ARUP

Indaver

Ringaskiddy Resource Recovery Centre

Response to Submissions

Reference: 307174-00 Response to Submissions_Issue

Issue | 18 March 2026

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 307174-00

Ove Arup & Partners Ireland Limited
One Albert Quay
Cork
T12 X8N6
Ireland
arup.com

Contents

1.	Introduction	1
1.1	Structure of the Response to Submissions Document	1
2.	CHASE Submission	2
3.	Statutory Consultees	37
4.	Private/Public Organisations	85
4.1	Response to Proformas	85
4.2	Response to Larger Submissions	123
4.3	Response to Remaining Submissions (By Topic)	267

Tables

Table 2.1: Applicant's response to the CHASE submission 2
Table 3.1: Applicant's Response to Statutory Consultees' Submissions 37
Table 4.1: Applicant's Response to Proformas 85
Table 4.2: Applicant's Response to Larger Submissions 123
Table 4.3: Applicant's Response to Remaining Submissions (By Topic) 267

Appendices

Appendix A A-1
List of Submissions Relating to Proforma #1 A-1

Appendix B B-1
List of Submissions Relating to Each Topic B-1

1. Introduction

This document has been prepared by Arup on behalf of Indaver in response to the invitation from An Coimisiún Pleanála (ACP) on 21 January 2026 to make a submission on the observations received in relation to the significant further information submitted to ACP on 29 August 2025 and referred to by ACP as Case Number: ABP-318802-24 in relation to the following proposed development.

"The proposed development will consist principally of a waste-to-energy facility (waste incinerator) for the treatment of up to 240,000 tonnes per annum of residual, household, commercial and industrial non-hazardous and hazardous waste which is currently landfilled or exported. Of the 240,000 tonnes of waste, up to 24,000 tonnes per annum of suitable hazardous waste will be treated at the facility."

This document is referred to as the Response to Submissions Document hereafter.

In its letter to Indaver on 21 January 2026, ACP invited Indaver to make a submission on the observations received in relation to the significant further information. ACP advised that '*any response to the Commission's invitation should not contain any additional reports or supplementary reports and should be confined to the issues raised in the observations*'. Therefore, the responses provided in this Response to Submissions Document do not contain any reports or supplementary reports in addition to those previously provided to ACP.

1.1 Structure of the Response to Submissions Document

The Response to Submissions Document has been split into three distinct sections –

- Response to CHASE submission (Section 2)
- Response to Statutory Consultees (Section 3)
- Response to private/public organisations submissions (Section 4)

When reviewing the submissions, it is important to note the following limitations:

- Handwritten submissions were interpreted as accurately as possible;
- A small number of submissions were missing portions of text, which limited context in some cases. These submissions were nonetheless interpreted as accurately as possible based on the information available.
- The information provided in the 'Submission Statement' column of the tables below are quotes, paraphrased text or the general sentiment/concern of the submissions received and should not be taken as statements of fact.
- This response document addresses topics raised in submissions that relate specifically to documents and information provided in response to the 2024 Request for Information (RFI) from then An Bord Pleanála (now An Coimisiún Pleanála). Topics that fall outside the scope of the 2024 RFI have not been considered or addressed as part of this response document.

2. CHASE Submission

Table 2.1 below presents Indaver's responses to the various issues raised in the CHASE submission. Each entry identifies the document in which the issue was raised, referenced by the ACP file name, outlines the topic and the relevant statement from the submission (paraphrased where appropriate for brevity), and provides Indaver's response.

Table 2.1: Applicant's response to the CHASE submission

ACP Submission Reference	Topic	Submission Statement	Applicant Response
1. 17.11.2025 Submission Letter to An Coimisiún Pleanála.pdf	Further Legal Issues	Under Regs.22(2) and 22(4) of the Planning and Development Regulations 2001-2025 (unofficial consolidation published by Department of Housing, Local Government and Heritage) the applicant is obliged to furnish the Commission with a correct statement of the area of the site and correct map of the site. This is a mandatory requirement and is a pre-requisite for a valid application. Without compliance with the Regulations in this regard the application is invalid and must be rejected as such. The Commission has no jurisdiction to entertain it further.	Regulations 22(2) and 22(4) of the Planning and Development Regulations 2001-2025 apply to applications made under section 34 of the Planning and Development Act 2000, as amended. These regulations have no application to SID applications, made under section 37E of the Planning Act. CHASE accepted this position on Day 2 of its JR of ACP's grant of permission in 2018 (see para 54 of the substantive judgment dated 19 March 2021). Nonetheless, the documentation submitted to the Commission complies with the requirements of section 22(2) and 22(4) of the Planning and Development Regulations 2001 – 2025. A correct statement of the area of the site is provided in the public notices (site notice and press notice) and a correct map of the site is clearly identified on Drawing 1434-101.
1. 17.11.2025 Submission Letter to An Coimisiún Pleanála.pdf	Further Legal Issues	We wrote on behalf of our clients to the Commission by email on 11 November requesting a short additional period of twenty-one days for our clients to respond, giving their reasons. We asked for a reply from the Commission to this request to be given to us by close of business on Friday 14 November. In the absence of any reply we telephoned the Commission at 4pm on that date enquiring as to the position. We were asked to send our letter in once more and we did so by email at 4.10pm. The Commission replied by email at 4.46pm refusing our clients' request, saying that the deadline had been 'set by Indaver'. That reply evidences a grave failure by the Commission to apply fair procedures, to impartially consider the request and to examine the reasons given in	CHASE has raised an issue regarding the refusal of an extension of time for its submissions. The setting of the time period allowed for submissions is a matter for An Coimisiún Pleanála, as per section 37(F)(2) of the Planning and Development Act 2000 (as amended). The time period referenced in Indaver's notice met requirements of An Coimisiún Pleanála's RFI dated 4 June 2024, as confirmed in correspondence with ACP.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		our request letter, or to apply its own discretion in the matter.	
1. 17.11.2025 Submission Letter to An Coimisiún Pleanála.pdf	ECHR rights: Unfair procedures, unreasonable timeframe	Article 6&1 of the ECHR states *'In the determination of his civil rights and obligations or of any criminal charge against him, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law'*. Article 13 of the ECHR states '"*Everyone whose rights and freedoms as set forth in this Convention are violated shall have an effective remedy before a national authority notwithstanding that the violation has been committed by persons acting in an official capacity'*. The present application has been with the Commission since January 2016, almost a decade. The substantial delay in reaching finality in a matter engaging our clients' rights must be seriously considered by the Commission in light of its obligations under Article 6§1 and Article 13, as reinforced by the ECtHR's recent judgment.	The CHASE submission does not demonstrate how any rights under the ECHR, including under Article 6 and 13, have been engaged by the decision-making process relating to the application for planning permission. Whilst of course it is a matter for ACP to consider this issue, Indaver observes that: 1. the application has not been with the Commission for almost a decade (see timeline below); 2. CHASE has been participated in the application process, as entitled by law; 3. The timeline for this application (as set out below) is not indicative of any delay, substantive or otherwise, on the part of ACP (or Indaver or any third parties); **13 January 2016** Application for proposed development lodged with (as it is now known) ACP **29 May 2018** Permission granted by ACP **1 June 2022** Application remitted to ACP by Order of the High Court **4 June 2024** RFI issued to Indaver **29 August 2025** Response to RFI submitted by Indaver **6 October 2025** Re-advertisement by Indaver **6 October 2025 - 17 November 2025** Period for third party submissions on response to RFI **26 January 2026 - 18 March 2026**

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Period for Indaver to respond to observations on response to RFI
1. 17.11.2025 Submission Letter to An Coimisiún Pleanála.pdf	Oral Hearing	We submit (without prejudice to other grounds) that the Commission is precluded from deciding to grant permission on the basis of a review the material before it and in the absence of an oral hearing.	Chase has not identified any specific reason to hold an oral hearing, save that it "*would also allow our clients to present any further relevant analysis or reportage from experts*" who CHASE assert "*are currently being excluded from the process*". The decision as to whether to hold an oral hearing is a matter in the absolute discretion of ACP as per section 134 of the 2000 Act. That was recognised by the High Court in its remittal judgment CHASE v ABP & Ors, 2018 No 593 JR dated 1 October 2021 at paragraph 130, where the court stated: "*I do not believe that I should go further than recommending that consideration be given [by ACP] to the exercise of some or all of [its powers under section 37F(1) and (2) or its discretion under section 134]. I will not direct that the Board does so*". The High Court also stated in its substantive judgement CHASE v ABP & Ors dated 19 March 2021 (see paras 469-471) that it is "*a decision for the Board as to whether it needed to receive any further information in order to complete the statutory task entrusted to it under s.37G(2)*".
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	'Zoning in CCDP	Paraphrased: Under the Cork County Development Plan 2022-2028 (Volume 4: South Cork, Cobh Municipal District), Indaver's site now spans two objectives: Objectives RY-I-15 large stand-alone industry, and RY-I-09 enterprise and educational, including marine education /research, ancillary offices and laboratories (10.19 ha total).While the zoning in the western side of Indaver's site remains the same (RY-1-15, suitable for stand-alone industry) the eastern part of the site has been rezoned (RY-1-09), prioritising high-value sectors like pharmaceuticals and marine R&D and not residual waste treatment. I respectfully request An Coimisiún Pleanála refuse permission.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states *'Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan..... Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	M28 and site useability reduction	Paraphrased: M28 construction cuts across and reconfigures the western/northwestern portions of the site. It reduces the effective area for development. There has been no recognition of this in Indaver's updated information and means the footprint of the site is smaller than reported by Indaver.ACP's own inspectors cited over-development and excessive scale on the original 13.3hectre. I respectfully request An Coimisiún Pleanála refuse permission.	The acquisition of lands by Cork County Council for the development of the M28 project from Indaver is clearly identified in Section 15.3.2.1 of the EIS. Cork County Council have confirmed that they have no objection to the lands which were subject to the CPO being included in the planning boundary. This confirmation is also included in Appendix 1.3 of the EIS.
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	Ongoing Coastal Erosion	Paraphrased: Indaver's average rate of erosion of 0.5 m/yr is super conservative, as erosion does not take place uniformly and at the same yearly rate. One storm could take away several meters of the cliff , which is what we have witnessed at this site over the last ten years. At Indavers conservative rate of 0.5 meters / year along the coast they have lost 5 meters of land at a minimum, in the last 10 years .The fact that their site has reduced by this amount is not accounted for in their application.	Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	Ongoing Coastal Erosion	The EIS downplays hydrogeological vulnerabilities, including groundwater pollution from leachate or fire-fighting or accidental spills that could accelerate erosion and contaminate aquifers. This could also possibly cause contamination in the near-by Cork Harbour SPA (approx. (500m)	Refer to EIS Chapter 13, Soils, Geology, Hydrogeology, Hydrology and Coastal Recession Section 13.6, which documents that water will be contained on the site and therefore there is no possibility of an acceleration of erosion, contamination of aquifers, or consequent contamination in Cork Harbour SPA.
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	Ongoing Coastal Erosion	The placing of shingle would interfere with the integrity of the geological heritage of the area and also the use of the area as an amenity. I respectfully request An Bord	Refer to EIS Chapter 13, Soils, Geology, Hydrogeology, Hydrology and Coastal Recession Section 13.6.1.1 Construction Phase Mitigation Measures, which documents

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		Pleanála refuse permission. Gobby Beach, adjacent to the site, is a designated County Geological Site (CGS CK077) under the Geological Survey Ireland's heritage audit (completed 2023). Development would fragment this heritage asset, breaching GSI protections and the Plan's biodiversity objectives. Preserving Gobby Beach aligns with Ireland's National Geoscience Plan, not incineration. I respectfully request An Bord Pleanála refuse permission	how the applicant will carry out the beach nourishment works in consultation with the Geological Survey of Ireland (GSI), to ensure the protection of the Geological Site.
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	Adverse Impacts on Local Amenities	Paraphrased: Bord Failte have recently announced a plan to make Cork harbour a destination. The cultural and historical heritage of the harbour is beyond doubt and the imposition of the incinerator can but only undermine the success of this new plan. I respectfully request An Bord Pleanála refuse permission.	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape. As such, it is considered that the proposed development is compatible with the plans for improved tourist amenities in the Lower Harbour.
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	EU Policy on Circular Economy, Sustainability, and Waste-to-Energy (2015-2025)	Paraphrased: The 2015 Circular Economy Action Plan (CEAP) introduced 54 measures prioritizing waste reduction and recycling over recovery. The waste hierarchy is given binding effect through Section 7(3) of the Circular Economy and Miscellaneous Provisions Act 2022 and through the National Waste Management Plan 2024-2030. Indaver's facility still does not achieve the R1classification and represents the lowest tier of the waste hierarchy, disposal D10.The project, first proposed over two decades ago, is fundamentally misaligned with	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		contemporary priorities for waste reduction, recycling, and true circularity. I respectfully request An Bord Pleanála refuse permission.	interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
1. Final Submission to Indavers New Information 318802-24 - clean3.pdf	Emissions and Health	Paraphrased: The air quality modelling in the EIS still underestimates nano-particulates and dioxins in this new information. The MARI man, according to our experts, is still starving with a diet of 1000calories / day. The flawed health assessments also ignores cumulative exposures in the harbour's microclimate and ignores that we get thermal inversions in the harbour which trap emissions horizontally sometimes for days. Furthermore, the air modelling was yet again done at Cork airport 12 kilometres away and situated on a hill, not at Roches point which was recommended by one of your expert inspectors in a previous refusal.	The modelling of emissions to air from the Ringaskiddy Resource Recovery Centre indicates that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for all compounds emitted from the facility even under abnormal operating conditions. In terms of dioxins/furans it was assumed that abnormal operations, including startup and shutdown, occurred for 11 days (264 hours) per year at a concentration 0.5 ng/m^3 which is at a level over eight times the licence limit. Under these circumstances, the impact of dioxins and furans from the facility was insignificant and a small fraction of existing ambient levels. The approved model for assessing the *'maximum at risk individual'* (MARI) provides default values for calorific input. These values were used consistently to provide the model outputs in accordance with the required methodology. In relation to nano-particulates, as outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. The current limit values for PM_{10} and $PM_{2.5}$ will be in place until 2030 when more stringent limit values will be enacted. There are currently no limit values for nano-particles or ultrafine particles (UFPs), defined as particles with a diameter less than 100 nm (0.1 µm), there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. In relation to meteorological stations and the presence of thermal inversions in Cork Harbour, as outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007.*"
3a. Submission - site selection.pdf	Site Selection,SFI 2025	Paraphrased: The text of Chapter 3 in the EIS is identical to that submitted for the IEL application but policy references have been updated to match the CCDP 2022. The County Development Plan has been incorrectly interpretated with regards to the zoning recommendation for waste-to-energy being exclusively to areas zoned as SEAs.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan. Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas'*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
3a. Submission - site selection.pdf	Site Selection,SFI 2025	Paraphrased: Table 3, Chapter 3 of the EIAR presents a matrix of the merits or otherwise of the '*alternative*' sites. There are serious methodological flaws in some of these criteria which lead to significant misrepresentations about the suitability of some of the sites under the headings of visual impact, Population and Human Health, Material Assets, Traffic, Biodiversity, Cultural Heritage.	Refer to EIS Appendix 3.3 Comparison of Environmental Effects for Reasonable Alternative Sites for details of the process of considerations of site suitability. There are no misrepresentations in the analysis provided.
3b. Submission - waste.pdf	Waste	Paraphrased: Ireland is legally bound by both European and national policy to prioritise waste prevention, reuse, recycling. When the Circular Economy Act was passed in 2022, it was hailed as a landmark commitment to move Ireland from a linear model of resource use to a more circular pattern of production and consumption. It is more than vital – it is critical – that when policymakers and planning authorities are enabling Ireland's future waste management infrastructure, they look towards the new rake of legislation around circularity and the lessons learned by some of our European brethren. Locking Ireland into more privately-run residual waste infrastructure at this point is a commitment to three decades of linearity.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
3b. Submission - waste.pdf	Waste	Through a range of legislative instruments and policy documents, Ireland has committed to the circular economy concept: maximising resource assets, re-capturing them for reuse, thereby minimising carbon emissions and (finally) implementing the waste hierarchy. A shift from burying to burning in the last decade has helped, at least theoretically, in climbing one rung of the waste hierarchy ladder. But with a stagnating MSW recycling rate, missed 2020 recycling targets and a general trajectory towards missing 2025 and 2030 targets, it is clear that business as usual is no longer good enough. Building additional incineration capacity at this point will lock these failures in for the long term. Ireland	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		has systemic upstream issues in waste prevention, separation, and sorting. Introducing new incineration capacity before fixing communication and separation issues will undermine participation and send contradictory signals to the public. Providing yet more burn capacity at this 15stage will disincentivise the upstream infrastructure that is critically needed to improve materials capture. **A core principle of EU circular economy policy is that capacity expansion for incineration must not undermine higher tiers of the hierarchy. To lock in additional thermal capacity for another 30+ years by permitting the proposed Ringaskiddy facility is, at very best, premature** before meeting recycling and reduction targets, application of the waste hierarchy, investment in upstream waste sorting and recycling, clarify outcome of Arc21 planning application, clarification on revision of EU's ETS, life cycle analysis of the overall environmental impacts of the proposed Ringaskiddy facility as compared to the interim use of more efficient spare capacity in existing facilities in Europe.	
4. Coastal_Mapping_Objection_IndaverRRC_Final.pdf	High water mark and foreshore position	Paraphrased: My objection stems from the fact that I believe the High Water Mark claimed by Indaver to be inaccurate and I have done work to verify this. In my opinion as a researcher, using data from 2001 is entirely inappropriate to identify the foreshore, especially with no apparent mention of any work done on the ground to verify if their line was indeed accurate. Through field studies undertaken on 12 Nov 2025 which represented a 'medium tide' at Gobby beach, I determined that the foreshore based off the 2001 PLACE map is inaccurate and the area Indaver intend on placing the “sacrificial material” is largely within the foreshore.	The Foreshore Act 1993 as amended defines the foreshore as "*the bed and shore, below the line of high water of ordinary or medium tides, of the sea and of every tidal river and tidal estuary...*". The Foreshore Act does not specify how the high-water mark line is to be measured. Accordingly, it was reasonable for Indaver to rely on the high-water mark (denoted HWM on Ordnance Survey Ireland mapping, digitised version). The sacrificial material proposed for the Indaver development will be placed above the High-Water Mark (HWM) as shown on Drawing 1434-101 and during the placement of this material the construction plant and equipment will also remain above the HWM.
5. Joe Noonan_indaver boundaries Rev A.docx.pdf	Indaver boundaries	On checking the PRAI (Land Registry) website, lands currently registered to Cork County Council, being folio CK192956F, are included in the planning boundary envelope. The area of these Co Council lands is c. 2.2284 hectares. The area of lands stated in this planning application is c.13.55 hectares. When the area of the County Council lands is deducted the area of the lands should be c. 11.31 hectares. Map 1 clearly shows that	The lands registered to Cork County Council are within the application site boundary, but are not necessary for the construction or operation of any aspect of the proposed development, and no development is proposed by the applicant on these lands. Works along the northern boundary of the site will be completed in consultation with the occupier, within lands under the ownership of the applicant.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		major roadworks are being carried out on these same lands registered to Cork County Council and would therefore not be available for the applicant to use in their application. Also note the inclusion of lands occupied by Port of Cork on the North boundary, across the roadway. This area is in the applicant's title, however is it allowed to be included in the application envelope ?.	
5. Joe Noonan_indaver boundaries Rev A.docx.pdf	Indaver boundaries	The map provided identifies an area of land within the planning boundary and the contiguous property ownership recorded boundary, which is below the OSI HWM as recorded on historic OSI mapping.	The high-water mark (denoted HWM on Ordnance Survey Ireland mapping) used for the application documentation is that provided in the digitised version of OSI. This is consistent with the property ownership folio records, as land under the ownership of the applicant. In circumstances where the legislation (Foreshore Act 1993, as amended) does not specify that high water mark is to be measured by reference to hard copy OSI data, it was reasonable for Indaver to rely on the digitised version. The identified area of land is in the north-eastern part of the site, where no beach nourishment is proposed, so there will be no works at this location as shown in Appendix 13.3 of the Environmental Impact Statement.
5. Joe Noonan_indaver boundaries Rev A.docx.pdf	High water mark and foreshore position	Map 3 has the landscape Vol. 3 figure 4.7 as a background. This shows a possible error in the PRAI registered title map as it does not match the high-water mark from older mapping Ordnance survey mapping. It also shows the planting plan near the West boundary being on County Council Lands and on what appears to be a new roadway. Map 4 has a background map of the Ordnance Survey of Ireland 1929 mapping. This shows the high-water mark in conflict with the application boundary/folio boundary which are the same line. Map 5 is another Ordnance Survey map background which shows the same high-water mark. The legal boundary line at the foreshore would need investigation.	The high-water mark (denoted HWM on Ordnance Survey Ireland mapping) used for the application documentation is that provided in the digitised version of OSI. This is consistent with the property ownership folio records, as land under the ownership of the applicant. In circumstances where the legislation (Foreshore Act 1993, as amended) does not specify that high water mark is to be measured by reference to hard copy OSI data, it was reasonable for Indaver to rely on the digitised version. The identified area of land is in the north-eastern part of the site, where no beach nourishment is proposed, so there will be no works at this location as shown in Appendix 13.3 of the Environmental Impact Statement. As noted on Figure 4.7 of the EIS, this is a diagrammatic graphic. The detailed landscape plans: 300, 301, 302 and 303 included with the application show that there is no proposed planting on the County Council lands.
6b. Observation on Environmental Impact Statement (EIS) – engage meaningfully with the public.pdf	Engage meaningfully with the public	Paraphrased: EIA Directive (2011/92/EU, as amended by Directive 2014/52/EU): Public Participation Directive (2003/35/EC): Transposing the Aarhus Convention (1998) , the Irish Planning and Development Act 2000 (as amended), Sections 129-131: .S.I. No. 352/2010 –	The updated EIS and NIS submitted in 2025 are part of the application process commenced in 2016 and build on the application process to date, including the public consultation documented in section 1.9 of Appendix 1.2 – Consultation. In addition, the updated EIS and NIS submitted in 2025 were

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		European Communities (Public Participation) Regulations 2010 ; Office of the Planning Regulator (OPR) Guidance (2022) collectively demand more than passive receipt of objections—they require active, two-way engagement to empower communities and refine proposals, particularly where transboundary effects (e.g., plume dispersion to Cobh or Aghada) affect multiple locales. Indaver's public involvement has fallen short of these standards, appearing reactive and minimalistic, with no tailored outreach to the wider impact area. Concerns from non-statutory bodies over cumulative pollution and habitat disruption—were not meaningfully incorporated into the EIAR iterations post 2016. Their input was sidelined, breaching Aarhus' requirement for "*taking into account*" views (Article 6(3)).No equivalent early dialogue occurred for the 2025 process. Inadequate engagement violates EU law, as affirmed in ECJ cases (e.g.,C-58/24, emphasizing Aarhus in EIAs) and Irish precedents (e.g., 2021 High Court in Friends of the Curragh Environment v An Bord Pleanála, quashing for Aarhus non-compliance). It erodes trust, delays projects via appeals, and exposes the Board to infraction proceedings under Article 258 TFEU.	the subject of public consultation during 6 October 2025 – 17 November 2025. Public participation in relation to the planning process has throughout the process been in compliance with relevant obligations under European law and under the Aarhus Convention. The record shows that the applicant has comprehensively engaged with stakeholders and the Board/Commission at all stages in the planning process. The potential for cumulative effects is addressed in the individual assessment chapters of the 2025 EIS (Chapters 7-15) and Chapter 16 Cumulative Impacts, Other Impacts and Interactions. The potential for transboundary effects is addressed in Section 16.7 of Chapter 16 Cumulative Impacts, Other Impacts and Interactions of the 2025 EIS.
6c. Observation on EIS in relation to contravention of the national waste management plan.pdf	Observation on Environmental Impact Statement (EIS) – contravenes national waste management plan	The EIS posts the facility (240,000 tonnes per annum (tpa) total, including 216,000 tpa non-hazardous residual municipal solid waste (MSW) and 24,000 tpa hazardous) as essential for self-sufficiency and proximity, citing EPA data on export reliance (e.g., 38% MSW exported in 2021). However, NWMPCE Volume I reveals these gaps as symptoms of systemic recycling failures (e.g., 41% MSW recycling rate stagnant since 2009), not a mandate for thermal expansion. The project contravenes Ireland's National Waste Management Plan for a Circular Economy (NWMPCE) 2024-2030, Volume I: Current Situation and Challenges (May 2024), EU waste directives, and circular economy (CE) principles.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
6c. Observation on EIS in relation to contravention of the national waste management plan.pdf	Observation on Environmental Impact Statement (EIS) – contravenes	**Issue:** The application emphasises immediate thermal capacity deficits (e.g., dedicated WtE at full utilisation, 910,000 tpa authorised but strained) to justify 216,000 tpa non-hazardous incineration, with limited integration of upstream measures like separate collections or	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	national waste management plan	producer responsibility initiatives (PRIs). NWMPCE Volume I projects MSW rising to 3.7-3.8 million tonnes by 2030 (16-19% increase) but stresses diverting 50-74% of residuals via 60% recycling targets, rendering large-scale incineration non-essential if reforms succeed (e.g., biowaste collection diverting 21% household residuals).**Non-compliance:** Contradicts NWMPCE's "*whole-of-government*" CE strategy (e.g., pay-as-you-throw enforcement, end-of-waste criteria for 13 recyclables) and WFD Article 4 (waste hierarchy: prevention > recycling > recovery). The facility risks processing 51% divertible household residuals (per 2021 data), forgoing €200-500/tonne embedded value.	treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
6c. Observation on EIS in relation to contravention of the national waste management plan.pdf	Observation on Environmental Impact Statement (EIS) – contravenes national waste management plan	**Issue:** Indaver claims critical shortages (e.g., no commercial hazardous incinerator; 48% hazardous exports; 29% thermal exports for non-hazardous), validated short-term by NWMPCE (e.g., 807,785 tonnes treated vs. 910,000 tpa authorised in 2022).However, projections show potential surpluses by 2035 if CE targets met (residuals drop ~500,000 tonnes), with proposed additions (Ringaskiddy + Glanpower 65,000 tpa) creating 261,000 tpa contingency—exceeding needs without decoupling waste from GDP growth **Non-Compliance**: Ignores NWMPCE warnings on "*over-reliance on thermal treatment*" (41% MSW in 2021) and Landfill Directive (1999/31/EC) goals (⩽10% biodegradable MSW landfilled by 2035), favouring cheaper contingencies like a 150,000 tpa landfill extension (€10-12M vs. €200M for Ringaskiddy). **Lifetime Risk**: Over 30-40 years, the facility could become underutilised, importing waste like overcapacity-plagued neighbours, conflicting with WFD selfsufficiency (Article 16) by undermining prevention.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
6c. Observation on EIS in relation to contravention of the national waste management plan.pdf	Observation on Environmental Impact Statement (EIS) – contravenes national waste	**Issue:** The EC and EEA have critiqued "*emergence of over-capacity in incineration*" across Member States, warning it locks in low recycling, distorts markets, and contradicts CEAP's zero-pollution goals. Examples include Denmark, Sweden, Germany, Netherlands, and Austria, where landfill bans shifted residuals to incineration, creating excess capacity that "*limits the potential for recycling*" and competes for waste streams	As outlined in Section 2.2.1.3 of Chapter 2 of the EIS, in 2017 the European Commission published a Communication on the role of waste-to-energy in the circular economy to enhance synergies between the circular economy, resource efficiency and waste-to-energy. It seeks to provide guidance to Member States on how to achieve properly balanced waste-to-energy capacity. It also affirms that the waste hierarchy remains as the cornerstone of EU policy and

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	management plan	(e.g., high incineration rates of 50-60% despite strong recycling). In Estonia, a 42% incineration rate (2022) led to overcapacity hindering 33% recycling, exacerbated by insufficient separate collections—mirroring Ireland's 41% rate and export reliance. Civil society echoes this, calling for an EU moratorium on new incinerators amid a "*significant overcapacity crisis*," with facilities capable of treating more waste than generated, fostering imports and undermining prevention. **Non-Compliance**: Risks Ireland joining "Type 3/4" countries (high residual treatment) per EC assessments, violating CEAP and 7th Environment Action Programme (residual waste near zero by 2050). EEA 2024 Ireland Profile flags similar overbuild risks, with ash exports (183,598 tonnes/2022) adding emissions burdens. **Impacts:** Economic lock-in (€200M investment over facility lifespan); environmental (GHG from avoided recycling: 443 Mt CO_2 e.g. savings possible per EC modelling); social (lost 178,000+ recycling jobs EU-wide).	legislation and is a key to a transition to a circular economy. The Communication refers to a European Environment Agency study which suggests there is currently no incineration overcapacity in the EU as a whole and in certain Member States where there is excessive reliance on waste to energy (e.g. due to high heat demand from district heating networks) then a moratorium on new facilities may be an appropriate measure. An analogous situation does not arise in Ireland. Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. An additional policy TP14.5 calls for the provision of national capacity for bottom ash from existing thermal treatment facilities, pending the provision of alternative uses which optimise the circularity of this material. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. Future EPA end-of-waste determinations will permit the use of incinerator bottom ash as a secondary raw material further contributing to the circular economy.
6d. Observation on Environmental Impact Statement (EIS) – reliance on outdated incineration technology.pdf	Observation on Environmental Impact Statement (EIS) – contravenes national waste management plan	Paraphrased: This observation centres on the facility's reliance on outdated incineration technology, The 30+ year design life to 2050 ignores rapid advancements in waste technologies, risking "*lock-in*" to obsolete methods amid falling waste volumes and stricter EU zero-pollution targets. Approving this would contravene the Industrial Emissions Directive (2010/75/EU) on Best Available Techniques (BAT), the Habitats Directive (92/43/EEC) for protected sites, the EU Sero Pollution Action Plan (2021) aiming for 50% air toxics reduction by 2030, and Ireland's emerging Circular Economy Bill (2025).	As documented in Section 4.7 of the EIS, the design of the facility is based on the most up-to-date technology. The operation of the proposed facility will be regulated by the Environmental Protection Agency, as a licensed operation and subject to an Industrial Emissions licence. The provisions of that licence will require ongoing compliance with all relevant Directives, and its operation will be compliant with all relevant Best Available Techniques (BAT), BAT Conclusions, and BAT Reference documents. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
6d. Observation on Environmental Impact Statement (EIS) – reliance on outdated incineration technology.pdf	Observation on Environmental Impact Statement (EIS) – contravenes national waste management plan	Paraphrased: Incineration, the core of this proposal (240,000 tonnes per annum, including 24,000 tonnes hazardous waste), remains a 20th-century method that burns waste at high temperatures, generating energy but also substantial toxic ash (up to 20-30% of input mass as bottom/fly ash laden with heavy metals, dioxins, and nano-plastics). There are superior alternatives to avoid combustion entirely and render incineration obsolete: **Advanced Sorting and Recycling:** AI-optical sorters (e.g., AMP Robotics) now achieve 95% purity for plastics/organics (up from 70% in 2020), diverting 80%+ of waste pre-residual stage without ash or emissions. **Plasma Arc Vitrification**: Systems like Sierra Energy's FastOx convert waste to syngas and inert glass slag, recovering 99% energy with zero dioxins/heavy metals—scalable for hazardous streams at €80-100/tonne.	As outlined in Chapter 2 of the EIS, the National Waste Management Plan for a Circular Economy 2024-2030 took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. Section 3.5.1 of Chapter 3 of the EIS on alternatives considers gasification and pyrolysis technologies as alternatives to more traditional waste-to-energy combustion technology but concludes overall that "*due to the range of residual waste streams to be handled at the Ringaskiddy Resource Recovery Centre, the absence of any reference plant operating to the scale required for the waste streams required, the robustness of the technology and the focus on energy recovery, pyrolysis and gasification technology were not considered as reasonable or practical alternatives to proven waste combustion technology*". Plasma Arc technology is a gasification process but it is not a commercially available technology in the market for the treatment of municipal waste.
6d. Observation on Environmental Impact Statement (EIS) – reliance on outdated incineration technology.pdf		Paraphrased: Despite BAT compliance, episodic stack emissions (e.g., 0.1 ng TEQ/m³ dioxins) could deposit via wet scavenging in the harbour, bioaccumulating in food chains and harming waders/mammals under the Habitats Directive (Article 6 appropriate assessment required).Cumulative effects with adjacent facilities (e.g., Indaver's operational hazardous incinerator) risk exceeding BAT limits during peaks, unassessed in the EIS despite Industrial Emissions Directive requirements for integrated pollution prevention.	Bioaccumulation in food chains is documented and assessed in Appendix 6.3 of the EIS, which is based on conservative assumptions of continuous operation at maximum concentration limits, and sediment exposure to a maximum rate of deposition. This would never happen in reality, so the conclusions of the assessment are robust. Therefore, any impact from the bioaccumulation of potentially toxic compounds, such as dioxins, in macro-invertebrate and fish populations is predicted to be negligible. Section 8.1.1 of Chapter 8 of the EIS outlines that the air dispersion model has included very conservative (well in excess of the emission limit values) emissions for all parameters for 3% of the year. The modelled value for dioxins and furans was 0.5ng TEQ/Nm^3. Cumulative effects were assessed in Section 8.2.4 in Chapter 8 Air Quality of the EIS and the associated results of that assessment are available in Appendix 8.4 of the EIS. Indaver does not have an adjacent operational hazardous incinerator, and the proposed development will be operated in full compliance with all relevant BAT requirements.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
6d. Observation on Environmental Impact Statement (EIS) – reliance on outdated incineration technology.pdf		A 30+ year lifespan to 2050 locks Ireland into combustion amid exponential non-thermal innovations, undermining EU net-zero goals (European Green Deal) and the Critical Raw Materials Act (2023) prioritising recovery over energy. Key 2025 advancements include: Thermal Alternatives: 1. Gasification/pyrolysis shrink waste 95% with 90% less flue gas/syngas for clean fuels; EU pilots (e.g., Netherlands' HoSt) save 90% GHGs vs. incineration. A Springer review highlights scalability for RDF/hazardous waste.2. Biological/Circular Tech: Anaerobic digestion captures 95% biogas from organics; microwave/chemical sterilisation handles hazards ash-free.3. AI/ML Optimisation: Machine learning hybrids (e.g., IoT-deep learning for bin forecasting) enable 100% substitution in urban systems, per ScienceDirect studies. Digital Product Passports (EU 2024) will track materials, favouring sorting over burning.	Chapter 3 (Sections 3.5 to 3.7 incl.) of the EIS comprehensively describes the alternative technologies considered by the applicant and explains why the proposed development is an appropriate technological solution to the identified need for a facility of this type at this location.
6e. Observation on EIA in relation to inadequate baseline monitoring on air quality.pdf		Paraphrased: This observation focuses specifically on the applicant's non-compliance with EU air quality policy and directives—particularly the Ambient Air Quality Directive (AAQD, 2008/50/EC as amended by Directive (EU) 2024/2881)—as well as Irish legislation under the Air Pollution Act 1987 (as amended) and the Environmental Protection Agency Act 1992. The EIS's air quality baseline monitoring (Chapter 8) is fundamentally inadequate, relying on a single, site-proximate point for fine particulate matter ($PM_{2.5}$); meteorological data underpinning dispersion modelling is sourced from Cork Airport rather than the Board recommended Roches Point, the assessment ignores significant cumulative emissions from cruise liners, The proposed facility's emissions pose risks of deposition and transboundary effects over Cork Harbour, yet the monitoring program—does not represent the wider impacted area, as implied in the EIS figures (e.g., 8.8 and 8.9).. This contravenes the EIA Directive (2011/92/EU, as amended) requirement for "*comprehensive*" baseline data (Article 5) and the AAQD's monitoring obligations for zones exceeding limits (Annex III).	As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Article 5, each Member State is required to designate the competent authority to undertake air quality assessments and install an appropriate monitoring network in compliance with the Directive. "*Article 5 Responsibilities* *Member States shall designate at the appropriate levels the competent authorities and bodies responsible for the following:* *(a) assessment of ambient air quality, including ensuring an adequate functioning and maintenance of the monitoring network*;" The EPA is the competent authority to undertake this task. It is not the responsibility of an individual facility or development to set up and operate a monitoring network in line with EU 2024/2881. Detailed site-specific baseline air monitoring data for both the period 2018 – 2019 and 2024 – 2025 was however undertaken as outlined in Section 8.4 of Appendix 8.1 of the EIS in line with the recommendations of EPA "*Air*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Dispersion Modelling From Industrial Installations Guidance Note – AG04" (EPA, 2020). As outlined in Section 8.3.3.2 of Appendix 8.1 of the EIS, in relation to ecology, the background concentrations for NO_X, and nitrogen and acid deposition at the most impacted modelled designated habitats as identified through the IN2 screening process were available from the 1 km grid square concentrations provided on the Air Pollution Information System (APIS) website (APIS, 2025), in line with UKEA guidance AGTAG06 – Technical Guidance On Detailed Modelling Approach For An Appropriate Assessment For Emissions To Air (UKEA, 2014).
6e. Observation on EIA in relation to inadequate baseline monitoring on air quality.pdf		**Issue:** Continuous $PM_{10}/PM_{2.5}$ monitoring is limited to one site (Hammond Lane Metals Recycling, next to the proposed facility, coordinates ~178500E, 70000N), justified in the EIS as "*operational efficiency and representativeness near emission sources*." This site recorded baseline PM10: 9.4 µg/m³ and PM2.5: 5.7 µg/m³ (2024-2025 data), but the EIS implies broader coverage across the ~10 km study area (e.g., Monkstown, Cobh, Passage West) through figures depicting multiple markers. In reality, passive diffusion tubes (e.g., for NO_2 at N1-N16, SO_2/benzene at S1-S7/B1-B7) dominate elsewhere, with no added continuous PM sites—making the assessment unrepresentative of downwind/residential gradients or harbour dispersion. **Non-Compliance:** Violates AAQD Annex I (representative monitoring in agglomerations >250,000 inhabitants, applicable to Cork conurbation) and Irish EPA guidance (AG4:2012) for multi-point baselines in heterogeneous terrains. The confinement to Hammond Lane (an industrial yard, elevated ~5 m) biases results toward source proximate levels, underestimating exposure at sensitive receptors like Martello Park residences (N4) or Loughbeg school (N11).Natura Sites **Omission:** Locations do not include direct monitoring within or adjacent to protected areas, such as the Cork Harbour SPA (encompassing Haulbowline, Spike Island, and eastern harbour channels) or Great Island Channel SAC (marine/coastal habitats ~1-2 km southeast). While	As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Article 5, each Member State is required to designate the competent authority to undertake air quality assessments and install an appropriate monitoring network in compliance with the Directive. "*Article 5 Responsibilities* *Member States shall designate at the appropriate levels the competent authorities and bodies responsible for the following:* *(a) assessment of ambient air quality, including ensuring an adequate functioning and maintenance of the monitoring network*;" The EPA is the competent authority to undertake this task. It is not the responsibility of an individual facility or development to set up and operate a monitoring network in line with EU 2024/2881. Detailed site-specific baseline air monitoring data for both the period 2018 – 2019 and 2024 – 2025 was however undertaken as outlined in Section 8.4 of Appendix 8.1 of the EIS in line with the recommendations of EPA "*Air Dispersion Modelling From Industrial Installations Guidance Note – AG04*" (EPA, 2020). As outlined in Section 8.3.3.2 of Appendix 8.1 of the EIS, in relation to ecology, the background concentrations for NO_X, and nitrogen and acid deposition at the most impacted

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		terrestrial sites extend to Cobh Promenade (N14/S6/B6, harborside) and Monkstown (N12/S5/B5), no PM-specific points target SAC/SPA boundaries, ignoring potential acidifying/eutrophying deposition (Habitats Directive 92/43/EEC, Article 6). This is accurate based on EIS Figures 8.8-8.9, which focus on urban/industrial nodes without marine extensions.	modelled designated habitats as identified through the IN2 screening process were available from the 1 km grid square concentrations provided on the Air Pollution Information System (APIS) website (APIS, 2025), in line with UKEA guidance AGTAG06 – Technical Guidance On Detailed Modelling Approach For An Appropriate Assessment For Emissions To Air (UKEA, 2014).
6e. Observation on EIA in relation to inadequate baseline monitoring on air quality.pdf		**Issue:** The EIS reports only $PM_{10}/PM_{2.5}$, dismissing sub-2.5 µm measurement (e.g., PM1 or ultrafine particles, UFPs) on grounds that "*current regulations*" (AAQD) specify $PM_{2.5}$ as the limit. However, the Osiris Continuous $PM_{10}/PM_{2.5}$ Unit deployed at Hammond Lane is capable of simultaneous multi-fraction analysis: Total Suspended Particulates (TSP), PM_{10}, $PM_{2.5}$, and PM1 (⩽1 µm), with high sensitivity detecting concentrations as low as 0.1 µg/m³ —far below AAQD limits ($PM_{2.5}$ annual: 25 µg/m³ pre-2030). No data on PM1/TSP were included, despite the instrument's specifications enabling it without additional cost. **Non-Compliance**: EU environmental policy increasingly addresses $PM_{2.5}$ "*or less*," with the revised AAQD (2024/2881, effective 2030) halving $PM_{2.5}$ limits to 10 µg/m³ annual mean and mandating UFP monitoring (particle number concentration) in urban areas from 2030, recognizing UFPs' (>90% PM mass <2.5 µm) role in oxidative stress and translocation to organs. The facility's construction/operation will extend beyond 2030, necessitating forward-looking compliance; omitting PM1 data now contravenes precautionary principles (Treaty on the Functioning of the EU, Article 191) and Irish EPA AER requirements for comprehensive pollutant profiling. Scientific consensus links UFPs from combustion (e.g., WtE stacks) to heightened mortality risks (WHO 2021).	As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. The current limit values for PM_{10} and $PM_{2.5}$ will be in place until 2030 when more stringent limit values will be enacted. There are currently no limit values for TSP or PM1 nor will there be limit values for these parameters after 2030. In relation to ultrafine particles (UFPs), defined as particles with a diameter less than 100 nm (0.1 µm), there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. However, what is new in the Directive is a requirement for the competent authority to undertake monitoring for UFPs. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex III: *"… at least one sampling point per 5 million inhabitants shall be established at a location where high UFP concentrations are likely to occur. Member States that have fewer than 5 million inhabitants shall establish at least one sampling point for fixed measurements at a location where high UFP concentrations are likely to occur.* *For Member States with more than 2 million inhabitants, monitoring supersites at urban background or rural background locations established in accordance with Article 10 shall not be included for the purpose of meeting the requirements on the minimum number of sampling points for UFP set here.*" The EPA is the competent authority to undertake this task post 2030. It is not the responsibility of an individual facility

