ground levels, but this merely deflects water, it doesn't remove risk. Groundwater beneath the site rises and falls with the tide, so flooding can occur from below. Under planning law, artificial elevation cannot satisfy the Justification Test for flood-prone land. Granting permission would ignore national policy on climate-resilient siting.

- o What about future sea-level rise?

Their flood model uses 2015 data and omits current sea-level and storm-surge allowances. The 2024 Adaptation Framework requires all critical infrastructure to apply the latest

climate projections. The design fails this requirement and therefore cannot be considered “proper planning and sustainable development.”

- Energy and Waste Policy

☐ Is this truly an energy-recovery plant?

No. It would generate electricity only and has no system to export heat. Under EU law

(Waste Framework Directive 2008/98/EC Annex II) a facility that achieves an R1 score below 0.65 counts as disposal, not recovery. The verified figure for this design is about 0.6, so legally it is an incinerator for waste disposal, not an energy-recovery plant.

☐ Could they add heat use later?

They could not. There is no nearby heat network, and none is proposed in the application. Without a Combined Heat and Power (CBA) study or pipeline route, future export is speculative. Approving it would breach the Energy Efficiency Directive Article 14 and Circular Economy Act 2022 section 7(3), which require priority for prevention, reuse, and high-efficiency recovery.

☐ Do we even need more incineration capacity?

No. EPA 2023 data show existing national plants already handle roughly 1 million tonnes of residual waste per year—almost the entire national total. Building more would exceed the capacity projected in the National Waste Management Plan 2024–2030 and risk “lock-in” to burning waste instead of reducing it.

- Environmental and Health Protection

☐ What will come out of the chimney?

The flue gases will contain fine particulates, acid gases, metals and dioxins within licensed limits, but those limits still add to air pollution. The stack’s height means emissions spread widely across Cork Harbour. Sensitive receptors—schools, houses, and the Naval Base—lie downwind. The plan’s own modelling confirms measurable deposition. Under the Habitats Directive this risk must be avoided, not merely mitigated.

☐ Will it release visible smoke or vapour?

Yes. Even with filters, the exhaust is hot and moist. In damp air it condenses as a white plume that can stretch kilometres across the harbour. The Environmental Impact Assessment confirms that the plume will often be visible.

- Landscape and Visual Impact

☐ Why are people so concerned about the stack?

Because it would be about 75 metres tall—higher than any other structure in the Lower Harbour—and visible for kilometres. From Cobh, Crosshaven, Spike Island and Carrigaline it would dominate the skyline and alter the character of the harbour. The County Development Plan protects these scenic coastal views and specifically prohibits visually dominant industrial features.

☐ Would it be lit at night?

Yes. Aviation warning lights and plant illumination would make it stand out above every

surrounding light source. In clear weather it would be visible across the harbour after dark, further extending its visual impact.

☒ Why does this matter in planning terms?

Visual dominance is a recognised ground for refusal under the County Development Plan's "landscape and amenity" policy. The harbour is designated as a scenic coastal area where large-scale industrial structures are incompatible with the established character and recreation use.

- Local Amenity and Community Impact

☒ What about noise, traffic and odour?

The plant would require continuous heavy-goods traffic and operate 24 hours a day. Residents in Ringaskiddy, Crosshaven and Monkstown would experience year-round industrial noise and odour. These effects contravene the plan's objective to protect residential amenity and tourism in the Lower Harbour.

☒ Would this benefit the local economy?

No. The plant would employ fewer than 50 people once built and could deter high-tech or tourism investment. By contrast, the County Development Plan designates Ringaskiddy for research, innovation and clean-technology uses—industries incompatible with a large incinerator.

- Trust and Planning Process

☒ Has this proposal already been rejected?

Yes. The Board refused earlier versions in 2003 and 2011 because of flood risk, visual impact, and proximity to sensitive uses. Those findings remain valid.

☒ Was the last permission quashed?

Yes. The High Court (CHASE v ABP [2021] IEHC 629) overturned the previous grant due to procedural bias and applicant-identity errors. The Court confirmed that legality and impartiality are prerequisites for any new decision.

☒ So what should happen now?

Under current law and policy, the project conflicts with national waste, energy-efficiency, and flood-risk frameworks. The Board must refuse permission or require complete redesign and re-advertisement. Anything less would breach the Circular Economy Act 2022 and the principles of proper planning and sustainable development.

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.

Please refuse this planning application on the basis that the site is inherently unsuitable, concluded by all three 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 a fee of €50

Please do not allow Indaver to build an incinerator in Cork harbour, the second largest natural harbour in the world.

Signed: **Jeff & Mary Poulter, Eileen Dore, Aoife & Ellen Poulter**

Address: **5 Woodfield, Knocknagore, Crosshaven, Cork P43AK25**

Date: **14/11/2025**

Email: **Marydore2013@gmail.com**