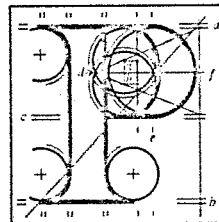


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Sue Walsh B.E (Civil)

1 Beechmount

Lower Road

Crosshaven

Cork

P43 RV09

**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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An Coimisiun Pleanala,  
64 Marlborough Street,  
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D01 V902

Reference: Application for incinerator at Ringaskiddy Co Cork.  
Planning application No.: Case no: PA04.318802 (ABP-318802-24)  
Original ref: PL04. PA0045  
Applicant: Indaver Ireland  
Planning Authority: Cork County Council  
Development: Proposed waste/toxic waste incinerator with energy recovery.  
Location: Ringaskiddy, County Cork

I am writing to oppose the proposed development of an incinerator at Ringaskiddy . I am making this submission as a local resident, a civil engineer, a mother, and someone who has spent most of my life in and around Cork Harbour working, swimming, sailing, walking its coastline, raising my children beside it, and watching it change month by month, year by year. I live in Crosshaven, directly across from the proposed development. My children have trained in the harbour every week. We breathe this air, we swim in this water, and our lives are woven into the movement of the tides and the weather patterns that roll through this harbour.

The short period allowed for public participation was completely inadequate, despite the sheer size, technical complexity, and ecological sensitivity of this proposal which has placed an enormous burden on local people trying to respond meaningfully. I have watched the harbour heal and evolve over the last twenty years, Camden Fort Meagher reborn, Spike Island transformed, Haulbowline finally turned back into a place for people. To now place a massive incinerator at its centre on a site that has already been found unsuitable multiple times, feels like turning the clock back to a time when this harbour was treated as a dumping ground rather than the extraordinary natural and cultural resource it is. For clarity and transparency, I am setting out at the beginning the key reasons why I am objecting to this proposal and asking the Board to refuse it.

I respectfully request that An Coimisiún Pleanála refuse this application for the following Reasons:

1. The site is fundamentally unsuitable being physically constrained, low-lying, and repeatedly deemed unsuitable by 3 previous inspectors.
2. It conflicts with the Cork County Development Plan, which zones this area for marine research, education, and innovation, not for heavy waste infrastructure.
3. It poses unassessed coastal-erosion and flood-risk dangers, with no robust modelling to support the applicant's assertions that the coastline will remain stable.
4. The ecological baseline is inadequate, with surveys carried out at the wrong times of year, missing species, and inaccurate characterisation of habitats.
5. It threatens the Cork Harbour Special Protection Area, and the application fails to demonstrate that the development will not damage the integrity of the SPA.
6. It will severely impact amenity, swimming, sailing, and navigation, especially for the hundreds of children who train close to the proposed stack.
7. It undermines Cork Harbour's future as a centre for tourism, heritage, recreation, and marine education, running directly counter to current investment and vision.
8. It presents unacceptable safety and emergency-access risks, particularly for Haulbowline Island residents and visitors, which has only one evacuation route, directly past the proposed site.
9. It directly contradicts national waste policy, which prohibits new residual disposal capacity in Ireland and is incompatible with Ireland's climate obligations,
10. It poses health risks that are not adequately assessed, including exposure to ultrafine particles, PFAS, and plume behaviour with regular inversions Cork Harbour.

Taken together, these issues are not minor imperfections. They indicate a proposal that is fundamentally at odds with the physical reality of the site, the ecological sensitivity of the harbour, the policy direction of the state, and the safety and wellbeing of the communities who live around and depend on this area

For all of these reasons, I ask the Board to refuse permission.

### **Points 1-3: Unsuitable size, Zoning Conflict, Erosion/Flooding**

This is a completely unsuitable site for the proposed development. Three planning inspectors have recommended refusal (in 2004, 2011 & 2017). The site is regularly prone to flooding and any raising of the site only increases its visual dominance. 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)

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)



The image above shows the beach an hour below full tide on 4 November with recent erosion visible to the south. From Gobby Strand, you can already see how hard the shoreline is working to hold itself together. That November picture is not an outlier – it is a snapshot of an ongoing process. The shoreline is repeatedly scoured and undercut. You can see where material has been peeled away. The EIAR, however, skates over this and offers reassuring language about “coastal management” and “nourishment”



Figure 10 Proposed view from Gobby Beach Strand towards Golden Rock

Indaver propose adding beach nourishment or imported shingle (Image shown from EIS showing high shingle build up) will not cause any negative impact. How can they say this with certainty without

modeling? The glacial till present is very easily eroded and every new frequent storm or heavy rainfall event brings new erosion/landslides. There has been extensive erosion also to the cliffs to the south of Gobby beach. Adding shingle will only exacerbate the erosion and should Indaver ever in the future look to Rock Armour the site it would create wave refraction causing extensive erosion to unprotected nearby coastline.

One thing is certain, any planned beach "nourishment" WILL move and could also harm feeding areas for diving birds like grebes and cormorants. The proposed shingle would completely change the character of Gobby Beach, be difficult to walk on, reducing its amenity value and irreparably change the coastline habitat and natural shoreline.