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			or development to set up and operate a UFP monitoring network as outlined in EU 2024/2881.
6e. Observation on EIA in relation to inadequate baseline monitoring on air quality.pdf		**Issue**: The 2024-2025 campaign spanned only six months, yielding "*historical*" supplements (e.g., 2018-2019 NO_2 at N17: 9.4 µg/m³) but no full-year PM data. This overlooks seasonal peaks (e.g., winter inversions amplifying PM in Cork Harbour's topography)and meteorological influences on dispersion. **Non-Compliance**: Scientific literature recommends at least 12 months for EIA baselines to ensure representativeness across cycles (IAIA Guiding Principles for Air Quality Assessments in EIAs, 2023; EPA Quality Assurance Handbook for Air Pollution Measurement Systems, Vol. I, 2020). Shorter periods risk underestimation, as evidenced in peer-reviewed evaluations of EIA performance where six-month data correlated poorly with annual means (r=0.65 vs. 0.92 for 12 months). Irish EPA AG1:2005 echoes this for "*robust*" zoning under AAQD.	As outlined in Appendix D of "*Air Dispersion Modelling From Industrial Installations Guidance Note – AG04*" (EPA, 2020) site specific ambient monitoring (for a minimum of 3 months) can be used to estimate annual mean background concentrations: "*Estimating Annual Mean Background Concentration Based On Shorter-Term Survey* *Guidance is available from the UK DEFRA(50) in relation to estimating the long-term (annual) averages from a shorter-term monitoring survey (a minimum of 3 months is recommended in the guidance). The approach is based on the fact that patterns in pollutant concentrations usually affect a wide region. Thus a short-term peak at one location is usually replicated at similar sites up to 80km away. The adjustment procedure is outlined below for a three-month monitoring period (Jan – Mar) at site A:* • *2 - 4 long-term monitoring sites should be used to obtain annual means (from available EPA / Local Authority urban background or background sites(47) within 80km if possible);* • *The 3-month average (Jan-Mar) at these 2-4 monitoring sites is then calculated and compared to the 3-month average (Jan-Mar) at site A;* • *The ratio of the mean during this period (Jan-Mar) to the annual mean is then determined for the 2-4 monitoring sites;* • *The average ratio derived from the 2-4 monitoring sites is then applied to Site A to obtain an estimate of the annual average.*" (EPA AG4, Page 60) As outlined in Section 8.4.2 of Appendix 8.1 of the EIS, this methodology was employed to derive annual mean background concentrations based on six months of site-specific NO_2 and PM_{10} monitoring.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
6e. Observation on EIA in relation to inadequate baseline monitoring on air quality.pdf		**Issue**: Dispersion modelling in Chapter 8 relies on meteorological data from Cork Airport (~15 km northeast), rather than Roches Point lighthouse (~5 km southeast, at the harbour entrance), as explicitly recommended by An Coimisiún Pleanála in prior assessments (e.g.,2018 Board Order PA0045 conditions for site-specific meteorology). This distant inland source fails to capture the unique microclimatic features of the estuarine, 4maritime location—such as sea breezes, tidal influences on humidity, and complex wind channelling over Cork Harbour—which can alter plume dispersion, ground-level concentrations, and deposition patterns for pollutants like PM and dioxins. **Non-Compliance**: Contradicts EPA guidance (AG4:2012) and AAQD Annex III for "*local*" meteorological inputs in coastal/industrial EIAs to ensure accurate modelling (e.g., AERMOD/CALPUFF simulations). Roches Point data better represents prevailing southerly winds and inversion risks, essential for assessing impacts on downwind receptors (e.g., Haulbowline, Cobh) and Natura sites. Using airport data risks over- or under-predicting concentrations by over 20% in estuarine settings, per peer-reviewed studies on harbour microclimates (e.g., Atmospheric Environment, 2019).	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station *"The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007."* Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards.
6e. Observation on EIA in relation to inadequate baseline monitoring on air quality.pdf		**Issue:** The EIS accounts for additional road transport emissions but entirely overlooks those from cruise liners, which currently average ninety-five calls per year at the Port of Cork (e.g., 93 scheduled for 2025, 103 in 2024 - Port of Cork data). These vessels, berthing ~2 km north at Cobh Cruise Liner Terminal emit substantial $PM_{2.5}$, SOx, NOx, and UFPs from auxiliary engines during idling—contributing up to 250 times WHO safe levels in localized spikes (2025 Clean Arctic report on Cork Harbour). The six-month monitoring period (2024-2025) does not coincide with the peak cruise season (April-November), missing elevated baselines that could amplify cumulative effects on receptors like Cobh Promenade (N14). While ship impacts are high in themselves, they are dwarfed by the facility's planned	As outlined in Section 8.4.2 of Appendix 8.1 of the EIS, ambient monitoring of PM_{10} and $PM_{2.5}$ in addition to NO_2, SO_2 and benzene was measured over the period August 2024 – January 2025. In addition, previous monitoring was conducted over three winter months from October 2018 – January 2019 and three summer months from June 2019 – September 2019. Thus, baseline monitoring captured any significant background emissions in both summer and winter months including relevant emissions from shipping. In addition, as outlined in Appendix 8.3 of the EIS, road traffic emissions were specifically modelled for both the do nothing and do something scenario. Furthermore, as outlined in Appendix 8.4 of the EIS, an evaluation of cumulative air quality effects as a result of

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		outputs (e.g., ~1-2 tonnes PM10/year from stack, plus fugitives, vs. episodic ship peaks. **Non-Compliance**: Fails AAQD requirements for cumulative assessments (Annex I) and EIA Directive Article 7 on transboundary/industrial synergies. Internationally, EU Alternative Fuels Infrastructure Regulation (AFIR, 2023) mandates 90% shore-power uptake at TEN-T ports like Cork by 2030 for container/passenger ships, reducing emissions by up to 98% (CLIA Europe). The Port of Cork's Masterplan 2050 and ongoing considerations (e.g., ISO 14001/50001 certifications) aim to implement this for air quality compliance, yet the EIS ignores future mitigations, risking non-precautionary overestimation of "*acceptable*" baselines under the Green Deal's zero-pollution pillar.	relevant industrial emission sources was also carried out using the methodology outlined by the EPA in AG4 (EPA, 2020). The relevant nearby air emission points sources identified were Janssen Biologics Ltd, Hovione Cork, ESB Aghada, Sterling Pharma. Ltd, Thermo Fisher Scientific Ltd, Pfizer Ireland Pharmaceuticals (Ballintaggart), BGE Whitegate and Recordati Ltd.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	The modelling is supposedly concentrating on cormorant and common tern. But when the concentration in eggs obtained from the modelling is compared to the value given for the no observed adverse effect level (NOAEL), we find that the NOAEL is not derived from cormorant or tern. It comes from two different species, 'black-eyed gull' (actually black-headed gull) and herring gull, cited from an Australian report.2 The NOAEL value we are given is 50,000 pg per gram of egg. Interestingly, the Australian report that is the source for this NOAEL reports that these two gull species are the least sensitive among the SPA species or their close relatives. Another reason the NOAEL given is so high is that the 'adverse effect' for the gulls was embryo death! (It is well known that dioxins cause more subtle harms at concentrations very much lower than the lethal dose, as will be shown below.) The reason for choosing the lethal dose in very insensitive species as the criterion here is not stated. This choice is especially puzzling because the same Australian report that presents the very high gull values used in the modelling, also presents values in cormorant and tern that could have been used instead. These are much lower than the gull values used in the modelling. The values in the Australian report are for lowest observed adverse effect levels (LOAEL) in eggs from double-crested cormorant and Foster's tern. They are	The modelling approach used was to model the impact on a fish-eating bird egg, the model is not species specific but generic. The species identified in the Australian study are not present in Cork Harbour, so the details of the conclusions in relation to that report are not applicable to the modelling and assessment completed for the proposed development, which, as documented in Appendix 15 to the NIS, concludes that there will be no significant impact.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		more appropriate for risk assessment, not only because these are close relatives of the tern and cormorant in the SPA that are the focus of the modelling, but also because the LOAEL values relate to developmental abnormalities and not to death. To understand how different the LOAEL or NOAEL values are for the two endpoints of embryo damage vs death, we can compare the values in eggs of double-crested cormorant in the Australian report. Developmental abnormalities are observed at 0.8 – 2 pg/g in cormorant eggs, and death at 4,000 pg/g, at least 2,000 times higher. In Foster's tern the LOAEL for developmental abnormalities is 8 pg/g egg (p. 39-40 of footnote 2; note that although that table also gives values in common tern, they are not in eggs, and only Foster's tern has egg values that are comparable to the modelling).	
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	On a related point, we are particularly concerned that the applicant was provided by the Department of Arts, Heritage and the Gaeltacht with an LOAEL value in eggs in Foster's tern, and recommended to use it for common tern, but failed to do so (this is evident from the letter in Appendix 2). No reason for that is given. The LOAEL they were given in Foster's tern was 90 pg/g, over 500-fold lower than the LOAEL in gulls that they actually used in the modelling (But as mentioned in (1) above, the Australian report cites a still lower LOAEL value in Foster's tern from other research.)	Although the Dept of Arts, Heritage & Gaeltacht referred to a toxicity reference value of 90 pg/g for use with the common tern, the relevant species present in this case is the black-headed gull. It is noted, however, that the predicted value for eggs in the model is 2.324 pg/g which is well below this value.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	The modelling in Appendix 15, as performed by AWN, results in a baseline value of 2.23 pg/g in eggs of a '*fish-eating bird*' (Table 2.2 or Appendix 15). It will be remembered that the LOAEL in double crested cormorant is 0.8 – 2 pg/g, meaning that the modelling in Appendix 15 already produces a value for egg dioxin concentration above the upper end of the range of LOAEL for developmental abnormalities in the cormorant.	The aim of the AWN approach was to model the impact on a fish-eating bird egg. Although the Australian report cited a range of bird species that occur outside Ireland, the species most relevant from this study, and chosen as a representative species for the AWN model was Black Headed Gull which is listed as a Special Conservation Interest of Cork Harbour Special Area of Conservation. Herring gull, although not a SCI species, is a regularly occurring species within Cork Harbour. Other species discussed in the Australian study (such as Forster's Tern and the Double Crested Cormorant) are not present in Cork Harbour. The AWN model (which used maximum operational levels) predicted a value for eggs of 2.324pg/g, with a contribution from the proposed development of 0.094pg/g representing an increase of 4.2%

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			from the current baseline. As concluded in Appendix 15 to the NIS, there will be no significant effect on Cork Harbour SPA.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	Paraphrased: The submission references the reporting of only lower bound DL-PCBs in the model is inadequate. The upper bound values that were measured and reported in Appendix 14 Insert 4.1 should have been used in the model as they represent a more conservative approach. Comparison of the upper bound DL-PCBs values with the dioxin and furan values in Appendix 14 shows that the DL-PCB concentration can vary from about 20 % of the dioxin and furan values up to over 200 %. This variability makes any single sample unreliable as a basis for estimating the DL-PCB contribution to overall dioxin-like toxicity in Cork Harbour, but emphasises the importance of DL-PCBs in a marine context. It is clearly unacceptable to ignore DL-PCBs in the modelling of risk to the species in the SPA. Refer also to submission 0001.8iii Appendices- Appendix 3: Correcting for the exclusion of dioxin-like PCB's from the AWN modelling	Appendix 14 focuses on PCDD/F emissions from the proposed plant. PCBs are not a significant source of emissions from a modern waste to energy facility as proposed in this application. These compounds, if present in the flue gases, are abated in the same way as Dioxins and Furans (due to their similar chemical composition and structure) by the injection of activated carbon. Due to this, it can be inferred that if the measured values for Dioxins and Furans are well below the emission limit value specified in the IED, then any emissions of Dioxin-like PCBs are also not significant. This is borne out when you look at the publicly-available data reported by the operational Indaver Waste to Energy plant in Meath (available on the EPA's LEAP portal) which shows that the measured value for PCBs is an order of magnitude lower than the measured value for Dioxins/Furans.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	We should now consider the effect that inclusion of DL-PCBs would have on the modelling in Appendix 15. This is hard to quantify based on the highly variable Cork Harbour samples, but as mentioned in (4) above, FSAI data shows that their inclusion increases total dioxin like toxicity by 3 '*Investigation into Levels of Dioxins, Furans, Polychlorinated Biphenyls and Brominated Flame Retardants in Fishery Products in Ireland'*, Food Safety Authority of Ireland, April 2013; see Table 5. about 60 % or more in real fish samples, compared to that estimated from dioxins and furans alone. Using that to guide our estimate, the value of 2.23 pg/g of dioxins and furans presented in the NIS (see item 3 above) would therefore increase to around 3.57 pg/g (2.23 pg/g x 1.6), which is well above the LOAEL for cormorant. Refer also to submission 0001.8iii Appendices- Appendix 4: Choice of sample site for the modelling	The assessment in Appendix 15 to the EIS uses maximum predicted operating concentrations and maximum exhaust flow rates occurring all the time. This is a highly conservative approach, as in reality the plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the SPA. In actuality therefore, the SPA will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. The national measurement of long-term PCDD/F in the environment, which is the EPA milk

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			PCDD/F analysis shows no significant change in PCDD/F concentrations in the Cork Harbour Area since 2015. PCBs are not a significant source of emissions from a modern waste to energy facility as proposed in this application. These compounds, if present in the flue gases, are abated in the same way as Dioxins and Furans (due to their similar chemical composition and structure) by the injection of activated carbon. Due to this, it can be inferred that if the measured values for Dioxins and Furans are well below the emission limit value specified in the IED, then any emissions of Dioxin-like PCBs are also not significant. This is borne out when you look at the publicly available data reported by the operational Indaver Waste to Energy plant in Meath (available on the EPA's LEAP portal) which shows that the measured value for PCBs is an order of magnitude lower than the measured value for Dioxins/Furans.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	Paraphrased: Only piscivorous (fish-eating) bird species are considered in the modelling in Appendix 15, and only intake via fish is modelled. Other species protected in the SPA, that feed on worms, crustaceans and molluscs on the beach at low tide, are completely ignored – these include at least ten of the species protected in the SPA4. This omission makes assessment of possible adverse effects of the proposed incinerator on these species impossible. It is essential that the NIS include species such as those mentioned in footnote 4, and to include modelling of the dioxin-like toxicity in molluscs and other seabed-living species. Serious doubt is raised about the protection of the species that are ignored in the modelling in Appendix 15.	The assessment in Appendix 15 to the NIS uses maximum predicted operating concentrations and maximum exhaust flow rates occurring all the time. This is a highly conservative approach, as in reality the plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the SPA. In actuality therefore, the SPA will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. The national measurement of long-term PCDD/F in the environment, which is the EPA milk PCDD/F analysis shows no significant change in PCDD/F concentrations in the Cork Harbour Area since 2015. Black-headed Gull, Cormorant and Common Tern were selected as the appropriate species for analysis and

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			modelling, as they are all Special Conservation Interests of the Cork Harbour SPA.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	It is fundamental to any peer review that one should be able to follow what the authors of a report have done, in order to be able to verify that it was done in a valid way. But when one tries to follow the method used for the modelling here, it turns out to be very difficult. At baseline, we are told that the Whitegate sample is used, but in Insert 4.1 which gives the sample concentration, this appears as sample 1A, while in Inserts 5.2 and 5.5 it appears as sample 4A. As if this were not bad enough, the dioxin and furan concentration at Whitegate appears as 0.480 ng/kg in Insert 4.1, and 0.193 ng/kg in Insert 5.5. In fact, every value in Inserts 5.2 and 5.5 is different in Insert 4.1, whether one compares them based on the stated sample location, or the sample code – not only are they in the wrong order, but completely different. When we consider the effect of the incinerator, we find that basic information in the modelling, such as how the change in sediment concentration was calculated, is completely missing.	This statement is not correct, the labelling of 1A is consistent throughout. It is also incorrect to say the basic information is completely missing, on the contrary, the baseline PCDD/F value has been provided for the chosen location and the impact assessment is rightly focused on the proposed contribution from the proposed waste to energy plant. This proposed contribution is based on the extremely conservative assumptions described previously in this response.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	Paraphrased: The confusion about the identity of the baseline samples has implications for the conclusions of the modelling. Sample 1A at Ringaskiddy has a concentration of dioxins and furans that is about 2.5 times higher than sample 4A at Whitegate (as well as obviously being closer to the proposed incinerator). In this case, the concentration of dioxins, furans and DL-PCBs in cormorant eggs would be increased from 3.57 pg/g (see 5 above) to 8.925 pg/g egg (i.e. 3.57 x 2.5). This is far above the LOAEL 4 These species include Curlew, Whimbrel, Redshank, Greenshank, Black-tailed Godwit, Turnstone, Oystercatcher, Common Sandpiper, Knot, and Dunlin.5 '*National Dioxins Program Technical Report No. 11: Ecological Risk Assessment of Dioxins in Australia*', Australian Government, Department of the Environment and Heritage, 2004; see Figs. 3.5 and 3.66 Soerensen AL, Faxneld S, 'The use of common tern, Eurasian oystercatcher, and great cormorant as indicator species for contaminant monitoring', Swedish Museum of Natural History, report	Beach1A, Strand at Whitegate Village was used to show the relative predicted change in PCDD/F concentrations, which is conservatively overestimated. The focus is therefore on predicted change in concentrations, baseline values will no doubt vary at different points across the harbour, and birds will feed across different areas and be exposed to a myriad of possible concentrations, so again the emphasis is on the predicted change based on very conservative assumptions.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		no. 5, 2020.for cormorant eggs of 0.8 – 2 pg/g egg, and is now also above the LOAEL for tern eggs of 8 pg/g egg.	
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	On inspecting the sediment concentration values in Tables 2.2 and 2.4 of Appendix 15 of the NIS, one finds that when the incinerator is added to the model, the modelled dioxin and furan concentrations in marine sediments change by a similar or identical amount to the modelled soil concentrations in the EIS.7 This is a serious concern because, as mentioned in the report by one of us (GR) on the human modelling in the EIS, the change in modelled soil concentration and dioxin uptake caused by the incinerator was reduced sixfold between 2008 and the latest 2019 modelling – despite only a small change in the dioxin and furan output of the proposed incinerator. It thus seems likely that the problems highlighted in the report on the human modelling – unexplained and extreme changes in deposition rate and soil loss, that cannot be explained by the small change in incinerator output – have been carried over into the modelling in the NIS. This needs to be clarified. Until the detail of the calculations is given, and the issues relating to soil concentration in my report on the EIS are clarified, we must keep in mind the possibility that the 2008 report (where these problems do not arise) is a better representation of the effect of the incinerator than the present model, and that its effect may be about six times greater than shown in Tables 2.2 and 2.4.	The 2008 modelling is not the subject of this application, the 2019 modelling is the subject of this application, and as noted previously already includes a series of very conservative assumptions, likely emissions will be an order of magnitude below the maximum modelled emissions, and only the maximum deposition rate is used in the modelling, the whereas this only occurs at one point and deposition rates will fall as one moves away from that point. The assessment in Appendix 15 to the NIS uses maximum predicted operating concentrations and maximum exhaust flow rates occurring all the time. This is a highly conservative approach, as in reality the plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the SPA. In actuality therefore the SPA will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	Turning now to otters, the risk assessment is presented in terms of the dioxin content of the fish they are assumed to eat. But information about the model used to obtain the dioxin content of fish is completely missing. The only equation in the Appendix relates to birds' eggs, and we are left guessing as to whether the same equation is used for the fish in the otters' diet. The reader may suspect that the equation might be the same, but this is nowhere made clear, nor is the source of the parameters in the model given (e.g. lipid content and BSAF). This makes the method difficult to follow and validate.	This statement is incorrect. The modelling report references the fact that the model used is from the Framework for the Application of Toxic Equivalency Methodology, Polychlorinated Dioxins, Furans and BiPhenyls,in Ecological Risk Assessment, 2003

ACP Submission Reference	Topic	Submission Statement	Applicant Response
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	As an outcome of the model, we are given a value for dioxin content of fish, and that is all. The model does not arrive at a dioxin intake value for the otters. There is no way even for the reader to work out the dioxin intake, because we are not told how much fish an otter is assumed to eat or its body weight, which are the two pieces of information that would allow us to work out the dioxin intake.	The report clearly states that the predicted increase for fish is very small, and of no significance. It is logically concluded that the likely impacts for otters are then insignificant.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	We are not told the species of fish being modelled, which makes it impossible to compare the modelled dioxin content of fish with real measured values in fish (there is great variation between fish species in their dioxin content). The value for fish dioxin content that emerges from the modelling is low, and far lower than reported values in real fish (e.g. mackerel and salmon) from the FSAI report. There must therefore be a degree of doubt about whether the model is truly representing the uptake of dioxins into fish.	Salmon and mackerel will travel across large areas and spend considerable time periods in the open ocean, and therefore they are not relevant in this context. The model correctly uses a representative fish as an example of likely predicted impacts.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	As with the modelling of birds' eggs, mentioned in (4) above, DL-PCBs are completely ignored. This is particularly unfortunate in view of the data in fish from the FSAI, which shows that including DL-PCBs for salmon and mackerel would increase dioxin-like toxicity by 60 % or more.	Appendix 14 focuses on PCDD/F emissions from the proposed plant. PCBs are not a significant source of emissions from a modern waste to energy facility as proposed in this application. These compounds, if present in the flue gases, are abated in the same way as Dioxins and Furans (due to their similar chemical composition and structure) by the injection of activated carbon. Due to this, it can be inferred that if the measured values for Dioxins and Furans are well below the emission limit value specified in the IED, then any emissions of Dioxin-like PCBs are also not significant. This is borne out when you look at the publicly available data reported by the operational Indaver Waste to Energy plant in Meath (available on the EPA's LEAP portal) which shows that the measured value for PCBs is an order of magnitude lower than the measured value for Dioxins/Furans.
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS -	No NOAEL or LOAEL is given for otters, which is odd, since such values for Mustelidae based on food intake are not difficult to find. For this reason, even if we had been given information on the otter's dioxin intake, it	The report clearly states that the predicted increase for fish is very small, and of no significance, it is logically concluded that the likely impacts for otters are then insignificant.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	Detailed Comments	would be impossible to make any comparison between that intake and the level that might be safe.	
8i. Gordon Reid & Dara Fitzpatrick submission.pdf	Modelling of dioxins and related substances in the NIS - Detailed Comments	In summary, the report is not one on which we could base a confident judgement that the protected bird species in the SPA, or the otters protected under the Habitats Directive, would not come to harm if the proposed incinerator were to be built. On the contrary, it suggests that even at baseline, levels of dioxin like toxicity are already at or over the limits where adverse effects may be observed.	The plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the SPA. In actuality therefore the SPA will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. The national measurement of long-term PCDD/F in the environment, which is the EPA milk PCDD/F analysis shows no significant change in PCDD/F concentrations in the Cork Harbour Area since 2015.
8ii. Gordon Reid submission final draft.pdf	Report on the modelling of dioxins and furans at Ringaskiddy	Even at baseline, with no incinerator, the dioxin and furan intake modelled for the hypothetical human family in Appendix 6.3 exceeds the EU's permitted limit, the Tolerable Weekly Intake. Appendix 6.3 cites an obsolete higher value for the EU TWI, and uses this to argue that the site is safe for the proposed incinerator. Appendix 8.1 makes a similar mistake.	The current TWI is 2 pg/kg/wk, however the important point to focus on is the predicted change associated with the proposed project. The plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the lands in the harbour area. In actuality therefore, the lands in the harbour area will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. The national measurement of long-term PCDD/F in the environment, which is the EPA milk PCDD/F analysis shows no

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			significant change in PCDD/F concentrations in the Cork Harbour Area since 2015.
8ii. Gordon Reid submission final draft.pdf	Report on the modelling of dioxins and furans at Ringaskiddy	Furthermore, the dioxin and furan intake values modelled in Appendix 6.3 are grossly underestimated. This is partly owing to some remarkable omissions from the model (e.g. assuming a starvation-level diet for the hypothetical family whose intake is modelled, thus understating their food-related dioxin and furan intake, which is by far the main route of exposure), partly to deviations from the standard methodology that the Appendix states is being used (e.g. failing to consider the dioxin and furan intake of a child, which is far greater than that of an adult), and partly to failure to compare like with like (modelling only dioxins and furans, but then comparing with an EU intake limit that also included dioxin-like PCBs). Correct application of the model would result in an intake value that is very substantially above the permitted limit.	The default values provided for food intake provided in the approved Maximum At Risk Individual model were correctly used as a basis for the MARI study, as documented in Appendix 6.3 to the EIS, which conservatively concludes that there will be no significant effects.
8ii. Gordon Reid submission final draft.pdf	Report on the modelling of dioxins and furans at Ringaskiddy	Comparison with earlier (2008) modelling by the same consultant at the same site, with a modelled incineration plant operating at the same dioxin and furan output concentration and with similar quantities being emitted, shows a remarkable reduction in the stated effect of the incinerator on the family's modelled intake in 2025 compared to 2008. (Lest it be thought that this is due to improved technology, it should be noted that the model simply uses the maximum permitted output concentration, which was exactly the same in 2008 as it is in 2025, so changes in technology do not enter the model at all.)In the case of the most toxic of the dioxins, the reduction in intake is an incredible 560-fold. Given the similarity in the data on which the modelling was based – the modelled incinerator output, the terrain, and the soil – this discrepancy raises questions about the credibility and reproducibility of the modelling which urgently require clarification.	The 2008 modelling is not the subject of this application, the 2019 modelling is the subject of this application, and as noted previously already includes a series of very conservative assumptions. Likely emissions will be an order of magnitude below the maximum modelled emissions, and only the maximum deposition rate is used in the modelling, whereas this only occurs at one point and deposition rates will fall as one moves away from that point. The assessment uses maximum predicted operating concentrations and maximum exhaust flow rates occurring all the time. This is a highly conservative approach, as in reality the plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the lands in the harbour area. In actuality therefore, the harbour area will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts.
8ii. Gordon Reid submission final draft.pdf	Report on the modelling of dioxins and furans at Ringaskiddy	I am also concerned that, although I understand the Directive requires data in the EIS to be the most recent available, substantial parts of the present Appendices I have inspected are based on old data, and other parts that were present in previous versions of the EIS are simply missing now. Although new air dispersion modelling was performed in 2025, this was not used in the dioxin and furan intake modelling, which is simply a re-submission of the 2019 EIA Report for the EPA licence application. It is based on soil samples that were collected in 2015. The air dispersion modelling, although it is new for this EIS, lacks the cumulative analysis of all dioxin and furan sources that was included in previous versions; the apparent reason for this is quite bizarre.	The 2025 EIS includes updated assessments for all topics, where material changes in the baseline or standards of assessment have changed. Relevant reports which were previously prepared, and which are still correct and relevant to the proposed development now, have been included as appropriate. The conclusions of the EIS are therefore robust and based on appropriate and current data.
8iii. Appendices.pdf	Appendix 1: Correcting the food intake to rectify the MARI family's starvation diet	Comments on AWNs model: Paraphrased: The first point to be made about the table above is that this low calorie intake is not consistent with long term survival and health. The second is that, since nearly all human dioxin intake is from food, this starvation diet lowers the modelled MARI dioxin intake, and with a realistic food intake, the dioxin intake would be much higher. There are food groups omitted from the model that are some of the biggest sources of dioxins and similar compounds in the average Irish diet. It is important to realise that the correction of the MARI food intake for dairy fat and vegetables still leaves us with a very serious underestimate of the total toxicity from dioxins and related compounds, and the MARI still has only 1876 of the necessary 2300 kcal per day.	The default values provided for food intake provided in the approved Maximum At Risk Individual model were correctly used as a basis for the MARI study, as documented in Appendix 6.3 to the EIS, which conservatively concludes that there will be no significant effects.
8iii. Appendices.pdf	Appendix 2: Comparison of adult and child MARI dioxin intakes	Paraphrased: When looking at the lifelong dioxin intakes taken from the 2025 EIS, Appendix 6.3, Attachment D, it is apparent that t the child's intake is well over twice that of the adult in the modelling by AWN ; also that the adult and lifelong intakes are very similar. This biases the reporting towards the adult intake and obscures the much higher child intake. The child intake should also be	The default values provided for food intake provided in the approved Maximum At Risk Individual model were correctly used as a basis for the MARI study, as documented in Appendix 6.3 to the EIS, which conservatively concludes that there will be no significant effects. The child intake forms part of the lifetime intake, as correctly applied in the report, and in accordance with the appropriate methodology.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		reported, according to the HHRAP methodology that AWN states is being followed.	
8iii. Appendices.pdf	Appendix 3: Correcting for the exclusion of dioxin-like PCBs from the AWN modelling	We should now consider the effect that inclusion of DL-PCBs would have on the modelling in Appendix 15. This is hard to quantify based on the highly variable Cork Harbour samples, but as mentioned in (4) above, FSAI data shows that their inclusion increases total dioxin like toxicity by 3 'Investigation into Levels of Dioxins, Furans, Polychlorinated Biphenyls and Brominated Flame Retardants in Fishery Products in Ireland', Food Safety Authority of Ireland, April 2013; see Table 5 about 60 % or more in real fish samples, compared to that estimated from dioxins and furans alone. Using that to guide our estimate, the value of 2.23 pg/g of dioxins and furans presented in the NIS (see item 3 above) would therefore increase to around 3.57 pg/g (2.23 pg/g x 1.6), which is well above the LOAEL for cormorant. Refer also to submission 0001.8iii Appendices- Appendix 4: Choice of sample site for the modelling	The assessment in Appendix 6.3 to the EIS uses maximum predicted operating concentrations and maximum exhaust flow rates occurring all the time. This is a highly conservative approach, as in reality the plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the harbour area. In actuality therefore the harbour area will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. The national measurement of long-term PCDD/F in the environment, which is the EPA milk PCDD/F analysis shows no significant change in PCDD/F concentrations in the Cork Harbour Area since 2015. PCBs are not a significant source of emissions from a modern waste to energy facility as proposed in this application. These compounds, if present in the flue gases, are abated in the same way as Dioxins and Furans (due to their similar chemical composition and structure) by the injection of activated carbon. Due to this, it can be inferred that if the measured values for Dioxins and Furans are well below the emission limit value specified in the IED, then any emissions of Dioxin-like PCBs are also not significant. This is borne out when you look at the publicly-available data reported by the operational Indaver Waste to Energy plant in Meath (available on the EPA's LEAP portal) which shows that the measured value for PCBs is an order of magnitude lower than the measured value for Dioxins/Furans.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
8iii. Appendices.pdf	Appendix 4: Choice of sample site for the modelling	Paraphrased: Only piscivorous (fish-eating) bird species are considered in the modelling in Appendix 15, and only intake via fish is modelled. Other species protected in the SPA, that feed on worms, crustaceans and molluscs on the beach at low tide, are completely ignored – these include at least ten of the species protected in the SPA4. This omission makes assessment of possible adverse effects of the proposed incinerator on these species impossible. It is essential that the NIS include species such as those mentioned in footnote 4, and to include modelling of the dioxin-like toxicity in molluscs and other seabed-living species. Serious doubt is raised about the protection of the species that are ignored in the modelling in Appendix 15.	The assessment in Appendix 6.3 to the EIS uses maximum predicted operating concentrations and maximum exhaust flow rates occurring all the time. This is a highly conservative approach, as in reality the plant will be operating at values which are likely to be an order of magnitude less than the maximum predicted concentration value. The modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the harbour area. In actuality therefore the harbour area will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. The national measurement of long-term PCDD/F in the environment, which is the EPA milk PCDD/F analysis shows no significant change in PCDD/F concentrations in the Cork Harbour Area since 2015. PCBs are not a significant source of emissions from a modern waste to energy facility as proposed in this application. These compounds, if present in the flue gases, are abated in the same way as Dioxins and Furans (due to their similar chemical composition and structure) by the injection of activated carbon. Due to this, it can be inferred that if the measured values for Dioxins and Furans are well below the emission limit value specified in the IED, then any emissions of Dioxin-like PCBs are also not significant. This is borne out when you look at the publicly-available data reported by the operational Indaver Waste to Energy plant in Meath (available on the EPA's LEAP portal) which shows that the measured value for PCBs is an order of magnitude lower than the measured value for Dioxins/Furans.
8iii. Appendices.pdf	Appendix 5: The contribution of the incinerator	Paraphrased: The contribution of the incinerator, in TEQ terms, to MARI intake of dioxin-like toxicity fell to one sixth between 2008 and 2019, despite the incinerator output of dioxins and furans only falling by about 12 %	The EIS uses maximum predicted operating concentrations and maximum exhaust flow rates occurring all the time. This is a highly conservative approach, as in reality the plant will be operating at values which are likely to be an order of

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	to intake of dioxin-like toxicity for MARI	(from 6.7 to 5.9 ng/sec). In understanding the marked change in the contribution of the proposed incinerator to MARI intake of dioxins and furans, we have seen two phenomena: the drastic change in soil loss in the table above, and a very substantial fall in deposition for some congeners. The latter is probably the main contributor to the reduction in soil concentration and thus in MARI intake. Although some congeners show extreme changes, such as the 90-fold reduction in deposition of OCDD, for others the change is less marked. It may well be a genuine and very dramatic year-to-year change in deposition resulting from the behaviour of the air dispersion model. A 22-fold reduction in deposition at the point of maximum deposition, resulting from a 12 % fall in incinerator output, is indicative of a rather extreme year-to-year variation in how pollutants move around the Ringaskiddy area. It suggests that we would be very unwise to place any reliance on a deposition value that happens to be low in any particular year, and that a precautionary approach requires that we base our analysis on the 2008 behaviour until proven otherwise. As detailed in the main text, the 2008 contribution from the incinerator (reduced by 12 % to reflect the reduced output), superimposed on the baseline reported in Appendix 6.3, would lead to a 40 % increase in dioxins and furans over a baseline that is already well over the EU tolerable weekly intake.	magnitude less than the maximum predicted concentration value. As also noted previously, the modelling also assumes the maximum predicted deposition rate for PCDD/F. This is also highly conservative, as the maximum deposition rate will occur at one point only. It is therefore not representative of likely impacts across the lands in the harbour area. In actuality therefore the lands in the harbour area will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. We agree that deposition rates will vary from year depending on climatic conditions and operating conditions, hence the conservative assumptions built into the assessment. We would point out the 2019 reports are the subject of this application, not previous reports. we have already addressed teh issue of TWI above, the EFSA is of the opinion that most people in the EU are exposed to a dose greater than the value of 2 pg/kg bw/wk, but again we would point out the important point to note is that the proposed impact of the proposed facility will be negligible in terms of PCDD/F dose increase.
FI Sub - CHASE (Mamie Bowen).pdf	Site Selection	Submission states inadequate site selection process. The site is unsuitable due to the flooding and erosion leading to mudslides	Refer to EIS Chapter 13 Soils, Geology, Hydrogeology, Hydrology and Coastal Recession, Section 13.4.3.3, which documents that the proposed development is not vulnerable to flooding, and there is no risk to its operation from erosion or mudslides.
FI Sub - CHASE (Mamie Bowen).pdf	Traffic	The traffic loading on the area is prejudicial to public safety and amenity.	Chapter 7 of the EIS documents that the construction of the proposed development will have a short-term moderate impact on local traffic, and that in operation, there will be no significant impact on the road network. Consequently, there will be no significant effect arising from traffic associated with the proposed development on public safety or amenity.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - CHASE (Mamie Bowen).pdf	Flooding	This site is classified as Flood zone C. I raised this point at the last oral hearing as the site had flooded 8 times since 2004 and must be classified as A.	Refer to EIS Chapter 13, Section 13.3.3.3 Flooding, Appendix 13.4 Flood Risk Assessment Section 2.1.2 Definition of Flood Zones. All areas within the site where waste management activities are proposed to be carried out are outside any zone at risk of flooding.
FI Sub - CHASE (Mamie Bowen).pdf	Raising site levels	In raising the level of the lndaver site by 4 meters it would exacerbate the visual intrusiveness and impact of the vast scale and bulk of their facility with its 75-meter chimney.	Refer to the EIS Chapter 11 Landscape and Visual Assessment Section 11.5 Potential Effects. The elevation of the proposed development was optimised to provide an efficient and safe design, while endeavouring to minimise adverse visual impacts.
FI Sub - CHASE (Mamie Bowen).pdf	Raising site levels	While raising the road 0.9 m this will impact all other users particularly Hammond Lane who were compelled to move back their entrance to allow sight view for safety of traffic on exiting their site.	Refer to EIS Chapter 13 Soils, Geology, Hydrogeology, Hydrology and Coastal Recession. Section 13.4.3.3. The proposed revision to the horizontal alignment of the road maintains safe access for all existing road users, including those accessing and egressing from the Hammond Lane site.
FI Sub - CHASE (Mamie Bowen).pdf	Zoning in CCDP	The western side is zoned as RY-1 -09, however the whole site is predominantly RY-1 -1 5 zoned for educational purposes. Arup's map on page 15 4.7 does not mark the eastern coastal site as zoned RY-1-15. educational purposes, nor the western site -industrial. Where lndaver proposes to site their hazardous facility with its chimney is zoned RY-1 -1 5 educational.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……..Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
FI Sub - CHASE (Mamie Bowen).pdf	Coastal Erosion and Flooding	The boundary at the eastern side has the soil structure of a glacial till and is located over a vulnerable aquifer; it is subject to erosion, flooding and mudslides. It has already degraded the proposed public path and viewing platform, leading from Gobby to the Martello Tower as mud slides have encroached on it already. For health and safety reasons this access path at this location is unsustainable. Climate change has added to the risk of erosion, and flooding now takes place at an ever-increasing rate.	As noted in Appendix 13.3 Coastal Erosion Study, Arup (2025) *'The proposed resource recovery centre has a design life of 30 years. In view of the complexity of the development, licensing requirements and the need for the advance agreement of all conditions, Indaver is applying for a 10-year planning permission to commence and complete the construction phase.* *The study found that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste to energy facility will not be impacted by the predicted retreat rates over the design life of the planning permission.* *However, the study found that there could be a risk of an impact on a small section of the proposed development after 40 years however this would be confined only to the amenity walkway and viewing platform outside of the security fence line.'*
FI Sub - CHASE (Mamie Bowen).pdf	Location	Paraphrased: WHO guidelines advise NOT to build a toxic incinerator near a stationary population; NMCI is such. The proximity of the site to the Marine College NMCI, and to the UCC campus is such that it imposes real risk of fire and explosion. This is not taken into account by lndaver. As a result of industrial incremental creep there is no view of the water travelling from Carrigaline to Ringaskiddy until you get to Gobby. This is a very important place in its own right, because of its geology. 70,000 years the ice age ended here leaving Golden Rock, and other erratic's Lough Beg, the nearest sandy beach to Cork City is used by people to swim.	The 2016 planning application did not include any hazardous waste management facilities. Nonetheless, the EIS submitted in 2016 similarly adopted the approach in the WHO guidelines, as a conservative benchmarking tool and the suitability of the site satisfied the WHO guidelines in 2016. Refer to the EIS Appendix 6.1 Hazard Identification and Risk Assessment by Byrne O'Cléirigh, which documents that the proposed development is appropriately sited with regard to surrounding activities. The proposed development will not have an adverse effect on the local geology, and will not constrain the use of the coastline and beaches as local amenities.
FI Sub - CHASE (Mamie Bowen).pdf	Need	Our national policy is to follow a circular economy and reduce reuse and recycle, it is not to convert non-	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		renewable natural resources into toxic ash and carbon dioxide.	per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - CHASE (Mamie Bowen).pdf	Visual Impact	All cruise liners, over a hundred in any one year, will have a clear view of a toxic plume and a gigantic building directly in front of them as they enter the very scenic corridor entrance to the inner harbour	Refer to the EIS Chapter 11 Landscape and Visual Assessment Section 11.5 Potential Effects, which addresses the visual impact of the proposed development on the landscape from a comprehensive range of viewpoints, including those within the harbour.

3. Statutory Consultees

Nine submissions were received from statutory consultees and are documented in Table 3.1 below. Each entry identifies the document in which the issue was raised, referenced by the ACP file name, outlines the topic and the relevant statement from the submission, and provides Indaver's response.

