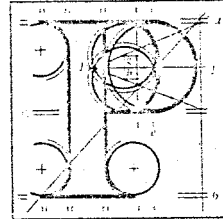


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Richard Leonard & Béibhinn O'Leary  
22 Drakes Point  
Crosshaven  
Co. Cork  
P43 DH59

**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*

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 Coimisiún Pleanála  
64, Marlborough Street,  
Dublin 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** *Richard Leonard and Béibhinn O'Leary*

**DATE:** *17<sup>th</sup> November 2025*

**OBSERVER ADDRESS** *22 Drakes Point, Crosshaven, Co. Cork. P43 DH59*

**OBSERVATION DETAILS**

Having examined the above application for permission and having also perused previous applications by Indaver for this site and Board Pleanála's commentary on same, we have the following observations:

**1. Air Quality Study**

The air quality study represents the single most critical impact on local populations associated with this proposed development. Based on the information presented in Chapter 8 of the Environmental Impact Statement (EIS), I have significant concerns regarding the representation of meteorological conditions used as inputs for the air dispersion modelling exercises and the associated sensitivity analyses.

Site-specific meteorological input data is fundamental to ensuring that dispersion predictions reflect 'real-world' conditions. Any deficiencies in this area could significantly affect the reliability of the impact assessment.

The primary meteorological input data for the air dispersion modelling is sourced from the Cork Airport Met Éireann weather station, which is approximately 12 km from the proposed development site and situated about 150 m above sea level—roughly 80 m higher than the proposed chimney stack outlet. It is concerning to note in Appendix 8.1 – Section 8.3.2.3 that *“Calm conditions account for only a small fraction of the time in any one year, peaking at 31 hours in 2021 (0.4% of the time)”*.

In my experience, calm or near-calm conditions occur far more frequently at the proposed incinerator site than indicated by the wind speed data used for the Air Dispersion Modelling (as provided in Appendix 8.2). Such conditions would likely present a more adverse scenario for Air Dispersion Modelling, as reduced wind speeds significantly limit pollutant dispersion and increase ground-level concentrations.

Furthermore, thermal inversion is a well-known and regular meteorological event within Cork Harbour, often occurring during calm conditions. The EIS is unclear on how emissions during such scenarios have been addressed within the various Air Dispersion Models. Section 8.6 notes that the AERMOD analysis software cannot accurately represent calm conditions. While an alternative CALPUFF modeling study is outlined in Section 8.6 to address calm conditions and ‘shoreline fumigation’, the EIS fails to provide a conclusive statement demonstrating that environmental impacts under thermal inversion and shoreline fumigation have been assessed, or whether exceedances of permitted ground-level pollutant concentrations could occur during these atmospheric events.

The sensitivity study of modelling input parameters outlined in Appendix 8.5 (Section 8.5.3) references additional datasets used for sensitivity purposes, namely the Onsite Station (2007) and Roches Point Data (2018–2020). However, several issues are evident:

- Table A8.15 presents results for only one pollutant scenario (NO<sub>2</sub>)
- The Roches Point weather data row references the period 2020–2024, contradicting the statement in the body of the text (2018–2020).
- The datasets for the Onsite Station (2007) and Roches Point Data are not provided, leaving the broad-reaching statements in the sensitivity study and wider Air Quality Study unsupported.

In summary, the sensitivity study does not appear sufficiently detailed to qualify the inputs used in the air dispersion modelling. Its presentation is disjointed and confusing, falling short of the standards expected to support such a critical component of this application.

In my view, these deficiencies in the Air Quality Study prevent a proper assessment of the development’s environmental impacts on the surrounding area. Based on my experience living close to the proposed facility, I believe the meteorological data used in the Air Quality Study and associated sensitivity analyses are not representative of real-world on-site conditions. Therefore, the Air Quality Study is not sufficiently conclusive to properly inform the EIS and enable a robust evaluation of environmental impacts.

## 2. Coastal Protection

I refer to the strategy adopted for the coastal protection measures along the eastern boundary of the proposed development site, specifically Chapter 13.3.4 and Appendix 13.3 of the Environmental Impact Statement (EIS) 2025.

The observed rate of coastal regression of the boulder clay cliff (approximately 0.5 m/year) is concerning. The EIS identifies the primary causes as:

1. Wave action
2. Surface/overland flow (see February 2025 walkover observation in Section 2.3.2 of Appendix 13.3)
3. Groundwater seepage (see March 2016 observation in Sections 2.3.1 & 2.3.3 of Appendix 13.3)

Additional contributory factors include freeze/thaw cycles and other 'episodic' events are also mentioned. Recent significant collapses appear primarily linked to groundwater seepage and surface overflow rather than wave action alone. While the proposed beach nourishment strategy may mitigate wave action, the EIS lacks a conclusive assessment of the relative contribution of each factor to overall cliff regression. This lack of clarity undermines the rationale for selecting beach nourishment as the preferred engineering solution, particularly given that such an intervention may itself introduce unpredictable impacts on the surrounding environment.

The acceptability criteria for coastline retreat and associated impacts on the development are unclear. Figure 13 of Appendix 13.3 indicates that the 30-year and 40-year "top of cliff" recession lines approach the toe of the engineered embankment forming the eastern boundary of the site. There is clearly a risk to the toe of the embankment would become progressively vulnerable to undermining over the design life of the development, particularly given the surcharging effects from imported material and any unpredicted hydrological effects in the boulder clay.

Furthermore, a risk is identified of the cliff face adjacent to the amenity walkway could result in undercutting of the public walkway. It is not reasonable to rely on annual inspections/monitoring to mitigate this risk, especially when the area is known to be prone to 'episodic' events as identified in the EIS.

In my view the site is fundamentally unsuitable for a facility of this nature due to the ongoing effects of coastal erosion on the eastern boundary.

## 3. Western Fields

The planning drawings for the "Raised Plateau Level" at the western end of the site—referred to as the Western Fields—are unclear in the submission. This appears to be a significant engineered platform with vehicular access from the public road. The intended purpose of this area should be explicitly stated on the planning drawings to ensure transparency and allow for proper assessment of its function within the overall development.

Please consider the above points before making your decision on this application.

Yours faithfully,

*Richard Leonard*      *Béibhinn O'Leary*

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Richard Leonard & Béibhinn O'Leary