On top of this physical instability, you have the planning reality: the Cork County Development Plan has clearly moved this area towards a marine research and education role, supported by the National Maritime College, the Beaufort Building, and related institutions. The site is not some anonymous corner of an industrial port; it sits at the heart of a consciously emerging "blue-tech" and academic cluster, tourism & amenity area. To even consider siting a municipal waste incinerator of any description adjacent to state of the art centres of excellence would highlight poor environmental policies and planning practice. How can we look to attract the best researchers and inward investment in facilities in the shadow of an incinerator.

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A heavy residual-waste incinerator contradicts the zoning, conflicts with the stated vision for the area, and sits on land that has to be physically defended from the very sea it overlooks. Add climate change to that picture: higher mean sea levels, more frequent storm surges and increased coincidence of spring tides with extreme weather. This is a rapidly changing coastline. This will not improve over the lifetime of a 30-40 year incinerator. This isn't just an "imperfect" site. It's a site that wasn't suitable 10-15 years ago when inspectors already warned against it and is even less suitable now. An undersize site, flood risk, access constraints and zoning conflict all converge here. The fundamentals haven't changed, only got worse.

#### **Point 4: Ecological Impacts & Inadequate Baseline**

The site has become a valuable habitat over the years and has high biodiversity value for many species. 6 out of 9 of Ireland's bat species were noted in the EIS which would indicate a very favorable habitat. The Environmental Impact Statement (EIS) understates the site's ecological importance and contains unjustified conclusions for bats, badgers, otters, and notable bird species. Bat surveys were carried out in September which inevitably under-records activity.. Badgers are actively using the site and are a protected species. Should this development proceed it would destroy valuable necessary habitats.

These habitats and shoreline margins act as stepping stones for wildlife. These are exactly the kinds of natural habitats that matter in fragmented landscapes. It is also highly likely otters use this shoreline.

There is also a significant night time roost of Great Crested Grebe sited very close to Gobby beach. A serious ecological assessment would err on the side of caution in a system like Cork Harbour. Instead, this assessment minimises constraints and uncertainty.

### **Point 5: Threats to Cork Harbour SPA & Failure of an Appropriate Assessment**

Cork Harbour's designation as a Special Protection Area (SPA) is not a decorative label. It is a legal recognition that the harbour supports internationally important populations of birds, particularly wintering waterbirds. The proposed incinerator lies within 1 km of the SPA. Given that proximity, and the open, connected nature of the marine environment, the onus is firmly on the applicant to show that the project will not adversely affect the integrity of the SPA. They have not done so.

Several issues undermine the Appropriate Assessment:

The baseline is incomplete, as outlined above. If you don't know who is using the site and when, you can't say what impact you'll have.

Potential changes to shoreline morphology from nourishment and hard structures are not properly modelled, despite the fact that small shifts in erosion/deposition patterns can matter a lot for invertebrate communities and therefore for diving birds. Disturbance impacts during construction (noise, lighting, heavy machinery) and operation (noise, lighting, traffic) are waved away without evidence consistent with the sensitivity of SPA species. The siting of an incinerator in 2025 within 1km of an SPA is completely inappropriate and would be completely unacceptable elsewhere.

The Appropriate Assessment process is supposed to be conservative: Here, there is more than reasonable doubt. There is missing data, missing modelling, and a pattern of underestimation. In that context, the only lawful conclusion is that the test is not met.

## Point 6: Amenity, Swimming, Sailing



Cork harbour may be the second largest natural harbour in the world however the only safe area for dinghys to sail in the proximity of Crosshaven is in the highlighted rectangular zone. Dinghies from Monkstown, Cobh sail here to the Curlane Bank area. Due to the obvious dangers in the shipping channel and strong tides, this is the equivalent of the sailing classroom of the harbour .

This is where we send our children aged 7 and above to sail. You will note that the dinghy sailing area is right beside the proposed incinerator. The body of water that has been eroding the Indaver site has been a vital amenity area for all harbour users for hundreds of years. Luc and Gobby beaches are in year round use by walkers, swimmers & kayakers.

Our family are long term members of RCYC. Our children have sailed in the harbour most weekends. RCYC has a membership of 1500 including approximately 400 junior members. This club regularly hosts national and international sailing events including Dinghy Fest, Cork Week ,National youth trials for all classes and has also hosted the Womens Match Racing International series and Laser Master Worlds. All of these events draw large numbers of sailors and accompanying families and visitors. Cork Week alone can count for up to 600 yachts in pre recession years and 15000 visitors to the village . In 2020 the club celebrated being 300 years old.

Crosshaven regularly hosts major events such as the Ocean to City Rowing Race, Crosshaven Traditional Boat and Seafood Festival & numerous high profile world & national sailing events. This proposal would diminish the amenity value of the harbour reversing all the work of the past 20 years.