Table 3.1: Applicant's Response to Statutory Consultees' Submissions

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - An Taisce.pdf	Site Selection Suitability	The proposal site may not be accessible via the national road network, requiring traffic to travel in one direction past residential areas to a cul de sac location. This would increase congestion of Heavy Goods Vehicles (HGVs) and would be likely to disturb community an residential amenity, while also potentially contributing to increased road hazard risk.	As outlined in Section 7.9.10 of Chapter 7, the proposed development site access will have capacity to accommodate the projected traffic flows associated with the construction of the facility (2029) and similarly during the operational years assessed (2030, 2035, and 2045). Nonetheless, Indaver has proposed an HGV Mobility Management Plan. A step-by-step process flowchart of the HGV MMP is included in Appendix 7.3.
FI Sub - An Taisce.pdf	Site Selection Suitability	The site also appears to be exposed due to being proposed at the end of a peninsula, directly facing the shoreline and below a ridgeline to the immediate south. Buffering might be inadequate in this respect.	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the proposed development.
FI Sub - An Taisce.pdf	Site Selection Suitability	Coastal erosion effects are likely to increase in frequency and severity due to increased storm surges, rainfall and extreme weather events associated with climate change. This	Coastal erosion effects were assessed in a Coastal Erosion Study included as Appendix 13.3 of the EIS. Climate change effects such as increased storminess and sea level rise were considered. The Appendix 13.3 Coastal Erosion Study found that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates over the design life of the proposed development.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		calls into the question the viability of the proposal in its entirety at this vulnerable location.	
FI Sub - An Taisce.pdf	Site Selection Suitability	The proposal has a 30-year operational timeframe, well within the influence of climate change induced coastal storms and surges. Future proofing of infrastructure from climate change effects is an urgent consideration in the context of increased vulnerability to the aforementioned extreme weather events, a matter exacerbated by the undesirable site location proposed within the subject application.	Having considered the reasonable alternative site locations, the conclusion in Section 3.3.3 in Chapter 3 of the EIS is that the Indaver-owned site is an appropriate site for the proposed development. An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - An Taisce.pdf	Site Selection Suitability	We submit that it must be ensured that an independent suitably qualified expert	As outlined in Table 1.2 Competence and Experience of EIS Authors of Chapter 1 - Introduction, the Coastal Erosion Study included as Appendix 13.3 was carried out by Susana Lizondo and Clon Ulrick.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		specialising in coastal erosion, such as a coastal geomorphologist, has been consulted to ascertain the likelihood of adverse impact arising from the proposed installation.	Susana Lizondo is a Chartered Engineer working as a Senior Coastal Engineer with Arup's Climate Change and Sustainability Group. Susana is experienced in the management, consenting and design of international projects dealing with coastal evolution and morphodynamics, coastal erosion, coastal protection, flooding, resilience and climate change adaptation, numerical wave modelling and MetOcean studies. Clon Ulrick is a chartered engineer with over 40 years' of experience in maritime and civil engineering. Clon has been Arup's maritime team leader in London and global maritime skills leader for 6 years. He has had various roles as engineer in over 20 coastal engineering projects in 6 countries, including Ireland.
FI Sub - An Taisce.pdf	Site Selection Suitability	It should be ensured that this Coastal Erosion Study carried out by the applicant's consultants has factored climate tipping points and glacial melt into its impact assessment, which may lead to a higher rate of sea level rise than modelled, as well as a greater frequency of storm surge and extreme weather events generally.	Coastal erosion effects were assessed in a Coastal Erosion Study included as Appendix 13.3 of the EIS. Climate change effects such as increased storminess and sea level rise were considered. The Appendix 13.3 Coastal Erosion Study found that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates over the design life of the proposed development.
FI Sub - An Taisce.pdf	Landscape Character	The proposed site is also located within a High Value Landscape (HVL) area, as designated by the Cork County Development Plan 2022-2028. Section 14.8.9 (p. 330) outlines crucial considerations when contemplating development in such areas	Landscape effects were assessed in Chapter 11 - Landscape and Visual Assessment. In general construction effects on the landscape will be short term, negative and localised in nature. Construction operations and deliveries to the proposed development site will be carefully managed to minimise the effect on the surrounding community, amenities and roads. Upon the completion of the proposed works, there will be a significant change in the appearance of the proposed development site, from the existing open land to the larger industrial elements of the resource recovery plant. Initial potential effects on the landscape character will be significant, negative on the adjacent local landscape reducing to moderate, negative effects as planting matures. Effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. Mitigation and Monitoring measures have been included in the design and will be implemented in the development of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral.
FI Sub - An Taisce.pdf	Landscape Character	The overbearing and visually obtrusive nature of the proposal would appear	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		to be at odds with these aims, as well as GI 14-10 of the Development Plan: *"Ensure that the management of development throughout the County will have regard for the value of the landscape, its character, distinctiveness and sensitivity as recognised in the Cork County Draft Landscape Strategy and its recommendations, in order to minimize the visual and environmental impact of development, particularly in areas designated as High Value Landscapes where higher development standards (layout, design, landscaping, materials used) will be required.* "	negative. Mitigation and monitoring measures are included which will reduce the visual impact of the proposed development.
FI Sub - An Taisce.pdf	Energy Recovery V Waste Disposal	The energy recovery benefit from the proposal is negated by the effect of the proposal in maintaining and sustaining the development of unsustainable waste streams and disincentivises the reduction of waste.	As documented in detail in Chapter 2 of the EIS, the proposed development supports the sustainable management of waste by providing energy recovery from non-recyclable waste. Implementation of existing waste policy prevents and diverts compostable and recyclable streams prior to inclusion in the material streams for incineration with energy recovery. The policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - An Taisce.pdf	Energy Recovery V Waste Disposal	It also may unsustainably encourage the unsorted inclusion of both biological and plastic waste in the mixed waste stream being incinerated, a point	As documented in detail in Chapter 2 of the EIS, the proposed development supports the sustainable management of waste by providing energy recovery from non-recyclable waste. Implementation of existing waste policy prevents and diverts compostable and recyclable streams prior to inclusion in the material streams for incineration with energy recovery. The policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		requiring clarification by An Coimisiun.	active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - An Taisce.pdf	Energy Recovery V Waste Disposal	The proposal has failed to address the sustainability of the waste production stream required to sustain the incinerator proposal in the first instance. Furthermore, incinerators are known to emit toxic pollutants such as dioxins, furans, heavy metals and $PM_{2.5}$. As a result, the applicant's proposed mitigation measures should be assessed with regard to each of these problematic pollutants and the potential for these to adversely impact residential and environmental receptors surrounding the site.	Air dispersion modelling of the facility was undertaken, including the potential effects of PCDD/PCDFs (Dioxins/Furans), heavy metals and $PM_{2.5}$ during the operational phase. Refer to section 8.5.3 of Chapter 8 - Air Quality of the EIS. AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. Results will also be below the air quality standard for $PM_{2.5}$ critical level for the protection of vegetation under maximum and abnormal operation of the proposed development. Furthermore, a number of measures have been incorporated into the design of the proposed development to ensure that emissions from the plant do not exceed regulatory emission limit values as outlined in Industrial Emissions Directive 2010/75/EU. In addition, the stack height has been designed in an iterative fashion in order to ensure that ambient ground level concentrations are minimised.
FI Sub - An Taisce.pdf	Energy Recovery V Waste Disposal	Close regard should also be given to the range of plumes emanating from the proposal, which can contain toxic compounds.	Emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, firstly under maximum emissions limits of the EU Directive 2010/75/EU and secondly under abnormal operating conditions. AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios.
FI Sub - An Taisce.pdf	Energy Recovery V Waste Disposal	It should be noted that Cork may be susceptible to the atmospheric phenomenon of inversion, potentially compounding the effects of plume contamination, a	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		matter which An Coimisiun should have regard to.	*parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007.*" Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards.
FI Sub - An Taisce.pdf	Energy Recovery V Waste Disposal	It is noted that the energy recovery coefficient was an issue during the oral hearing of 2009. The rectification of this issue needs to be ensured prior to development consent determination.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - An Taisce.pdf	Energy Recovery V Waste Disposal	… the disposal method of generated waste should be assessed to ensure that adverse environmental impacts do not arise, including but not limited to a full lifecycle emissions assessment of exporting waste material.	The operation of the proposed development will dramatically reduce the volume and mass of waste material, when comparing input with output streams. By definition, therefore the emissions associated with managing the waste streams from the facility will be lower than those that would be associated with managing the input waste stream by other means. A full assessment of the potential impacts from residue generation and its subsequent disposal or recovery has been carried out in Sections 15.5.3.9, 15.5.3.10 and 15.7 of the EIS. Potential impacts have also been assessed in Section 4.7 of the NIS. No adverse environmental impacts were identified as part of those assessments.
FI Sub - An Taisce.pdf	Lock-In of Waste Production	It is submitted that An Coimisiun should be mindful of the risk of lock-in where the operational timeframe of the incinerator plant could perversely incentivise municipalities to continue supplying a steady stream of waste, despite future reductions in	Chapter 2, Section 2.2.2.2 indicates that the waste management sector in Ireland is an open market predominantly operated by the private sector and the proportion of waste collection and treatment infrastructure in direct ownership of local authorities is relatively small. The policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		generated waste which would compromise circular economy and waste reduction goals. This conflicts with the circularity of resources and the required emphasis on reduction, reuse and recycling within the EU Waste Framework Directive.	
FI Sub - An Taisce.pdf	Dioxin Impact	It should be ensured that the applicant's EIAR and associated documentation has fully factored the potential for dioxin contamination into the assessment, alongside an articulation of robust mitigation measures.	Air dispersion modelling of the facility was undertaken, including the potential effects of PCDD/PCDFs (Dioxins/Furans) during the operational phase. Refer to section 8.5.3.4 of Chapter 8 Air Quality of the EIS. Monitoring results indicate that the existing levels are similar to rural areas in the UK and Ireland. The additional contribution from the proposed development to levels of Dioxins/Furans is minor, with levels at the maximum off-site receptor to the south of the proposed development, under maximum and abnormal operation, accounting for only a small fraction of existing levels. Levels at the nearest residential receptor will also be minor, with the annual contribution from the proposed development accounting for less than 1% of the existing background concentration under maximum operating conditions.
FI Sub - An Taisce.pdf	Dioxin Impact	It would appear that the applicant's EIAR fails to dedicate a specific chapter on water impacts, which may not adhere to EPA *'Guidelines on the Information to be Contained in Environmental Impact Assessment Reports'* (2022) and as mandated under Article 3(1) and Annex IV of the EIA Directive .(2011/92/EU) (as amended in 2014), with regard to water as being listed as a prescribed	The 2016 EIS which accompanied the 2016 planning application has now been updated to reflect the changes in EIA legislation. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement'*, this report is referred to as an EIS but is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. Furthermore, the chapter titles remained the same as in 2016 with the contents updated to reflect any changes with the passage of time and having regard to the latest environmental regulations, legislation and guidelines. Water impacts are included in Chapter 13 - Soils, Geology, Hydrogeology, Hydrology and Coastal Recession.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		environmental factor required to be addressed.	
FI Sub - An Taisce.pdf	Dioxin Impact	It should be determined whether 24,000 tonnes per annum of hazardous material would constitute a large amount of material, as per the WHO guidelines, thereby necessitating a higher temperature of 1000 °C. The applicant's proposed temperatures may be insufficient in this regard and require close consideration by An Coimisiun.	The WHO guidelines referred to appear to relate to a specific type of hazardous waste - clinical / medical waste. This is not a waste type proposed for acceptance as per Appendix 4.1 of the EIS. Higher operating temperatures than those outlined in Section 4.7.3.1 of Chapter 4 of the EIS (850° to 1000°C) are typically associated with dedicated hazardous waste incineration plants burning hazardous wastes with a chlorine content of above 1%. These hazardous waste types are also not proposed for acceptance as per Appendix 4.1 of the EIS.
FI Sub - An Taisce.pdf	Dioxin Impact	It should also be clarified whether or not fisheries are located in the marine environment within the proposal's zone of influence as dioxin exposure mostly occurs via the food chain, with potential adverse impacts upon both fish and human health ..	Air dispersion modelling of the facility was undertaken, including the potential effects of PCDD/PCDFs (Dioxins/Furans) during the operational phase. Refer to section 8.5.3.4 of Chapter 8 Air Quality of the EIS. Ambient Air Monitoring results indicate that the existing levels are similar to rural areas in the UK and Ireland. The additional contribution from the proposed development to levels of Dioxins/Furans is minor, with levels at the maximum off-site receptor to the south of the proposed development, under maximum and abnormal operation, accounting for only a small fraction of existing levels. Levels at the nearest residential receptor will also be minor, with the annual contribution from the proposed development accounting for less than 1% of the existing background concentration under maximum operating conditions. Therefore, any impact from the bioaccumulation of potentially toxic compounds, such as dioxins, in macro-invertebrate and fish populations is predicted to be negligible.
FI Sub - An Taisce.pdf	General Incinerator Compliance Issue	Elsewhere, communities near incinerators have reported issues such as noise, litter, increased vehicle traffic, unpleasant smells, and air pollution. These complaints highlight the broader concerns associated with waste-to-energy facilities and should be fully considered by An	As outlined in Chapter 6 - Population and Human Health, the proposed development will be designed and constructed to best industry standards, with an emphasis being placed on the health and safety of employees, local residents and the community at large. The technology to be employed in the proposed development is well understood and has been used successfully in equivalent projects internationally, with no implications for health and safety. Additionally, many of the mitigation measures described elsewhere, such as in relation to emissions to air and noise will have the effect of mitigating any effects on human health. To minimise any potential psychological effects in relation to worry about human health effects, even though the overwhelming evidence is that there are none, ongoing information and education of the community will be made available. This may be facilitated by

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		Coimisiun when determining the subject proposal.	information and performance of the facility and emissions being available on a website for the public to review. Seeing the real values will likely reassure reasonable persons.
FI Sub - An Taisce.pdf	Waste Transfer Facility and Project Splitting	We note from the applicant's EIS NTS (p. 40) that *"a pre-treatment facility (waste transfer station) is not required for the operation of the Ringaskiddy Resource Recovery Centre and is not proposed as part of the current application*." This requires clarification as a preliminary matter to ensure the absence of project splitting and to ascertain whether functional interdependence may exist between the two facilities, as was investigated within An Taisce and Friends of the Irish Environment v An Bord Pleanala [2015] IEHC 604 where it was found that indirect effects between two functionally interdependent sites/activities should be assessed cumulatively in an EIAR.	As outlined in the Non-Technical Summary, a pre-treatment facility (waste transfer station) is not required the operation of the Ringaskiddy Resource Recovery Centre and is not proposed as part of the current application, and therefore the issue of project splitting does not arise.
FI Sub - An Taisce.pdf	Flood Risk	The site appears to be located on a known flood risk area, which would have serious implications for the water environment during flood events given the	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		processing and generation of hazardous waste on site.	
FI Sub - An Taisce.pdf	Proximity to Third Level Education Facility	We note the proximity of the subject site to the National Maritime College of Ireland (NMCI) and UCC MaREI campus area which are located to the north. The applicant acknowledges in the Planning Report that "*Further developments for these institutions may be located on the remainder of the land to the east of the NMCJ*" (p. 7). This would ensure that the installation of a facility processing hazardous waste would create long term disturbances for a site important for research and development. Both campuses will be encroached upon by the facility, introducing overbearing visual impact, noise disturbance, potential odour nuisance and waste residue contamination.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. .Mitigation and monitoring measures are included which will reduce the visual impact of the proposed development. Noise disturbance is assessed in Chapter 10 - Noise and Vibration. The results of the evaluation indicate that the operational noise levels during daytime and evening periods are all comfortably below the relevant noise criteria at the nearest noise sensitive locations, while during night-time periods are all comfortably at or below the night-time noise criterion of 45dB adopted for the facility at the nearest residential noise sensitive locations. Additionally, the relative increase in noise level associated with traffic movements on the surrounding road network with and without the proposed development was assessed. The change in noise levels during the opening year, with and without the M28 ranges from a not significant to imperceptible effect, while the change in noise levels during Design Year of 2045 with the M28 in operation is imperceptible in all road links assessed. As outlined in Chapter 6 - Population and Human Health, the tipping hall and bunker will be under negative pressure to prevent odours from the facility impacting on local residents. There will not be a significant effect from odours resulting from the proposed development.
FI Sub - An Taisce.pdf	Proximity to Third Level Education Facility	This would directly contravene the Cork County Development Plan given the RY-I-09 zoning which overlays the eastern part of the applicant's red line boundary. As noted by the applicant in the Planning Report (p. 8), the	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		RY-1-09 zoning is suitable for extension of the educational campus to the north and general research/development facilities. The suitability of the site is therefore inappropriate in this respect due to the proposal being industrial in nature, which should be closely considered by An Coimisiun.	Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - An Taisce.pdf	Water Framework Directive	The subject site adjoins the Cork Harbour coastal waterbody which has been designated as good water quality status by the EPA under the Water Framework Directive (WFD) (2000/60/EC) and is considered to be at risk of not achieving good status by 2027. Contamination of groundwater via spillage of hazardous chemicals or waste during loading/unloading operations, and hence pollution of harbour waters, should also be closely considered. Currently, groundwater status at the site is considered to be of good quality.	Groundwater effects are assessed in Chapter 13 Soils, Geology, Hydrogeology, Hydrology and Coastal Recession. The EIS concluded that potential effects on groundwater quality from the proposed waste-to-energy facility will be negative, temporary, local, small adverse and slight during the construction phase, while the operational phase will have an overall imperceptible long-term effect on the groundwater. Mitigation measures are included which will reduce any potential effects on groundwater.
FI Sub - An Taisce.pdf	Water Framework Directive	The proposal should be assessed against Article 4 of the WFD to determine whether the project may	As outlined in Chapter 13 Soils, Geology, Hydrogeology, Hydrology and Coastal Recession, potential effects on surface water quality were assessed for Glounatouig Stream which is outside the site, but is within the catchment of Hilltown_010 located within the proposed development. Potential effects during the construction phase will be

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		cause a deterioration of the status of a surface or ground water body or if it may jeopardise the attainment of good surface or ground water status or of good ecological potential and good surface or ground water chemical status.	negative, temporary, local, small adverse and slight, while during the operational phase will be negative, permanent, local, negligible and not significant. The potential effects on groundwater quality from the proposed waste-to-energy facility will be negative, temporary, local, small adverse and slight during the construction phase, while the operational phase will have an overall imperceptible long-term effect on the groundwater. Hilltown_010 and Ringaskiddy are within the proposed development, Cork Harbour is adjacent to the proposed development, and Outer Cork Harbour, Lough Beg/Curraghbinny, Lough Mahon and Owenboy Estuary are hydrologically connected to the proposed development and were all assessed for potential effects on WFD waterbody status. During the construction phase potential effects will be negative, temporary, local, negligible and not significant, while during the operational phase will be negative, permanent, local, negligible and not significant for all waterbodies.
FI Sub - An Taisce.pdf	Water Framework Directive	To assess the proposal against Article 4, the EPA monitoring data on the water quality status indicators and Environmental Quality Standards must be used. These data do not appear to be presented in the EIAR.	Appendix 13.7 to the EIS is a WFD compliance report, which identifies relevant WFD waterbodies (Table 1), records their Status (Table 2), includes water quality data (Table 3), identifies potential effects, and on the basis of the assessment, concludes that the proposed development is compliant with the WFD.
FI Sub - An Taisce.pdf	Marine Strategy Framework Directive	Given the aforementioned concerns regarding floodwater retreat and hazardous material contamination, we submit that the subject proposal requires assessment against the Marine Strategy Framework Directive, which contains 11 descriptors describing different elements of the marine environment and the requirement to achieve Good Environment Status (GES) ..	As outlined in Chapter 13 Soils, Geology, Hydrogeology, Hydrology and Coastal Recession, Cork Harbour is adjacent to the proposed development, and Outer Cork Harbour, Lough Beg/Curraghbinny, Lough Mahon and Owenboy Estuary are hydrologically connected to the proposed development and were all assessed for potential effects on WFD waterbody status. During the construction phase potential effects will be negative, temporary, local, negligible and not significant, while during the operational phase will be negative, permanent, local, negligible and not significant for all waterbodies. The proposed development will therefore not impede the achievement of Good Environmental Status for the marine environment.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - An Taisce.pdf	Birds Directive	... the proposal may be likely to encroach on an important roosting, foraging and nesting ground for Annex I bird species, among others of conservation interest. This is exemplified by the mosaic of open-ground habitat mixed with naturally regenerating scrub and woodland.	As outlined in Chapter 12 - Biodiversity, the diversity of habitats and semi-natural habitat i.e. scrub, immature woodland, semi-natural grassland have developed due to an absence of active management within the proposed development. However, the study area does not support a community of birds or individual species that would be considered significant conservation priorities, and the study area, which is small, does not provide critical resources for such communities and/or species. Some species that are considered of high conservation value (Annex I of the Birds Directive, qualifying species for the Cork Harbour SPA and Red List) were noted in this general area. Many of these birds were recorded overflying the channel. The proposed development site itself and the shoreline adjoining the proposed development site, does not support high numbers of these species.
FI Sub - An Taisce.pdf	Birds Directive	The habitat loss associated with the subject proposal, and the potential for transgression of the requirements of Article 4(4), requires close consideration in the development consent determination.	As outlined in the Landscape Design Report, there will be removal of an area of habitat including scrub/immature woodland and remnants of semi-natural grassland, however, hedgerows and areas of semi-natural vegetation outside the proposed works area will be retained and the biodiversity value of grassland in the northwest corner of the site will be increased by allowing this area to naturally recolonise, providing no net loss in this area of the site. Additional native planting will also be carried out along the boundary of the proposed development site. Bat boxes, swift boxes, insect hotels, butterfly banks and loggeries will be integrated in the design of the proposed development, and these biodiversity enhancement measures will be maintained and managed through the operational phase of the proposed development.
FI Sub - An Taisce.pdf	Proposed Natural Heritage Area	The site is also in close proximity to the Lough Beg (Cork) pNHA (site code : 001066). Consequently, assessment of the proposal requires consideration with regard to Development Plan Objective BE15-2: *"Protect all natural heritage sites which are designated or proposed for designation under European legislation National legislation and International Agreements. Maintain and where*	Any potential effects from the proposed development on the Lough Beg (Cork) pNHA (site code: 001066) have been assessed in Chapter 12 - Biodiversity of the EIS.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		possible enhance appropriate ecological linkages between these. This includes Special Areas of Consetvation Special Protection Areas/ Marine Protected Areas/ Natural Heritage Areas/proposed Natural Heritage Areas, Statutory Nature Reserves, Refuges for Fauna and Ramsar Sites. These sites are listed in Volume 2 of the Plan " In particular, any ornithological or other ecological receptors associated with the pNHA which may utilise the proposed development site for activity should be considered given the potential for habitat loss of regenerating/mature scrub and woodland.	
FI Sub - An Taisce.pdf	Adverse Impact on Cork Harbour Cycle Network	The photomontages submitted by the applicant provide for a scale of development structure which is incongruous with the character of the surrounding area, with a significant impact on amenity, including in views across the harbour and from Cobh. (...) In spite of this, the applicant characterises the visual impact from Cobh as *"moderate, neutral*	As outlined in Chapter 11 - Landscape and Visual Assessment, a Viewpoint Assessment was undertaken for a total of 38 vantage points from the surrounding landscape and harbour. Operational and cumulative impacts range from slight, permanent and neutral to significant, permanent and negative effects, while construction visual impact range from imperceptible to significant, temporary, negative effects. Mitigation and monitoring measures have been included in the design and will be implemented in the development of the proposed development, including the main process building and stack. The form, height, positioning and cladding of this building has been carefully chosen to reflect the shape of the existing natural ridgeline, and to sit within it. The narrowest part of the building has been aligned to face and minimise visual effects on views from Ringaskiddy Martello tower. The varying heights of the roof are at minimum heights to house the internal machinery. The cladding materials have been chosen to reflect the existing shades and tones apparent in the area. Darker sections are proposed towards the bottom of the building and lighter sections towards the top, with angled sections of different tones to reflect the angle to the ridge depending on whether the viewer is viewing from the north, south, east or west and what the predominant backdrop from that direction will be. Many shapes, heights and colour ranges were tested using a 3D model and photomontages. The dark green

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		and permanent " upon completion while simultaneously acknowledging *"areas of significant effect around the White Point area'"*. We would argue that this large significance effect characterises the majority of views of the proposal within the radius of the proposal, and the applicant's characterisation of visual impact fails to fully acknowledge this. The application particulars fail entirely to mitigate these impacts, including but not limited to the highly overbearing 50-metre-tall main process building combined with the chimney stack which reaches a height of 75 metres (coupled with a visible plume).	and grey colour palette worked best against the sky and sea and the darker greys, greens, browns and black colours against the landform. The breaking down of the facades and roofline also helped to reduce the overall appearance of scale of the building.
FI Sub - An Taisce.pdf	Adverse Impact on Recreational Amenity	The application site is on a cul de sac road with an established right of way to the foreshore for recreational amenity and for access to the Martello tower. The proposal would be entirely incompatible with the continued enjoyment of these areas for recreational amenity. Furthermore, the location impact and operation of the	Recreational amenity effects are addressed in Chapter 6 - Population and Human Health. Access to the foreshore where construction works will take place and the area of the car park in which materials will be stored will be temporarily closed (3 weeks) to ensure the safety of the general public. However, access to the rest of the beach will be maintained for the duration of the works. The operation of the proposed development will not encroach on the shoreline amenity. Additionally, a new bitumen macadam footpath will be constructed to give access from Gobby Beach to the Martello Tower.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		proposal would generate direct conflicts with recreational amenity access.	
FI Sub - An Taisce.pdf	Adverse Impact on Cork Harbour Cycle Network	The proposed development site appears to overlap with a stretch of the Cork Harbour Cycle Network, as shown in Figure TM 12.3 of the Cork County Development Plan. This would lead to the encroachment of an intensive industrial facility upon the enjoyment of the greenway, contravening objectives TM12-2-1 and TM12-2-2 with regard to prioritising walking and cycling and promoting an active travel culture. It is not clear how the proposal would interact with the greenway, with an elimination of access for the greenway to the coastline being unacceptable.	Full cycle access for the greenway to the coastline will be maintained, with short term interruption during the construction phase occurring, and full access maintained during the operation of the proposed development.
FI Sub - An Taisce.pdf	Scenic Views	The site also encroaches upon designated scenic route S54, as demonstrated in the Development Plan, which would directly contravene Objective GI 14-13 and 14-14 which seek to protect the character of views and prospects from scenic routes.	As outlined in Chapter 11 - Landscape and Visual Assessment, potential visual effects of the proposed development on scenic route S54 (R610 and N28 Roads between Passage West and Ringaskiddy) were assessed. Overall, there will be slight to moderate, short term and negative effects during construction and moderate, permanent and negative effects on this route at operational stage due to the clear open and direct views on approach into Ringaskiddy. For the short stretch adjacent to the proposed development site in both directions the visual effects will be significant, and negative, with short term effects during construction and permanent upon completion.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - An Taisce.pdf	Landscape and Visual	The proposal is completely out of character with the surrounding landscape and contravenes the aforementioned objectives, requiring rigorous alternative site consideration at the minimum. The large quantity of visual receptors (38) contained in Table 11.1 *'Viewpoint Assessment Table'* demonstrates the huge visual impact associated with the proposal.	As outlined in Chapter 3 - Alternatives, a description of the reasonable alternatives studied by Indaver, which are relevant to the Ringaskiddy Resource Recovery Centre proposal and its specific characteristics, and indication of the main reasons for the option chosen, including a comparison of environmental effects was provided. Additionally, as outlined in Chapter 11 - Landscape and Visual Assessment, a Viewpoint Assessment was undertaken for a total of 38 vantage points from the surrounding landscape and harbour. Operational and cumulative impacts range from slight, permanent and neutral to significant, permanent and negative effects, while construction visual impact range from imperceptible to significant, temporary, negative effects.
FI Sub - An Taisce.pdf	Artificial Lighting	It is submitted that the proposal may introduce undesirable artificial light pollution effects into the area which would create disturbance for nocturnal pollinators, other ecological receptors, as well as human receptors. This would adversely impact melatonin production, circadian rhythms and the enjoyment of the night sky as a cultural resource.	As outlined in Section 4.5.12 of Chapter 4, the site lighting proposed for the waste-to-energy facility will include full cut off LED light head fixtures in order to reduce any light pollution into the surrounding area. Additionally, low intensity obstacle lights will be located at the top of the stack.
FI Sub - An Taisce.pdf	Adverse Biodiversity and Recreational Impact	Satellite imagery and Plate 2 in page 5 of the applicant's Planning Report reveals that the proposed development site contains a significant amount of naturally regenerating scrub and woodland habitat,	As outlined in Chapter 12 - Biodiversity, the proposed development site is divided between eight types of habitat. Scrub WS1/Immature woodland WS2 is concentrated in the eastern party of the study area. The majority of this habitat will be removed to facilitate the proposed development with a negative, slight to moderate and long-term effect at a local level. However, the establishment of scrub to the west of the site (refer to Landscape masterplan) will provide additional scrub habitat in the medium to long-term. This habitat will be largely retained and enhanced as outlined in the landscape plan. Long-term management plan will ensure that non-native species and/or dominance of species such as Bracken does not occur within retained scrub habitat. This will

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		which is likely to contain ecosystem services of local benefit to wildlife, as well as human residents who may enjoy the area for recreational purposes due to access to Gobby Beach and Golden Rock. We note the occurrence of a pathway through this area which is likely to utilised by members of the local community for recreational purposes. In the context of a biodiversity emergency, the retention of such areas is of paramount importance.	ensure that biodiversity is maximised within the proposed development site. A positive, imperceptible, long-term effect is predicted.
FI Sub - An Taisce.pdf	Cultural Heritage	We note the close proximity of Martello Tower to the proposed development site which is a designated historic monument ((0087-053) (…) The views towards Cork Harbour from this iconic structure may be obscured by the installation of a visually obtrusive industrial facility, detracting from the enjoyment of an important cultural and heritage resource. This could potentially contravene Objective H E 16-7 of the Development Plan which seeks to ensure that development does not	An assessment of the visual effect of the proposed development on the Martello Tower (RMP CO087-053; RPS No. 00575) is presented in Chapter 11 Landscape and Visual Assessment, supported by a series of photomontages. Upon completion of the proposed development, the upper portion of the main process building and its stack will be visible from the Martello Tower. However, the building's orientation places its narrowest elevation facing the tower, helping to reduce its perceived mass from this sensitive viewpoint. While partial obstruction of the northwestern portion of Spike Island will occur, views toward Fort Mitchell and other key heritage sites across Cork Harbour will remain intact. The visual change reflects an ongoing pattern of industrial expansion in the Ringaskiddy area and will be mitigated in part through the alignment, scale, and architectural treatment of the proposed structures. Additionally, as noted in Chapter 14 - Archaeological, Architectural and Cultural Heritage, the Martello tower stands 70m to the south of the proposed development boundary.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		negatively impact upon defensive archaeological sites. We would argue that this includes encroachment of views in the immediate vicinity of such sites, as is evidenced by the subject proposal. Furthermore, the red line boundary of the subject site may contravene the 20-metre buffer zone standard between development sites and historic monuments. These archaeological considerations require careful assessment by An Coimisiun.	
FI Sub - Cork County Council.pdf	Ringaskiddy Urban Realm Project	Many of the existing services on the L2545 road including storm water drainage were upgraded as part of the Ringaskiddy Urban Realm Project, it is unclear what impact the increase in elevation of the L2545 road would have on these services.	All existing services and utilities within the L2545 will be maintained as part of the proposed road upgrade, and there will be no adverse impact on these services as outlined in Section 5.3.2 of Chapter 5 Construction Activities of the 2025 EIS *'The existing services running along and adjacent to the road will be carefully set out and suitable working methods will be employed to ensure that the existing services are protected during construction.'*
FI Sub - Cork County Council.pdf	Utilities and Services	There is an existing ESB 220kV circuit on the southern side of the L2545 road to Gabby strand and under the west channel to Whitegate, it is unclear the implications if any on this significant circuit of increasing the elevation of the L2545 road.	The potential impact of the proposed development on the 220kV power cables is addressed in Section 15.5.2.5 of the EIS. As documented in that Material Assets chapter, ESB Networks has been consulted in relation to the proposed works, and they are satisified that they are technically feasible.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Cork County Council.pdf	Utilities and Services	The L2545 road is currently drained by a 450mm diameter storm water runoff pipe. This was recently replaced as part of the Ringaskiddy Urban Realm Project due to being in a poor state of repair. The existing 450mm diameter storm water runoff pipe currently serves the Hammond Lane facility as well as the Haulbowline Road. The Ringaskiddy Resource Recovery Centre's drainage design shows 2 no. proposed 1,500mm diameter storm water runoff pipes discharging into the existing 450mm pipe to the west of Gabby strand. This arrangement may surcharge the existing network.	The rationale for the drainage design along the L2545 is described in Section 4.5.14.2 of the EIS. It provides for 7 hours storage when the storm water outfall is tide locked by a 1 in 200-year design high tide, combined with a 1 in 30 rainfall event, providing an improvement to the existing performance of the network.
FI Sub - Cork County Council.pdf	Placemaking	Establishing the impact and implications of this development on this new Placemaking initiative for the local community.	The proposed development will not have any long-term adverse effects on the Placemaking initiative for the local community. An amenity walkway and viewing platform are included as part of the proposed development. As noted in Section 14.5.3 of Chapter 14 Archaeological, Architectural and Cultural Heritage of the 2025 EIS '*the walkway and viewing platform will enhance public engagement with the area's historic coastal landscape. By formalising and managing access to the Martello Tower through the provision of safe and respectful infrastructure, the development contributes to the interpretation and appreciation of local heritage'*. The proposed development will tie into the existing Ringaskiddy Urban Realm and Active Travel Scheme as shown on the updated proposed road layout planning drawings.
FI Sub - Cork County Council.pdf	Transportation Implications for Carrigaline	In documentation submitted to ACP it is evident that no traffic analysis has been undertaken for Carrigaline	As outlined in Chapter 7 - Roads and Traffic, the R613 links Ringaskiddy to Carrigaline providing additional east-west connection into the peninsula. This road has been included in the Baseline Environment as part of the existing road network. The projected levels of construction and operational traffic generated by the proposed development were assigned to the local road network with projected traffic increases during the construction

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		town. This is an important consideration for ACP as some vehicles serving the proposed facility will originate from here. Rush hour flows around Carrigaline are significant with frequent delays generated both at morning and evening rush hour periods. It is submitted to ACP that trip generation from locations west of Carrigaline that encompasses Waste Vehicles, be factored into calculations.	stage (2029) and operational traffic (2030) during the different operational and network peak times, with and without the M28. Additionally, key junctions were examined during the morning, afternoon and evening peak periods to assess their operational capacity. The junctions assessed include Shannonpark Roundabout, which connects with the N28, with Carrigaline to Cork traffic movement during the morning peak and Cork to Carrigaline movement during the PM peak.
FI Sub - Cork County Council.pdf	Roads and Traffic	It is also submitted to ACP since 2016, there has been an escalation in the State's attempts to drive modal shift from the private motor car to more sustainable transportation options, such as active travel and public transport. (…) It is submitted that ACP consider key areas where this modal shift can be achieved, with the following now typically being considered under Development Management since 2016: • Mobility management plans • Traffic and transport assessments	As outlined in Chapter 7 - Roads and Traffic, a Mobility Management Plan has been prepared by Indaver for staff employed at the facility intended to reduce the amount of single occupancy car trips to and from the site. A new cycleway has been recently completed as part of the Ringaskiddy Urban Realm and Active Travel Scheme, north of the proposed development. Additionally, Chapter 7 outlines that four bus routes (223, 223X, 225 and 225L) currently serve the proposed development site.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• Accessibility audits • Active travel connectivity • Access to public transport • DMURS compliance if located within the 60kph speed limit (DMURS obligatory since 2013) • Restrictions on the number of car parking spaces • Provision being made for EV parking and charging facilities • Provision being made bicycle parking and charging facilities	
FI Sub - Cork County Council.pdf	Coastal Erosion and Cliff Retreat	The applicant intends placing over 1,000m^3 of shingle material by means of protection for any potential further erosion. It should be noted that erosion has occurred here in the recent past, particularly during periods of strong easterly and southerly winds. It is submitted that ACP should consider the impacts of this measure during construction and operational stages.	As outlined in Chapter 13, approximately 1150m^3 of sacrificial material (shingle of appropriate size and rounded shape with high density and resistance to abrasion) is proposed to be placed above the foreshore on Gobby Beach along the eastern boundary of the proposed development site. This will be a '*soft*' solution which will reduce erosion rates by increasing beach levels i.e. reducing near shore water depth and wave heights and will protect the glacial till face from breaking waves. The coastal boundary of the proposed development site will be monitored for erosion on an annual basis. The placement of beach nourishment material is predicted to result in a reduction in the rate of cliff recession, considered a slight positive effect.
FI Sub - Cork County Council.pdf	Biodiversity Considerations	Mammal surveys in 2024 and 2025 identified mammal tracks within the proposed development site	As outlined in Chapter 12 - Biodiversity, construction activities within the vicinity of affected badger setts may commence once these setts have been evacuated and destroyed under licence from the NPWS. Where affected setts do not require destruction, construction works may commence once recommended alternative mitigation measures to address the Badger issues have been complied with. Additionally, works close to Badger setts or

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		and it was determined that a badger sett, previously unoccupied in 2014/2015, was being used sporadically. ACP will be aware that works close to Badger setts or removal of Badgers from a site may only be carried out under the supervision of a qualified expert under licence from the NPWS.	removal of Badgers from a site may only be carried out under the supervision of a qualified expert under licence from NPWS.
FI Sub - Cork County Council.pdf	Biodiversity Considerations	In terms of Coastal Protection and Cliff Retreat, it is suggested appropriate that ACP include the impact on the physical structure of the upper shore above the high tide line and on any flora/fauna occupying this zone. Some of this material could impact on the intertidal zone if the material moves position during storm surges. Depending on the chemical composition of the deposited material and its similarity to the existing beach material, ACP should assess any potential changes in floral communities.	Potential effects from the proposed development on flora and fauna are outlined in Chapter 12 - Biodiversity. It was noted that no rare or uncommon species or habitats have been recorded within the area of the proposed coastal protection works and re-colonisation of this area is expected to proceed quickly. The material to be deposited will be inert and similar to the existing material in this area and thus no changes in flora/fauna communities will occur. Similarly, if any of this material reaches the intertidal zone during storm surges, it will be rapidly re-colonised and will not have a significant effect on marine ecology. Any direct effects on marine ecology arising from the beach nourishment scheme are predicted to be negligible.
FI Sub - Cork County Council.pdf	Biodiversity Considerations	It is noted that, during the recent bird surveys, a Red List species i.e. Oystercatcher, was recorded foraging along the	As outlined in Chapter 12 - Biodiversity, the nourishment material to be deposited will be similar to the existing material in the area and thus no changes in flora/fauna communities will occur. Some species that are considered of high conservation value (Annex I of the Birds Directive, qualifying species for the Cork Harbour SPA and Red List) were noted in this general area. Many of these birds were recorded

