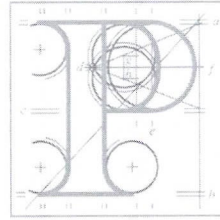


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Michael Griew
National Maritime College of Ireland
Ringaskiddy
Co. Cork

Date: 30 December 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.

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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Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

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

AN COIMISIUN PLEANALA	
LDG- _____	
ACP- _____	
17 NOV 2025	
Fee: € _____	Type: _____
Time: 4:55	By: (PDS)

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 MICHAEL GRIEW DATE 13/11/25
OBSERVER ADDRESS (CORRESPONDENCE) NATIONAL MARITIME COLLEGE OF IRELAND
RINGASKIDDY, CO. CORK
(HOME) GLENGARRA, MOUNTAIN ROAD, KILMONEY
CARRIGALINE, D43 W018

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

2 Additional pages attached (no of)

Additional Observations (Michael Griew)

In respect to alternative site selection, on the previous page a concern regarding insufficient justification for choosing the current site was raised. This point referred to enhancements in the immediate area; however, transformation of the entire Southern region should also be considered. In the decade since the previous EIS was prepared, the national road network has undergone numerous improvements [1]. Moreover, Irish Rail Freight Strategy 2040 sets out to position rail at the centre of Ireland's freight transportation network.

The carbon footprint caused by transporting waste to a location at the extremity of the region in the face of ongoing infrastructure initiatives, is a glaring omission in the EIS. The applicant's justification for lack of search for alternative sites with more sustainable transport overheads is unacceptable and should be subject to public review.

On the day of writing, news was released by the Climate Change Advisory Council revealing the extent to which Ireland is failing to meet its binding 2030 climate commitments [2].

The National Climate plan for the 2021-2025 carbon budget set a cap of 295 million tons of Carbon Dioxide equivalent, but according to the CCAC report, emissions will overrun by 10 million tonnes equivalent. The CCAC claim these excess emissions will have to be added to the cuts required in the second carbon budget which covers the years 2026-2030.

The council states being "deeply disappointed" by Ireland's poor record on transposing EU climate directives into national law and calls for the Government to address this issue before Ireland assumes EU Presidency next year.

The report adds that failure to meet 2030 climate commitments and could result in fines of up to €26 billion.

Waste management is a critical aspect of post-industrial civilization, but as the impacts of climate change deepen public concerns over anthropogenic CO₂ production, and the acceptability of industrial CO₂ emissions comes under ever increasing scrutiny, the role of the taxpayer in subsidising the applicant's business by footing the bill for the CO₂ it creates, should be openly discussed. As should the desirability for industrial byproducts to be under public control, rather than subject to the whims of a for-profit industry.

I am troubled by the temporal and spatial quality of meteorological data underpinning the EIS air quality assessment.

The section of the EIS pertaining to air quality modelling (8.2.2) retains the applicant's justification for basing modelling on Cork airport weather, an argument that rests on comparison between just over one year of local site records (October 2006 to December 2007) to airport meteorological records. The years 2020 to 2024 were used in the current appraisal, the previous application evaluated Cork weather from 1991 to 2020.

As part of the applicant's justification for reliance on Cork airport data, a sensitivity assessment of modelling input parameters was made. To validate assumptions about the accuracy of predictions made for the site area, meteorological data was drawn from Roches Point automated station (over an uncertain timeframe, probably 2018 to 2020, however these dates appear printed in Appendix 8.5 8.5.3 in reverse order). The report notes that Cork airport cloud cover was added to Roches Point data as this station did not report cloud cover. It should be noted that Roches Point lighthouse is at the mouth of the harbour, facing open water, arguably invalidating its use as a proxy for the applicant's site which is

I believe this strategy to be fundamentally unsound, brushing aside the obvious and significant effects that local topography has on cloud formation and meteorological phenomena driven by cloud cover.

The airport is located 500ft above sea level, a rise in elevation that occurs in approximately 2.5km. Under critical atmospheric conditions (wind direction, air pressure and moisture content) wind flow over this rising terrain will create or thicken cloud over the airport compared to adjacent areas. Regardless of orographic lifting, meteorological wind gradient theory would lead one to expect wind strength to be greater than at sea level, and wind direction to also differ.

Similarly, the applicant's site lies on the shore of a large body of tidal water that predispose it, under specific environmental conditions (high pressure, stable airmass conditions associated with atmospheric inversions) to trapping and possibly concentrating airborne contamination.

The EIS acknowledges 'some differences in surface characteristics are apparent between the meteorological station at Cork Airport and the proposed development site location' without elaboration, rather turning to the results of their own sensitivity study which uses averaged values based on a short period of on-site observation that minimises impacts of short-lived phenomena that may not occur consistently every year, to dismiss differences.

Given the obvious topographic differences between Cork airport and the lower harbour area, accepting modelling data based on a single year of comparison to site conditions not only skews overall confidence in modelling results but also ignores micro-climate effects that could potentially lead to short-term episodes of higher-than-average air pollution in urban areas fringing Cork harbour. These areas may be subject to local low-level local wind circulation that flawed modelling would not reveal or underestimate.

The applicant has owned the land for many years and could, if it genuinely wished air pollution to be modelled with unequivocal accuracy, could have recorded meteorological data continuously. They might also have recorded weather conditions at urban concentrations around the harbour (for example Cobh, Monkstown, Ringaskiddy, Carrigaline) where residents are most at risk from airborne contamination. I should welcome an explanation of why this opportunity was brushed aside.

1. [Irish Motorway Info](#)
2. [Ireland failing to hit climate targets - advisory council](#)
3. [Wind gradient - Wikipedia](#)