## Point 7: Tourism, Heritage & the Future Vision of the Harbour

Cork Harbour is a national asset with an incredibly unique series of Military Fortifications, islands & Martello Towers. Development of the tourism and marine potential of the harbour is only in its infancy in comparison to its enormous potential. Failte Ireland have just launched their **Cork City, Harbour & East Cork Destination & Experience Plan** showing plans to link the harbour islands which would give visitors an upclose experience of this enormous incinerator. There has been substantial investment in projects such as Haulbowline Island Park, Camden Fort Meagher & Spike Island, NMRC & Beaufort with world class facilities. There are also plans for development of a tourism experience at the Naval Base in Haulbowline.

I think in looking forward to the future development of the harbor it is important to look back.



I include a rare map from circa 1900 showing the Steam engine network and ferry passenger network of Cork harbour. This shows a transport network, incorporating tourism that was evident even at that time. At the side of this tourism map is printed The Cheapest and most picturesque route through the unrivalled scenery of the River Lee, Cork Harbour and Bays on the adjacent Atlantic Ocean. This is a map showing the rail, steamer and horse drawn coach service . Part of the services included the Palmer tender services that ran from Palmers island in Ringaskiddy to the American liners that stopped in Cobh.

They could see the potential of the harbour in the late 1800s yet in 2025 we are looking at placing a toxic waste facility in the heart of the harbour, only that is so serious it is laughable.

In 1978 the tunnels at Camden Fort Meagher were sought to be used to dump asbestos. The community of Crosshaven united to block the trucks and stop this travesty. There was a public meeting and it was decided to set up a rota starting the following morning. Nell Mc Cafferty happened to be at this meeting. She suggested starting immediately and when the group went up they found men welding doors in the tunnels in readiness to receive the waste. These men left the fort by boat. The trucks were blockaded in the village and a standoff ensued. Where would that have left Camden Fort today if that short term frantic search for a solution to a problem had been followed through. water. Setting a toxic waste facility in the middle of that is not just planning policy gone wrong; it completely misunderstands what Cork Harbour already is, and what it is clearly becoming.

### **Point 8: Safety & Emergency Access**

There is only one escape route from Haulbowline Island as may be seen in the image below. It is ludicrous that in the event of an accident at the Indaver Facility that all visitors, Park users & Irish Navy Families would need to be evacuated TOWARDS the accident site.



I will also point out that in the event of an accident there is no running indoors for any sailing children as it would take approximately an hour to get them back ashore. Rescue boats would not be able to get very close to shore at lower tides and we heard at the oral hearing how helicopter rescue may not be an option. The RNLI based in Crosshaven carry out 45 -50 rescues per year and the Coastguard carrying out numerous rescues including helicopter use. This shows the high level of usage of the amenity of Cork

harbour. I also have concerns as to whether thermal imaging of the shoreline is possible so close to an incinerator plume. This is completely unacceptable.

### **Point 9: Non-Compliance with National Waste Policy, Climate & Carbon-Budget Incompatibility**

Irish law now prohibits expansion of residual-waste incineration capacity. The “Southern Region gap” argument relies on planning structures abolished in 2022; capacity is now assessed nationally, and Ireland already meets its projected requirements. Adding new disposal capacity conflicts directly with circular-economy policy. Ireland is already in breach of its carbon budget. This proposal would lock in a significant new stream of fossil CO<sub>2</sub> every year, largely from burning plastics. The developer has provided no carbon-budget test, no ETS modelling, and no lifecycle greenhouse-gas accounting, so compliance with the Climate Act cannot be demonstrated. The question is “Does this help us meet our carbon budgets and EU obligations?” Here the answer is clearly no. It is incompatible with Ireland’s climate obligations, locking the region into high- carbon waste management for decades. All this in the shadow of our centres for excellence for climate research.

### **Point 10: Health Concerns**

There is a high rate of asthma and respiratory illness in Cork harbour. As an asthma sufferer I know how weather and air pressure affects how I feel. In the harbour we regularly in the winter experience thermal inversions as seen in these conditions a sea fog is contained with warmer air above with little or no dispersion. In light of Professor Howards submission at the oral hearing in 2016 I am extremely concerned. Thermal inversions in Cork Harbour can trap emissions at ground level. The application does not analyse PFAS, ultrafine particles (PM0.1), which penetrate deeply into the lungs and bloodstream, coastal trapping, or inversion behaviour. Assertions of safety are impossible when key pollutants and dispersion conditions are unassessed.

### **Conclusion**

Indaver have applied twice for planning on this site and twice been refused. One has only to look at the plethora of consultants and paid advisors to underline the concept that deep corporate pockets can circumvent due democratic process. I have found this whole process an affront to the community of Cork Harbour.

I request that the community be provided with an oral hearing.

Indaver cannot guarantee that the proposed development will not impact the local community, biodiversity & heritage. Why should we take the risk for their profit? Three **An Bord Pleanála inspectors** (in 2004, 2011 and 2017) **recommended refusal**, citing site overdevelopment, site unsuitability, and serious incompatibility with educational, amenity and heritage investment in the local Cork Harbour area. I urge you to refuse this application