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		shoreline of Gobby Beach. Should the soft engineering shingle nourishment proceed, it is considered that ACP assess existing habitats and species occupying the habitat and or utilising it for foraging purposes. It is considered that beach nourishment material should be in keeping with existing on-site natural material.	overflying the channel. The proposed development site itself and the shoreline adjoining the proposed development site, does not support high numbers of these species.
FI Sub - Cork County Council.pdf	Flood Risk Assessment	Executive summary of the Flood Risk Assessment notes that "small areas of the site are also below the predicted 1 in 200-year design tidal level (2.87mOD) but these are not proposed for development". However, we draw your attention to the following: • The existing levels of the section of the L2545 to be raised as part of this project are all below 2.87m, and in some cases are being raised by as much as 872mm. • A review of the topographical survey would indicate that a significant width of the northern extents of the site which is below the 2.87m OD Contour is proposed for development Proposed Site Levels of 4.55mOD and an	According to Appendix 13.4 - Flood Risk Assessment, the upgrade of the L2545 will address the risk of flooding of the road. The upgrade works will include raising a 190m section of the road to a maximum height of 3.495m OD between the car park adjacent to Gobby Beach and the eastern end of the Hammond Lane Metal Company site. This is approximately 0.9m above the existing road level. This will elevate the road to above the 200-year design tidal water level plus an allowance for climate change. This will offer a high level of protection to the road from tidal flooding and will help ensure that access and egress routes can be maintained during flood events. The minimum design flood defence level of the proposed development has been calculated as 3.42m OD. Arup however has proposed a more conservative flood defence level of 4.55m OD for the site. This level offers a very high standard of flood protection to the site. The proposed upgrade of the L2545 will address the risk the risk of flooding events such as the one of October 2004.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		ESB substation is also included in this area. (...) As noted above, the Report assumes 2.87mOD to be the 1 in 200-year flood level. In any case, there are sections of the site at 2.66mOD, which makes them below the 1 in 200-year design tidal level. It has also been proven through the 2004 flood event that the site is susceptible to flooding in what is stated in the FRA as between a 1 in 50 and a 1 in 100-year flood event.	
FI Sub - Cork County Council.pdf	Flood Risk Assessment	The Flood Risk Assessment indicates that the site is classified as Flood Zone C. This is correct according to the County Development Plan mapping. However, as it is demonstrable that parts of the site are below the 1in 200-year tidal flood level, ACP should consider if the site should be considered as within Flood Zone A. ACP should therefore consider requesting a Site-Specific Flood Risk Assessment to be undertaken in accordance with the OPW Planning System and Flood Risk Management Guidelines. As noted above, development is proposed below the 1 :200 tidal flood level. There is no evidence in the	As documented in Appendix 13.4 - Flood Risk Assessment, it is proposed to upgrade the L2545 to address the risk of flooding of the road. This will elevate the road to above the 200-year design tidal water level plus an allowance for climate change. Additionally, small areas of the site along the northern boundary are also below the predicted 1 in 200-year design tidal level (2.87m OD), but these are not proposed for development. The majority of the site is above 2.87m OD. The Indaver site is not indicated as being within the design 1000-year tidal floodplain. Consequently, the site is classified as lying within Flood Zone C, which means that the probability of flooding from rivers and the sea is very low.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		documentation that a Site-Specific Flood Risk Assessment has been undertaken, including the identification of any increased flood risk to third party lands a consequence of the proposed development.	
FI Sub - Cork County Council.pdf	Clarification of Waste Acceptance Times	Proposed waste acceptance times are 06.00-20.00 weekdays and 09.00-14.00 on Saturdays. No mention is made of deliveries on Sundays. It is submitted that ACP should clarify this matter and confirm if this facility works on a 24-hour basis, 7 days a week basis. If this is not the case, it is considered that ACP should clarify if material processed on Sunday would have to be stockpiled on previous days. ACP should assess any associated implications.	As stated in Chapter 4 - Description of the Proposed Development, waste acceptance will be limited to the hours of 06.00 to 20.00 on weekdays and 09.00 to 14.00 on Saturdays, with the facility operating 24 hours per day, seven days per week.
FI Sub - Cork County Council.pdf	Cork City, Harbour and East Cork Destination and Experience Development Plan (Cork DEDP)	ACP should note the publication of the Cork City, Harbour and East Cork Destination and Experience Development Plan (Cork DEDP) since the last application received. The Cork City, Harbour and East Cork DEDP was launched in November 2024, aims to position the region as Ireland's gastronomy	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		capital and enhance the harbour experience, with key projects including a new visitor attraction and development of tourism trails. (...) Consideration should be given on the impact of the sustainable tourism initiative as set out on DEDP and the collective goals of creating a world class Cork Harbour experience which will assist in developing the appeal of this area as a vibrant leisure destination.	As such, it is considered that the proposed development is compatible with the plans for improved tourist amenities in the Lower Harbour.
FI Sub-Department of Defence.pdf	Aviation Obstacle Lighting	Following consultations with our Air Corps colleagues at Casement Aerodrome, the Department of Defence would like to make the following observations: The 75m stack should be fitted with aviation obstacle lighting with the following specifications: (1) Type C, Medium IntensIty Fixed Red avIatIon obstacle IIght fixed to the highest point on the stack and visible from all angles of azimuth. (2) The obstacle lighting may be incandescent or of a type visible to Night Vision equipment and must emit light at the near Infra-Red	As outlined in Chapter 4 - Description of the Proposed Development, the top of the stack will be indicated by white strobe (flashing) obstacle warning lights. The lights will be incandescent or of a type visible to Night Vision Equipment. The lights will emit light at the near infra-red (IR) range of the electromagnetic spectrum specifically at or near 850 nanometres (nm) of wavelength. Light intensity is to be of a similar value to that emitted in the visible spectrum of light.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		(IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light. (3) Medium intensity lights shall have a minimum output of 2,000 candela (4) Obstacle lights shall be visible in all directions of azimuth and to be illuminated H24/7. (5) Lighting must be in good working order. Any unserviceable lamp fittings should be replaced as soon as possible after failure, and in any event within 24 hours. During this time, Military Air Traffic Services should be contacted so that flight crews can be notified.	
FI Sub-Department of Defence.pdf	Military radar systems	In the event negative impacts on future military radar systems, the owner will engage with the Department of Defence and will provide suitable mitigation as soon as practical.	An assessment was carried out by two independent aviation experts on potential impacts on helicopter operations and flight paths, in to and out of Haulbowline in the context of the existing structures in the harbour area, which are included in Appendices 15.1 and 15.2. Both reports demonstrate that there will be no impact on the safety of helicopter operations and navigation out of the naval base. Additionally, plume characteristics of the plume in relation to key parameters that can influence helicopter functionality and the distance of the stack tip beyond which there would be no effect were also assessed. The assessment is provided in Appendix 8.8 of the EIS. The effect of the plume of 14m is well within the safety margin prescribed by the Department of Defence (Appendix 15.3), significant negative effects on the neighbouring land use of the Naval Base will not arise.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Development Applications Unit.pdf	Nature Conservation	The results, assumed to be scientifically valid, indicate that, in practice, the operation of WtE incineration facilities may result in considerably higher emissions of PCDDs (dioxins) and PCDFs (furans) than would be suspected from regulatory monitoring, with a bioaccumulation potential in domestic terrestrial birds even to levels which are a health hazard for human consumption. However, the marine and intertidal environment, which is relevant to the bird species occurring in Cork Harbour SPA, is different in that the aerial plume reaches the sea surface layer, or intertidal mudflat surface, as opposed to the soil. Nevertheless, an assumption that pollutants landing on the sea surface simply sink, and further dilute in concentration in the sea water column, may not be correct.	The air dispersion model and associated dioxin/furan-uptake modelling documented in Appendices 11 and 15 to the NIS is an environmental model, and is attempting to look at likely effects on a very large open system where PCDD/F concentrations will be predicted to be at a maximum at a particular location within a very wide area but will fall off rapidly when one moves away from this point. The SPA will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. Since 2011 Indaver has been operating a waste to energy plant in Duleek and has many years of data which show that PCDD/F emissions are negligible and well below the very low air emission limit value imposed on waste to energy plants and the EPA milk monitoring data which has been undertaken for many years in the Duleek area which shows consistently low levels of PCDD/F in milk in the area. The examples provided in the DAU submission relate to installations in developing countries where the protocols and procedures are not as stringent as in the EU. However, the DAU response letter also cites three recent studies from Belgium, France and the Netherlands carried out by ToxicoWatch. These studies recorded elevated levels of dioxins and furans (in soil, moss and eggs) were recorded in the vicinity of WtE facilities. The DAU notes that these publications are not peer reviewed, but also states that as the DR CALUX bioassay method (although relatively new) has been verified by the French public health authority and that therefore these studies should be assumed to be scientifically valid. However, the issue with these publications is that they are not scientifically rigorous and they do not follow the proper scientific methods/design that would be required if the publication were peer reviewed (and published scientific literature). The studies do not use controls, do not look at any other sources of emissions in these areas and these are not longitudinal studies looking at patterns of emissions/deposition over time. A number of these sites are also dealing with historical issues, as they have been operational prior to stricter controls such as the IED and directives before it. Persistent organic chemicals can come from a range of sources. There are many confounding variables which are not accounted for or discussed in these reports e.g. were these facilities operational before the tightening of emission guidelines, in the Netherlands a survey site over 125km the WtE facility has much higher levels of dioxins than the sites adjoining the facility, the Paris facility has significant non-compliance issues (over 7,000 hours of exceedances in 2 years). These studies note that further research is needed to determine the extent to which the waste incineration contributes to this contamination. Following a review of these studies, there is no change to the conclusions in the NIS and EIS i.e. that when best operational practices (and compliance monitoring) are carried out, then the levels of emissions do not create human (or avian) health issues.
FI Sub - Development Applications Unit.pdf	Nature Conservation	It was noted that breeding common terns, one of the species listed for the SPA, forage in the Harbour east of the proposed	The air dispersion model and associated dioxin/furan-uptake modelling documented in Appendices 11 and 15 to the NIS is an environmental model, and is attempting to look at likely effects on a very large open system where PCDD/F concentrations will be predicted to be at a maximum at a particular location within a very wide area but will fall off rapidly when one moves away from this point. The SPA will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		development (p. 45 of the NIS). However, there appears to be no baseline data on bird use of areas where stack plume modelling would indicate maximum potential deposition on surface waters or intertidal mudflats, or where sea current modelling may indicate deposit accumulation on intertidal mudflats. I-Webs (Irish Wetland Birds Survey) data is available on request from BirdWatch Ireland, and includes recent winter counts for at least some the count zones in Fig. 1 below, including Whitegate Bay and Monkstown Creek.	rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. Since 2011 Indaver has been operating a waste to energy plant in Duleek and has many years of data which show that PCDD/F emissions are negligible and well below the very low air emission limit value imposed on waste to energy plants and the EPA milk monitoring data which has been undertaken for many years in the Duleek area which shows consistently low levels of PCDD/F in milk in the area. The winter bird surveys and breeding bird surveys documented in Chapter 12 of the EIS, were used in combination with relevant I-WeBS data for subsites in the vicinity of the proposed development site, to inform biodiversity impact assessment documented in Chapter 12, and the detailed assessment of impacts on the Special Conservation Interests of Cork Harbour SPA documented in the NIS, including common tern.
FI Sub - Development Applications Unit.pdf	Nature Conservation	2019 DAU Submission to the EPA: As a general principle, permitting *any* avoidable production of persistent pollutants such as dioxins and furans adjacent to a protected wetland ecosystem such as Cork Harbour is not best ecological practice. The *Stockholm Convention on Persistent Organic Pollutants*, and its implementing legislation in the European Union, *Regulation (EC) No*	In modern Waste-to-Energy plants, the recovery of energy is optimised without compromising the reformation of Dioxins in the flue gases via de-Novo synthesis. The adiabatic quench referred to above for a dedicated hazardous waste incinerator (presumably burning chlorinated hazardous wastes also) is not analogous to the project that is proposed in Ringaskiddy and an adiabatic quench would destroy valuable renewable energy for no environmental benefit, as the levels of Dioxins and Furans in the flue gases are easily controlled by the injection of activated carbon or clay. This may not be the case for a dedicated hazardous waste incinerator burning highly chlorinated wastes. Data from Indaver's waste to energy plant in Carranstown (available on the EPA's Leap Portal), which has been in commercial operation since 2011 demonstrates the consistently low levels of dioxin and furan emissions from the plant which are at least an order of magnitude lower than the required emission limit value in the IED licence from the EPA. Minimising dioxin reformation by de-novo synthesis is ensured by reducing the fly ash content (to reduce the amount of metals present that are needed to catalyse this synthesis) by fixed installed cleaning devices of the heat transfer surfaces in the different stages of the boiler. Reducing the amount of time available is also addressed by increasing the velocity of the flue gases to keep residence time at this temperature window (450° - 250°C) in line with the principles of the BAT conclusions.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		850/2004 of the European Parliament and Council of 29 April on persistent organic pollutants, as well as *Directive 2000/76/EC on the incineration of waste*, all refer to reduction or elimination of production of dioxins and furans. Although this arguably refers to the *deliberate* production of these pollutants, the general principle of reduction of their production including as *avoidable* by-products of industrial processes is clear. A review of hazardous waste incineration in 1999 stated: "Formation of these compounds can be minimized with good combustion of precursors in the incinerator, but proper operating conditions of the downstream equipment is critical to prevent formation of the tiny amounts that would cause problems in meeting the proposed standards. Thus, cooling of the gases in the downstream equipment is extremely important. ***A rapid (1 to 2 seconds) adiabatic quench is much preferred over waste heat recovery in a boiler that lets the gases linger at [dioxin and furan] formation temperatures****8*	These measures are described in Section 4.8.1.1 of Chapter 4 of the EIS and the BAT assessment has been provided in Appendix 4.4 of the EIS.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		***for 5 to 10 seconds*.”** [p. 17]. (Emphasis and Italics added). This issue is still emphasized in the recent scientific literature. For instance, one recent 2016 study stated: “*The economizer had been found [to be] the source of PCDD/F formations in the MSWIs, because its operational temperature falls within [the] PCDD/F window. Therefore, it is encouraged to improve the heat exchange efficiency of economizers in order to shorten the residence time of the flue gas so as to effectively reduce PCDD/F formation in the MSWIs*.” *Also, rapidly quenched ash may also be more condensed and, as a consequence lead to less leaching of toxic metals when disposed in landfill*.”	
FI Sub - Development Applications Unit.pdf	Nature Conservation	2019 DAU Submission to the EPA: There is a question as to whether the Natura Impact Statement (NIS) has sufficiently investigated this issue. While the NIS refers to rapid cooling, it does not cite how many seconds the gases will linger for at dioxin-	The NIS has considered the measures proposed for the compliance with the BAT conclusions as specified in Appendix 8 of the NIS. The NIS has fully assessed the impact of emissions from the facility based on the maximum limits permitted under the Industrial Emissions Directive (IED) and under abnormal operating conditions. The facility will be fully compliant with the emission limits as specified in the IED and will in fact operate well below these limit values in normal operation. The authors of the NIS (DixonBrosnan) have assessed the implications of the further information provided in this document in relation to the conclusions of the original NIS. The NIS concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA or any other European sites. Therefore, no changes to the conclusions of the original NIS are considered necessary.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		formation temperatures, or give the reasons why the rapid cooling system proposed is state-of-the-art in this area (i.e. no quantitative or comparative data on performance).	
FI Sub - Development Applications Unit.pdf	Nature Conservation	2019 DAU Submission to the EPA: According to an International Solid Waste Association review: "*Today solid residues from modern Waste-to-Energy facilities constitute the primary emission route to the surrounding environment*." In a recent High Court case, it has been established that, in the case of a wind-farm, the electricity cable through which the generated electricity is exported to the grid must be viewed as part of the project for assessment (EIA and appropriate assessment) to be complete. The same argument may be valid for the assessment of the disposal of ash residues being necessary for a complete assessment of a proposed municipal waste and hazardous waste incinerator.	The project in its entirety has been assessed fully in the NIS and EIS. The transfer of flue gas cleaning residues to licensed facilities in Europe or Northern Ireland have been assessed in line with the applicable regulatory regime based on an overarching EU law framework (as maintained in Northern Ireland through the Northern Ireland Protocol) is detailed below. The ISWA document that is referenced by the NPWS quite rightly states that the main potential for pollution is from flue gas cleaning residues (referred to in their report as air-pollution control (APC) residues) and that is why the methods for its handling, transport and recovery are proposed in the application. The ISWA report states: *"Although bottom ashes are generated in larger quantities, the main pollution potential is found in the air-pollution control (APC) residues originating from cleaning the flue gases before emission to air."* The Report further states that: *"Salt mines are considered a viable disposal option as natural salt deposits are characterized by practical no hydraulic contact with the surrounding groundwater bodies. Consequently any leaching, or other contaminant release, from the residues is considered effectively hindered over geological time scales, i.e. millions of years. The salt content of APC residues is (in contrast to other options) not a concern here because of the \salty" environment. Salt mines are generally regarded as safe disposal sites in Europe."* This is the method of recovery proposed and described in detail in the Application and its supporting documents (EIS and NIS) and applies regardless of whether that site is located in Germany or in Northern Ireland. Both sites are licensed to accept and are currently accepting flue gas cleaning residues from the Indaver Waste to Energy facility in Co. Meath. Specifically, the transport and recovery method proposed has been comprehensively addressed in the relevant sections of the NIS and EIS. The NIS addresses this issue in Sections 4.7.9, 4.7.10, 4.8.2 and 4.13, Appendix 8 and Appendix 13.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		In this case, the flue gas cleaning residues should be a particularly important focus of ecological assessment, because of the elevated quantities of dioxins, furans, heavy metals and other pollutants extracted from the post-combustion process. An estimated 9,100 tonnes would be produced annually. The NIS states: "*It will be exported abroad for recovery in a salt mine or for disposal to a hazardous waste landfill, until a suitable landfill for hazardous waste is developed in Ireland*." In Appendix 18 to the NIS, the location of the facility currently being used and proposed is in underground mines at Hattorf and Wintershall in Germany. A likely site (National Difficult Waste Facility) has not yet been identified in Ireland. The Hattorf and Wintershall sites are near the [River] Werra between Phillippsthal and Herleshausen Special Area of Conservation (SAC) (5125-350) designated in 2008. The NIS does not include a screening for appropriate assessment for the effects of flue gas cleaning residue	The recovery method proposed is also addressed in the EIS in Sections 4.13.3 and 4.13.4 of Chapter 4 Description of the Proposed Development, Section 12.5.6 of Chapter 12 Biodiversity, Section 15.5.3.10 of Chapter 15 Material Assets and Chapter 16 Cumulative Impacts, Other Impacts and Interactions. The authors of the NIS (DixonBrosnan) have assessed the implications of the further information provided in this document in relation to the conclusions of the original NIS. The NIS concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA or any other European sites. Therefore, no changes to the conclusions of the original NIS are considered necessary.

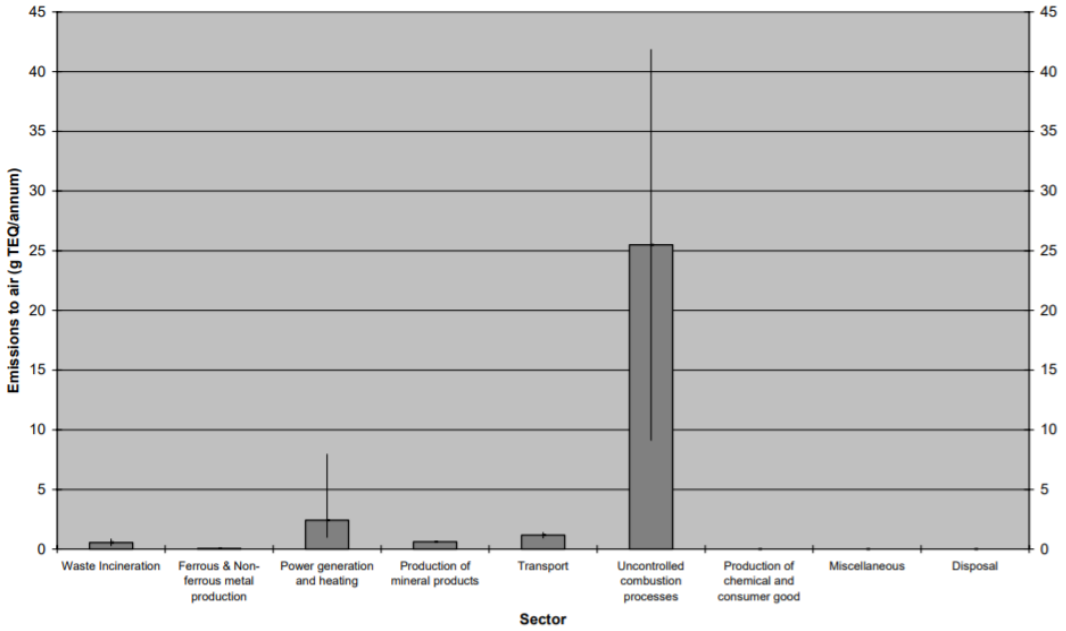
ACP Submission Reference	Topic	Submission Statement	Applicant Response
		disposal at the underground facility on this or other European sites in the vicinity. Again, it is worth citing the International Solid Waste Association Review: "*Metal leaching from residues after final disposal may continue for thousands of years. Although the actual consequences cannot be determined today, the potential impacts from this long-term release should be assessed and accounted for*." The NIS does not appear to refer to the likelihood of EU Member States being restricted in their ability to export waste in the future. The maximum permitted lifetime of the proposed incinerator installation is 40 years (10 to complete construction, 30 for operation). If, during this period some or all bottom and filter ash will have to be disposed of within the State, then, as specific sites cannot be yet located, the generic types of location should be at least screened for assessment. If disposal could be within a cSAC catchment, or a river with significant populations of kingfisher (a species listed in Annex I of the EU Birds	

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		Directive), is a possibility, then the likely generic impacts and best available techniques for mitigation measures need to be completely assessed. Assessment of the disposal of bottom ash is also necessary, including the possibility of leaching of nanoparticles (see item 5 below) to groundwater in their disposal site.	
FI Sub - Development Applications Unit.pdf	Nature Conservation	2019 DAU Submission to the EPA: It is well recognized that considerable exceedance of dioxin and furan emissions can occur during start-up. In April 2018, the European Environmental Bureau (EEB) published the following document: "*A wasted opportunity? EU environmental standards for waste incineration plants under review*". It specifically refers to the problem of bypass of part or all of the flue-gas cleaning system during start-up. In the event that the EPA decides to grant a licence, there should be a clearly specified condition which requires the technology to	There is no by-pass of the flue gas cleaning system. In addition, during the startup process and before any waste is introduced to the furnace, the baghouse filter is pre-coated with lime and activated carbon. The NIS has fully assessed the impact of emissions from the facility based on the maximum limits permitted under the Industrial Emissions Directive (IED) and under abnormal operating conditions. The facility will be fully compliant with the emission limits as specified in the IED and will in fact operate well below these limit values in normal operation. The term "*autothermal*" refers to the fact that the plant is designed to be self-sustaining on waste feeding alone and does not require any additional thermal inputs. The auxiliary burners are only required for controlled start-up/shutdown and in the event that a minimum temperature is reached in the furnace upon which the auxiliary burners will start automatically to maintain the required temperature. The modelling of emissions to air from the Ringaskiddy Resource Recovery Centre indicates that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for all compounds emitted from the facility even under abnormal operating conditions. In terms of dioxins/furans it was assumed that abnormal operations, including startup and shutdown, occurred for 11 days (264 hours) per year at a concentration 0.5 ng/m3 which is at a level over eight times the licence limit. Even under these circumstances the impact of dioxins and furans from the facility was insignificant and a small fraction of existing ambient levels. All continuously monitored parameters in the stack are recorded as half-hourly and hourly average values with the exception of Ammonia which is reported as a daily average. The authors of the NIS (DixonBrosnan) have assessed the implications of the further information provided in this document in relation to the conclusions of the original NIS. The NIS concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA or any other European sites. Therefore, no changes to the conclusions of the original NIS are considered necessary.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		be installed which avoids bypassing the flue-gas cleaning system at all times.	
FI Sub - Development Applications Unit.pdf	Nature Conservation	2019 DAU Submission to the EPA: Mercury is a particularly important pollutant, and deposition occurs globally, affecting, for instance, Swedish freshwater fish and marine mammals in the northeast Atlantic. There is variation in the mercury emissions performance of incinerators within the EU, and there is a question as to whether the proposed process would always be able to use activated carbon injection at start-up. The NIS does not refer to the 2018 Global Mercury Assessment, or consider mercury under the in-combination assessment. Also, there is no assessment in the NIS of comparative mercury emissions data from similar incinerators in the EU. At the 2009 planning Oral Hearing for this proposed installation, sets	The 2018 Global Mercury Assessment states that, waste incineration contributes less than 1% of the total mercury emissions with gold mining, coal burning and cement production being the largest contributors world-wide. The system will be pre-charged with activated carbon/clay and lime before waste feeding begins. Hence the control of mercury emissions from the facility will also not be by-passed. It should also be noted that the modelled emissions for mercury from the proposed development used the maximum emission limit value in the IED of 50 µg/Nm^3 as a maximum daily average. The typical emission limit that is applied in IED licences is 20 µg/Nm3 as a daily average under normal operating conditions. Typically, the measured values (with reference to the Indaver, Carranstown waste to energy plant) are much less than this again at <10 µg/Nm3. Hence, a worst case assessment approach has been taken in both the NIS and EIS and the impact has been fully assessed. The authors of the NIS (DixonBrosnan) have assessed the implications of the further information provided in this document in relation to the conclusions of the original NIS. The original NIS concluded that there will be no adverse effect on the integrity, special conservation interests and conservation objectives for the Cork Harbour SPA from emissions, including cumulative emissions and possible bioaccumulation. Therefore, no changes to the conclusions of the original NIS are considered necessary.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		of data from selected incinerators (with similar furnace and flue gas cleaning systems) were produced (17 June 2009) as supplementary further information. Updated data from incinerators using the same processes as that proposed (e.g. from the Thaumaide incinerator (Belgium)), would provide a useful comparison on which to base the assessment. The above EEB report recommended that an emission limit of 10 µg/Nm^3 (maximum daily average) should be applied to new incinerator emissions, and this could be recommended here too as it appears to have been achieved elsewhere in the EU.	
FI Sub - Development Applications Unit.pdf	Nature Conservation	2019 DAU Submission to the EPA: The lack of assessment in the NIS of the effects of nanoparticles in incinerator emissions, on Cork Harbour SPA, was raised by Cllr. Marcia D'Alton at the Oral Hearing held by	As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. Although additional scientific papers have been published in recent years to supplement those presented at the 2016 Oral Hearing, the conclusions of these studies have confirmed our conclusions drawn in 2016 that provided the waste-to-energy facility operates at temperatures above 850°C and the appropriate abatement systems, such as fabric filters, are appropriately operated and maintained, the emissions of nanoparticles from waste-to-energy facilities are likely to be insignificant.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		An Bord Pleanála on April 2016. The NIS for the licence application was up-dated (pp. 39-40) to include this, based on a review of the scientific literature included in Appendix 20. However, despite the claim that the above review is comprehensive (Appendix 20, p. 9), some recent scientific reviews are missing as is a discussion of the necessity for electrostatic precipitators for nanoparticle removal in addition to fabric filters, and the importance of how filters are '*regenerated*'. In particular, the issue raised in a very recent paper concerning the role, during incineration of carbon nanomaterials, of fullerene "*leading to the formation of high concentrations of PCDD/Fs*" needs to be assessed.	The authors of the NIS (DixonBrosnan) have assessed the implications of the further information provided in this document in relation to the conclusions of the original NIS. The NIS concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA or any other European sites. Therefore, no changes to the conclusions of the original NIS are considered necessary.
FI Sub - Development Applications Unit.pdf	Nature Conservation	2019 DAU Submission to the EPA: A recommendation was given, by this Department, to An Bord Pleanála (ABP) during the 2016 Oral Hearing, for	The Irish EPA Report titled: Inventory of Dioxin and Furan Emissions to Air, Land and Water in Ireland for 2000 and 2010 : Synthesis Report, (2000–DS–2–M1) (page 11. Figure 3.3) presents the following graphic (Figure 1.1 below) for projected sources of dioxin and furan in the Irish environment, assuming that up to 1,500,000 tonnes per annum of waste incineration capacity was in operation.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		ecotoxicological monitoring. However, possibly because the ABP Inspector recommended refusal of planning permission, and therefore did not recommend conditions, when the Board inserted conditions, there was none for ecotoxicological monitoring. In the event that the EPA grants an industrial emissions licence to the proposed waste-to-energy facility, the following two licence conditions are therefore ecommended by the Department. (The EIS/NIS refer to monitoring of cow's milk as a suitable indicator for effects on Cork Harbour SPA. However, the main plume depositions from the stack are over marine ecosystem, by the nature of the geography of the prevailing wind and the Harbour. Also, a terrestrial food-chain is rarely used in ecotoxicology as a surrogate for a marine food-chain.). Monitoring of PCDDs and PCDFs will be carried out in livers of fish which form part of the diet of piscivorous birds in Cork	 Figure 1.1 Projected sources of dioxin and furan emissions to air in the Irish Environment for 2010 Just over 84% of the projected emissions to air are related to uncontrolled combustion processes with waste incineration projected to make up only 1.81%. It can therefore be concluded that monitoring of fish livers for dioxin and furan as proposed would not be an appropriate and meaningful method of monitoring the impacts of the proposed Ringaskiddy facility as the dominant sources of dioxin and furan emission in the environment are uncontrolled combustion processes. The authors of the NIS (DixonBrosnan) have assessed the implications of the further information provided in this document in relation to the conclusions of the original NIS. The NIS concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA or any other European sites. Based on the inherent difficulty in assigning changes in the concentrations of particular substances in fish livers to particular sources in the wider environment, this method of ecotoxicological monitoring is unlikely to provide usable information on potential or actual adverse effects on the integrity of the Cork Harbour SPA. Therefore, no changes to the conclusions of the original NIS are considered necessary

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		Harbour Special Protection Area. Monitoring methods will be based on standard methods, and in particular will be sufficient to be statistically robust. Fish samples will be collected in shallow waters (<5m depth) from Whitegate Bay and from Monkstown Creek (avoiding wastewater discharge areas), by competent aquatic ecologists and samples will be analysed in an accredited laboratory. Monitoring will be carried out every 5 years after commencement of operation, and a baseline data-set will be established pror to the commencement of the operation of the incinerator. Reports of the baseline and monitoring will be forwarded to the Environmental Protection Agency and the National Parks and Wildlife Service of the Department of Arts, Heritage and the Gaeltacht. Reason: To monitor the predictions of no adverse effects of incinerator emissions on Cork Harbour Special Protection Area. In the event that real-time PCDD/F monitoring, or acceptable indicator	

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		monitoring, techniques become effective and feasible, these will be installed at the Ringaskiddy waste-to-energy facility. Reason: To monitor the predictions of no adverse effects of incinerator emissions on Cork Harbour Special Protection Area.”	
FI Sub - Development Applications Unit.pdf	Alternative Technologies	For instance, regarding gasification (which reportedly can significantly reduce dioxin and furan formation), there is no change in the text paragraphs discussing the disadvantages of this technology for MSW treatment from the January 2016 EIS (Chap. 3, p. 33) to the August 2025 EIAR (p. 3. 1 7). No updated references are cited on this comparison, despite their apparently being numerous studies published on this. The issue is not that the conclusion of MSW incineration to Energy may be incorrect as the best available technology, but it is that it has not been sufficiently assessed in a reasoned manner based on up-to-date scientific and technology data.	As outlined in Section 3.4, Chapter 3 - Alternatives, alternative thermal treatment technologies were considered by Indaver, including pyrolysis and gasification, and waste combustion with thermal energy recovery. The text has not changed since the 2016 EIS which reflects the position that although these technologies exist as a theoretical alternative to the proposed development, in practice they are difficult to maintain under stable operating conditions with a variable waste stream such as residual municipal waste or are not economically viable. Flue gas quench technology is typically applied for a dedicated hazardous waste incinerator (burning chlorinated hazardous wastes and therefore with higher dioxin reformation potential) and is not analogous to the proposed development, which is primarily a municipal waste incinerator with energy recovery. Modern municipal Waste-to-Energy plants (via the implementation of principles of BAT - See appendix 4.4 of the EIS on compliance with these techniques) optimise the recovery of energy by extraction of the maximum amount of heat in the boiler (a rapid quench would destroy this energy) without compromising the reformation of Dioxins in the flue gases via de-novo synthesis.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		It would also appear that there is insufficient consideration of updates in flue-gas quench technology, which can significantly reduce post-combustion dioxin and furan formation. These are highly technical issues, which the EPA are the competent authority to decide upon.	
FI Sub - Development Applications Unit.pdf	Archaeological Conditions	A list of archaeological requirements (conditions) were given by DAU as a recommendation to be included if granted permission.	Should the Commission include any or all of the recommended list of archaeological requirements (conditions) provided by the DAU, these will be implemented by Indaver if the proposed development is granted consent.
FI Sub - Elected Members of Cork City Council.pdf	Endorsement of Cork County Council submission	We therefore endorse the submission of the elected members of Cork County Council with respect to the above application, recognising that common and mutual interest between the two Local Authorities of the Cork Harbour area.	Indaver recognises that the elected members of Cork City Council endorse the submission of the elected members of Cork County Council with respect to the proposed development application, recognising the common and mutual interest between the two Local Authorities of the Cork Harbour area.
FI Sub - Environmental Protection Agency.pdf	Industrial Emissions Licence	An Industrial Emissions (IE) licence application was made by lndaver Ireland Limited (Reg No: P1114-01) on 18 July 2019 for the following classes of activity under the EPA Act 1992 as amended: 11.3{a) Disposal or recovery of waste in waste	Indaver recognises that the Industrial Emissions (IE) licence application (Reg No: P1114-01) made on 18 July 2018 will be updated, if needed, to accommodate all relevant updates included as part of the 2025 assessment and the final outcome of the planning application process. Indaver has confirmed with the EPA the current status of the planning application and has shared the 2025 EIS and NIS with the EPA as part of the live licence application process.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		incineration plants or in waste co-incineration plants for, 11.3{b). Disposal or recovery of waste in waste incineration plants or in waste co-incineration plants for The IE licence application P1114-01 may need to be updated to accommodate the changes proposed as part of the planning application.	
FI Sub - Environmental Protection Agency.pdf	Industrial Emissions Licence	The EIS dated 2025 submitted with the IE licence application (received by the EPA on 07 October 2025) appears to be the same as that submitted to An Coimisiun Pleanala as part of planning application Ref: 318802.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement'*, the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development. Indaver can confirm that the EIS received by the EPA on 07th October (and also the NIS) is the same as that submitted to ACP in August 2025 in response to the RFI.
FI Sub - Environmental Protection Agency.pdf	Industrial Emissions Licence	Should the applicant wish to include the changes proposed in the planning application as part of the licence application, the applicant will be required to submit the associated EIS/EIAR to the Agency as part of the licence application if it hasn't already been submitted. This will be considered by the Agency as part of its assessment for the purposes	The updated EIS has been submitted to the Agency as a statutory consultee as part of the Request for Further Information (RFI) from An Coimisiún Pleanála regarding the proposed development.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		of EIA and further consultation with the planning authority will be undertaken.	
FI Sub - Fáilte Ireland.pdf	Toursim, Recreation and Amenity	Having regard to the above and the objective to develop Cork Harbour into a world class visitor experience, Failte Ireland respectfully request that the potential for impacts on the tourism, recreation and amenity value of Cork Harbour as a result of the proposed development be given due consideration in the determination of this planning application.	Potential effects from the proposed development on tourism, recreation and amenity of Cork Harbour are assessed in Chapter 6 - Population and Human Health.
FI Sub - Irish Aviation Authority.pdf	Aviation Lighting	In the event of planning consent being granted, the 75m AOD stack should be fitted with a Type C, Medium intensity, Fixed Red obstacle lighting with a minimum output of 2,000 candelas to be visible in all directions of azimuth and operational 24/7 or any alternative specification agreed directly with the Department of Defence. Guidance from the Department of Defence - Property Management Branch states that obstruction lighting should be incandescent or of a type	As outlined in Chapter 4 - Description of the Proposed Development, the top of the stack will be indicated by white strobe (flashing) obstacle warning lights. The lights will be incandescent or of a type visible to Night Vision Equipment. The lights will emit light at the near infra-red (IR) range of the electromagnetic spectrum specifically at or near 850 nanometres (nm) of wavelength. Light intensity is to be of a similar value to that emitted in the visible spectrum of light.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		visible to Night Vision equipment. Obstruction lighting fitted to obstacles must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum, specifically at or near 850 nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.	
FI Sub - Irish Aviation Authority.pdf	Use of Cranes	Furthermore, the applicant should be conditioned to provide a minimum of 30 days notification of any associated crane operations in relation to this planning application to the Department of Defence.	A minimum of 30 days notification will be made to the Department of Defence of any associated crane operations in relation to the proposed development.
FI Sub - Transport Infrastructure Ireland.pdf	M28	The Authority advises that Cork County Council are at an advanced stage of construction of M28 Ringaskiddy/Cork Scheme. The Authority recommends that the boundaries and other ancillary infrastructure such as landscaping and drainage with the M28 Scheme shall be undertaken, and maintained thereafter, strictly in accordance with the M28 Scheme requirements, which are to be agreed with the Cork	Boundaries and other ancillary infrastructure such as landscaping and drainage with the M28 Scheme will be undertaken and maintained strictly in accordance with the M28 Scheme requirements and agreed with Cork County Council in consultation with TII prior to commencement of development.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		County Council in consultation with TII Publications prior to the commencement of development.	
FI Sub - Transport Infrastructure Ireland.pdf	Construction Environmental Management Plan and Construction Traffic Management Plan	A Construction Environmental Management Plan (CEMP) and Traffic Management plan (TMP) shall be prepared and agreed with relevant County Councils and TII, prior to the commencement of development. The matters to be addressed in the CEMP and TMP relating to national road network maintenance and road safety shall demonstrate compliance with TII Publications (Standards), in accordance with relevant TII Publications (Technical) especially where it will be required for any work that may impact the national road pavement, structures and infrastructure including drainage.	As outlined in Appendix 5.1, a Construction Environmental Management Plan (CEMP) and a Construction Traffic Management Plan (CTMP) will be prepared and agreed with Cork County Council prior to commencement of development. The CEMP has been prepared in accordance with industry best practice guidance including TII's Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan.
FI Sub - Transport Infrastructure Ireland.pdf	Traffic Mitigation Measures	Haulage, mobility management and transport mitigation measures included in the EIAR need to be implemented in full to ameliorate potential impacts on the national road network and	Haulage, mobility management and transport mitigation measures included in the EIS will be implemented in full to ameliorate potential impacts on the national road network and associated junctions for all road users.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		associated junctions for all road users.	

4. Private/Public Organisations

Submissions received from private individuals and public organisations were addressed using three distinct approaches -

- Standardised or repeat proforma submissions were identified, separated, and responded to collectively, refer to Table 4.1. Six proformas were identified during the review of the submissions. Note that there were two variations of Proforma #1, but the responses provided are applicable to both.
- Larger submissions were also responded to individually and responses are documented below in Table 4.2.
- All remaining submissions were reviewed individually, grouped into common topics, a summary of the issues raised outlined and addressed through consolidated responses, refer to Table 4.3 below.

4.1 Response to Proformas

Table 4.1: Applicant's Response to Proformas

ACP Submission Reference	Topic	Submission Statement	Applicant Response
Proforma #1			
The list of submissions to which this proforma relates is included in Appendix A.	Site is too small for the proposed project	*'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.'*	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	Environmental Impact Statement is deficient in substance	*'By all 3 Bord Pleanala Inspectors, the Environmental Impact Statement (EIS) was found to be deficient in substance even where found legally adequate in form…..Despite revisions, the updated EIS still continues to be inadequate.'*	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement*', the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development.
	Alternatives	*'No site selection has been done since 2001 despite the enormous change that has taken place in the area. It failed the W.H.O site selection process then and certainly fails now after 20 years. There is no renewed site selection assessment 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 that have 'transformed the character of the immediate area in the intervening period since 2000 (Daly 2017). The only qualification is that they own the site'*	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: *'(b) Support the sustainable*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites –** A comparison of environmental effects at each aforementioned site was carried out under the following topics – air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility –** An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices. It is not accepted that the site "*failed the WHO site selection process*" in 2001, or at any time since. The EIS submitted as part of the 2001 and 2008 planning applications relied on WHO guidelines for the *Site Selection for new hazardous waste management facilities (*Sloan, 1993), as those applications included a hazardous waste transfer station. Section 3.2.3 of the 2008 EIS states that the WHO guidelines were used as a "*conservative benchmarking tool*" for the Ringaskiddy site. The conclusion of the 2008 assessment was that the site enjoyed a favourable rating based upon the WHO guidelines. The 2016 planning application did not include any hazardous waste management facilities. Nonetheless, the EIS submitted in 2016 similarly adopted the approach in the WHO guidelines, as a *conservative benchmarking tool* and the suitability of the site satisfied the WHO guidelines in 2016. The guidance which informed the 2025 site selection assessment is set out at Section 3.2.2 of Chapter 3 of the 2025 EIS.
	Soils, Geology, Hydrogeology,	*'The site is in a flood risk area. Indaver plans to overcome this problem was to raise the entire area by 4m, which will be an eyesore for all who use this area for recreation. Mitigation measures to locate the facility at levels significantly above*	The proposed development site is not indicated as being in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	Hydrology and Coastal Recession	*projected flooding levels would exacerbate the negative visual impact of the proposed large structure.'*	which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site.
	Landscape and Visual	*'The site is in a flood risk area. Indaver plans to overcome this problem was to raise the entire area by 4m, which will be an eyesore for all who use this area for recreation. Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.'*	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development In addition, as noted in Section 4.5.15 of the EIS, the levels of the low-lying parts of the site will be raised to 4.55mOD '*the ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 will also be raised to 4.55mOD'* . This will offer a very high standard of flood protection to the site.
	Zoning	*'Indaver's submission ignores the fact that part of their site (RY-I-09) is now zoned for marine education and related enterprise and activities. That part of their site is no longer zoned for industry. The proposal is therefore in contravention of the County Development Plan.'*	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states *'Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered*

[1] Note that 10,000m^3 is a typographical error in the EIS, and this should read 10,000m^2

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
Proforma #2			
FI Sub - Carrie Denham and Others.pdf FI Sub - Cillian Moore.pdf FI Sub - Cork Harbour Cruises.pdf FI Sub - David Pollard Others.pdf FI Sub - Ellen O'Neill.pdf FI Sub - Joanne O'Keefe.pdf FI Sub - Julie McCall.pdf FI Sub - Leila Pender & Others.pdf FI Sub - Megan O'Driscoll & Miguel Amado.pdf FI Sub - Patrick Quinlan.pdf FI Sub - Sarah Slattery and Mark Slattery.pdf	Climate and Carbon-Law Non-Compliance	*'Ireland is already over its carbon budget; this plant would lock in a large new stream of fossil emissions every year. '*	As outlined in Chapter 9 - Climate, during the operation of the proposed development, heat will be recovered and converted to electricity, thereby the export of 18.5MWe will give a direct benefit in terms of GHG emissions which would have been released in the production of 18.5MWe from fossil-fuel burning power stations. The recycling and recovery of ferrous and non-ferrous materials during the thermal treatment process will require less energy than processes using virgin inputs and thus lead to a direct saving in energy and thus GHG emissions. Additionally, the operation of the facility could potentially allow 240,000 tonnes of residual waste currently exported to continental Europe to cease leading to a saving of over 5,070 tonnes of CO_2eq/annum.
	Climate	*'The developer has provided no carbon-budget analysis, no ETS modelling, and no lifecycle GHG accounting, so compliance with the Climate Act cannot be demonstrated. '*	Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Susan Lenihan.pdf FI Sub - Yvonne Garcia.pdf	Export of electricity to the national grid	*'Electricity-only incineration of fossil plastics is higher-carbon than the future Irish grid and would displace cleaner renewable generation.'*	The proposed development treats waste which cannot be re-used or recycled. As outlined in Chapter 2 of the 2025 EIS, the National Waste Management Plan reports that *'the State has a continued reliance on export to manage residual MSW and other waste streams which is unsuitable and while an emphasis on prevention and reuse may reduce this reliance, there remains a need for additional indigenous recovery infrastructure'.* Furthermore, '*the proposed development will recover heat and will use this to generate 21MW of electricity, of which 18.5MW will be exported to the grid. As described in Section 2.3 (*of Chapter 2), *approximately 50% or 9.25MW could be renewable electricity, which would contribute to meeting Ireland's target of an 80% share of electricity from renewable sources in gross final consumption by 2030……The majority of renewable electricity capacity has been delivered by wind turbines to date, and so the contribution of renewable electricity from biomass at the proposed development will not only support the achievement of the target but will also help to diversify Ireland's renewable energy supply.'*
	Waste Policy	*''Their own data place the plant below the legal R, threshold, which means it is disposal, not recovery.'*	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	Heat Network Feasibility	*'There is no heat-recovery infrastructure, and the site cannot support a heat network, making compliance structurally impossible.'*	While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development. The findings of this assessment are set out in a report prepared by Fichtner, entitled *"Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork"*, which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date.
	Waste Policy	*'High efficiency in Dublin depends on CHP; Meath only narrowly clears the threshold and still damages Ireland's carbon performance. Cork cannot meet it at all'*	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	Waste Policy	*'Irish law now prohibits new residual-waste capacity; national policy requires waste reduction, not expansion.*	Irish law does not prohibit new residual-waste capacity. Chapter 2 – Policy and Planning Framework and Need for the Scheme sets out the European Union (EU), national, regional and local waste policy and planning framework which underpins the proposed development. The chapter demonstrates the specific need for the proposed development in the context of the waste policy and planning policy framework. In summary, EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management. Indeed, the NHMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development.
	Waste Policy	*'The supposed "Southern Region capacity gap" is based on planning structures abolished in 2022; capacity is now national, and Ireland already meets projected needs.*	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that 'The NWMP *(*National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: *"There is a waste treatment*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market."'
	Landscape and Visual and Tourism	*'A single industrial stack permanently alters the harbour's visual identity; tourism branding is fragile and once damaged cannot be restored.'*	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development Landscape impacts are also assessed in Chapter 11. The EIS concludes that the effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral.
	Flooding	*'The access road floods, making the site isolatable during storms and surge events.'*	The principal design objective for the upgrade of the L2545 road is to improve the surface water drainage so that the road does not flood after prolonged rainfall and to raise the level of the road above the 1 in 200-year tidal flood event with an added allowance for climate change. Section 4.5.14 of Chapter 4 Description of the Proposed Development provides a description of the L2545 upgrade.
	Flooding	*'Raising ground levels does not solve tidal inundation, a rising water table, or coastal surge behaviour.'*	Appendix 13.4 Flood Risk Assessment outlines the vulnerability of the site to tidal flood risk, fluvial risk, pluvial risk and groundwater risk and outlines various mitigation/design measures to protect the proposed development and surrounding infrastructure. *'It is considered that the proposed resource recovery centre at Ringaskiddy should be classified as a "Highly Vulnerable Development" as per the vulnerability classification. As the site is classified as Flood Zone C, a Justification Test is not required for the proposed development, and it is necessary only to identify mitigation measures for any residual risks (i.e. an appropriate development level, that being 4.55 m OD).'*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	Flood Risk Assessment	*'The site fails the Sequential Approach and cannot guarantee egress.'*	Section 8.3 of Appendix 13.4 Flood Risk Assessment to the EIS outlines the '*Sequential Approach*'. It concludes, '*as the proposed development lies within Flood Zone C, a Justification Test is not required, and it is necessary only to identify mitigation measures for any residual risks*'.
	Air Quality	*'Thermal inversions in Cork Harbour can trap emissions at ground level rather than allowing safe dispersion.'*	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007.*" Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards. As outlined in EIS Chapter 8 Air Quality Section 8.4.2 Operational Phase the emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, under maximum emissions limits of the EU Directive 2010/75/EU and under abnormal operating condition.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The AERMOD modelling indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios within a 10km radius of the facility. A 10 km radius of the proposed development site were reported in this study even though, in many cases, no residential receptors were near the location of this maximum ambient concentration. Concentrations at the nearest residential receptors are generally significantly lower than the maximum ambient concentrations reported.
	Air Quality	*'The application omits PFAS assessment, ultrafine-particle analysis, and key pollutant monitoring.'*	As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that: "*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific $PM_{2.5}$ component or group of components associated with any source categories of fine particles*". (USEPA, 2015b)
	Heat Network Feasibility GHG Assessment Air Quality Flooding	*'The application claims the highest environmental and safety standards, yet excludes heat recovery, carbon modelling, PFAS/UFP analysis, updated flood data, and a compliant R1.'*	While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	Waste Policy		The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date. Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. A Greenhouse Gas Assessment was carried out as part of the 2025 EIS and is documented in Chapter 9 – Climate. Chapter 9 concluded that the proposed development will have a '*short-term, not significant and negative*' effect as a result of construction traffic and construction works/equipment. During the operational phase of the proposed development the significance of effect is predicted to be '*long-term, not significant and negative*'. Full details are provided in Chapter 8 – Air Quality. As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that:

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			"*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific $PM_{2.5}$ component or group of components associated with any source categories of fine particles*". (USEPA, 2015b) A Flood Risk Assessment is included as Appendix 13.4 to the 2025 EIS, which utilises the most up to date data available including aerial mapping and topographical survey information. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	Waste Acceptance	*'"This plant will deal with industrial waste". It won't. This is a municipal-grade burner, not a specialist industrial or hazardous-waste facility. It cannot accept the chemical, pharmaceutical or high-spec industrial streams produced in Cork. Those already go to dedicated treatment plants with far stricter controls. This project doesn't replace any of that infrastructure – it simply adds a general waste incinerator that cannot treat the very materials people think it will'.*	The types of waste which will be accepted by the proposed development are outlined in the Chapter 4 of the EIS – Description of the Proposed Development and Appendix 4.1 – List of Waste (LoW) Codes Proposed by Indaver for Acceptance. '*The facility will have the capability to treat low risk hazardous wastes. Many of these can be found in municipal solid waste, (e.g. paint tins, rags and wipes contaminated with paints or oils)…. Other streams would include "low hazard" materials from industry such as contaminated personal protective equipment/clothing, filters, absorbents, redundant over-the-counter preparations, medicines, and raw materials such as sugars, starches and gelatine tablet coatings. These streams are classified as hazardous in compliance with the List of Waste (LoW) due to their chemical or physical properties. However, this does not imply that they are dangerous to handle (i.e. they may be handled by householders and businesses regularly).*' Indaver's municipal waste –to-energy facility in Carranstown, Co. Meath is already successfully treating these low risk hazardous wastes in compliance with their EPA licence for over 10 years now.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
Proforma #3			
FI Sub - David and Maria Riordan.pdf FI Sub - John Moynihan.pdf	Health Impacts	*'Emissions can spread within a 40 mile radius affecting resident's health potentially. i.e. as per WHO and IARC, cancer, heart defects, respiratory illness, immune and hormonal disruption, birth defects, and learning difficulties with children and infants especially vulnerable '*	A Health Impact Assessment is included in Chapter 6 – Population and Human Health of the 2025 EIS and concludes '*from health protection terms strong evidence is that there will be no deleterious effects. Mainly as a result of a misunderstanding of the health effects of modern, well-run incinerators it is acknowledged that some public anxiety might remain, but this will be mitigated by an education program and no long-term adverse health effects are predicted*'.
	Impact of dioxins	*'Dioxins may contaminate the food chain threatening or agri food industry e.g. Belgium's dioxin crisis cost €465m'*	As outlined in Chapter 8 - Air Quality, emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, firstly under maximum emissions limits of the EU Directive 2010/75/EU and secondly under abnormal operating conditions. AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters (including dioxins) under both the maximum and abnormal operation scenarios. Additionally, as outlined in Chapter 6 - Population Human Health, when we look at the other Indaver facility in Ireland in Carranstown, Co. Meath, and its efficient operation it is clear that in practice as well as in theory that there will be no adverse effects on Air Quality. Therefore, it can be concluded, according to evidence in the literature, that modern well-run incinerators will not have a deleterious effect on human health.
Proforma #4			
FI Sub - Dr Elaine Kiely.pdf FI Sub - Ryan Morgan.pdf	Conflict with the Cork County Development Plan	*'The Cork County Development Plan designates Cork Harbour as an area of exceptional ecological, landscape, recreational and tourism value. The Plan requires the protection of Natura 2000 sites, the safeguarding of coastal landscapes, the promotion of sustainable tourism and amenity development, and the prioritisation of circular-economy approaches to waste*	The Natura Impact Statement submitted in 2025 concluded that '*following a comprehensive evaluation of the potential direct, indirect and in-combination impacts on the qualifying interests and conservation objectives for the Cork Harbour SPA, it has been concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA*'.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		management. The proposed development clearly contradicts these objectives'	Landscape impacts are also assessed in Chapter 11. The EIS concludes that the effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral. Chapter 6 Population and Human Health of the 2025 EIS states '*it is considered that there will be a minor residual effect on the recreational amenity of the site and its immediate vicinity as the site will have somewhat more of an industrial character than it does at present. However, the industrial context is in keeping with its location within a Strategic Economic Area'* . Access to all beaches in the vicinity of the proposed development will be maintained throughout the construction and operation of the proposed development. EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management. Indeed, the NWMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development.
	Public Health Effects	*'Waste-to-energy incinerators emit fine particulates, NOx, dioxins and ultrafine particles. Cork Harbour's partially enclosed topography increases pollutant entrapment and heightens health risks for surrounding communities, including Cobh, Ringaskiddy, Monkstown, Glenbrook, Passage West, Crosshaven and Carrigaline'.*	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007." Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards. As outlined in EIS Chapter 8 Air Quality Section 8.4.2 Operational Phase the emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, under maximum emissions limits of the EU Directive 2010/75/EU and under abnormal operating condition. The AERMOD modelling indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios within a 10km radius of the facility. A 10 km radius of the proposed development site were reported in this study even though, in many cases, no residential receptors were near the location of this maximum ambient concentration. Concentrations at the nearest residential receptors are generally significantly lower than the maximum ambient concentrations reported.
	Environmental and Ecological Damage	*'Cork Harbour is internationally important for its protected wetlands, migratory birds, and unique marine biodiversity. The development risks airborne pollutant deposition, habitat disturbance, increased HGV traffic and significant ecological impacts inconsistent with conservation requirements.'*	The Natura Impact Statement submitted in 2025 concluded that '*following a comprehensive evaluation of the potential direct, indirect and in-combination impacts on the qualifying interests and conservation objectives for the Cork Harbour SPA, it has been concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA*'.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	Impact on Tourism & Amenity Development	*'Cork Harbour is undergoing major tourism investment, including:* *• growth of cruise tourism in Cobh,* *• large-scale amenity and greenway projects,* *• maritime recreation expansion,* *• heritage development at Spike Island and Camden Fort Meagher,* *• the Harbour Greenway linking Passage West, Monkstown, Glenbrook and Carrigaline.* *A visually intrusive, emissions-producing incinerator at the Harbour's core directly undermines these strategic public and private investments'*	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development Landscape impacts are also assessed in Chapter 11. The EIS concludes that the effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral. Chapter 8 Air Quality of the 2025 EIS concludes that '*based on the results of air dispersion modelling of process emissions, the air quality effect of the proposed development will not be significant*'.
	Climate, Emissions Targets & Circular Economy Concerns	*Ireland is legally required to cut emissions by 51 % by 2030, but the EPA projects only a 23% reduction, even with full implementation of current policy measures. Both carbon budgets will be exceeded. A new incinerator would:* *• increase national emissions due to the high fossil-carbon content of waste,* *• lock Ireland into long-term combustion-based waste management,* *• undermine recycling, composting and reuse targets,* *• conflict with COP and Paris-aligned climate commitments,* *• hinder progress toward circular-economy goals.*	As outlined in Chapter 9 - Climate, during the operation of the proposed development, heat will be recovered and converted to electricity, thereby the export of 18.5MWe will give a direct benefit in terms of GHG emissions which would have been released in the production of 18.5MWe from fossil-fuel burning power stations. The recycling and recovery of ferrous and non-ferrous materials during the thermal treatment process will require less energy than processes using virgin inputs and thus lead to a direct saving in energy and thus GHG emissions. Additionally, the operation of the facility could potentially allow 240,000 tonnes of residual waste currently exported to continental Europe to cease leading to a saving of over 5,070 tonnes of CO_2eq/annum.
	Site size and spatial constraints (site too small)	*The proposed site is physically too small and tightly bounded to safely accommodate a development of this scale. The usable area is constrained by coastal erosion on one side and the M28 boundary on the other, resulting in:* *• over-intensification of land use,* *• inadequate HGV circulation,*	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• *insufficient safety buffer zones,* • *compromised emergency access,* • *inability to mitigate visual impacts,* • *increased environmental and public-health risks.* *These constraints make the site unsuitable for a hazardous industrial facility.*	site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.
	Cumulative Industrial Burden	*'The Lower Harbour is already heavily industrialised. Adding a major emissions-intensive facility is incompatible with the region's balanced-development strategy and places disproportionate environmental and social burdens on the surrounding communities.'*	An assessment of alternative locations was completed in 2025 to supplement the assessments carried out in 2016, 2008 and 2001. The 2035 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: *'(b) Support the sustainable development of the Bottlehill facility for specialised and*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites –** A comparison of environmental effects at each aforementioned site was carried out under the following topics – air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility –** An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices. Following this assessment, Ringaskiddy was concluded to be a suitable location for the proposed development.
Proforma #5			
FI Sub - Avril Russell.pdf FI Sub - Caroline Buckley.pdf FI Sub - Cllr Audrey Buckley & Others.pdf FI Sub - Eiblish Buckley.pdf FI Sub - Kieran & Lisa Jordan.pdf	Landscape and Visual Zoning	*'The proposed site is adjacent to Gabby Beach and sits within a landscape that is now actively used and enjoyed by local residents, students, researchers, military personnel, families, and visitors. Furthermore, part of the land owned by the applicant has been zoned for educational use in the Cork County Development Plan since 2017. This zoning reflects a long-term vision for the harbour that prioritises research, learning, innovation, and public access - not heavy • industrial incineration. The incinerator proposal is incompatible with the current and emerging character, land use patterns, and economic development direction of the Lower Harbour.'*	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development Landscape impacts are also assessed in Chapter 11. The EIS concludes that the effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral. In relation to zoning, Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states *'Local planning policies and*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
	Roads and Traffic Air Quality Landscape and Visual	*'A large-scale industrial incinerator, with a 24/7 operational cycle, constant HGV traffic, emissions, and visual impact directly undermines the objectives and design principles of this nationally supported tourism plan (*Lower Harbour Destination and Visitor Experience Masterplan*). Approving this incinerator now would undercut ongoing strategic planning, and risk damaging future tourism and recreation revenue for the region.'*	Chapter 7 Roads and Traffic of the 2025 EIS acknowledges that regardless of whether or not the proposed development proceeds, there are ongoing capacity issues on the local road network at a number of key junctions, particularly at Shannon Park and Shanbally roundabouts. However, it is noted that these capacity issues will be relieved upon the completion and operation of the M28 motorway which will result in a significant redistribution of traffic from the N28. The introduction of the proposed development has a moderate impact during the construction phase in the 18:00-19:00 evening period. This impact is short term in nature as it is associated with construction activity at the site. Post-opening, the facility will not have a significant impact on the local road network. Indaver have committed to scheduling construction traffic during the construction phase, and operational traffic in 2030 (and beyond) so as to have a minimal amount of traffic flow to and from the site in two-hour periods in the morning and evening, thereby avoiding the peak periods in the morning and evening, and instead availing of the capacity on the local road

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			network outside of these times in the scenario where the M28 is not operational. Once the M28 is operational, the restrictions on scheduling of operational traffic shall be no longer required. Chapter 8 Air Quality of the 2025 EIS concludes that '*based on the results of air dispersion modelling of process emissions, the air quality effect of the proposed development will not be significant*'. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development Landscape impacts are also assessed in Chapter 11. The EIS concludes that the effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral.
	Coastal Erosion Flooding	*'Cork County Council has already acknowledged coastal vulnerability and erosion risk in this area. The Council is in the process of developing a Coastal Vulnerability Index in partnership with UCC and national agencies, due for completion in 2026. Locating a hazardous industrial development on a known eroding coastline, with climate change and sea level rise already impacting the area, is not consistent with precautionary coastal management or climate adaptation principles. This site is not suitable for long-term industrial use requiring coastal security, flood resilience, and emergency access.'*	Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission. The proposed development site is not indicated as being in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			situated. It also establishes the site level for flood protection for any future uses of this part of the site. The principal design objective for the upgrade of the L2545 road is to improve the surface water drainage so that the road does not flood after prolonged rainfall and to raise the level of the road above the 1 in 200-year tidal flood event with an added allowance for climate change. Section 4.5.14 of Chapter 4 Description of the Proposed Development provides a description of the L2545 upgrade.
	Traffic and Transport	*'The proposal includes:* *• 40-50 truckloads of waste per day* *• Movement across already pressured road infrastructure • Use of the Jack Lynch Tunnel, a critical regional transport artery* *This represents an unsustainable strain on the road network. The traffic profile is incompatible with the nearby educational campuses, residential areas, and tourism/recreational transport needs.'*	Chapter 7 Roads and Traffic of the 2025 EIS acknowledges that regardless of whether or not the proposed development proceeds, there are ongoing capacity issues on the local road network at a number of key junctions, particularly at Shannon Park and Shanbally roundabouts. However, it is noted that these capacity issues will be relieved upon the completion and operation of the M28 motorway which will result in a significant redistribution of traffic from the N28. The introduction of the proposed development has a moderate impact during the construction phase in the 18:00-19:00 evening period. This impact is short term in nature as it is associated with construction activity at the site. Post-opening, the facility will not have a significant impact on the local road network. Indaver have committed to scheduling construction traffic during the construction phase, and operational traffic in 2030 (and beyond) so as to have a minimal amount of traffic flow to and from the site in two-hour periods in the morning and evening, thereby avoiding the peak periods in the morning and evening, and instead availing of the capacity on the local road network outside of these times in the scenario where the M28 is not operational. Once the M28 is operational, the restrictions on scheduling of operational traffic shall be no longer required.
	Air Quality Noise emissions	*'Cork Harbour is a residential, recreational, educational and ecological environment. Locating a hazardous waste incinerator in close proximity to:* *• Family housing* *• Beaches and walking routes*	As outlined in Section 11.3 of Chapter 11 Landscape and Visual Assessment '*the mixture of the harbour activity, water, industrial development, wind turbines, agricultural land, architectural heritage, and low density housing define the overall character of the local area. Although the proposed development site is greenfield and scrubland, it is fundamentally industrial in character and heavily influenced both by the water and the industrial developments in the surrounding area (and also the*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• *University research facilities* • *Naval and maritime training centres* *is inappropriate and poses unnecessary risk. Communities should not be required to accept incineration-related air emissions, noise disruption, and 24/7 industrial activity when viable alternatives for waste reduction and ·circular resource use exist.'*	*scrap metal works located centrally within the site). The character is best described as an 'Industrial Harbour' landscape'.* Chapter 8 Air Quality of the 2025 EIS concludes that '*based on the results of air dispersion modelling of process emissions, the air quality effect of the proposed development will not be significant*'. EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management. Indeed, the NWMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development. Chapter 10 Noise and Vibration of the 2025 EIS concludes that '*the proposed waste-to-energy facility has been assessed against the relevant operational noise emission limit values (ELV's) prescribed within the EPA's noise guidance document Guidance Note for Noise: Licence Applications, Surveys and Assessments in Relation to Scheduled Activities (NG4, EPA 2016) at the closest noise sensitive locations the assessment has concluded that due to the distance between the proposed development and the nearest sensitive buildings, the proposed site layout and the recommended noise mitigation measures, the facility can operate within the adopted day, evening and night-time noise limit values. The overall noise and vibration effect from the operation of the proposed facility is expected to be long term, not significant taking account of the existing noise environment and the predicted effect of the proposal'.*
Proforma #6			
FI Sub - Aisling O'Callaghan & Others.pdf FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	Waste Acceptance	*'This is a municipal-grade burner, not a specialist industrial or hazardous-waste facility. It cannot accept the chemical, pharmaceutical, or high-spec industrial streams produced in Cork. Those already go to dedicated treatment plants with far stricter controls. This project doesn't replace any of that infrastructure-it simply adds a general waste incinerator that*	The types of waste which will be accepted by the proposed development are outlined in the Chapter 4 of the 2025 – Description of the Proposed Development and Appendix 4.1 – List of Waste (LoW) Codes Proposed by Indaver for Acceptance.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Caroline Brugess.pdf FI Sub - Denis Cronin.pdf FI Sub - Mokopuna Ltd (Cronins Pub).pdf		*cannot treat the very materials people think it will. Also, Is the port side location the incentive to eventually import international waste to feed the 240,000-ton incinerator'*	'*The facility will have the capability to treat low risk hazardous wastes. Many of these can be found in municipal solid waste, (e.g. paint tins, rags and wipes contaminated with paints or oils)…. Other streams would include "low hazard" materials from industry such as contaminated personal protective equipment/clothing, filters, absorbents, redundant over-the-counter preparations, medicines, and raw materials such as sugars, starches and gelatine tablet coatings. These streams are classified as hazardous in compliance with the List of Waste (LoW) due to their chemical or physical properties. However, this does not imply that they are dangerous to handle (i.e. they may be handled by householders and businesses regularly).'* Indaver's municipal waste-to-energy facility in Carranstown, Co. Meath has been successfully treating these low risk hazardous wastes, for over 10 years, in compliance with its EPA licence. The need for the proposed development is driven by the policy action called for in the National Waste Management Plan which acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "*There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market."* (page 2.11 Chapter 2 of the EIS). Import of waste is not envisaged.
	Climate and Carbon-Law Non-Compliance	*'Ireland is already over its carbon budget; this plant would lock in a large new stream of fossil emissions every year'*	As outlined in Chapter 9 - Climate, during the operation of the proposed development, heat will be recovered and converted to electricity, thereby the export of 18.5MWe will give a direct benefit in terms of GHG emissions which would have been released in the production of 18.5MWe from fossil-fuel burning power stations. The recycling and recovery of ferrous and non-ferrous materials during the thermal treatment process will require less energy than processes using virgin inputs and thus lead to a direct saving in energy and thus GHG emissions. Additionally, the operation of the facility could potentially allow 240,000 tonnes of residual waste currently exported to continental

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Europe to cease leading to a saving of over 5,070 tonnes of CO_2eq/annum.
	Climate	*'The developer has provided no carbon-budget analysis, no ETS modelling, and no lifecycle GHG accounting, so compliance with the Climate Act cannot be demonstrated.'*	Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy.
	Export of electricity to the national grid	*'Electricity-only incineration of fossil plastics is higher-carbon than the future Irish grid and would displace cleaner renewable generation.'*	The proposed development treats waste which cannot be re-used or recycled. As outlined in Chapter 2 of the 2025 EIS, the National Waste Management Plan reports that *'the State has a continued reliance on export to manage residual MSW and other waste streams which is unsuitable and while an emphasis on prevention and reuse may reduce this reliance, there remains a need for additional indigenous recovery infrastructure'.* Furthermore, '*the proposed development will recover heat and will use this to generate 21MW of electricity, of which 18.5MW will be exported to the grid. As described in Section 2.3 (*of Chapter 2*), approximately 50% or 9.25MW could be renewable electricity, which would contribute to meeting Ireland's target of an 80% share of electricity from renewable sources in gross final consumption by 2030……The majority of renewable electricity capacity has been delivered by wind turbines to date, and so the contribution of renewable electricity from biomass at the proposed development will not only support the achievement of the target but will also help to diversify Ireland's renewable energy supply.'*
	Waste Policy	*'Indaver's own data place.the plant below the legal R1 threshold, which means it is disposal, not recovery'.*	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	Heat Network Feasibility	*'There is no heat-recovery infrastructure, and the site cannot support a heat network, making compliance structurally impossible'*	While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date.
	Waste Policy	*'High efficiency in Dublin depends on CHP; Meath only narrowly clears the threshold and still damages Ireland's carbon performance. Cork cannot meet it, at all'*	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	Waste Policy	*'The design of the 2016 is electricity-only incinerator. The verified efficiency (R=0.597) fails the 0.65 Eu Recovery threshold'*	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	Waste Policy	*'Irish law now prohibits new residual-waste capacity; .national policy requires waste reduction, not expansion'*	Irish law does not prohibit new residual-waste capacity. Chapter 2 – Policy and Planning Framework and Need for the Scheme sets out the European Union (EU), national, regional and local waste policy and planning framework which underpins the proposed development. The chapter demonstrates the specific need for the proposed development in the context of the waste policy and planning policy framework. In summary, EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			that Ireland should be self-sufficient in waste management. Indeed, the NWMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development.
	Waste Policy	*'The supposed "Southern Region capacity gap" is based on planning structures abolished in 2022; capacity is now national, and Ireland already meets projected needs'*	The National Waste Management Plan policy action calls for additional dedicated thermal recovery capacity up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*The NWMP (*National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: *"There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market." '*
	Waste Policy	*'Adding new disposal capacity directly contradicts circular-economy policy'*	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria. Also, as noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*In summary, EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management. Indeed, the NWMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development.* ' .

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Full details are provided in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS.
		A single industrial stack permanently alters the harbour's visual identity; tourism branding is fragile and once damaged cannot be restored. *Recently Bord Failte launched an amazing plan for the Harbour area. Surely you can't have an Incinerator along with this plan. The harbour has seen huge changes over the last 25 years - Spike Island, Haulbowline Park, Camden, Fota Wildlife new Education centres and 125 Cruise liners. All these organisations, to name just a few realise on our beautiful harbour. The knock on and potential from this, in the greater Cork harbour is enormous. Why spoil the great progress and future planned growth? Why invest if this is going to be overshadowed by a huge chimney pumping out constant plume?*	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. As outlined in Section 11.3 of Chapter 11 Landscape and Visual Assessment '*the mixture of the harbour activity, water, industrial development, wind turbines, agricultural land, architectural heritage, and low density housing define the overall character of the local area. Although the proposed development site is greenfield and scrubland, it is fundamentally industrial in character and heavily influenced both by the water and the industrial developments in the surrounding area (and also the scrap metal works located centrally within the site). The character is best described as an 'Industrial Harbour' landscape'.* The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included which will reduce the visual impact of the proposed development. Landscape impacts are also assessed in Chapter 11. The EIS concludes that the effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral. As noted in Chapter 11, the plume will not be constantly visual and will be dependent on atmospheric and climatic factors - '*periodically, depending on climatic/atmospheric factors, including temperature and wind speed, a short, thin white plume may be visible from the stack'* .
	Zoning	*'It is very important to point out that; this site is zoned for Education. The Proposed Incinerator would be alongside the Internationally renowned Maritime College and the Ma REI Centre, Environmental Research centre, UCC'*	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states *'Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan…….Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
	Amenity	*'The Proposed Incinerator is right next to the Glacial sandy beach of Luc, with has become increasingly popular as the nearest and most accessible beach to Cork City'*	Chapter 6 Population and Human Health of the 2025 EIS states '*it is considered that there will be a minor residual effect on the recreational amenity of the site and its immediate vicinity as the site will have somewhat more of an industrial character than it does at present. However, the industrial context is in keeping with its location within a Strategic Economic Area'* . Access to all beaches in the vicinity of the proposed development will be maintained throughout the construction and operation of the proposed development. The visual assessment contained in Chapter 11 Landscape and Visual of 2025 EIS concludes the following regarding the visibility of the proposed development from Loughbeg Beach '*whilst there are views north towards the proposed development site, this proposed development will be obscured by intervening topography (Ringaskiddy ridge), existing vegetation and the DePuy manufacturing facility at Loughbeg. During construction, there may be effects arising from cranes, however effects will be slight, neutral and short term in nature. Whilst the proposed building and stack will be substantially screened, the occasional white plume will be visible above the treeline/ridgeline. The lighting on the*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			stack will be visible against the sky, similar to the De Puy wind turbine lighting ’ . Refer to EIS Volume 3, Figure 11.38.2.
	Flooding	*‘OPW's updated rules require safe, dry access for critical infrastructure; this location cannot provide it.’*	The principal design objective for the upgrade of the L2545 road is to improve the surface water drainage so that the road does not flood after prolonged rainfall and to raise the level of the road above the 1 in 200-year tidal flood event with an added allowance for climate change. Section 4.5.14 of Chapter 4 Description of the Proposed Development provides a description of the L2545 upgrade.
	Flooding	*‘The access road floods, making the site isolatable during storms and surge events’*	The principal design objective for the upgrade of the L2545 road is to improve the surface water drainage so that the road does not flood after prolonged rainfall and to raise the level of the road above the 1 in 200-year tidal flood event with an added allowance for climate change. Section 4.5.14 of Chapter 4 Description of the Proposed Development provides a description of the L2545 upgrade.
	Flooding	*‘Raising ground levels does not solve tidal inundation, a rising water table.or coastal surge behaviour.’*	Appendix 13.4 Flood Risk Assessment outlines the vulnerability of the site to tidal flood risk, fluvial risk, pluvial risk and groundwater risk and outlines various mitigation/design measures to protect the proposed development and surrounding infrastructure. ‘*It is considered that the proposed resource recovery centre at Ringaskiddy should be classified as a “Highly Vulnerable Development” as per the vulnerability classification. As the site is classified as Flood Zone C, a Justification Test is not required for the proposed development, and it is necessary only to identify mitigation measures for any residual risks (i.e. an appropriate development level, that being 4.55 m OD).*’
	Flood Risk Assessment	*‘The site fails the Sequential Approach and cannot guarantee egress’*	Section 8.3 of Appendix 13.4 Flood Risk Assessment to the EIS outlines the ‘ . It concludes, ‘*as the proposed development lies within Flood Zone C, a Justification Test is not required, and it is necessary only to identify mitigation measures for any residual risks’.*
	Coastal Erosion	*‘There is huge coastal erosion at the site is very strong. This can be seen in the disintegration and decreasing size of the site over the past 25 years’*	Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.
	Air Quality	*Thermal inversions in Cork Harbour can trap emissions at ground level rather than allowing safe dispersion.* *The thermal inversion in the harbour and its surrounding topography, pushes air to stay in the harbour and not disperse a huge amount of the time. The plume will spread a 65 km radius. The plume is majorly unsightly. Plume, depending on the weather conditions {e.g. Fog stuck in Harbour for the last 3 weeks), toxic particles and heat will be maintained in the harbour. This will strongly affect air quality and respiratory problems. This alone should rule out the location of an incinerator at Ringaskiddy.'*	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007.*" Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards. As outlined in EIS Chapter 8 Air Quality Section 8.4.2 Operational Phase the emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, under maximum emissions limits of the EU Directive 2010/75/EU and under abnormal operating condition. The AERMOD modelling indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			under both the maximum and abnormal operation scenarios within a 10km radius of the facility. A 10 km radius of the proposed development site were reported in this study even though, in many cases, no residential receptors were near the location of this maximum ambient concentration. Concentrations at the nearest residential receptors are generally significantly lower than the maximum ambient concentrations reported.
	Air Quality	*'The application omits PFAS assessment, ultrafine-particle analysis, and key pollutant monitoring'*	As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that: "*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific $PM_{2.5}$ component or group of components associated with any source categories of fine particles*". (USEPA, 2015b)
	Climate Waste Policy Flooding	*'The same deficiencies reappear missing climate analysis, unverifiable R1 , outdated flood data, and overstated policy claims'*	Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. A Greenhouse Gas Assessment was carried out as part of the 2025 EIS and is documented in Chapter 9 – Climate. Chapter 9 concluded that the proposed development will have a '*short-term, not significant and negative*' effect as a result of construction traffic and construction works/equipment. During the operational phase of the proposed development the significance of effect is

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			predicted to be '*long-term, not significant and negative*'. Full details are provided in Chapter 8 – Air Quality. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria. A Flood Risk Assessment is included as Appendix 13.4 to the 2025 EIS, which utilises the most up to date data available including aerial mapping and topographical survey information.
	Heat Network Feasibility GHG Assessment Air Quality Flooding Waste Policy	*'The application claims the highest environmental and safety standards, yet excludes heat recovery, carbon modelling, PFAS/UFP analysis, updated flood data, and a compliant R1'*	While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development. The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date. Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. A Greenhouse Gas Assessment was carried out as part of the 2025 EIS and is documented in Chapter 9 – Climate. Chapter 9 concluded that the proposed development will have a '*short-term, not significant and negative*' effect as a result of construction traffic and construction works/equipment. During the operational phase of the proposed development the significance of effect is

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			predicted to be '*long-term, not significant and negative*'. Full details are provided in Chapter 8 – Air Quality. As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5.}$ In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that: "*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific $PM_{2.5}$ component or group of components associated with any source categories of fine particles*". (USEPA, 2015b)A Flood Risk Assessment is included as Appendix 13.4 to the 2025 EIS, which utilises the most up to date data available including aerial mapping and topographical survey information. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	Department of Defence	*'It is paramount that the defence forces are at risk on the Haulbowline Island. There no evacuation for the defence force workers. It would also be alongside the Maritime College and the Ma REI Centre, Environmental Research centre, UCC.'*	The Department of Defence (a statutory consultee) in their observation only made reference to the lighting requirements of the stack and requested that if any negative impacts on future military radar system were to occur, Indaver is requested to engaged with the Department of Defence and provide suitable mitigations as soon as practicable.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Indaver accepts all recommendations made by the Department of Defence.
	Risk Assessment	*'For those burying their loved ones at the Crematorium on Rocky Island they would be trapped if and incident happened'*	A Hazard Identification and Risk Assessment was prepared by Byrne Ó Cléirigh and included as Appendix 6.1 to the 2025 EIS and concluded '*based on the findings of this risk assessment exercise it is considered that with the control measures that will be put in place at the site……the risks associated with accident scenarios at the Indaver facility at Ringaskiddy will be reduced to ALARP (As Low As Reasonably Practicable)*'. In addition, Chapter 6 Population and Human Health of the 2025 EIS included an assessment of the potential for a major accidents or disaster and states '*in the event of an accident occurring during operations, Indaver will have emergency response measures in place to minimise the effects to human health and to the environment*'. Full details are provided in Chapter 6 Population and Human Health and Appendix 6.1 Hazard Identification and Risk Assessment.
	Policy	*'The application contradicts national and local government policy from maritime, educational, and tourism perspectives'*	Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS outlines how the proposed development is compliant with national and local government policy. Chapter 6 - Population and Human Health of the 2025 EIS assesses the proposed development in the context of the Cork County Development Plan 2022-2028, the Spike Island Masterplan and the Cork City, Harbour and East Cork Destination and Experience Development Plan. Chapter 6 Population and Human Health of the 2025 EIS concludes '*it is considered that there will be a minor residual effect on the recreational amenity of the site and its immediate vicinity as the site will have somewhat more of an industrial character than it does at present. However, the industrial context is in keeping with its location within a Strategic Economic Area*'.
	Zoning	*'Cork County Council rejected the first application and rezoned the lndaver site from industrial to educational.'*	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states *'Local planning policies and objectives, as set out in the Cork County Development Plan 2022-*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
	Roads and Traffic	*'Road access is inadequate - an extra 150 truck movements per day would strain infrastructure.'*	Chapter 7 Roads and Traffic of the 2025 EIS acknowledges that regardless of whether or not the proposed development proceeds, there are ongoing capacity issues on the local road network at a number of key junctions, particularly at Shannon Park and Shanbally roundabouts. However, it is noted that these capacity issues will be relieved upon the completion and operation of the M28 motorway which will result in a significant redistribution of traffic from the N28. The introduction of the proposed development has a moderate impact during the construction phase in the 18:00-19:00 evening period. This impact is short term in nature as it is associated with construction activity at the site. Post-opening, the facility will not have a significant impact on the local road network. Indaver have committed to scheduling construction traffic during the construction phase, and operational traffic in 2030 (and beyond) so as to have a minimal amount of traffic flow to and from the site in two-hour periods in the morning and evening, thereby avoiding the peak periods in the morning and evening, and instead availing of the capacity on the local road network outside of these times in the scenario where the M28 is

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			not operational. Once the M28 is operational, the restrictions on scheduling of operational traffic shall be no longer required.
	Risk Assessment	*'The site poses public safety risks in the event of an accident, with a single access road serving Haulbowline Island and UCC's National Maritime College and Beaufort Institute'*	A Hazard Identification and Risk Assessment was prepared by Byrne Ó Cléirigh and included as Appendix 6.1 to the 2025 EIS and concluded '*based on the findings of this risk assessment exercise it is considered that with the control measures that will be put in place at the site……the risks associated with accident scenarios at the Indaver facility at Ringaskiddy will be reduced to ALARP (As Low As Reasonably Practicable)*'. In addition, Chapter 6 Population and Human Health of the 2025 EIS included an assessment of the potential for a major accidents or disaster and states '*in the event of an accident occurring during operations, Indaver will have emergency response measures in place to minimise the effects to human health and to the environment*'. Full details are provided in Chapter 6 Population and Human Health and Appendix 6.1 Hazard Identification and Risk Assessment.
	Risk Assessment	*'In the event of an accident at the incinerator, 1 5,000 residents on Cobh and Great Island depend on a single hump-backed bridge for access.'*	A Hazard Identification and Risk Assessment was prepared by Byrne Ó Cléirigh and included as Appendix 6.1 to the 2025 EIS and concluded '*based on the findings of this risk assessment exercise it is considered that with the control measures that will be put in place at the site……the risks associated with accident scenarios at the Indaver facility at Ringaskiddy will be reduced to ALARP (As Low As Reasonably Practicable)*'. In addition, Chapter 6 Population and Human Health of the 2025 EIS included an assessment of the potential for a major accidents or disaster and states '*in the event of an accident occurring during operations, Indaver will have emergency response measures in place to minimise the effects to human health and to the environment*'. Full details are provided in Chapter 6 Population and Human Health and Appendix 6.1 Hazard Identification and Risk Assessment.
	Public Consultation	*'Meaningful public consultation was not carried out, in breach of international guidelines'*	The updated EIS and NIS submitted in 2025 are part of the application process commenced in 2016 and build on the application process to date, including the public consultation

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			documented in Section 1.9 of Appendix 1.2 – Consultation. In addition, the updated EIS and NIS submitted in 2025 were the subject of public consultation during 6 October 2025 – 17 November 2025.
	Human Health	*'No Health Impact Assessment was conducted or required by An Bord Pleanala'*	A Health Impact Assessment is included in Chapter 6 Population and Human Health of the 2025 EIS.
	Dioxins	*'Dioxins from emissions contaminate soil and water, entering the food chain - threatening Ireland's €7 billion agri-food industry. Belgium's 1 999 dioxin crisis cost €465 million'*	As outlined in EIS Chapter 8 Air Quality Section 8.4.2 Operational Phase the emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, under maximum emissions limits of the EU Directive 2010/75/EU and under abnormal operating condition. The AERMOD modelling indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters (including dioxins) under both the maximum and abnormal operation scenarios within a 10km radius of the facility. A 10 km radius of the proposed development site were reported in this study even though, in many cases, no residential receptors were near the location of this maximum ambient concentration. Concentrations at the nearest residential receptors are generally significantly lower than the maximum ambient concentrations reported.
	Waste Policy	*'The European Commission (2017) advised a "moratorium on new incinerators" in favour of waste prevention, reuse, and recycling'*	The European Commission published a Communication on the role of waste-to-energy in the circular economy to enhance synergies between the circular economy, resource efficiency and waste-to-energy. It seeks to provide guidance to Member States on how to achieve properly balanced waste-to-energy capacity. It also affirms that the waste hierarchy remains as the cornerstone of EU policy and legislation and is a key to a transition to a circular economy. The Communication also refers to a European Environment Agency study which suggests there is currently no incineration overcapacity in the EU as a whole and in certain Member States where there is excessive reliance on waste to energy (e.g. due to high heat demand from district heating networks) then a moratorium on new facilities may be an appropriate measure. An analogous situation does not arise in Ireland. (page 2.6 in Chapter 2 of the EIS).

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The need for the proposed development is driven by the policy action called for in the National Waste Management Plan which acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market." (page 2.11 Chapter 2 of the EIS).
	Waste Policy	*'Ireland's national policy on waste (National Waste Management Plan for a Circular Economy and the National Hazardous Waste Management Plan) prioritises waste prevention, reuse and recycling.'*	Chapter 2 – Policy and Planning Framework and Need for the Scheme sets out the European Union (EU), national, regional and local waste policy and planning framework which underpins the proposed development. The chapter demonstrates the specific need for the proposed development in the context of the waste policy and planning policy framework. In summary, EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management. Indeed, the NWMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development.

4.2 Response to Larger Submissions

Table 4.2: Applicant's Response to Larger Submissions

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Brid Kirby.pdf	Fundamentally Changed Receiving Environment	Cork County Development Plan 2022-28, Volume 4, Table 4.1.17 states that Objective No. RY-I-09 applies to the proposed development site. Suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities. • The proposed development no longer aligns with its proposed setting. • Conflicts with Cork County Development Plan 2022-28 specified objective RY-I-09 for this land parcel.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Brid Kirby.pdf	Changing Legislative Landscape	Ireland is already over its carbon budget. This development would lock in a new stream of fossil emissions every year.	As outlined in Chapter 9 - Climate, in the proposed development, heat will be recovered and converted to electricity, thereby the export of 18.5MWe will give a direct benefit in terms of GHG emissions which would have been released in the production of 18.5MWe from fossil-fuel burning power stations. The recycling and recovery of ferrous and non-ferrous materials during the thermal treatment process will require less energy than processes using virgin inputs and thus lead to a direct saving in energy and thus GHG emissions.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Additionally, the operation of the facility could potentially allow 240,000 tonnes of residual waste currently exported to continental Europe to cease leading to a saving of over 5,070 tonnes of CO_2eq/annum.
FI Sub - Brid Kirby.pdf	Changing Legislative Landscape	EU has formed a policy shift away from WtE, as it is not aligned with the circular economy.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, waste policies in the context of European Union (EU) Law and Policy were assessed. The EU Circular Economy Action Plan (CEAP) (2020) was adopted by the EU Commission with the main aim of this initiative to accelerate the EU's transition to a circular economy, ensuring sustainable growth by reducing waste and keeping resources in use for as long as possible. In 2023, the Commission revised the Circular Economy Monitoring Framework, previously adopted in 2018. This revision adds indictors such as resource productivity and consumption footprint to the existing monitoring framework which includes generation of municipal waste per capita, recycling rate of municipal waste and green public procurement, among others. The proposed development will contribute to reducing reliance on landfill in Ireland, recovering energy from residual waste that cannot be recycled, and supporting more efficient resource use. By diverting non-recyclable waste from disposal and converting it into useful energy, the proposed development can help lower the environmental footprint of waste management and contribute to decoupling economic growth from raw material extraction. Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Brid Kirby.pdf	Location	Proximity to residential areas (Section 6.1.2.6), areas of high amenity (Section 5.2.1) and prevailing winds were demonstrated evaluation criteria for Poolbeg WtE. Such criteria were not applied in lndaver's weak, retrospective site selection report, steered by existing ownership. • In contrast, Ringaskiddy town has grown eastwards; RY-T-04 now lies 360m west of the proposed plant, further highlighting the unsuitability of this location.	Having considered the reasonable alternative site locations, the conclusion in Section 3.3.3 in Chapter 3 of the EIS is that the Indaver-owned site is an appropriate site for the proposed development. An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Brid Kirby.pdf	Location	The winds in Cork Harbour will disperse the plume in-land, across harbour communities.	The 2025 air quality model incorporated the best available information on weather data, terrain, etc, and forms the basis for the impact assessment conclusions documented in Chapter 8 and the associated appendices of the EIS, which concludes the operation of the proposed development will not have a significant effect on air quality.
FI Sub - Brid Kirby.pdf	Air Quality	Updated Air Quality Directive (EU 2024/2881) introduced new controls for ultrafine particles (UFPs) and black carbon (BC). These are omitted in EIAR. • Please request Indaver include UFPs and BC in EIAR to comply with updated Directive.	The combustion of waste produces a number of emissions, the discharges of which are regulated by the EU Directive on Industrial Emissions (IED) (2010/75/EU). The emissions to atmosphere which have been regulated are: • Nitrogen Dioxide (NO_2) • Sulphur Dioxide (SO_2) • Total Dust (although there is no regulated Total Dust standard, standards exist for PM_{10} and $PM_{2.5}$

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			(particulate matter less than 10 and 2.5 microns respectively)) • Carbon Monoxide (CO) • Total Organic Carbon (TOC) • Hydrogen Fluoride (HF) and Hydrogen Chloride (HCl) • Dioxins/Furans (PCDD/PCDFs) • Cadmium (Cd) & Thallium (Tl) • Mercury (Hg) • and the sum of Antimony (Sb), Arsenic (As), Lead (Pb), Chromium (Cr), Cobalt (Co), Copper (Cu), Manganese (Mn), Nickel (Ni) and Vanadium (V) The effect of the pollutants outlined above has been assessed in Chapter 8 Air Quality of the EIS in addition to any potential construction phase emissions. In addition, Ammonia (NH_3) and Polycyclic Aromatic Hydrocarbons (PAHs) have been assessed as incineration is a potential emission source for this group of compounds. In relation to the Updated Air Quality Directive (EU 2024/2881), the main focus of this Directive is the measurement and assessment of ambient air quality and the requirements on the competent authority to undertake ambient air monitoring. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Article 5, each Member State is required to designate the competent authority to undertake air quality assessments and install an appropriate monitoring network in compliance with the Directive. "*Article 5 Responsibilities*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Member States shall designate at the appropriate levels the competent authorities and bodies responsible for the following: *1. assessment of ambient air quality, including ensuring an adequate functioning and maintenance of the monitoring network*;" The EPA is the competent authority to undertake this task. It is not the responsibility of an individual facility or development to set up and operate a monitoring network in line with EU 2024/2881.
FI Sub - Brid Kirby.pdf	Air Quality – Dispersal Maps	Variations across the 2016, 2019 and 2025 air quality models presumably reflect the addition of more up to date weather data, higher resolution terrain, larger domain etc. For transparency, a consistency matrix comparing 2016-2025 input files should be provided, to demonstrate what data/assumptions have been updated or changed, and why. • Please request lndaver provide consistency matrix, to align with the integrity of the EIAR process.	The 2025 air quality model incorporated the best available information on weather data, terrain, etc, and forms the basis for the impact assessment conclusions documented in Chapter 8 and the associated appendices of the EIS, which concludes that the operation of the proposed development will not have a significant effect on air quality.
FI Sub - Brid Kirby.pdf	The Plume – Glaring in its Omission	Conflicts with Directive 2014/52/EU Article 5(1). Please request provision of a plume visibility assessment, including simulated model of thermal plume, to align with the intended purpose of EIAR process. Should include cross-section contour mapping demonstrating corresponding elevations between top of stack and plume and urban/residential Cobh and Rushbrook. Results should be integrated into Chapters 11, 14 and 16, for consideration of loss of amenity (see point 9 below).	As outlined in Chapter 11 - Landscape and Visual Assessment, a viewpoint assessment was undertaken from various points from the surrounding landscape and harbour which were identified as suitable viewshed reference points (VRP) for illustrating the existing views and level of visual effect with photomontages. For each VRP, the existing view is shown, followed by the view with the proposed development and cumulative views. Photomontages for each viewpoint are included in Volume 3 - Photomontages. The number for each viewpoint or VRP corresponds to the Figure number, e.g. VRP 1 is illustrated on Figure 11.1.0 (As existing 2025), 11.1.1 (As proposed), and 11.1.3 (As proposed including the representation of occasional steam plume).
FI Sub - Brid Kirby.pdf	Visual Disamenity of Plume	• Conflicts with Cork County Development Plan 2022-28, landscape of national importance, of very high value and very high sensitivity; objective GI 14-9, protect visual and scenic amenity, protect skylines.	Landscape effects were assessed in Chapter 11 - Landscape and Visual Assessment. In general construction effects on the landscape will be short term, negative and localised in nature. Construction operations and deliveries to the

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• Cork Harbour, and particularly Cobh, is well known to the wider public and at an international level. Its visual resource sensitivity is very high. • The waterside views of Cobh and Whitepoint, and the elevated views from residential property, especially those of Cobh and Rushbrook that overlook the top of the proposed stack, are also highly sensitive. • Any large, permanent plume would introduce intrusive, negative changes of large magnitude, major-substantial effect, with loss of amenity. Cobh, with its elevated view across the harbour, would be unable to absorb the scale of the development and the negative impact to its skyscape (please see Plates below).	proposed development site will be carefully managed to minimise the effect on the surrounding community, amenities and roads. Upon the completion of the proposed works, there will be a significant change in the appearance of the proposed development site, from the existing open land to the larger industrial elements of the resource recovery plant. Initial potential effects on the landscape character will be significant, negative on the adjacent local landscape reducing to moderate, negative effects as planting matures. Effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. Mitigation and Monitoring measures have been included in the design and will be implemented in the development of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral. Additionally, as outlined in Chapter 11 - Landscape and Visual Assessment, a short, thin white plume may be visible from the stack. The degree of visibility will vary greatly depending on climatic factors, including temperature and wind speed both of which will affect density and dispersion. The plume may be visible in a morning, not be present during the day and then in a cooler evening it can become visible again.
FI Sub - Brid Kirby.pdf	Cobh and Brand Ireland – Additional View Receptor Points	Conflicts with Cork County Development Plan 2022-28, landscape of national importance, of very high value and very high sensitivity; objective GI 14 -9, protect visual and scenic amenity, protect skylines.	Landscape effects were assessed in Chapter 11 - Landscape and Visual Assessment. In general construction effects on the landscape will be short term, negative and localised in nature. Construction operations and deliveries to the proposed development site will be carefully managed to minimise the effect on the surrounding community, amenities and roads.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Upon the completion of the proposed works, there will be a significant change in the appearance of the proposed development site, from the existing open land to the larger industrial elements of the resource recovery plant. Initial potential effects on the landscape character will be significant, negative on the adjacent local landscape reducing to moderate, negative effects as planting matures. Effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. Mitigation and Monitoring measures have been included in the design and will be implemented in the development of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral.
FI Sub - Brid Kirby.pdf	Cobh and Brand Ireland - Additional View Receptor Points	Conflicts with Failte Ireland RTDS strategic objective 1, to develop Cork Harbour as a world class visitor destination; and objective 9.3, to develop Cobh as an international destination.	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in its visual and landscape character in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			without changing the character of Cork Harbour landscape. As such, it is considered that the proposed development is compatible with the plans for improved tourist amenities in the Lower Harbour.
FI Sub - Brid Kirby.pdf	Residents Concerns re. Risk of being Knowingly Mislead	In another jurisdiction, lndaver opened a new incinerator at Rivenhall, Essex, UK, in August 2025. Essex County Council granted permission under condition that plume would not be visible. Less than 2 months later lndaver successfully argued that it would be more energy efficient to let the plume be visible. Any such risk would mock the rigours of the Irish planning process.	As outlined in Chapter 11 - Landscape and Visual Assessment, a short, thin white plume may be visible from the stack. The degree of visibility will vary greatly depending on climatic factors, including temperature and wind speed both of which will affect density and dispersion. The plume may be visible in a morning, not be present during the day and then in a cooler evening it can become visible again.
FI Sub - Brid Kirby.pdf	Community Gain	Community gain potential at this location is very low.	As outlined in the Non-Technical Summary, there will be a number of benefits for the local community. An amenity walkway, incorporating a viewing platform, is proposed as part of the proposed development. The upgrade of the local road (L2545) will alleviate local flooding issues which constitutes a significant planning gain for the benefit of existing and future users of the immediate area. In addition, the project will support a significant number of jobs off-site in construction industry suppliers and service providers, with the employment provided contributing to the economy of the South Cork area both directly and indirectly through the supply of goods and services. Finally, Indaver is proposing a community fund which would fund environmental and other community projects and initiatives in the Ringaskiddy area.
FI Sub - Brid Kirby.pdf	Radioactive Safety	A radioactivity detection system is proposed (Section 4.7.1 Waste Acceptance). Hazard ID (Appendix 6.1) makes zero reference to radioactive material. Are lndaver planning to import feedstock from overseas that could potentially contain radioactive material? Please request clarification and commitment from lndaver.	As outlined in Chapter 4, solid hazardous and non-hazardous waste will arrive at the site in a number of different type of waste vehicles from compactor trucks to walking floor trailers. All waste trucks entering the waste-to-energy facility will pass through a radiation detection system to detect the presence of radioactive elements. If a truck is found to be carrying radioactive waste, the protocol will dictate

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			the next steps which may include the waste not being accepted for treatment. The site will work to an operating protocol, that is produced in consultation with an appropriately qualified person such as a Radiological Protection Adviser.
FI Sub - Brid Kirby.pdf	Other Considerations	The proposed design features a high carbon cost (no CCSU), no district heating (no heat recovery), and a comparatively small export to grid.	As outlined in Chapter 9 - Climate, during the operation of the proposed development, heat will be recovered and converted to electricity, thereby the export of 18.5MWe will give a direct benefit in terms of GHG emissions which would have been released in the production of 18.5MWe from fossil-fuel burning power stations. The recycling and recovery of ferrous and non-ferrous materials during the thermal treatment process will require less energy than processes using virgin inputs and thus lead to a direct saving in energy and thus GHG emissions. Additionally, the operation of the facility could potentially allow 240,000 tonnes of residual waste currently exported to continental Europe to cease leading to a saving of over 5,070 tonnes of CO_2eq/annum. While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development. The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date.
FI Sub - Brid Kirby.pdf	Other Considerations	The regular occurrence of thermal inversions in Cork Harbour is not mentioned in NTS, Chapter 8, and Chapter 16 etc. This has clear implications for dispersal and exceeding of air standards. Has it been taken into account by lndaver?	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007*." Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			found to be in compliance with the ambient air quality standards.
FI Sub - Cliona O'Halloran.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must:* *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA*." Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Cliona O'Halloran.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "*recovery*". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Cliona O'Halloran.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Cliona O'Halloran.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to completeness, transparency, and the competency of experts.
FI Sub - Cliona O'Halloran.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes per annum and savings from diversion from landfilling of 91,800 tonnes per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Cliona O'Halloran.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Cliona O'Halloran.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Cliona O'Halloran.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.
FI Sub - Cobh Action for Clean Air.pdf	Climate impact assessment	The Climate Chapter of the EIAR asserts that the proposed development *'is aligned with ... plans, strategies and objectives*' outlined in section 15 of the revised Climate Act. This is patently incorrect. There are at least two major concerns here. First, the assumptions in the EIAR seems to place strong reliance on the EPA's With Additional Measures (WAM) rather than the more conservative and realistic With Existing Measures (WEM) scenarios presented in the EPA's Ireland publication "*Ireland's Greenhouse Gas Emissions Projections 2024-2055*". This is to give the impression that the proposed development is compatible with Ireland's national climate objective and the objective of mitigating GHG emissions and adapting to the effects of climate change in the State. The EIAR selectively quotes from the EPA's Emissions Projects report. It does not mention that Ireland is projected to significantly exceed its first two carbon budgets based on both the WAM and WEM scenarios.	As outlined in Chapter 9 - Climate, the WAM scenario is based on the projection of future emissions based on the measures outlined in the latest Government plans at the time projections are compiled. This includes all policies and measures included in the With Existing Measures (WEM) scenario, plus those included in Government plans but not yet implemented. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*.""

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Thus, the proposed development will reduce GHG emissions. Whether the EPAs WAM or WEM targets are met is outside of the control of the Proposed Development. However, the Proposed Development will make a positive contribution to meeting the climate goals outlined in the Climate Action Plan 2025.
FI Sub - Cobh Action for Clean Air.pdf	Climate impact assessment	The EIAR selectively quotes from the Waste chapter of the Climate Action Plan 2025 (CAP 2025) to suggest that the proposed development is consistent with it. The EIAR refers to general waste policies like levies on landfill and widespread segregation of waste in CAP2025. However, it omit one of the key measures identified as *'critical to success*' for delivering the sectoral that emissions ceiling for waste ('other'), the commitment to *'Reduce Waste sent to Landfill and/or lncineration*' (pg 156 of CAP25). This makes clear that contrary to what the EIAR suggests the proposed development is not compatible with CAP 2025 or Ireland's climate objectives.	As outlined in Chapter 9 - Climate, the 2025 Climate Action Plan (CAP25) provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting Ireland on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021. The plan outlines the current status across key sectors including Electricity, Transport, Built Environment, Industry, Waste and Agriculture and outlined the various broadscale measures required for each sector to achieve ambitious decarbonisation targets. CAP25 also detailed the required governance arrangements for implementation including carbon-proofing of policies and establishment of sectoral emission ceilings and carbon budgets. In relation to waste-to-energy facilities, CAP25 states that: "*Waste emissions in Ireland fell 9.4% in 2023 from 2018 figures and are projected to fall 27% by 2030. The key policy tools which have been successful in Ireland are:* • *Levies on landfill, certain forms of recovery and diversion regulations, including narrowing the scope for derogations.* • *Widespread segregation of waste, capturing recyclables and biodegradable waste;* • *Industry-supported recycling operations.* • *Regional waste planning*." (P. 133, CAP25)
FI Sub - Cobh Action for Clean Air.pdf	Air quality assessment	The EIAR does refer to the 2026- 2030 limit values under Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024	Chapter 8 of the EIS compares the air emissions from the facility will the current legal ambient air quality

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		on ambient air quality and cleaner air for Europe (recast). However, it does not benchmark the likely effects of the proposed development on air quality against the WHO 2021 Guidelines, despite the fact that Ireland's Air Quality Strategy commits Ireland to achieving the final WHO Guideline Values by 2040. This is particularly relevant for air pollutants such as particulate matter and nitrous oxide.	standards outlined in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. With the adoption of Directive (EU) 2024/2881, Ireland must transpose this Directive into national law (i.e. update the Air Quality Standards Regulations) before December 2026 with the revised limits coming into force in 2030. At that time the facility will be required to ensure compliance with these limit values. The WHO 2021 Guidelines are not legally enforceable but the EU is actively seeking to align with these levels in the coming years and the facility will ensure compliance with all legal air quality standards as they are enacted over time.
FI Sub - Cobh Action for Clean Air.pdf	Environmental and human health impacts of incomplete degradation of toxic PFAS compounds	Grounds for refusal include: 1. Failure to demonstrate adequate PFAS destruction capacity at proposed operating temperatures 2. Non-compliance with EU precautionary principle as enshrined in Article 191 (2) TFEU 3. Inadequate environmental impact assessment regarding PFAS and PIC formation 4. Inconsistency with scientific consensus on temperatures required for PFAS mineralisation 5. Risk of long-term environmental contamination through PIC emissions	As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. As outlined in Section 8.7 of Appendix 8.1 of the EIS, a detailed air modelling assessment of the Proposed Development on ecological impact was undertaken. The assessment was conducted on all nearby SACs, SPAs and pNHAs. The modelling found that all critical levels and critical loads are in compliance with the impact from the facility and not significant. Assessment of risk of long term environmental contamination was undertaken following Human Health and Ecological Risk Assessment Support to the Development of Technical Standards for Emissions from Combustion Units Burning Hazardous Wastes, US EPA Contract No. 68-W6-0053, US EPA Washington, 1999 and Van Hall Institut, Leeuwarden/Groningen for the Dutch

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Institute of Public Health and Environmental Protection (RIVM), on behalf of the Dutch Ministry for Spatial Planning, Housing and the Environment, February, 2000 and provided in Appendix 6.3 of the EIS and Appendix 15 of the NIS. Both assessments concluded that the predicted impact from the proposed development is not significant.
FI Sub - Cork Environmental Alliance.pdf	Baseline receiving environment	The applicants revised EIS noted the cut was through glacial till over mudstone/sandstone (EIS, 2025, page 13.73). The revised EIS further states that it is proposed to raise the existing ground levels in the western field to 4.55m OD and that "*this activity could induce instability in the M28 cut slope/ace*" (EIS, 2025, page 13.73). The applicant have failed to provide revised plans or section drawings which show the proposed development as it relates to the M28 road which traverses within the development redline area and have failed to adequately address potential impacts upon the M28 cut during construction and operation of the proposed development. The applicant has therefore failed to adequately establish the very significant changes to the baseline receiving environment within the proposed development redline area.	EIS Chapter 13 Section 13.8.1 Cumulative Effects Soils and Geology state that the earthworks design to raise the existing ground level in Area 1 to 4.55mOD will take into account the M28 cut to the west of Area 1 to avoid inducing instability in this cut, so there is no predicted residual risk of slope instability arising from the proposed development.
FI Sub - Cork Environmental Alliance.pdf	Baseline receiving environment	Notwithstanding Cork County Council's letter and the redesign within this portion of the site, the proposed scheme, as shown in the revised drawings (see *'Proposed surface water drainage layout sheet 1 of 2' C-000-011)*, appears to encroach within the compulsorily Purchased lands where a 1m wide x 1m deep filter drain at the toe of the embankment is shown running outside the proposed fence line (which follows the line of the boundary of the lands in the ownership of Cork County Council) and the revised gate allowing access to the raised plateau appears to encroach marginally within the Compulsorily Purchased lands. Cork County Council have clearly stated they do not consent to these works within those Compulsorily Purchased lands.	Any necessary works to be undertaken for the proposed development within the Compulsorily Purchased lands, including minor boundary interface works such as those identified in this submission, will be done in consultation with Cork County Council.
FI Sub - Cork Environmental Alliance.pdf	Fire	In spite of any guarantees the applicant may give vis a vis safety precautions which will be employed to prevent as far as possible accidents occurring on-site, the applicant is clearly not in a position to give any such assurances as regards operations in the Hammond Lane facility, which is situated at the very centre of the proposed site (Plate 4). The attached photographs show a fire at that site on Dec 22nd 2012 (see Plates 5 & 6). Such a fire would likely have very serious repercussions should it occur at the very centre of this incinerator site.	As outlined in Appendix 6.1 Hazard Identification and Risk Assessment, there is a metal reclamation works at Hammond Lane, which is directly to the west of the proposed Indaver facility. Due to proximity of this site to the proposed development, the HAZID&RA Team gave consideration to the potential risk that an incident at the metal reclamation works could act as an initiator to an accident scenario the Indaver establishment.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The only credible off-risk identified by the HAZID&RA Team which could potentially give rise to an impact at the Ringaskiddy site is in the event of a fire at the adjacent Hammond Lane facility. This site is located immediately to the west of the proposed development. The HAZID&RA Team considered the potential for a fire to occur at the Hammond Lane site. The main stockpiles of material at the site comprise light scrap metal / car shred and so present little fire hazard. Car tyres are removed prior to arrival on site. There are also some smaller stockpiles, comprising foam from car seats and other plastic materials from cars, which would present a more credible potential for fire. In the event of a fire arising in one of these stockpiles, this would require an emergency response to be implemented at the Hammond Lane site. The Emergency Response Team at Indaver would mobilise in such a scenario, to review whether any actions should be taken at the site, but it is not envisaged that any fire scenario arising at Hammond Lane would present any risk of escalation / domino effects to the Indaver facility.
FI Sub - Cork Environmental Alliance.pdf	Wastes arising and disposal routes	The applicant does not appear to have supplied a design Destruction and Removal Efficiency (DRE) output rating for the proposed incinerator. Therefore, it is not possible to quantify with any degree of accuracy the composite parts of emissions exiting the stack.	Compliance with the principles of Best Available Technology Reference Document (BREF) as outlined in Section 4.20 of Chapter 4 of the EIS is the key. Appendix 4.4 of the EIS demonstrates compliance of the Ringaskiddy facility with the relevant provisions of the BREF document.
FI Sub - Cork Environmental Alliance.pdf	Evacuation plan	Indaver seem to be relying entirely on the infallibility of their on-site safety procedures to negate any eventuality at their facility which would require an emergency evacuation plan. (…) This misplaced confidence is foolish in the extreme and exhibits a complete disregard for the protection of public health and safety in relation to the operation of the proposed incinerator. The photographs below show the only escape route available (across Haulbowline Bridge) for the 1000 plus personel at Naval HQ on Haulbowline Island in the event of an incident at the Indaver site (see Plates 3 & 4). The most basic understanding of evacuation procedures would insist that people are NEVER evacuated towards the incident they are fleeing, but this is exactly	As outlined in Chapter 4 - Description of the Proposed Development, a Site Emergency Plan will be prepared prior to operational start-up, which will set out the response measures to be taken by personnel in the event of an emergency. These measures will be designed to ensure maximum protection to site employees, site visitors and people in other premises near the site, to limit property damage and to minimise the impact on site operations and on the environment.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		what Indaver suggested as a sensible option when questioned at the Oral Hearing in 2016.	The Site Emergency Plan will have four basic components, Prevention, Preparedness, Response, and Recovery. Prevention involves identifying potential hazards and then taking measures to remove the hazard or reduce the potential for the hazard and its adverse effects. Preparedness starts with Emergency planning, training programmes, emergency drill and exercise programmes which are integral components of an effective preparedness programme. The site will have a dedicated *'emergency response team*', which will be given specific training. Evacuation routes will be defined, and all personnel will be aware of them. The site will be manned on a continuous basis. Response activities address the immediate and short-term effects of an emergency. Recovery activities and programmes involve restoration of site services and systems to normal status.
FI Sub - Cork Environmental Alliance.pdf	Other incinerators	We note that the EIS supplied as further information to the original application makes no mention of the recently permitted merchant incinerators at the former Novartis site on the Western edge of Ringaskiddy village - a village which would be hedged in by commercial incinerators at both ends should this proposal go ahead.	The Sterling Pharma (former Novartis) site operates under an IE licence, which sets emission limits for relevant parameters for the operation of incinerators at their installation. The detailed air quality modelling and assessment documented in Chapter 8 and associated appendices of the 2025 EIS had full regard to the limits of emissions established under Sterling Pharma's IE licence.
FI Sub - Dr Niamh O'Riordan.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must: *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA*." Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Dr Niamh O'Riordan.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "*recovery*". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		(...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Dr Niamh O'Riordan.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Dr Niamh O'Riordan.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to completeness, transparency, and the competency of experts.
FI Sub - Dr Niamh O'Riordan.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS:

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			"*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Dr Niamh O'Riordan.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Dr Niamh O'Riordan.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Dr Niamh O'Riordan.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting,omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.
FI Sub - James O'Brien (3).pdf	Visual Impact and Air Quality	Locating an incinerator on the shoreline of the second largest harbour in the world, would be an enormous step backwards for the marine/tourism business in the harbour. The negative impact from granting planning for this proposal will come both from a visual and a pollution point of view and will directly affect the marine leisure and tourism.	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in its visual and landscape character in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape. As such, it is considered that the proposed development is compatible with the plans for greater tourist amenities in the Lower Harbour. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			reduce the visual impact of the proposed development. Regarding pollution, the 2025 air quality model incorporated the best available information on weather data, terrain, etc, and forms the basis for the impact assessment conclusions documented in Chapter 8 and the associated appendices of the EIS, which concludes that the operation of the proposed development will not have a significant effect on air quality.
FI Sub - James O'Brien (3).pdf	Planning and Policy	The incinerators planning application PA04.318802 does not comply with Planning Policies for the harbour namely - • Project Ireland 2040 - National Planning Framework • Project Ireland 2040 - National Marine Planning Framework • Southern Regional Assembly Regional Spatial and Economic Strategy	Planning policies related to the proposed development are assessed in Chapter 2 - Policy and Planning Framework and Need for the Scheme, and as documented in this chapter, the proposed development is compliant with the relevant policy documents.
FI Sub - James O'Brien (3).pdf	Zoning	The site 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-1-09, table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28)	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Area, is endorsed by Section 6.4.11 of the Plan……..Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
FI Sub - James O'Brien (3).pdf	Tourism	On the 22nd February 2024 Failte Ireland, Port of Cork, Cork County Council and Cork City Council jointly announced the development of a new plan to tranform visitor experience in Cork Harbour. The plan aims to position Cork Harbour as world class tourist destination and support the sustainable development of this area as a must visit destination (copy enclosed). If the incinerator goes ahead, it will not help to bring this plan to fruition.	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in its visual and landscape character in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape. As such, it is considered that the proposed development is compatible with the plans for improved tourist amenities in the Lower Harbour.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Judy Horgan and Others.pdf	Site Suitability	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.	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.
FI Sub - Judy Horgan and Others.pdf	Site Selection	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)	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population).

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			• **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Judy Horgan and Others.pdf	Flood Risk	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 10-1364, 13082, 12085).	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			probability of flooding from rivers and the sea is very low.
FI Sub - Judy Horgan and Others.pdf	Flood Risk	Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.	As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site. The visual impact of locating the proposed development at this appropriate level is reported in Chapter 11 of the EIS. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included which will reduce the visual impact of the proposed development.
FI Sub - Judy Horgan and Others.pdf	Zoning	Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the lndover 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-/-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 Mo REI Campus areas and the potential for future growth of this sector. The proposed incinerator is therefore in direct contravention of the County Development Pion and contrary to the specified objectives for the immediate area.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09'*. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……..Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
FI Sub - Linda Fitzpatrick.pdf	Planning Notice Incorrectly Represents Ownership	The original application made in 2016 states that the application is on a site that *'covers an area of approximately 13.55 hectares'* But Indaver does not own a 13.55ha site at Ringaskiddy following the acquisition of a 2.23ha parcel of the original 13.55ha into the ownership of Cork County Council in 2021 via CPO. The applicant now owns a 11.31ha site. The public notice from the applicant is therefore' incorrect.	The public notice for the proposed development is correct. As outlined in Chapter 15 - Material Assets, the proposed development site is approximately 13.55 hectares, with the majority of the site within the ownership of Indaver. Cork County Council has confirmed that they have no objection to the lands which were subject to the CPO being included in the planning boundary. This is included in Appendix 1.3 of this EIS.
FI Sub - Linda Fitzpatrick.pdf	Specific Statement from Cork Council excluding Private Development on its 2.23ha	A red-line boundary is intended to reflect the land that is actually available for the development, including any areas required for layout, buffers, access, drainage, mitigation and assessment. If the applicant does not have the legal ability to use these lands for the purposes set out in the application, they cannot form part of the development site, and should not be included in the red-line boundary. (...) Please consider that a corrected site boundary and accurate reflection of site owned and updated assessments of same would require a new application.	The planning boundary for the application has been maintained consistently for the proposed development. The full extent of the proposed development can be constructed within the available lands, and Cork County Council has confirmed that they have no objection to the lands within the planning boundary which were subject to CPO being included in the planning boundary.
FI Sub - Linda Fitzpatrick.pdf	The Surrounding Area.	The applicant consistently refers to the surrounding area as 'industrial' in nature. This is not correct. The lands around the proposed site are in fact water,	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		and this is core to the identity, heritage and prospects of both the immediate area and the greater area. (...) This is not an industrial vista. Investment by Government bodies in this area has focused on Tourism, maritime use, maritime education, Defence, heritage development, port activity. (...) The application in front of An Coimisiun Pleanala does not support the sustainable plans for the area, and will undermine them.	development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Linda Fitzpatrick.pdf	The Proposed Site Is Physically Too Small, And Smaller Than Ever Now.	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.	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			rates (even in the absence of any mitigation measures) over the design life of the planning permission.
FI Sub - Linda Fitzpatrick.pdf	Site Selection	There is no de novo site selection in the material submitted in 2025, but instead a justification based on site ownership by the applicant. Site selection with a pre-determined favoured outcome can never be considered de novo.	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy'

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			• **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Linda Fitzpatrick.pdf	Cork Harbour Heritage & Amenity	The nature, function, size and central location is injurious to Cork Harbour amenity and heritage, and contrary to intention and investment in the area.	As outlined in Chapter 11 - Landscape and Visual Assessment, the development will cause significant negative visual effects in areas closest to the site, particularly around the Ringaskiddy Martello Tower and from certain harbour viewpoints where the stack and main building break the ridgeline. However, the landscape is already characterised by extensive industrial, port, energy, and research facilities with large structures such as the National Maritime College, wind turbines, the Beaufort Centre, Aghada power station and Whitegate refinery. The proposed development will not significantly alter the wider Cork Harbour character and will be read as an extension of the existing mixed industrial maritime landscape rather than as an unprecedented intrusion. As outlined in Chapter 14 - Archaeological, Architectural and Cultural Heritage, no direct or significant adverse operational effects on recorded archaeology, architectural heritage or cultural heritage are anticipated as a result of the operation of the proposed development. The proposed development will result in direct and permanent changes to views from the Martello Tower

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			toward the northeast including Marloag Point and the northwest portion of Spike Island, and views toward the tower from surrounding parts of Cork Harbour, particularly from the northeast. Nevertheless, the change will contribute to the ongoing shift in landscape character from mixed rural-industrial to one more dominated by heavy industry, with the most significant negative effects localised to the immediate environs of the Martello Tower. The effect is therefore assessed as: Negative in quality, moderate to significant in significance (depending on viewpoint), and permanent in duration.
FI Sub - Linda Fitzpatrick.pdf	Inadequate NIS	The NIS is inadequate in a number of areas: Data given in Appendix 6 NIS contains Table 1: "*List of European incinerator facilities located within 15 km distance from Special Protection Areas (SPAs) for birds*, '" lists 67 facilities but when this data is interpreted in the context of facilities 500m or less from an SPA, the number reduces to 6. Of these 6 facilities, 5 were built between 1973 and 1988, predating the 1992 Habitats directive. The data in Table 1 referred to does not create a valid context for siting a new incinerator beside an already-designated, coastal SPA of international importance.	The NIS comprehensively assesses the potential effects of the proposed development on the SPA, and concludes that it will not have an adverse effect on the Integrity of Cork Harbour SPA.
FI Sub - Linda Fitzpatrick.pdf	Inadequate NIS	In addition, the NIS lacks also in the following areas: • Monitoring is STILL carried out at Cork Airport instead of Roches Point, this does not accurately reflect conditions in Cork Harbour. • No mention is given to the impact of coastal erosion mitigation measures on habitats or food sources. Proposals for 'beach nourishment' on Gobby beach, adjacent to the Lough Beg SPA have not been assessed for effect on feeding areas of birds from the SPA. • The impact on the removal of trees, shrubs and habits from the site itself has been disregarded. This area has become a de facto habitat over the past 24 years. • No assessment is given for PFAS and it's impact on feeding areas or habitats, despite growing use in household materials and black bag waste.	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• The temperature in this incinerator is not high enough to ensure the destruction of PFAS. A high temperature is recommended, Commission Regulation COMMISSION REGULATION (EU) 2025/1988 of 2 October 2025.	*the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007.*" Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards. As outlined in Section 4.8.4 of the NIS, breeding and wintering bird surveys were carried out on Gobby Beach between April to June 2025 and October 2024 to March 2025. As noted in Section 4.7.1, the adjoining shoreline habitats at Gobby Beach, which will be affected by the proposed beach nourishment works, do not lie within any designated Natura 2000 site. Beach nourishment is a well-recognised coastal engineering solution worldwide. It is a soft solution and will not significantly affect the areas in the vicinity of the proposed development site. The net coastal sediment transport goes from south to north according to wind conditions and swell and, therefore, the material is likely to move towards the north in the medium and long term. The closest area of the Cork Harbour Special Protection Area (SPA) is located to the southwest of the site. The nett coastal sediment transport goes from south to north according to wind conditions and swell and therefore, the beach nourishment material is likely to move towards the north in the medium and long term. Therefore, the sacrificial material will not impact on this part of the SPA. Other sections of the SPA which are to the north of the site are more than two kilometres from the site and these are too remote from the site to

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			receive any significant quantities of beach nourishment material. No signs of breeding birds were recorded along Gobby Beach during site surveys. Small numbers of Oystercatcher, Turnstone, Sanderling and gulls were recorded foraging and roosting within this area. However, as noted in Appendix 12.2, disturbance levels on Gobby Beach were high throughout site surveys from walkers and dogs. Ground nesting waders, such as Turnstone or Ringed Plover, can nest in this type of habitat. However the regular, high level disturbance at this site from walkers and dogs, means birds are highly unlikely to nest here. Table 12.11 of the EIS assessed direct habitat impacts from habitat removal (including scrub and immature woodland). The potential effects of this habitat removal on bats, otters, badgers, other mammals, birds, amphibians and reptiles is discussed in Section 12.5 of the EIS. As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds.
FI Sub - Linda Fitzpatrick.pdf	Still Deficient EIS	Despite revisions, the updated EIS material continues to repeat earlier conclusions, provides assertions without evidence and relies on 2015 input from multiple prescribed bodies. Absence of up-to-date information means the Commission cannot rely on the EIS to carry out an informed assessment.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement*', the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development.
FI Sub - Linda Fitzpatrick.pdf	Flooding, Coastal Erosion, Geography, Topography Geology makes Site intrinsically unsuitable, forever.	The site is situated in a harbour basin prone to thermal inversions below the level of the nearby populations of Cobh, Monkstown, Passage and Crosshaven on a regular basis.	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007*." Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards.
FI Sub - Linda Fitzpatrick.pdf	Flooding, Coastal Erosion, Geography, Topography	It is prone to coastal erosion and is fundamentally unsuitable for this located on a known flood risk area, marked as same in Table 4.1.17: Specific	As outlined in Chapter 13, approximately 1150m^3 of sacrificial material (shingle of appropriate size and

ACP Submission Reference	Topic	Submission Statement	Applicant Response
	Geology makes Site intrinsically unsuitable, forever.	Development Objectives for Ringaskiddy, and on OPW floodinfo.ie , (Flood Summary ID-1 364, 13082, 1 2085) .	rounded shape with high density and resistance to abrasion) is proposed to be placed above the foreshore on Gobby Beach along the eastern boundary of the proposed development site. This will be a '*soft*' solution which will reduce erosion rates by increasing beach levels i.e. reducing near shore water depth and wave heights and will protect the glacial till face from breaking waves. The coastal boundary of the proposed development site will be monitored for erosion on an annual basis. The placement of beach nourishment material is predicted to result in a reduction in the rate of cliff recession, considered a slight positive effect. Additionally, the proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Linda Fitzpatrick.pdf	Flooding and Landscape and Visual	This is a fundamental flaw in site selection, as Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.
FI Sub - Linda Fitzpatrick.pdf	Accident Hazard Risk	By reason of proximity to NMCI, MaREI and Haulbowline Naval Base and the absence of any exit route that does not pass by the incinerator site, in the event of an accident there is no evacuation route for students, Naval Personnel, visitors to Haulbowline Island or Rocky Island crematorium. This is not mitigated by the addition of the M28, which does not change cul-de-sac element of the site.	As outlined in Chapter 6 - Population and Human Health, a Hazard Identification and Risk Assessment has been undertaken and is included as Appendix 6.1. A total of 111 scenarios were examined in the HAZID&RA exercise, 108 of which were found to present credible accident hazards. Based on the findings of the HAZID&RA exercise, there were no scenarios identified which presented a Priority Risk and there was one scenario which presented a Substantial Risk, which was the bunker fire scenario.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			This scenario received a Severity Rating of 3 for both Human Health and for the Environment and a Likelihood Rating of 4. The risk associated with this scenario was considered by the HAZID&RA Team to be ALARP (as low as reasonably possible), due to the variety of measures that will be in place to protect against a fire scenario, either by reducing the likelihood of occurrence or mitigating the impacts if it did occur. These measures govern all stages of the potential development of this scenario. The measures will protect against the conditions arising under which a fire could occur, they will enable rapid detection and response at the early stages in the event that a fire scenario developing, they will enable extinguishment of the fire even in the event of escalation to a fully developed fire scenario, and protect against the risk of environmental contamination from fire-fighting run off. With these measures in place, the HAZID&RA team found that Indaver would have all necessary measures in place at the bunker, throughout all phases of the operation. As such the risks associated with this scenario were considered to be ALARP (as low as reasonably practicable).
FI Sub - Linda Fitzpatrick.pdf	Zoning - Zoned for Education, Research and Office use. NOT INCINERATION	Since the 2016 Oral Hearing, from which the above was concluded, the usable portion of the site, i.e. the portion on which the build is proposed has been rezoned, bringing it inline with activities and zoning in the surrounding area. (RY-I-09) is now 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 Ca pus areas and the potential for future growth of this sector.	As acknowledged in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher,

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Marcia D'Alton.pdf	Site Suitability	Senior Inspector Mr. Derek Daly considered that the proposal constituted overdevelopment of this restricted, cliff side, topographically challenged, strangely-shaped, end-of-peninsula site. The Coimisiun will be aware that this limited site is now even tighter than when Mr. Daly made his informed evaluation. The site area is described in the SFI as being 13.55 ha. In fact lndaver purchased a site of 12.34 ha from Irish lspat. Roadside verges and a square of land beside the Gobby beach car park have added to the lndaver land parcel but the developable area of the site was ever only 12.34 ha. Cork County Council have purchased 2.2158 ha of that 12.34 ha from lndaver. Therefore, the remaining developable area is only 10.12 ha.	As outlined in Chapter 15 - Material Assets, the proposed development site is approximately 13.55 hectares, with the majority of the site within the ownership of Indaver. Cork County Council have confirmed that they have no objection to the lands which were subject to the CPO being included in the planning boundary. This is included in Appendix 1.3 of this EIS. The full extent of the proposed development can be comfortably constructed with the available lands.
FI Sub - Marcia D'Alton.pdf	Site Suitability	Drawing 1434-106 accompanying the 2016 EIS illustrates the proposed site layout, the red line denoting the boundary of the site for which planning permission is being sought. The Coimisiun will see that on the eastern side, the red line encompasses a significant area of Gobby beach. On the northern side, it extends as far as the other side of the L2545. On the western side it includes land that no longer belong to lndaver. If the proposal constituted overdevelopment in 2016 that has been exacerbated exponentially since.	The planning boundary for the application has been maintained consistently for the proposed development. As outlined in Chapter 15 - Material Assets, the proposed development site is approximately 13.55 hectares, with the majority of the site within the ownership of Indaver. Cork County Council have confirmed that they have no objection to the lands which were subject to the CPO being included in the planning boundary. This is included in Appendix 1.3 of this EIS. The full extent of the proposed development can be comfortably constructed with the available lands.
FI Sub - Marcia D'Alton.pdf	Waste Incineration	Integration in waste treatment is a good thing. Co-locating upstream, downstream and symbiotic infrastructure is an efficient and wise approach and it is appropriately recommended by the site selection guidelines included in the National Waste Management Plan. But the greatest supporters of incineration would have to acknowledge that this kind of integration would never be possible on the restricted Ringaskiddy site. lndaver may claim that it is already proposing co-location insofar as its proposed plant would treat both hazardous	The site is of adequate size for a facility of this scale as outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The waste-to-energy facility will be confined to the eastern part. As described in detail in Chapter 4 of the EIS, the proposed waste treatment technology

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		and non-hazardous waste. But this is obviously a nonsense. Both feedstocks would be burned in the same grate.	is appropriate to treat both hazardous and non-hazardous waste streams. Indaver's municipal waste plant in Carranstown, Co. Meath is already successfully treating non-hazardous and hazardous wastes in full compliance with their EPA licence for over 10 years now.
FI Sub - Marcia D'Alton.pdf	Carbon Emissions	The carbon burden of this proposed development is not adequately assessed in the EIS.	As outlined in Chapter 9 - Climate, the climate assessment has been carried out in line with the guidance outlined in the European Commission publications "*Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment*" (EC, 2013) and "*Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment Report*" (EC, 2017) and the EPA publication "*Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*" (EPA, 2022a). In addition, as outlined in Appendix 9.1, a report has been compiled which outlines how the proposed development is in compliance with Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2021. The climate assessment is divided into two distinct sections – a greenhouse gas assessment (GHGA) and a climate change risk assessment (CCRA). The assessment methodology has been derived with reference to the most appropriate guidance documents relating to climate. As outlined in Chapter 9 - Climate, the climate assessment has been carried out in line with the guidance outlined in the European Commission publications "*Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment*" (EC, 2013) and "*Environmental Impact Assessment of Projects – Guidance on the preparation of the Environmental Impact Assessment Report*" (EC, 2017) and the EPA publication "*Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*" (EPA, 2022a). In addition, as outlined in Appendix 9.1, a report has been compiled which outlines how the

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			proposed development is in compliance with Section 15 of the Climate Action and Low Carbon Development (Amendment) Act 2021. The climate assessment is divided into two distinct sections – a greenhouse gas assessment (GHGA) and a climate change risk assessment (CCRA). The assessment methodology has been derived with reference to the most appropriate guidance documents relating to climate.
FI Sub - Marcia D'Alton.pdf	Planning and Policy	To construct another contract incinerator would be a woefully wrong move for sustainable waste management. But for sure, if it is built, we will fill it. Ireland's past record of decades indicates that if there is any easy way out, we will take it. But we will for 30 years and more thereafter be struggling to meet prevention and recycling targets mandated by the European Commission. Should we break the habit of a lifetime and not fill it with Irish waste, waste will be imported to fill it. In either scenario, export of both captured secondary material and waste will continue. Waste is a commodity. This Ringaskiddy proposal is for profit; it is not to assist Irish waste management.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, a review of waste, energy and climate policy at a European and national level shows that the proposed development could make a significant contribution toward: • Supporting the provision of 200,000 to 300,000 tonnes of additional dedicated thermal recovery capacity for the treatment of non-hazardous residual wastes nationally, to ensure there is adequate active thermal treatment capacity as identified in Focus Area 14 of the National Waste Management Plan for a Circular Economy 2024 – 2030 (NWMP); • Self-sufficiency in waste treatment within the State and reducing Ireland's vulnerable reliance on exports of hazardous waste and non-hazardous residual municipal waste as outlined in Core Policy 12 and Focus Area 11 of the NWMP; • Diverting residual waste away from landfill and recovering energy from it in line with the EU's Circular Economy Strategy, the revised Waste Framework and Landfill Directive, and Ireland's Climate Action Plan 2025, as well as the broader goals of the European Green Dealix and 8th Environment Action Programme; • More ambitious recycling targets, as set out in the revised EU Waste Framework Directive and supported by the EU Circular Economy Action Plan (CEAP)xi, by extracting ferrous and non-ferrous

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			metals from bottom ash in line with the principles of resource efficiency and material recovery; • Sustainable, secure and competitive energy generation in line with energy policy objectives; in the Renewable Energy Directive and other National and EU Energy policies; and • Delivering infrastructure of strategic importance with private sector investment; in line with the NWMP Delivery Roadmap and the NDP.
FI Sub - Marcia D'Alton.pdf	Assessment of the proposed development against statutory Planning Policy for County Cork	We are all familiar with the "*outline of the main alternatives*" requirement of Annex IV (2) of the 2011 EIA Directive4 . Annex IV (3) of the 2014 EIA Directive5 introduced a new requirement for an EIAR to include "an output of the likely evolution thereof without implementation of the project". The EPA3 helpfully sets out what this new departure would mean in practice: "*The 'do-nothing' alternative is a general description of the evolution of the key environmental factors of the site and environs if the proposed project did not proceed. It is similar to but typically less detailed than the 'likely future receiving environment' description describing the Baseline*." It is unfortunate that neither the 2016 EIS nor the 2025 SFI provided for the proposed waste to energy facility includes this. With a 24-year history at this site, since the closing of lrish lspat (formerly Irish Steel) in June 2001, this part of Cork Harbour has told its own story, illustrating what can happen when extra-special natural attributes are given a chance to blossom.	As outlined in Chapter 3 - Alternatives, a description of the reasonable alternatives studied by Indaver, which are relevant to the Ringaskiddy Resource Recovery Centre proposal and its specific characteristics, and indication of the main reasons for the option chosen, including a comparison of environmental effects was provided. In each specialist chapter of the EIS, the baseline environment is described, which presents the do-nothing alternative to the proposed development in the context of the particular environmental topic or sensitivity being assessed.
FI Sub - Marcia D'Alton.pdf	Assessment of the proposed development against statutory Planning Policy for County Cork	The Cork County Development Plan 2022-2028 sets out policy objectives and overall strategy for the proper planning and sustainable development of the County. Despite the ongoing efforts of lndaver's consultants, nothing about this proposed development aligns with that policy for this part of Cork Harbour.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Cork Harbour	It recommended that the kind of development which had no particular need to be beside the water or which could deliver substantial community benefit should be minimised, relative to an alternative location inland. The proposed waste to energy plant has neither a need to be beside the water nor would it deliver community benefit (other than of the monetary kind which is of a different nature entirely).	Chapter 3 - Alternatives provides a description of the reasonable alternatives studied by Indaver, which are relevant to the Ringaskiddy Resource Recovery Centre proposal and its specific characteristics, and an indication of the main reasons for the option chosen, including a comparison of environmental effects. As outlined in the Non-Technical Summary, there will be a number of benefits for the local community. An amenity walkway, incorporating a viewing platform, is proposed as part of the proposed development. The upgrade of the local road (L2545) will alleviate local flooding issues which constitutes a significant planning gain for the benefit of existing and future users of the immediate area. In addition, the project will support a significant number of jobs off-site in construction industry suppliers and service providers, with the employment provided contributing to the economy of the South Cork area both directly and indirectly through the supply of goods and services. Finally, Indaver is proposing a community fund which would fund environmental and other community projects and initiatives in the Ringaskiddy area.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Strategic Employment Areas	Whilst there were five Strategic Employment Areas (SEAs) when the applicant's Planning Report (Appendix 3.1, 2025 SFI) was being prepared, the current CCDP defines four SEAs: Carrigtwohill, Little Island, Ringaskiddy and	The conclusions of Appendix 3.1 Planning Report are correct, and are not misleading. As outlined in Section 2.17 of Appendix 3.1 Planning Report, paragraph 2.16.5 of the CDP states that within the County Metropolitan Area, Carrigtwohill, Little

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		Whitegate. (…) The CCDP's policy objective setting out appropriate use in areas zoned for industry is ZU 18-16*. The lndaver documentation quotes only part of this Policy Objective (3.3.2.2, 2025 SFI). The Planning Report (para. 2.20, Appendix 3.1, 2025 SFI) part-quotes the above Policy Objective as a foundation for a wholly erroneous conclusion: "*The development of strategic large-scale waste to energy recovery facilities is directed therefore [by reference in Paragraphs 6.4.11 and 11.7.4 and Policy Objective ZU 3-7(b) of the Plan], to industrially zoned lands within SEAs*." (para. 2.21, Appendix 3.1, 2025 SFI) (...) This conclusion, oft-repeated in one guise or another throughout Appendix 3.1 and Chapter 3 of the EIS, is evidently wholly incorrect. By quoting only part of the Policy Objective, it misleads entirely. * Because lndaver's Planning Report was prepared in 2019, it refers to Policy Objective ZU 3-7(b) as per the CCDP 2014.	Island, Ringaskiddy and Whitegate are identified as Strategic Employment Locations suitable for large scale employment development. Additionally, in Section 2.16 states that policy objective ZU 18-16 of the CDP states that the provision of strategic large scale waste treatment facilities including waste to energy recovery facilities will be considered in '*Industrial Areas*' designated as Strategic Employment Locations (SELs) in the CDP subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in this Plan.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Strategic Employment Areas	To further compound its inaccuracy, Section 15.12.14 of the CCDP has a well-defined Policy Objective for Bottlehill. (…) In other words, the CCDP makes abundant provision for the location of any waste facility, including waste-to-energy facilities, enabling them to be considered in any industrially zoned area and in Bottlehill, subject to policy and to the development management process. Para. 1.1 opening lndaver's Planning Report (Appendix 3.1) is self-evidently a nonsense: "Guided by the planning policy provisions set out in the Cork County Development Plan, 2014 (hereafter CDP), which direct that large-scale waste to energy recovery facilities should be located on industrially zoned lands within SEAs . . . " Neither the current (2022) nor the previous (2014) CCDP directed any such thing!	This submission misquotes the text from the Planning report. As outlined in Appendix 3.1, paragraph 2.16.5 of the CDP states that within the County Metropolitan Area, Carrigtwohill, Little Island, Ringaskiddy and Whitegate are identified as Strategic Employment Locations suitable for large scale employment development. Policy objective EC: 8-3 in relation to Strategic Employment Locations seeks to: a) Promote the development of Strategic Employment Locations suitable for large scale industrial developments at Carrigtwohill, Little Island, Ringaskiddy, and Whitegate where any such development must be sensitively designed and planned to provide for the protection of any designated sites. Any development must be compatible with relevant environment, nature and landscape protection policies as they apply around Cork Harbour and the protection of residential amenity. b) Protect lands in these areas from inappropriate development which may undermine their suitability as Strategic Employment locations.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The development of strategic large-scale waste to energy recovery facilities is directed therefore, by reference to paragraph 2.16.5 and Policy Objective EC: 8-3 of the Plan, to industrially zoned lands within Strategic Employment Locations.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Ringaskiddy	Other than the aim towards strategic employment, the M28 and the amenity of existing residents (Para. 6.2, Appendix 3.1), none of these statutory policy objectives appear to be mentioned by the applicant. Land-use planning within the Ringaskiddy area is evidently far more nuanced and holistic than the lndaver documentation would suggest.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, as follows (the zoning map from the Plan is included as Figure 2.2): Objective No. RY-I-09: (c.10.19ha) Suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities. This site is considered inappropriate for any short or full-time residential accommodation. Any existing access to the nearby Martello tower which crosses this site should be protected and provision for an open space buffer to any existing access will need to be provided. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area. Part of the site is liable to flooding. Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Ringaskiddy	How would the proposed waste-to-energy facility affect Ringaskiddy's soft power as a desirable location for FDI? Would it, as Indaver would likely claim, be an asset to waste management? Or would it, as the Soft Power Index potentially indicates, affect the familiarity and reputation of the clean, green image that Ireland presents so powerfully? If the proposed waste-to-energy plant is as helpful to the Ringaskiddy FDI sector as the Indaver document claims, would the IDA not have jumped at the opportunity of selling or leasing a slice of one of its larger sites for this supposed asset? After all, Indaver's initial search in 1999 was for a site of only 5-8 hectares, merely a fraction of some of the larger IDA lands. But from, the outset, the IDA said no.	As outlined in Chapter 4 - Description of the Proposed Development, the waste-to-energy facility will treat up to up to 240,000 tonnes per annum of hazardous and non-hazardous residual household, commercial and industrial waste, which is currently landfilled, exported or treated at a waste to energy facility further from the waste source. Up to 24,000 tonnes per annum of suitable hazardous waste will be treated at the facility. The facility will maximise the extraction and recovery of valuable material (in the form of ferrous and non-ferrous metals) and energy (in the form of 21 megawatts (MW) of electricity) resources from residual waste. Therefore, the waste-to-energy facility will be indeed an asset to waste management, locally and nationally. Having modern, integrated waste management infrastructure supports Ireland's reputation and clean green image.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for the proposed site	In discussing Ringaskiddy, the Planning Report (Para. 10.11, Appendix 3.1) comments that "*the extent of land zoned for industrial use has been increased in the 2017 Local Area Plan from 353.02ha to 361.32ha. Two new industrial zones have been identified through the change of use of a site previously zoned for community use and the splitting of another site into two separate industrial zoning objectives. Aside from this, all sites zoned remain as they were originally zoned in 2011. There are now a total of 20 sites zoned for industrial use in Ringaskiddy, a series of which are home to large pharmaceutical companies already producing hazardous and non-hazardous industrial waste*". This paragraph is extraordinarily misleading. There may be 20 industrial zonings in Ringaskiddy but one large area, RY-I-18, is the Port of Cork. Two new industrial zones have not been created. The site previously zoned for community use is that opposite Indaver's proposed site of development, now occupied by the Port of Cork's temporary car park. Although labelled C-01 in 2011, RY-I-19 in 2017 and RV-1-16 in 2022 (i.e. the last three revisions of the Local Area Plan), the objective for its zoning has stayed the same throughout (...)	The submission refers to text that is not in the Planning Report (Appendix 3.1). As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		The site described as having been split into two separate industrial zoning objectives includes Indaver's own site! (...) So one of the "*20 sites zoned for industrial use*" is for port use, two are for extensions of the third level campuses and/or associated research and all of the remaining 17 are undeveloped. Not a single one is a "*home to large pharmaceutical companies already producing hazardous and nonhazardous industrial waste*". If they were, they would be yellow on the map, i.e. built up area. They are blue, i.e. industrially zoned, because they are available for development!	Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for the proposed site	An inaccurate mention has been given in Indaver's Planning Report to the second part of the zoning objective for RY-I-09 also. The objective is that the existing access to the Martello tower crossing this site should be protected with provision for an open space buffer to that existing access. The Planning Report interprets this as "*the Martello Tower, a conservation structure, is located to the southwest of the site and access to same must be protected in any development".* The objective does not require replacement for the access, rather maintenance of the existing access. The proposed development diametrically opposes this part of the site's zoning objective too.	As per Planning Report (Appendix 3.1) zoning objective RY-I-09 is as follows: Objective No. RY-I-09: (c.10.19ha) Suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities. This site is considered inappropriate for any short or full-time residential accommodation. Any existing access to the nearby Martello tower which crosses this site should be protected and provision for an open space buffer to any existing access will need to be provided. The proposed development meets this objective.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Spike Island, Haulbowline Island and Cobh	Spike Island is 500 metres to the east of the Indaver site, closer than the centre of Ringaskiddy village (800m) (Section 4.2.4, 2025 SFI). Those 500 metres being from the edge of the cliff face, the entire bulk of the building would be presented from the western shore of Spike Island. CCDP policy for Spike is therefore critical and unmentioned in the SFI.	Section 2.1 of Appendix 3.1 acknowledges the attraction of Spike Island for tourists. The location of the proposed development site relative to Spike Island is identified in section 2.1 of Appendix 3.1. Section 6.1 of Appendix 3.1 states that the proposed development is compatible with other Cork Harbour activities, and that it will also enhance the provision of tourist facilities in the area by the amenity walkway including viewing point. The dedicated viewing point will enable tourists to appreciate the natural, built and cultural heritage of Cork Harbour. In determining the impact of the proposed

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			development on Spike Island, Section 6.3.1 of Appendix 3.1 states that the proposed development will result in direct and permanent changes to views from the Martello Tower toward the northeast including Marloag Point and the northwest portion of Spike Island, and views toward the tower from surrounding parts of Cork Harbour, particularly from the northeast. This potential effect will be mitigated through a combination of design measures and site layout considerations. Accordingly, this will result in a negative, moderate, indirect and permanent effect.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Spike Island, Haulbowline Island and Cobh	Haulbowline Island is 850 metres north of the lndaver site. The only road to Haulbowline goes past the lndaver site. Haulbowline is just over 400 metres from Spike Island. CCDP policy for Haulbowline Island is equally critical and unmentioned in the SFI.	The location of the proposed development site relative to Haulbowline Island is identified in section 2.1 of Appendix 3.1. Section 6.1 of Appendix 3.1 states that the proposed development is compatible with other Cork Harbour activities, and that it will also enhance the provision of tourist facilities in the area by the amenity walkway including viewing point. The dedicated viewing point will enable tourists to appreciate the natural, built and cultural heritage of Cork Harbour.
FI Sub - Marcia D'Alton.pdf	Aims of the Cork County Development Plan for Spike Island, Haulbowline Island and Cobh	Being both historically and currently the ferry departure point for both islands, intrinsically linked with them economically, culturally and visually and only 500 metres from Haulbowline, CCDP policy for Cobh is also critical and unmentioned in the SFI.	Cobh is identified as an urban development in the Cork Harbour area in section 2.1 of Appendix 3.1. Section 6.1 of Appendix 3.1 states that the proposed development is compatible with other Cork Harbour activities. The dedicated viewing point will enable tourists to appreciate the natural, built and cultural heritage of Cork Harbour. The environmental effects of the proposed development on the wider Cork Harbour area are summarised in Section 6.3 of Appendix 3.1.
FI Sub - Marcia D'Alton.pdf	Zoning	One of the key difficulties for the proposed development on this particular site is that it lies in the intersection of three different land use policy areas. Approximated on the diagram overleaf, the black line represents the industrial policy aim of Ringaskiddy, the blue line represents the research/educational aim of Ringaskiddy/Haulbowline whilst the green line represents the tourism/heritage aim of Spike/Cobh/Haulbowline. Recent policy shifts in land use planning for Haulbowline, RY-l-16 and in particular, RY-l-09, aim to smooth the transition between these juxtaopposing functions. A waste-to-	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, as follows (the zoning map from the Plan is included as Figure 2.2): Objective No. RY-I-09: (c.10.19ha) Suitable for the extension of the Third Level Educational campus and

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		energy plant on the edge of the cliff at RY-l-09 with a 50m high block of a building and a 75m high stack simply cannot sit at the intersections of these policy triangles. It would irretrievably damage all three land use policy aims.	enterprise related development including marine related education, enterprise, research and development. Consideration will also be given to established operators in Ringaskiddy for the provision of ancillary office accommodation and for Research and Development facilities. This site is considered inappropriate for any short or full-time residential accommodation. Any existing access to the nearby Martello tower which crosses this site should be protected and provision for an open space buffer to any existing access will need to be provided. Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area. Part of the site is liable to flooding. Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).
FI Sub - Marcia D'Alton.pdf	Landscape and Visual	It is fair to say that it is the size of this proposed development which is particularly jarring with County Development Plan land use policy. Its visual impact would be immense. The size of the building would obliterate the natural harbour topography whilst its location on the edge of the Ringaskiddy cliff would render any attempted buffer zone useless. The visual offence of its bulk would be magnified yet further by the plume from the proposed 75m stack.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Marcia D'Alton.pdf	Land-Use Policy	Section 11.5.2.1 of the SFI describes the anticipated impact of the waste-to-energy plant from the Whitepoint area of Cobh (…) Section 11.7 describes the anticipated impact from those areas closest to the site that so important to the future set out by land use policy - Spike Island, Haulbowline Island, the NMCI, the Beaufort Building, the nearby military fortification of the Martello tower (...) Whilst the evaluation of that impact is clearly objective rather than subjective, it seems nothing less than extraordinary that it could be considered to be anything other than wholly incompatible with land use policy and strategy for this part of Cork Harbour. lndaver can - and does – continually refer to the "*industrial landscape*" of Ringaskiddy. Yet Spike Island is both physically, visually and topographically closer to lndaver's site than most of the industrial developments in Ringaskiddy will ever be.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.
FI Sub - Margaret Deane.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	*framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must:* *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA."* Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Margaret Deane.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "recovery". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Margaret Deane.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Margaret Deane.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to completeness, transparency, and the competency of experts.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Margaret Deane.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Margaret Deane.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Margaret Deane.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Robert and Ulla McLaughlin.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.
FI Sub - Robert and Ulla McLaughlin.pdf	Site	The proposed site is unsuitable, is too small and suffers from serious coastal erosion on a regular basis. There is photographic evidence to show this and it contradicts the lndaver assumptions and predictions.	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the proposed development.
FI Sub - Robert and Ulla McLaughlin.pdf	Zoning	The site is located in an area that has been rezoned for Educational and Amenity development.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island).
FI Sub - Robert and Ulla McLaughlin.pdf	Flooding	The site is located in 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)	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Robert and Ulla McLaughlin.pdf	Hazard Risk	The site poses a public safety risk in the event of an accident or fire with only single access road serving Haulbowline Island and UCC National Maritime College.	As outlined in Chapter 6 - Population and Human Health, a Hazard Identification and Risk Assessment has been undertaken and is included as Appendix 6.1. A total of 111 scenarios were examined in the HAZID&RA exercise, 108 of which were found to present credible accident hazards. Based on the findings of the HAZID&RA exercise, there were no scenarios identified which presented a Priority Risk and there was one scenario which presented a Substantial Risk, which was the bunker fire scenario. This scenario received a Severity Rating of 3 for both Human Health and for the Environment and a Likelihood Rating of 4. The risk associated with this scenario was considered by the HAZID&RA Team to be ALARP (as low as reasonably possible), due to the variety of measures that will be in place to protect against a fire scenario, either by reducing the likelihood of occurrence or mitigating the impacts if it did occur. These measures govern all stages of the potential development of this scenario. The measures will protect against the conditions arising under which a fire could occur, they will enable rapid detection and response at the early stages in the event that a fire scenario developing, they will enable extinguishment of the fire even in the event of escalation to a fully developed fire scenario, and protect against the risk of environmental contamination from fire-fighting run off.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			With these measures in place, the HAZID&RA team found that Indaver would have all necessary measures in place at the bunker, throughout all phases of the operation. As such the risks associated with this scenario were considered to be ALARP (as low as reasonably practicable).
FI Sub - Robert and Ulla McLaughlin.pdf	Choice of Incineration	lndaver would not be allowed to locate an incinerator in such circumstances in Europe. ln fact in Belgium lndaver operate a number of facilities. At Poldervlietweg 5 Antwerpe Located close to major road networks.Nearest village is 6 km away. It is NOT located in a designated Amenity and Educational area At Molenweg 2 Kallo This plant is located on a 12 sqkm site on its own. No schools near by, no village nearby At Wiesele Aarschotsesteenweg 32 This plant stands on its own site of 8 sq km.No village or schools nearby. So there is no justification for lndaver to come to Cork and put in an incinerator into a village and next to a University College.	As outlined in Chapter 3 - Alternatives, the 2025 evaluation process has identified that the Southern Region and specifically Cork is the most suitable location for the provision of the required thermal treatment capacity identified in the NWMP. The provision of the facility in Cork would address the national capacity deficit and the Regional imbalance identified in the NWMP. Following the detailed assessment of suitable sites in Cork, a number of reasonable alternative sites were identified in the Ringaskiddy, Carrigtwohill, Little Island and in Bottlehill. Having reviewed this, Indaver still consider the Indaver-owned site an appropriate site for the proposed development, given that it is already owned by Indaver with good potential for connection to a heat network serving the industrial sector in Ringaskiddy.
FI Sub - Robert and Ulla McLaughlin.pdf	Health	No Health Impact Assessment was conducted at all.	As outlined in Chapter 6 - Population and Human Health, whilst a HIA can inform EIA practice in relation to human health, a HIA alone will not necessarily meet the requirements of the EIA Directive in relation to human health. Further, HIA is not routinely carried out for major infrastructure schemes in Ireland, such as this proposed development, and it is typically a non-statutory document normally prepared on a voluntary basis by developers overseas, e.g. in the UK. Guidance for performing HIAs was issued by the Institute of Public Health in Ireland in 2009 and they have outlined that there are considerable difficulties in performing a HIA for a project of this nature. Not least of these is the difficulty of getting baseline health data as it is quite difficult (due to patient

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			confidentiality and other reasons) to accurately determine levels of even relatively common medical conditions in a relatively defined population that might be affected. Additionally, the World Health Organisation (WHO) does not support a stand-alone HIA unless it can be demonstrated to be an advantage over the assessment of population and human health in the EIS. In this case no such advantage exists and indeed given the lack of baseline data, a stand-alone HIA would add very little to the assessment process.
FI Sub - Robert and Ulla McLaughlin.pdf	Environment/transport traffic	This will create 71 truck movements per day based upon traffic study 2016 and combined with the traffic from the port of Cork this will increase to more than 170/180 truck movements per day. Combined with normal other traffic the M28 will be clogged up before it starts.	As outlined in Chapter 7 - Roads and Traffic, the strategic development proposals submitted by the Port of Cork (2015) and the renewed application (2025) includes a Freight Mobility Management Plan, developed to assist the Port in managing and controlling the flow of traffic to and from Ringaskiddy during peak hours. It is stated in the Plan that the number of arrivals and departures can be controlled and reduced to an acceptable level. Though the Port of Cork has completely different operational requirements to an incinerator with energy recovery, Indaver recognise the need for a similar approach to Mobility Management of HGV traffic. Therefore, Indaver proposes to implement an MMP for HGVs, which will optimise the volume of waste delivery HGV traffic travelling to and from the site on the road network, allowing for traffic arrivals to be controlled and scheduled during peak periods. Adopting this system will ensure that the impact of HGV traffic flows associated with the facility will be minimised during peak periods until the M28 is operational, and that truck queuing in and out of the facility will be nominal. The HGV mobility management plan covers all stages of delivery, from pre-arrival, through to arrival and presence on-site, and departure. In addition to the proposed HGV MMP, the proposed extended operating hours of 06:00-20:00 will allow

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			hauliers to schedule their deliveries to the proposed facility outside of the prevailing AM and PM network peak hours.
FI Sub - Robert and Ulla McLaughlin.pdf	Waste Disposal	Where is the land fill site for 70000 tons of ash? Where does the 12000 tons of hazardous waste go?.back to Germany?	Landfill options in Ireland for Bottom Ash are outlined in Section 15.5.3.9 of Chapter 15 - Material Assets. Operational landfills which would be suitable for the disposal and recovery of the bottom ash include Knockharley landfill in County Meath, and Bord Na Mona landfill at Drehid, County Kildare. Boiler Ash and Flue Gas Cleaning Residues, which are classified as hazardous, will be recovered in a saltmine, either in Ireland, if one is available, or abroad as described in Section 15.5.3.10.
FI Sub - Robert and Ulla McLaughlin.pdf	Treatment of Emissions	But now we have to deal with the 175000 tons that will exit the flue stack. If the scrubbers are 99% efficient that leaves 1750 tons emitting into our atmosphere which is approximately 5 tons per day of unknown PICs.This particulate matter will fall over a wide area including Monkstown and Ringaskiddy ,over schools ,sportsfields, houses and the sea.	Modelling of particulate matter emissions to air was completed on a conservative and worst-case basis, as documented in the appendices to Chapter 8 of the EIS. Informed by this modelling, the EIS concludes that the operation of the proposed development will not have a significant effect on concentrations of particulate matter in the air, and consequently will not lead to significant deposition of particulate matter in the wider area.
FI Sub - Robert Deane.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must: *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA*." Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Robert Deane.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "recovery". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Robert Deane.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Robert Deane.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to completeness, transparency, and the competency of experts.
FI Sub - Robert Deane.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Robert Deane.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Robert Deane.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Robert Deane.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Rosemary Fitzgerald.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must:* *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA."* Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Rosemary Fitzgerald.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "*recovery*". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Rosemary Fitzgerald.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Rosemary Fitzgerald.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	completeness, transparency, and the competency of experts.
FI Sub - Rosemary Fitzgerald.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations."* Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Rosemary Fitzgerald.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not included in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Rosemary Fitzgerald.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFPs are not relevant parameters for inclusion in the assessment as there are no limit

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Rosemary Fitzgerald.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.
FI Sub - Sara & Trevor McCarthy.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must:* *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA.*" Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Sara & Trevor McCarthy.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "*recovery*". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Sara & Trevor McCarthy.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Sara & Trevor McCarthy.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to completeness, transparency, and the competency of experts.
FI Sub - Sara & Trevor McCarthy.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Sara & Trevor McCarthy.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Sara & Trevor McCarthy.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Sara & Trevor McCarthy.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.
FI Sub - Sean Fitzgerald.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must: *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA*." Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Sean Fitzgerald.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "*recovery*". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Sean Fitzgerald.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Sean Fitzgerald.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to completeness, transparency, and the competency of experts.
FI Sub - Sean Fitzgerald.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Sean Fitzgerald.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Sean Fitzgerald.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Sean Fitzgerald.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	have been prepared in accordance with Irish and EU law.
FI Sub - Simon Buckley.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must:* *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA."* Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Simon Buckley.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "*recovery*". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Simon Buckley.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Simon Buckley.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to completeness, transparency, and the competency of experts.
FI Sub - Simon Buckley.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Simon Buckley.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Simon Buckley.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Simon Buckley.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.
FI Sub - Siobhan Fleming.pdf	Site Suitability	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).	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Siobhan Fleming.pdf	Inadequate EIS	Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement*', the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development.
FI Sub - Siobhan Fleming.pdf	Site Selection	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)	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry,

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Siobhan Fleming.pdf	Flood Risk	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).	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Siobhan Fleming.pdf	Visual Impact	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)	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development. In addition, as noted in Section 4.5.15 of the EIS, the levels of the low-lying parts of the site will be raised to 4.55mOD '*the ground levels in the western fields area of the site consisting of a 10,000m^3 area*[1] *will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 will also be raised to 4.55mOD'*. This will offer a very high standard of flood protection to the site.
FI Sub - Siobhan Fleming.pdf	Zoning	Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the lndaver 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 Ma REI 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.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09'*. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states *'Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'.*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
FI Sub - Siobhan Fleming.pdf	Site Notices	Further, site notice posting has been non-compliant in relation to this submission. The submission site maps indicate that five site notices will be in position. From the beginning of the period, notice number 4 has been missing from entrance by Gobby Beach. More recently, site notice number 2 is missing. This is in contravention of the site notice requirements.	The site notices were regularly checked and replaced immediately if found missing.
FI Sub - Siobhan Fleming.pdf	Request for additional information	Under Article 103 of Planning Regulations 2001, I request that ABP seek additional information addressing: Alternative Site Assessment: Comprehensive assessment of alternative sites	As outlined in Chapter 3 - Alternatives, a description of the reasonable alternatives studied by Indaver, which are relevant to the Ringaskiddy Resource Recovery Centre proposal and its specific characteristics, and indication of the main reasons for the option chosen, including a comparison of environmental effects was provided.
FI Sub - Siobhan Fleming.pdf	Request for additional information	Cumulative Impact Analysis: Detailed assessment of Cork Harbour cumulative effects from industry and transport	Chapter 16 - Cumulative Impacts, Other Impacts and Interactions presents an assessment of the cumulative effects, indirect effects, secondary effects, transboundary effects and the interaction/inter-relationship of effects between the various environmental factors as a result of the proposed development. The chapter also addresses other environmental effects which have not been specifically addressed in the individual chapters of the EIS.
FI Sub - Siobhan Fleming.pdf	Request for additional information	Climate Impact Verification: Independent verification of calculations	Potential climate impacts from the proposed development are outlined in Chapter 6 - Climate, including mitigation and monitoring measures to ensure that GHG emissions are minimised wherever possible during the construction and operational phase of the proposed development. The methodology for calculating GHG emissions is outlined in detail in Section 9.2.3 of Chapter 9 of the EIS using USEPA, IPCC and EU standards methods and approaches. In addition, the detail inputs and

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			outputs from the calculations have been included in Chapter 9.
FI Sub - Siobhan Fleming.pdf	Request for additional information	Infrastructure Capacity Confirmation: Definitive capacity statements from service providers	Indaver has engaged with statutory bodies and other interested parties regarding its plans for the Ringaskiddy Resource Recovery Centre, which include service providers such as Gas Networks Ireland, ESB Networks, Open Eir, EirGrid and Irish Water. Refer to Appendix 1.2 Consultation.
FI Sub - Siobhan Fleming.pdf	Request for additional information	Emergency Management Plan: taking into consideration the adjacent Hammond Lane metal recycling facility which has a poor safety record and frequent explosions; the proximity of the YARA Fertiliser Packaging facility, listed in the submission as merely a '*warehouse*'; the presence of the entire Irish Navy on an island with egress only by passing the incinerator, metal recycling and fertiliser facility; the presence of two public access parks and slipways with similar egress constraints; the presence of the UCC Beaufort research centre and the MTU Maritime College the former having the same egress constraints and the latter being adjacent to both Hammond Lane and YARA and within metres of the proposed waste disposal/ incinerator site.	As outlined in Chapter 4 - Description of the Proposed Development, a Site Emergency Plan will be prepared prior to operational start-up, which will set out the response measures to be taken by personnel in the event of an emergency. These measures will be designed to ensure maximum protection to site employees, site visitors and people in other premises near the site, to limit property damage and to minimise the impact on site operations and on the environment. The Site Emergency Plan will have four basic components, Prevention, Preparedness, Response, and Recovery. Prevention involves identifying potential hazards and then taking measures to remove the hazard or reduce the potential for the hazard and its adverse effects. Preparedness starts with Emergency planning, training programmes, emergency drill and exercise programmes which are integral components of an effective preparedness programme. The site will have a dedicated '*emergency response team'*, which will be given specific training. Evacuation routes will be defined, and all personnel will be aware of them. The site will be manned on a continuous basis. Response activities address the immediate and short-term effects of an emergency. Recovery activities and programmes involve restoration of site services and systems to normal status.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Siobhan Fleming.pdf	National Planning Framework (NPF) Conflicts	NPF Objective 91 states: "*Ensure that the strategic development of major waste management facilities is guided by the National Waste Management Plan for a Circular Economy and regional waste management plans*." Breach Identified: • Planning Report (Issue 2025, p.45) fails to demonstrate compliance with circular economy hierarchy • No evidence of waste prevention/reduction measures as required by NPF National Policy Objective 64 • Contradicts NPF's emphasis on sustainable transport (NPF Objective 27) due to coastal location increasing transport distances	As described in Chapter 2 and 4 of the EIS, the proposed development provides infrastructure which forms part of Ireland's delivery of a circular economy. Other measures are being implemented nationally to provide waste prevention and reduction measures, to ensure that only material which cannot be recycled or composted will be directed to the proposed development. The site is close to major generators of waste materials, as outlined in Chapter 3 of the EIS. Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Siobhan Fleming.pdf	National Planning Framework (NPF) Conflicts	NPF Objective 35 requires: "*Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes*." BREACH IDENTIFIED: • Site selection prioritizes industrial zoning over sustainable urban consolidation • Fails to consider brownfield alternatives in less sensitive sites • Conflicts with compact growth strategy outlined in NPF Chapter 4	NPF objectives for residential density are not relevant to this industrial site.
FI Sub - Siobhan Fleming.pdf	Regional Spatial & Economic Strategy (RSES) Violations	Southern RSES Regional Policy Objective 221 states: "*Support the circular economy and the development of the bio-economy through sustainable waste management in accordance with the waste hierarchy.*" BREACH IDENTIFIED: • Volume 4 South Cork Development Plan (p.156 demonstrates inadequate waste hierarchy assessment	Section 2.4.2.1 of the EIS describes how the proposed development aligns with the RSES, and with the waste hierarchy, reducing dependency on landfill. The proposed development does not preclude the implementation of RSES RPO 221, which relates to renewable energy generation and transmission, not bio-economy integration.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• No evidence of bio-economy integration as required by RSES RPO 221 • Fails to align with RSES Metropolitan Area Strategic Plan (MASP) objectives for Cork	Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Siobhan Fleming.pdf	Regional Spatial & Economic Strategy (RSES) Violations	RSES RPO 55 requires: "*Enhance the climate resilience of our cities, towns, villages and rural areas*." BREACH IDENTIFIED: • Climate impact assessment (EIS Chapter 15 inadequately addresses sea level rise impacts on coastal facility • Fails to demonstrate climate resilience measures required by RSES	Chapter 9 - Climate includes a full Climate Change Risk Assessment (CCRA), covering exposure, sensitivity and vulnerability to climate hazards, including coastal flooding and extreme weather. Adaptation measures to increase project resilience are identified. Additionally, the proposed development incorporates a minimum flood defence level of 4.55 mOD, which exceeds the projected 1-in-200-year tidal level even when a 1.0 m conservative climate-change allowance is added (resulting in 3.87 mOD). This provides a "*very high standard of flood protection*" for all site infrastructure. The L2545 road upgrade includes raising a 190 m section of road above the 1-in-200-year design tidal water level to ensure climate resilient access to the facility.
FI Sub - Siobhan Fleming.pdf	County Development Plan Zoning Conflicts	Cork County Development Plan 2022, Volume 4 South Cork, Objective RK-GO-02 states: "*Protect and enhance the environmental quality and heritage value of Ringaskiddy and its environs*." BREACH IDENTIFIED: • Landscape Design Report (Issue 2025, p.23) fails to demonstrate heritage value protection • Industrial development conflicts with environmental quality enhancement objectives and site zoning as *'educational or research'*	As outlined in the Landscape Design Report, The Ringaskiddy Martello Tower is an important historic element to the area and is located the southwest of the proposed development on the top of the ridgeline. View lines to and from the tower have been an important consideration in determining the site layout and building form of the proposed development. As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• Contradicts specific Ringaskiddy area objectives outlined in Volume 4, Section 3.2	development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Siobhan Fleming.pdf	County Development Plan Zoning Conflicts	Zoning Map Reference: Sheet 14, Cork County Development Plan 2022 Conflict: Proposed development exceeds appropriate scale for 1-1 Industrial zoning as defined in CDP Table 3.1 A technical analysis in Geographical Information Systems demonstrates that nearly all the proposed buildings (>99% footprint) falls into the RY-I-09 parcel zoned for education.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09*'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……..Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'
FI Sub - Siobhan Fleming.pdf	Planning and Development Act 2000 Breaches	Section 34(6) - Proper Planning Considerations "*The planning authority or the Board may only grant permission if satisfied that the proposed development would be consistent with the proper planning and sustainable development of the area*." BREACH IDENTIFIED: • Coastal location conflicts with sustainable development principles. An individual would not be permitted to construct a house on this site. • Coastal site subject to severe erosion and flooding. lndaver incorrectly claim to own the beach outside their site per Plate 2 from Planning Report page 6 .. • Increased transport emissions contrary to climate objectives • The visual impact on the Cork Harbour landscape, the second target natural harbour in the world, is wholly incompatible with proper planning	Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission. The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site. As outlined in Chapter 9 - Climate, it is predicted that in 2029, the construction phase of the proposed development will increase CO_2 emissions by no more than 0.0033% of the Transport Sectoral Emission Ceiling 2030 target. Additionally, the transport associated greenhouse gas savings due to the proposed development replacing the landfilling of 240,000 tonnes of waste is approximately 1,070 tonnes of CO_2eq per annum. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.
FI Sub - Siobhan Fleming.pdf	Record of Protected Structures Breaches	BREACH IDENTIFIED: • Archaeological Impact Assessment (EIS Appendix 12.1) inadequately assesses impact on RPS No. 01642 (Haulbowline Island Naval Base) • Visual impact on protected structures contradicts guidance in Architectural Heritage Protection Guidelines (2011) RPS Reference: Cork County Council RPS, Entry 01 642 Impact: Proposed stack height (85m) creates adverse visual impact on protected naval heritage	As outlined in Chapter 14 - Archaeological, Architectural and Cultural Heritage, the Martello Tower is a part of a broader 19th century coastal defence network, which includes Haulbowline Martello tower (CO087-059002; PS578) and military buildings (fort; CO087-059003) on Haulbowline Island to the north. Views northward toward Haulbowline and Great Island, and southeast toward Camden Fort Meagher and Carlisle Fort Davis, will remain unaffected. The proposed development occurs in a context already shaped by industrial land use and does not represent an unprecedented form of development in the area. While some partial obstruction of views will occur and the open eastern backdrop to the tower will be affected, important sightlines, including those to and from Fort Mitchell on Spike Island, Haulbowline Martello Tower and military buildings on

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Haulbowline Island and the coastal forts at the harbour entrance, Camden Fort Meagher and Carlise Fort Davis, will remain largely intact.
FI Sub - Siobhan Fleming.pdf	Architectural Conservation Area Guidelines	Architectural Heritage Protection Guidelines for Planning Authorities (2011), Section 6.3 requires assessment of impacts on ACAs. BREACH IDENTIFIED: • Landscape and Visual Impact Assessment (EIS Chapter 13) fails to assess impact on Cobh ACA • No compliance with ACA Management Plan requirements • Contradicts heritage impact assessment methodology in DoEHLG Guidelines	Cobh Architectural Conservation Area lies outside the 1.5km architectural heritage study area, and the proposed development at Ringaskiddy will not affect the built fabric or character of the ACA. Any potential effects relating to distant views across Cork Harbour are addressed in Chapter 13 of the EIS. The proposed development is not located within or adjoining the Cobh Architectural Conservation Area and does not affect the built fabric or character of the ACA. Accordingly, the ACA management provisions relating to development within the ACA do not apply. The architectural heritage assessment in Chapter 14 of the EIS was undertaken with reference to Architectural Heritage Protection: Guidelines for Planning Authorities (DoEHLG, 2011), issued under Section 28 of the Planning and Development Act 2000 (as amended), including consideration of potential effects on architectural heritage assets and their settings within the defined study area of 1.5km from the proposed development site.
FI Sub - Siobhan Fleming.pdf	National Monuments Act Protections	National Monuments Act 1930, Section 12 protects recorded monuments. BREACH IDENTIFIED: • Archaeological assessment fails to adequately address impacts on RMP CO074-148 (Ringaskiddy Castle) • Geophysical survey methodology inadequate per NMS Guidelines for Archaeological Assessment • No evidence of consultation with National Monuments Service as required • Inadequately assess impact on the Napoleonic Martello Tower to the southwest of the site. The visual impact will be significant and will break the line of site between the tower and Spike Island.	The submission refers to RMP CO074-148 in association with "*Ringaskiddy Castle*". RMP CO074-148 relates to an ogham stone currently located in Cork City (UCC) and is not situated within the vicinity of the proposed development. No recorded monument identified as "*Ringaskiddy Castle*" is listed in the RMP within the study area assessed in the EIS. As set out in Section 14.6 of the EIS, a programme of licensed pre-construction archaeological investigation, including geophysical survey (where ground conditions permit) and archaeological testing, will be undertaken in consultation with the Cork County Council Archaeologist and under licence from the National Monuments Service, in accordance with the Policy and Guidelines on Archaeological Excavation (DoAHGI, 1999). These investigations will be carried out prior to the commencement of

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			construction works, ensuring that any archaeological material present will be appropriately identified and resolved prior to development. Consultation undertaken during preparation of the EIS is set out in Section 14.2.3 of the EIS. This included consultation with the National Monuments Service Archaeologist for County Cork and the Underwater Archaeology Unit, in addition to the Cork County Council Archaeologist and Conservation Officer. The Napoleonic Martello Tower (RMP CO087-053; PS No. 575) was identified as a sensitive heritage receptor within the study area. Potential effects on the tower and its setting were assessed in the EIS through the Archaeological, Architectural and Cultural Heritage assessment (Chapter 14) and the Landscape and Visual Impact Assessment (Chapter 11), supported by photomontages. The EIS acknowledges that the proposed development will introduce new built elements into views from the tower, including partial obstruction of views toward the north-eastern sector of Cork Harbour and part of Spike Island containing Fort Mitchell (RMP CO087-065003; PS No. 1272). Views between the Martello Tower and Spike Island form part of the wider visual relationship within Cork Harbour's historic defensive landscape rather than a specifically protected or designated view corridor. The effect on the tower's wider setting was assessed in the EIS as negative, moderate to significant (depending on viewpoint), and permanent in duration.
FI Sub - Siobhan Fleming.pdf	Landscape Character Assessment Conflicts	Cork County Landscape Character Assessment (2007), LCA 1 6 - Great Island and Environs identifies area as "*Very High Sensitivity*." BREACH IDENTIFIED: • LVIA methodology contradicts LCA sensitivity ratings • Fails to demonstrate compliance with landscape protection objectives • Visual impact assessment underestimates significance contrary to Guidelines for Landscape and Visual Impact Assessment (3rd Edition)	As outlined in Chapter 11 - Landscape and Visual Assessment, the EPA Guidelines (EPA 2022) provide a general methodology, including effect ratings and assessment structure, which is applicable across all environmental assessments. The GLVIA (Landscape Institute and IEMA 2013) provides specific guidance for landscape and visual impact assessments. A combination of the approaches outlined in the EPA Guidelines (EPA 2022) and in the GLVIA (Landscape Institute and IEMA 2013), supported by the professional experience and expertise of the

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			assessor, is utilised in the landscape and visual assessment.
FI Sub - Siobhan Fleming.pdf	Planning Regulation Non-compliance	Planning and Development Regulations 2001 (S. I . 600/2001), Article 94 requires adequate public notice. BREACH IDENTIFIED: • Site notice posting inadequate - site maps indicate that five site notices will be in position. From the beginning of the period, notice number 4 has been missing from entrance by Gobby Beach. More recently, site notice number 2 is missing. This is in contravention of the site notice requirements. Drawing of Site Notice Locations of which at least two (no. 4 and No. 2) have been non-compliant during the periods since announcement of latest submission • Newspaper notice in Irish Examiner insufficient circulation for affected area. • No notice in any local community newsletter or online forum contrary to best practice.	The site notices were regularly checked and replaced immediately if found missing. The planning authority Cork County Council identifies the Irish Examiner as a suitable publication for planning notices for this location. There is no statutory requirements for notices in any local community newsletter or online forums.
FI Sub - Siobhan Fleming.pdf	Aarhus Convention Violations	European Communities (Access to Information on the Environment) Regulations 2007 (S. I . 1 33/2007), Article 7 requires effective public participation. The manner in which the Environmental Impact Statement (EIS) and associated documentation have been made available to the public is inconsistent with the requirements of the Aarhus Convention and the EIA Directive. The EIS is fragmented into more than 139 separate files, each requiring individual download, and these files were hosted on a non-secure server that generated technical warnings. This approach creates unnecessary barriers to access and undermines the principle of effective and practical public participation. Aarhus requires that environmental information be provided in a timely, transparent, and easily accessible format. The current system fails to meet these standards, as it is neither user-friendly nor digitally accessible in a consolidated manner. Consequently, the public's ability to review and comment meaningfully on the proposal has been significantly impaired, which constitutes a procedural deficiency in the consultation process.	The planning documentation is divided into separate files to avoid having large size files which could constrain download and limit access to the environmental information.
FI Sub - Siobhan Fleming.pdf	EIA Directive Public Participation Requirements	EIA Directive (2014/52/EU), Article 6 requires early and effective public participation. BREACH IDENTIFIED:	The current process is a response to an RFI from ACP for an application which was already subject to public consultation.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• No public consultation occurred in relation to this submission. • Previous '*consultation*' was inadequate, consisting only of the presentation of finished designs • No evidence of consultation feedback integration into design • Fails to meet "*early and effective*" participation standard • Lack of multilingual access (...)	The updated EIS and NIS submitted in 2025 are part of the application process commenced in 2016 and build on the application process to date, including the public consultation documented in section 1.9 of Appendix 1.2 – Consultation. In addition, the updated EIS and NIS submitted in 2025 were the subject of public consultation during 6 October 2025 – 17 November 2025.
FI Sub - Siobhan Fleming.pdf	Digital Security Oversight as Indicator of Systemic Risk	The fact that official planning documents were distributed via insecure download links-despite the site appearing to use HTTPS-reveals a fundamental lapse in digital governance. For a facility that will operate with high automation, remote control systems, and integrated data flows, such negligence is not a trivial technicality but a warning sign of deeper vulnerabilities. If basic file transfer security cannot be guaranteed using a regulated planning process, it raises legitimate doubts about the applicant's ability to safeguard critical operational systems over a 30-year lifespan. Cybersecurity failures in industrial control environments are not hypothetical; they have caused catastrophic shutdowns and environmental incidents globally. This oversight suggests a culture of minimal compliance rather than proactive risk management, making the proposed plant inherently unsuitable for approval under EU and Irish law obligations for essential service operators. - It shows lack of attention to detail in compliance with best practices for secure data handling. - Public consultation materials should meet current cybersecurity standards, especially for sensitive environmental projects. - It might suggest outdated IT practices, which could undermine confidence in their ability to manage complex, long-term infrastructure under evolving regulatory and technological standards.	The public website for the project is a stand-alone site hosted by a provider. It is not part of, or connected to, any of Indaver's systems or sites as its purpose was for making information on the application readily available to members of the public. Consequently, high levels of security were not deemed to be necessary.
FI Sub - Siobhan Fleming.pdf	Material Objections Unaddressed	Previous consultation responses (2019 application) raised unresolved issues: UNADDRESSED CONCERNS: • Safety concerns from Ringaskiddy Residents Association • Marine ecology impacts raised by Coastwatch Ireland • Air quality concerns from Cork Environmental Forum • No evidence these material concerns addressed in current application	As outlined in Chapter 6 - Population and Human Health, Indaver carried out a hazard identification and risk assessment (HAZID&RA) for the proposed development. This is included as Appendix 6.1 to this EIS. Marine ecology impacts are addressed in Chapter 12 - Biodiversity.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Air quality impacts are addressed in Chapter 8 - Air Quality.
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	EU -Wide Moratorium on New Incinerators • 156 NGOs and Zero Waste Europe have called for an EU-wide moratorium on new incinerators due to: o Overcapacity (220 million tonnes). o Climate liability (high CO_2 emissions from plastics). o Health risks (dioxins, PFAS, heavy metals). • Recommendation: Reclassify incineration as a disposal operation, not recovery.	As outlined in Section 2.2.1.3 of Chapter 2 of the EIS, in 2017 the European Commission published a Communication on the role of waste-to-energy in the circular economy to enhance synergies between the circular economy, resource efficiency and waste-to-energy. It seeks to provide guidance to Member States on how to achieve properly balanced waste-to-energy capacity. It also affirms that the waste hierarchy remains as the cornerstone of EU policy and legislation and is a key to a transition to a circular economy. The Communication refers to a European Environment Agency study which suggests there is currently no incineration overcapacity in the EU as a whole and in certain Member States where there is excessive reliance on waste to energy (e.g. due to high heat demand from district heating networks) then a moratorium on new facilities may be an appropriate measure. An analogous situation does not arise in Ireland. Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	Inclusion of Incineration in the EU Emissions Trading System (ETS) • Municipal waste incineration is under review for ETS inclusion by 2028. • CO_2 pricing could make incineration financially unviable.	The European Parliament in a 2026 Briefing - Towards climate neutrality - Revision of the EU emissions trading system reports that by 31 July 2026, the EU ETS Directive mandates the European Commission to assess the feasibility of including

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• ETS inclusion would incentivize recycling and prevention over combustion.	installations for the incineration of municipal waste (MWI) within the ETS1, which could potentially lead to surrendering requirements from 2028. Member States should have the possibility to opt out from MWI until 31 December 2030, following a Commission assessment. The Commission will also assess expanding the EU ETS scope to other waste management processes, in particular landfilling. The EU Bioeconomy Strategy 2025 and Extended Producer Responsibility are measures that seek to reduce the use of fossil-based materials in products and ultimately reduce the source of fossil CO_2 emissions at their end-of-life in a Waste-to-Energy (WtE) installation, see Chapter 2, Sections 2.2.1.1 and 2.2.2.2 of the 2025 EIS. In the event that WtE is included in ETS1 the cost pass through will be based on the polluter pays principle. CEWEP - Confederation of European Waste-to-Energy Plants in a response to the European Commission Call for Evidence on the Review of the EU ETS for maritime, aviation and stationary installations, and of the Market Stability Reserve states that Waste-to-Energy (WtE) waste incineration with energy recovery, provides a sanitary service to communities by treating residual waste that cannot be prevented or recycled. There is no empirical evidence that the inclusion of WtE in the EU ETS will foster recycling and separate collection. The increase of recycling through separate collection must remain one of the focal points in waste management.
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	Circular Economy Act (2026) & Action Plan (2024-2030) • Aims to double circularity rate from 12% to 24% by 2030. • Promotes: o Digital product passports . o Extended producer responsibility (EPR) . o Eco-design for reuse and repair.	CEWEP - Confederation of European Waste-to-Energy Plants in a response to the European Commission Call for Evidence on the Review of the EU ETS for maritime, aviation and stationary installations, and of the Market Stability Reserve states that Waste-to-Energy (WtE), waste incineration with energy recovery, provides a sanitary service to communities by treating residual waste that cannot be prevented or recycled. Circular Economy interventions such as Extended producer

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		• Incineration is excluded from sustainable finance under the EU Taxonomy.	responsibility (EPR) and polluter pays principles are welcomed to improve the reuse and recyclability of materials, see Chapter 2, Section 2.2.1.1 of the 2025 EIS. Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. The 2025 EIS in Chapter 2, Section 2.2.1.1 states that thermal recovery also supports high quality recycling by treating polluted and complex waste, thereby keeping harmful substances out of the Circular Economy. Finally, thermal recovery facilities can contribute to recycling through extraction of ferrous and non-ferrous metals. Future EPA end-of-waste determinations will permit the use of incinerator bottom ash as a secondary raw material further contributing to the circular economy, see Chapter 2, Section 2.2.2.2 of the 2025 EIS.
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	Non-Combustive Alternatives Gaining Ground • Gasification, pyrolysis, anaerobic digestion, and plasma arc recycling are: o More efficient. o Lower in emissions. o Scalable by 2040-2050. • Al-powered sorting and robotic recycling are improving material recovery rates.	Anaerobic Digestion was not considered as an alternative thermal treatment technology for residual municipal waste because it is not a suitable treatment technology for this waste. As outlined in Chapter 2 of the EIS, the National Waste Management Plan for a Circular Economy 2024-2030 took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. Section 3.5.1 of Chapter 3 of the EIS on alternatives considers gasification and pyrolysis technologies as

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			alternatives to more traditional waste-to-energy combustion technology but concludes overall that "*due to the range of residual waste streams to be handled at the Ringaskiddy Resource Recovery Centre, the absence of any reference plant operating to the scale required for the waste streams required, the robustness of the technology and the focus on energy recovery, pyrolysis and gasification technology were not considered as reasonable or practical alternatives to proven waste combustion technology*". Plasma Arc technology is a gasification process but it is not a commercially available technology in the market for the treatment of municipal waste.
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	Ireland 's National Waste Management Plan (2024-2030) • Targets 0% waste growth per ca pita . • Warns against over capacity in incineration. • Emphasizes: o Reuse, repair, and recycling infrastructure. o Commercial sector waste reduction. o Throughput caps and sunset clauses for WtE facilities.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	Revised Industrial Emissions Directive (2024) • Requires: o Continuous emissions monitoring. o Public data transparency. o Compensation rights for pollution victims. • Incinerators must meet Best Available Techniques (BAT) with tighter limits.	Continuous emissions monitoring will be undertaken as part of the IE Licence for the Indaver site, with records available for public access on the EPA website. Additionally, refer to Appendix 4.4 Compliance with Best Available Techniques (BAT) of Chapter 4 Description of the Proposed Development for review of the proposed activities on site in the context of any applicable Best Available Techniques (BAT).
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	Environmental Crime Directive (2024) • Expands scope of offences to include:	As documented in Section 4.7 of the EIS, the design of the facility is based on the most up-to-date technology. The operation of the proposed facility will be regulated by the Environmental Protection

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		o Illegal recycling. o Pollution from incineration residues. • Introduces fines up to 5% of global turnover for companies.	Agency, as a licensed operation and subject to an Industrial Emissions licence, similar to the Indaver Waste-to-Energy facility in Carranstown, Co. Meath. The provisions of that licence will require ongoing compliance with all relevant Directives, and its operation will be compliant with all relevant Best Available Techniques (BAT), BAT Conclusions, and BAT Reference documents. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive
FI Sub - Siobhan Fleming.pdf	Future Waste Management Trends Overlooked in the Indaver Plan	Strategic Implications for the lndaver Plan Given these trends, the lndaver proposal risks: • Technological obsolescence by 2040. • Regulatory non-compliance post-2030. • Financial exposure due to ETS and exclusion from green finance. • Legal vulnerability under new EU directives.	The proposed development represents current technology for waste-to-energy facilities. The operation of the proposed development will remain compliant with current regulations for the duration of operation.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 282 Assertion Text "*There is potential for a significant opportunity for health improvements associated with the proposed development*" Evidence Deficiency No quantitative health impact studies, baseline health data, or methodology for measuring "*significant opportunity*"	As outlined in Chapter 6 - Population and Human Health, health improvements associated with the proposed development include the potential for economic development as well as tourism which in itself is associated with an improvement in health status. Additionally, it could help to provide extra opportunities for recreation and exercise as well as health and education facilities.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 282 "*The Community Benefit Fund of approximately €240,000 per year has the potential to provide real health improvements*" Evidence deficiency No evidence of how monetary fund translates to measurable health outcomes; no comparative analysis with other community health interventions	As outlined in Chapter 6 - Population and Human Health, health improvements associated with the proposed development include the potential for economic development as well as tourism which in itself is associated with an improvement in health status. Additionally, it could help to provide extra opportunities for recreation and exercise as well as health and education facilities.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 106 "*The proposed development could make a significant contribution toward supporting the provision of 200,000 to 300,000 tonnes of additional dedicated thermal recovery capacity*" Evidence deficiency No feasibility studies voice demonstrating how this specific facility achieves national capacity targets; no analysis of alternative solutions	As outlined in Appendix 3.1, Volume 1 of the National Waste Management Plan for a Circular Economy 2024-2030 states that there are 2no. dedicated thermal treatment plants with 910,000 tonnes per annum capacity and operating at capacity. The Plan also provides for continued and expanded residual waste treatment capacity within the State to move towards self-sufficiency and reduce the reliance on the export of waste materials. Future development of waste treatment capacity must ensure that circular policies including prevention, reuse/repair and recycling are not compromised by the provision of new recovery infrastructure. Specifically, Targeted Policy TP14.2, supports the provision of 200,000 to 300,000 tonnes of additional dedicated thermal recovery capacity for the treatment of non-hazardous residual wastes nationally, to ensure there is adequate active thermal treatment capacity.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol2, Page 42 "*This is enough energy to power approximately 30,000 homes annually and replaces non-renewable fossil fuels in the generation of electricity, which is a significant, positive, long term residual impact*" Evidence deficiency No lifecycle analysis comparing as fact environmental costs vs benefits; no quantification of "*significant*" in context of national energy grid	Every development (including the proposed development) that replaces the use of fossil fuels for electricity generation in the long term provides a positive long-term benefit.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 723 "*The proposed development will have a beneficial residual impact as it will reduce the quantity of hazardous waste being exported to Europe for disposal*" Evidence deficiency No data on current export volumes, alternative treatment options, or economic analysis of waste management alternatives	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the EPA's Circular Economy and Waste Statistics Highlight Report 2022 a total of 15.7 million tonnes of waste was generated in Ireland in 2022, which equates to 8 kg per person every day. Between 2016 and 2022, municipal waste generation increased from 2.7 million tonnes to 3.19 million tonnes, of which 1.24 million tonnes or 39% was exported for treatment. Additionally, the report highlights that 220,000 tonnes or 57% of hazardous waste was exported for treatment in 2022.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Additionally, alternative treatment technologies were assessed in Chapter 3 - Alternatives of the EIS.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	Planning Report, Page 31 "*The cumulative Report, effect of existing and known proposed developments on the landscape character will be negative in the short term but is deemed to be positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area to a more developed cluster of industry, energy and education campus style landscape*" Evidence deficiency No landscape architecture studies, visual impact assessments over time, or evidence supporting "*campus style*" transformation	As outlined in the Landscape Design Report, the landscape and external works design have been been prepared by a qualified landscape architect who will also supervise the implementation of all works. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 289 *"When the proposed development becomes operational, it is anticipated that 63 people will be employed at the facility. It is estimated that the employment provided will contribute positively to the economy of the South Cork area"* Evidence deficiency No economic impact analysis, multiplier effects study, or comparison analysis with alternative economic development strategies	The provision on new employment opportunities is self-evidently a positive contribution to the economy. The focus of an EIS is identifying potential significant environmental effects and it does not include detailed economic analysis.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol, Page 299 *"From health protection terms strong evidence is that there will be no deleterious effects*" Evidence deficiency No citation of specific studies constituting "strong evidence"; contradicts acknowledged uncertainty in health impact literature	As outlined in Chapter 6 - Population and Human Health, specific health issues such as respiratory symptoms and illness, reproductive effects, and cancer have been addressed. Different studies are cited for each health issue addressed. There have been a large number of studies on the health effects of incineration. There was some evidence particularly with older types of incinerators with higher levels of emissions, of environmental health effects. With modern incinerators with highly controlled levels of emissions no reputable study has shown any significant health effects.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			While some would caution that some effects could take a long time to materialise, for any realistic assessment this is extremely reassuring and of course very much in keeping with what we would expect due to reduced and strictly controlled emissions associated with modern incinerators.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 710 "*This considerable sum of money on an ongoing basis for the community has major potential to provide improved access to services and health improvements*" Evidence deficiency No analysis of €240,000 annual fund in context of community without needs, alternative funding sources, or evidence of health service improvements. Reduced annual amount compared to 2016 submission.	As outlined in Chapter 6 - Population and Human Health, the Community Benefit Fund of approximately €240,000 per year has the potential to provide real health improvements. It could help to provide extra opportunities for recreation and exercise as well as health and education facilities. In addition, the Community Benefit Fund will have the potential to add local amenities.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 131 "*High-quality International Connectivity "(National Strategic Outcome)"* Evidence deficiency No definition of "*high-quality*" standards or metrics for assessment	It is unclear what this submission point refers to, no chapter of the EIS has as many pages as 131.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 287 "*The emissions to atmosphere from the proposed development will be extremely low with no adverse effects on the environment envisaged*" Evidence deficiency No comparative analysis with other industrial facilities; no cumulative impact assessment methodology	As outlined in Chapter 8 - Air Quality, a detailed cumulative assessment of the proposed development and the relevant industrial emission sources has been carried out using the methodology outlined by the USEPA. The effect of relevant nearby air emission points sources (Janssen Sciences Ireland, Hovione Cork, Thermo Fisher Scientific Ireland Ltd, ESB Aghada, Recordati Ltd, Sterling Pharma Ringaskiddy Ltd, Pfizer Ireland Pharmaceuticals and BGE Whitegate) have been modelled in detailed as outlined in Appendix 8.4. The conclusion of the cumulative assessment study is that there is no significant overlap between the various emission sources and the proposed development and that all air pollutants emitted from the will remain in compliance with the ambient air quality standards.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	Landscape Report, Page 1 "*High-quality landscaping will contribute to transitioning Ringaskiddy to a corporate campus style landscape*" Evidence deficiency No landscape architecture principles, environmental impact studies, urban design evidence	As outlined in the Landscape Design Report, the landscape and external works design have been been prepared by a qualified landscape architect who will also supervise the implementation of all works. Potential impacts on landscape are assessed in Chapter 11 - Landscape and Visual Assessment.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol2, Page 107 "*Growth will be regenerative, climate neutrality will be a reality, and inequalities will have been significantly reduced* " Evidence deficiency No methodology for measuring inequality reduction or causal relationship to proposed development	This submission point does not provide context and it's unclear what this submission point refers to.
FI Sub - Siobhan Fleming.pdf	Unsubstantiated claims in the submission	EIS Vol 2, Page 123 "*The proposed development aligns with and contributes towards the attainment of European and national energy policy objectives*" Evidence deficiency No quantitative analysis of contribution to policy targets; no assessment of alternative energy investments	EIS Vol 2 Main Text, Chapter 2, Section 2.3 Energy and Climate Change Policies indicates that the proposed Ringaskiddy facility will generate approximately 9.25 MW renewable electricity for export to the national Grid. An assessment of alternative treatment technologies was considered in Section 3.5 of Chapter 3 of the 2025 EIS and the rationale for the technology selection is explained in Section 3.6 of Chapter 3.
FI Sub - Siobhan Fleming.pdf	Most Problematic Assertions Tier 1: Fundamental Unsubstantiated Claims	"*Strong evidence that there will be no deleterious health effects*" o Critical Issue: Contradicts scientific uncertainty in health impact literature o Evidence Required: Comprehensive epidemiological studies, independent health assessment	As outlined in Chapter 6 - Population and Human Health, effects on human health from the proposed development during construction and operation were assessed. While some studies, particularly in the past, report health effects in relation to incinerators, nearly all of these studies are, by their nature, historical and refer to toxic or industrial burning processes. These virtually all pre-date modern technology and the associated large decreases in emissions. They also pre-date current regulatory restrictions on allowable

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			emissions such as the EU Air Quality Directive and the EU Industrial Emissions Directive. We know from direct experience that modern incinerators operate well within these stringent guidelines. The Indaver waste-to-energy facility in Meath, widely predicted by objectors in advance of it's commissioning to greatly exceed those limits, has in operation been a great example of a well-run facility. Modelling for emissions of particulate matter in the form of PM_{10} and $PM_{2.5}$ does not support any likelihood of a detrimental health effect. There has been nothing published in recent literature which would significantly change this position. Overall, there is little evidence to suggest that waste incinerators are associated with the increased respiratory symptoms, or other medical conditions, in the surrounding population. This is consistent with the data from risk assessments, emissions and ambient air monitoring in the vicinity of incinerators, which indicate that modern, well-managed facilities make a very small contribution to background levels of air pollution. Multiple reputable reviews quoted within Chapter 6 support this position. The fact that the proposed development will be operated in accordance with the strict terms of the EU Industrial Emissions Directive, means that emissions will be lower than from practically all facilities assessed in publications cited herein, reducing even further any possible risk. The Emissions Compliance Report (Indaver, 2025), submitted to the EPA on emissions from the Indaver facility in Carranstown, Co. Meath states that the plant operates well below the Legal licensed limit and there have been no exceedances over the 5 years to 2023.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			All information available on the proposed development therefore, both from modelling and from actual results of a similar facility in Ireland, indicates that all emissions will be well within the statutory Air Quality Standards. These provide strong evidence that there will be no deleterious effect on human health either in the immediate vicinity or in the wider context, due to its operation.
FI Sub - Siobhan Fleming.pdf		"*Significant contribution to national waste management capacity*" o Critical Issue: No quantitative analysis of national capacity needs or alternatives o Evidence Required: National waste management capacity study, alternatives analysis	Refer to Chapter 2 - Policy and Planning Framework and Need for the Scheme which sets out the European Union (EU), national, regional and local waste policy and planning policy framework which underpins the proposed development. The chapter demonstrates the specific need for the proposed development in the context of the waste policy and planning policy framework. As outlined in Chapter 3 - Alternatives, a description of the reasonable alternatives studied by Indaver, which are relevant to the Ringaskiddy Resource Recovery Centre proposal and its specific characteristics, and indication of the main reasons for the option chosen, including a comparison of environmental effects was provided.
FI Sub - Siobhan Fleming.pdf		"*Beneficial residual impact on waste export reduction*" o Critical Issue: No data on current export patterns or market capture assumptions o Evidence Required: Waste flow analysis, market capture study	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the EPA's Circular Economy and Waste Statistics Highlight Report 2022 states that a total of 15.7 million tonnes of waste was generated in Ireland in 2022, which equates to 8 kg per person every day. Between 2016 and 2022, municipal waste generation increased from 2.7 million tonnes to 3.19 million tonnes, of which 1.24 million tonnes or 39% was exported for treatment. Additionally, the report highlights that 220,000 tonnes or 57% of hazardous waste was exported for treatment in 2022.
FI Sub - Siobhan Fleming.pdf	Tier 2: Subjective Value Judgments	"*High-quality landscaping* " and "*campus-style landscape*" o Critical Issue: Undefined aesthetic standards presented as objective benefits	As outlined in the Landscape Design Report, the landscape and external works design have been been

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		o Evidence Required : Professional landscape architecture assessment with defined standards	prepared by a qualified landscape architect who will also supervise the implementation of all works.
FI Sub - Siobhan Fleming.pdf	Tier 2 : Subjective Value Judgments	"*Considerable sum*" for community benefit fund o Critical lssue: No comparative context for €240,000 annual fund. This proposed fund (seen by the community as tantamount to blackmail) is less than that proposed in previous submissions. o Evidence Required: Community needs assessment, comparative funding analysis	As outlined in Chapter 6 - Population and Human Health, the existing Indaver facility in Meath contributes to a Community Benefit Fund as part of the planning conditions of that facility. The Meath fund is administered by the Indaver Community Liaison Committee, which was established in 2009 prior to the main construction works period. The Committee in Meath is made up of two representatives from the local resident's association, two local area councillors, two members of Indaver and two members of the local authority, who also act as administrators of the fund. So far in Meath, the fund has amounted to over €3,000,000 which has been invested in a range of important projects and community initiatives, such as: • the construction and lighting of a new safe footpath; • financing the construction of a school building, and • supporting local cultural, community, arts and sports groups/clubs.
FI Sub - Siobhan Fleming.pdf	Critical evidence gaps	**1. Quantitative Health Impact Assessment** **Missing**: Baseline health data, epidemiological studies, dose-response analysis taking into account the CUMULATIVE impact of all industrial activity in Cork Harbour. **Required**: Independent health impact assessment with measurable outcomes	As outlined in Chapter 6 - Population and Human Health, effects on human health from the proposed development during construction and operation were assessed. While some studies, particularly in the past, report health effects in relation to incinerators, nearly all of these studies are, by their nature, historical and refer to toxic or industrial burning processes. These virtually all pre-date modern technology and the associated large decreases in emissions. They also pre-date current regulatory restrictions on allowable emissions such as the EU Air Quality Directive and the EU Industrial Emissions Directive. We know from direct experience that modern incinerators operate well within these stringent

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			guidelines. The Indaver waste-to-energy facility in Meath, widely predicted by objectors in advance of it's commissioning to greatly exceed those limits, has in operation been a great example of a well-run facility. Modelling for emissions of particulate matter in the form of PM_{10} and $PM_{2.5}$ does not support any likelihood of a detrimental health effect. There has been nothing published in recent literature which would significantly change this position. Overall, there is little evidence to suggest that waste incinerators are associated with the increased respiratory symptoms, or other medical conditions, in the surrounding population. This is consistent with the data from risk assessments, emissions and ambient air monitoring in the vicinity of incinerators, which indicate that modern, well-managed facilities make a very small contribution to background levels of air pollution. Multiple reputable reviews quoted within Chapter 6 support this position. The fact that the proposed development will be operated in accordance with the strict terms of the EU Industrial Emissions Directive, means that emissions will be lower than from practically all facilities assessed in publications cited herein, reducing even further any possible risk. The Emissions Compliance Report (Indaver, 2025), submitted to the EPA on emissions from the Indaver facility in Carranstown, Co. Meath states that the plant operates well below the Legal licensed limit and there have been no exceedances over the 5 years to 2023. All information available on the proposed development therefore, both from modelling and from actual results of a similar facility in Ireland, indicates that all emissions will be well within the statutory Air Quality Standards. These provide strong evidence that there will be no deleterious effect on human health

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			either in the immediate vicinity or in the wider context, due to its operation. Additionally, a cumulative impact assessment on Population and Human Health was undertaken, which included proposed projects with other industrial facilities such as Janssen Sciences and Pfizer Ireland. Refer to Chapter 16 Cumulative Impacts, Other Impacts and Interactions, for a detailed description of each project/development assessed.
FI Sub - Siobhan Fleming.pdf	Critical evidence gaps	**2. Economic Impact Analysis** **Missing**: Cost-benefit analysis, economic multiplier studies, opportunity cost assessment taking into account the loss of tourism and green space adjacent to the coast. **Required**: Comprehensive economic impact study with quantified benefits/costs	The focus of an EIS is identifying potential significant environmental effects and it does not include detailed economic analysis.
FI Sub - Siobhan Fleming.pdf	Critical evidence gaps	**3. Environmental Lifecycle Assessment** **Missing**: Cradle-to-grave environmental impact analysis, carbon footprint assessment **Required**: Full lifecycle analysis comparing alternatives	The full lifecycle for the proposed development is assessed for each topic on the EIS. The carbon impact assessment for the proposed development is assessed in Chapter 9 - Climate. Environmental considerations were considered where relevant for alternatives as documented in Chapter 3 of the EIS. The climate assessment undertook a detailed assessment of the climate impact of the facility including assessing CO_2eq emissions from the transport of waste, raw material and ash to and from the facility. In addition, the CO_2eq from the operation of the facility which will emit 124,700 tonnes per annum of CO_2eq was calculated and the net power saving of 55,600 tonnes per annum and savings from diversion from landfilling of 91,800 tonnes per annum also taken into account leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended). Furthermore, the alternative of landfilling was investigated and found to emit more CO_2eq than the Proposed Development.
FI Sub - Siobhan Fleming.pdf	Critical evidence gaps	**4. Landscape and Visual Impact Studies** **Missing**: Professional landscape architecture assessment, visual impact methodology. **Required**: Systematic visual impact assessment with defined standards	As outlined in the Landscape Design Report, the landscape and external works design have been prepared by a qualified landscape architect who will also supervise the implementation of all works. The visual impact assessment methodology is detailed in Section 11.2 of Chapter 11 - Landscape and Visual Assessment.
FI Sub - Siobhan Fleming.pdf	Critical evidence gaps	**5. Technology Performance Validation** **Missing:** Independent technical assessment, performance benchmarking. **Required:** Third-party technology validation and performance guarantees	Third-party technology validation and performance guarantees are not a requirement of the planning process.
FI Sub - Siobhan Fleming.pdf	Critical evidence gaps	**6. Company Safety and Performance Records** **Missing:** Full records of the company's track record on compliance, safety, planning extensions in all regions in which it operates. **Required:** Report on past Lost Time Incidents, Deaths, Near Misses, failures to meet agreed emissions limits	Detailed operational records are not relevant or appropriate to an EIS, however, the company's track record on compliance for a similar installation that has been in operation in Carranstown Co. Meath since August 2011 is a matter of public record. Health and Safety for construction and operation are described in Section 4.17 of Chapter 4 of the EIS. Relevant information with regard to the applicant is also available on their corporate website www.indaver.com.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Siobhan Fleming.pdf	Policy and Legal Non-Compliance	The proposal breaches the binding waste-hierarchy and policy-consistency duties in the Circular Economy and Miscellaneous Provisions Act 2022 and the National Waste Management Plan for a Circular Economy 2024-2030. It rests on repealed regional plans and obsolete tonnage data, creating a policy base that no longer exists at the date of determination. Without prejudice to those Acts, and in the alternative if either is found inapplicable or superseded, the same defects arise under Directive 2008/98/EC (Arts 4-11) and, further in the alternative, the Waste Management Act 1996 s. 32. These inconsistencies render the application ultra vires Planning and Development Act 2000 s. 37G(2)(b).	Page 7, Preamble of the National Waste Management Plan for a Circular Economy - Volume I: Current Situation and Challenges states: "*The Regional Waste Management Planning Offices (RWMPO) have prepared the National Waste Management Plan for a Circular Economy 2024-2030 (hereafter 'the Plan') which is the first national waste plan and sets out a framework for the prevention and management of waste in Ireland for the period 2024 to 2030. This Plan replaces the three existing Regional Waste Management Plans (RWMP) which were prepared in 2015. Section 22 of the Waste Management Act 1996, (WMA) requires local authorities (as the competent authorities) to individually, or jointly, make a waste management plan for non-hazardous waste (while also taking account of the provisions of the National Hazardous Waste Management Plan) in relation to each functional area. Under the WMA, these plans must:* *(i) Lay down measures to protect the environment and human health by preventing or reducing the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use;* *(ii) Be in accordance with the waste hierarchy set out in Section 21A;* *(iii) Meet the protection of human health and the environment obligations set out in Section 32(1); and* *(iv) Meet the principles of self-sufficiency and proximity set out in Section 37A.* *This Plan is prepared in accordance with Section 22 of the WMA (as amended by the Circular Economy Act 2022) and is published as a draft for consultation in accordance with Section 23 of the WMA."* Chapter 2, Section 2.2.2.2 of the 2025 EIS also outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Siobhan Fleming.pdf	R1 Ineligibility and Misclassification	The proposed facility cannot lawfully qualify as "*recovery*". Under Directive 2008/98/EC Annex II, installations achieving R1 < 0.65 are classified as D10 disposal. The Ringaskiddy design is electricity-only with no heat export or network, making that threshold physically unreachable. (...) Because recovery vs disposal is a statutory gate test, not a balancing exercise, any R1 < 0.65 compels D10 classification.	As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Siobhan Fleming.pdf	Economic Need, Market Logic, and Financial Viability	The claimed "*Southern Region capacity gap*" is unsupported by current national data. Residual waste is declining, and existing recovery capacity already meets projected 2030 arisings. Re-labelling national headroom as a regional deficit mischaracterises need and conflicts with national circular-economy governance. (...) Approving new D10-class capacity would generate stranded assets and fiscal lock-in contrary to the Circular Economy Act 2022 s.7(3), NWMP 2024-2030, and Directive 2008/98/EC Arts 4-11.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
FI Sub - Siobhan Fleming.pdf	Evidence, Data Integrity, and Methodology	The submission fails the statutory sufficiency and transparency tests of s.37G(2)(b) and EIA Directive Arts 5-6. The record is neither current nor	Chapter 1 - Introduction documents that the EIS meets the statutory requirements of Irish and European Law. This includes those relating to

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		reproducible. Such evidential gaps are structural defects, not curable by condition or further information.	completeness, transparency, and the competency of experts.
FI Sub - Siobhan Fleming.pdf	Unquantified Carbon Burden and Climate-Law Conflict	The application omits a full greenhouse-gas lifecycle and ETS-cost analysis. It projects roughly 190 000 t CO_2 per year for at least 30 years yet provides no integration with Ireland's carbon budgets or EU neutrality pathways. (…) The absence of quantified carbon and ETS data breaches binding obligations under the Climate Act 2021 and EU Climate Law 2021/1119. It prevents lawful determination of compliance with national budgets and cumulative-impact duties under Article 6(3).	The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes CO_2eq per annum and savings from diversion from landfilling of 91,800 tonnes CO_2eq per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: *"The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations."* Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Siobhan Fleming.pdf	Outdated Hydrological Baseline and Access Non-Compliance	The flood, drainage, and access design contravene the OPW 2022 Guidelines, Floods Directive 2007 /60/EC, and WFD 2000/60/EC Art 4(1)(c). The site remains within Flood Zone A/B and lacks a dry-egress route. These are Level 1-2 physical defects that cannot be cured by condition or minor redesign.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Siobhan Fleming.pdf	Scientific Uncertainty and Transient Emissions	The omission of PFAS, organofluorine, and UFP analysis leaves the environmental record incomplete. Under IED 2010/75/EU Annex VI and PDA 2000 s.37G(2)(b), the project cannot be shown to achieve BAT or to protect human health as required by EU law.	All pollutants outlined in Council Directive 2010/75/EU have been assessed and found to be in compliance with the ambient air quality standards set out in Air Quality Standards Regulations 2022 (S.I. 739 of 2022) which transposed EU Directive 2008/50/EC. PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. PCDF's are assessed as outlined in Chapter 8 Air Quality of the EIS. Section 4.20 of Chapter 4 of the EIS documents how the proposed development will comply with BAT, as required under the Industrial Emissions Directive.
FI Sub - Siobhan Fleming.pdf	Additional Legal and Procedural Grounds	These procedural and jurisdictional defects-bias risk, applicant irregularity, project-splitting, omission of alternatives and health, and transparency failures-each independently breach statutory and EU law. Collectively they confirm that the application cannot be lawfully determined under s.37G(2)(b) PDA 2000 or Article 6(3) Habitats Directive.	The application and assessments are compliant with the provisions of the Planning and Development 2000 (as amended). The relevant application documents have been prepared in accordance with Irish and EU law.
FI Sub - Sue Walsh B.E (Civil).pdf	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).	Having considered the reasonable alternative site locations, the conclusion in Section 3.3.3 in Chapter 3 of the EIS is that the Indaver-owned site is an appropriate site for the proposed development. An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			• **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Sue Walsh B.E (Civil).pdf	Unsuitable size, Zoning Conflict, Erosion/Flooding	The site is regularly prone to flooding and any raising of the site only increases its visual dominance.	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.
FI Sub - Sue Walsh B.E (Civil).pdf	Unsuitable size, Zoning Conflict, Erosion/Flooding	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 sirice 2000. (Daly 2017)	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Sue Walsh B.E (Civil).pdf	Unsuitable size, Zoning Conflict, Erosion/Flooding	lndaver 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 lndaver ever in the future look to Rock Armour the site it	As outlined in Chapter 13, the beach nourishment will reduce erosion rates by increasing beach levels i.e. reducing near shore water depth and wave heights and will protect the glacial till face from breaking waves, with the coastal boundary of the proposed development site being monitored for erosion on an annual basis.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		would create wave refraction causing extensive erosion to unprotected nearby coastline.	
FI Sub - Sue Walsh B.E (Civil).pdf	Unsuitable size, Zoning Conflict, Erosion/Flooding	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.	As outlined in Chapter 13, the net coastal sediment transport goes from south to north according to wind conditions and swell, therefore the material is likely to move towards the north in the medium and long term. The closest area of the Cork Harbour Special Protection Area (SPA) is located to the southwest of the site. Since the net movement of beach nourishment shingle is from south to north, the sacrificial material will not impact on this part of the SPA. Other sections of the SPA which are to the north of the site are more than two kilometres from the site and these are too remote from the site to receive any significant quantities of beach nourishment material. As outlined in Chapter 12 - Biodiversity, the material to be deposited will be similar to the existing material in this area and thus no changes in flora/fauna communities will occur. Additionally, as outlined in Appendix 13.3 Coastal Erosion Study, the sacrificial material will provide a beneficial solution for the site and the adjoining areas of the beach, including an increase in the local amenity value of the area by providing a pathway which is accessible to members of the public during all states of tide.
FI Sub - Sue Walsh B.E (Civil).pdf	Unsuitable size, Zoning Conflict, Erosion/Flooding	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.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Sue Walsh B.E (Civil).pdf	Unsuitable size, Zoning Conflict, Erosion/Flooding	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.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Sue Walsh B.E (Civil).pdf	Unsuitable size, Zoning Conflict, Erosion/Flooding	Add climate change to that picture: higher mean sea levels, more frequent storm surges and increased coincidence of spring tides with extreme weather.	The vulnerability of the proposed waste-to-energy facility to climate hazards has been assessed in Chapter 9 - Climate. Climate hazards considered

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		This is a rapidly changing coastline. This will not improve over the lifetime of a 30-40 year incinerator.	include flooding (coastal, pluvial, fluvial), extreme heat, extreme cold, wildfire, droughts, extreme wind, lightning, hail, landslides and fog. The assessment concluded that the proposed development has at most low vulnerabilities to the identified climate hazards. Thus, the likelihood of extreme weather is of low likelihood and with a low or medium exposure leading to a finding of low vulnerability and thus a not significant effect.
FI Sub - Sue Walsh B.E (Civil).pdf	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 nighttime roost of Great Crested Grebe sited very close to Gobby beach. A serious ecological assessment would erron the side of caution in a system like Cork Harbour. Instead, this assessment minimises constraints and uncertainty.	The surveys and ecological assessment documented in Chapter 12 of the EIS are based on comprehensive data compiled by experts that have long-standing familiarity with the habitats and species within and close to the site. In this context, the chapter concludes that, with the implementation of mitigation measures that have a high likelihood of success, there will be localised slight to imperceptible impacts on habitats and species.
FI Sub - Sue Walsh B.E (Civil).pdf	Threats to Cork Harbour SPA & Failure of an Appropriate Assessment	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	Section 4.7.1 of the NIS and 12.5.6 of the EIS address potential impacts on the integrity of the SPA and potential effects on marine habitats. The proposed development site does not overlap with any Natura 2000 site. The adjoining shoreline habitats at Gobby Beach, which will be affected by the proposed beach nourishment works, do not lie within any designated Natura 2000 site. Beach nourishment is a well-recognised coastal engineering solution worldwide. It is a soft solution and will not significantly affect the areas in the vicinity of the proposed development site. The net coastal sediment transport goes from south to north according to wind conditions and swell and,

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		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.	therefore, the material is likely to move towards the north in the medium and long term. The closest area of the Cork Harbour Special Protection Area (SPA) is located to the southwest of the site. The nett coastal sediment transport goes from south to north according to wind conditions and swell and therefore, the beach nourishment material is likely to move towards the north in the medium and long term. Therefore, the sacrificial material will not impact on this part of the SPA. Other sections of the SPA which are to the north of the site are more than two kilometres from the site and these are too remote from the site to receive any significant quantities of beach nourishment material. There is no potential for beach nourishment works to significantly affect the SPA waters. Cork Harbour covers an area of approximately 2,660 ha. Gobby Beach covers an area of c.5.5ha. The protection measures will consist of the placement of approximately 1,150m^3 of shingle of appropriate size and shape (rounded) above the foreshore on Gobby Beach along the eastern boundary of the Indaver site. Erosion and deposition are natural processes within estuarine and coastal habitats. Given the scale of Cork Harbour relative to Gobby Beach, the estuarine and coastal nature of the habitats under consideration and the dilution available within Cork Harbour, there is no potential for significant effects on invertebrate communities or diving birds. As outlined in Section 5.2.3 of the NIS the noise assessment, which presented in Appendix 12, notes that noise levels associated with of the proposed development for the worst-case construction scenarios assessed are calculated to be less than 35dB LAeq at the closest areas of the Cork Harbour SPA to the south of the proposed development site. This particular area of the SPA is located in close proximity to a number of existing industrial facilities (i.e. Thermo Fisher Scientific, De Puy and Hovione) with operational noise limits of 55dB LAeq during daytime periods and 45dB LAeq during night-time periods. The noise impact from construction activities at the closest area of the SPA is insignificant. All

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			other areas of the Cork Harbour SPA are located at distances beyond 1.5km from the proposed development site with lower construction noise levels predicted at these distances, (less than 30dB LAeq) which is well below typical baseline noise levels in the surrounding environment. Taking the above into consideration, the construction phase of the proposed development is determined to have no significant impact to the existing noise environment at any of the designated Cork Harbour SPA's. During construction of the proposed development, peak noise along Gobby Beach will be less than 45dB. In the fields to the south of the proposed development site peak noise will be 45-55dB. It is noted that small numbers of SCI birds use these areas. According to Cutts et al. (2013), noise levels below 55dB are unlikely to cause a flight response in birds and no adverse effects are predicted to ex-situ foraging/roosting birds within these areas.
FI Sub - Sue Walsh B.E (Civil).pdf	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 lndaver 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.	As outlined in Chapter 6 - Population and Human Health, potential effects on recreational amenity have been assessed. Coastal protection works will be undertaken with the placement of sacrificial beach material (shingle) at the toe of the glacial till face on Gobby Beach designed to remain on site and help lower the natural erosion rate over a number of years. Monitoring of the sacrificial material and the cliff face will take place on an annual basis. To ensure the safety of the general public, it is envisaged that the area of the beach, in which the construction works will take place and the area of the car park in which the materials will be stored, and which will be used by the machinery, will be closed to the public for the duration of the proposed works, approximately three weeks. However, access to the rest of the beach will be maintained for the duration of the works. The operation of the proposed development will not encroach on the shoreline or maritime amenity.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Sue Walsh B.E (Civil).pdf	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 up-close experience of this enormous incinerator. (...) 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.	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in its visual and landscape character in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape. As such, it is considered that the proposed development is compatible with the plans for greater tourist amenities in the Lower Harbour.
FI Sub - Sue Walsh B.E (Civil).pdf	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 lndaver 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.	As outlined in Chapter 6 - Population and Human Health, a Hazard Identification and Risk Assessment has been undertaken and is included as Appendix 6.1. A total of 111 scenarios were examined in the HAZID&RA exercise, 108 of which were found to present credible accident hazards. Based on the findings of the HAZID&RA exercise, there were no scenarios identified which presented a Priority Risk and there was one scenario which presented a Substantial Risk, which was the bunker fire scenario. This scenario received a Severity Rating of 3 for both Human Health and for the Environment and a Likelihood Rating of 4.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The risk associated with this scenario was considered by the HAZID&RA Team to be ALARP (as low as reasonably possible), due to the variety of measures that will be in place to protect against a fire scenario, either by reducing the likelihood of occurrence or mitigating the impacts if it did occur. These measures govern all stages of the potential development of this scenario. The measures will protect against the conditions arising under which a fire could occur, they will enable rapid detection and response at the early stages in the event that a fire scenario developing, they will enable extinguishment of the fire even in the event of escalation to a fully developed fire scenario, and protect against the risk of environmental contamination from fire-fighting run off. With these measures in place, the HAZID&RA team found that Indaver would have all necessary measures in place at the bunker, throughout all phases of the operation. As such the risks associated with this scenario were considered to be ALARP (as low as reasonably practicable).
FI Sub - Sue Walsh B.E (Civil).pdf	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, an 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_2 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.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies. Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			55,600 tonnes per annum and savings from diversion from landfilling of 91,800 tonnes per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended).
FI Sub - Sue Walsh B.E (Civil).pdf	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.	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			means and annual average compared to the onsite station in 2007." Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. The current limit values for PM_{10} and $PM_{2.5}$ will be in place until 2030 when more stringent limit values will be enacted. There are currently no limit values for Total Suspended Particulates (TSP) or PM1 nor will there be limit values for these parameters after 2030. In relation to ultrafine particles (UFPs), defined as particles with a diameter less than 100 nm (0.1 µm), there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. However, what is new in the Directive is a requirement for the competent authority to undertake monitoring for UFPs. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex III: *"… at least one sampling point per 5 million inhabitants shall be established at a location where high UFP concentrations are likely to occur. Member States that have fewer than 5 million inhabitants shall establish at least one sampling point for fixed measurements at a location where high UFP concentrations are likely to occur.* *For Member States with more than 2 million inhabitants, monitoring supersites at urban background or rural background locations*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			established in accordance with Article 10 shall not be included for the purpose of meeting the requirements on the minimum number of sampling points for UFP set here." The EPA is the competent authority to undertake this task post 2030. It is not the responsibility of an individual facility or development to set up and operate a UFP monitoring network as outlined in EU 2024/2881. Chapter 6 of the EIS (Population and Human Health) evaluates the health significance of emissions to air from the proposed development, specifically discussing particulate matter and ultrafine particles. The evidence suggests that modern incinerators have significantly reduced particulate emissions, with modelled PM_{10} and $PM_{2.5}$ levels comfortably below air quality standards. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver's existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. As outlined in Section 8.7 of Appendix 8.1 of the EIS, a detailed air modelling assessment of the Proposed Development on ecological impact was undertaken. The assessment was conducted on all nearby SACs, SPAs and pNHAs. The modelling found that all critical levels and critical loads are in compliance with the impact from the facility and not significant. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Usna Keating.pdf	Sustainability and Circular Economy	By their very nature, incinerators incinerate waste and therefore need waste to operate. I feel that the new development of such infrastructure incentivises waste production, opposed to a strategic and focussed move to embrace a circular economy. If we are to truly embrace a circular economy, then we need to stop producing the current waste that we produce, and move towards circular and sustainable systems, and circular and sustainable materials (i.e. waste that does not need incineration). If we are to move towards a circular economy, the demand for such infrastructure (such as an incinerator) should not exist.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Usna Keating.pdf	Sustainability and Circular Economy	The Circular Economy and Miscillaneous Provisions Act (2022) does not include incineration as a method to support Circular economy. It is noted: *' "recovery activities" does not include incineration, whether with or without energy recovery, or export for incineration, whether with or without energy recovery (https://www.irishstatutebook.ie/eli/2022/act/26/enacted/en/html) '.* Therefore, the proposal for incineration is at odds with our Circular Economy Strategy.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Usna Keating.pdf	Impacts on Tourism, Landscape and the Local Economy	Given the location, size and visibility (from Spike Island, Cobh, Monkstown, Crosshaven, Ringaskiddy) of the incinerator, and other parts of the harbour, the development detracts from the harbour's natural beauty, and detracts from this world class tourist destination. This proposed development, in turn, could adversely impact on the tourist industry, local economy and local employment that depends on or is supported by tourism.	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in its visual and landscape character in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape. As such, it is considered that the proposed development is compatible with the plans for greater tourist amenities in the Lower Harbour.
FI Sub - Usna Keating.pdf	Impacts on Tourism, Landscape and the Local Economy	In addition to potential impacts on tourism, the proposed development would have a permanent adverse impact on landscape visibility for residents, visitors and maritime enthusiasts.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.
FI Sub - Usna Keating.pdf	Impacts on Biodiversity	According to the National Parks and Wildlife Service, Cork Harbour is of "*international importance*" for migratory bird species (https://www.npws.ie/sites/default/files/protectedsites/synopsis/SY004030.pdt), that feed in open water, estuarine and tidal areas and coastal habitats. Populations of international and national importance occur in the harbour. Should there be any accidents in the site, such as fires, release of poisonous gases, poisonous ash or hydrocarbons etc, there is scope for adverse impacts on the species and habitats in this internationally important site, where pathways (air and water) and receptors exist. Given the tidal and estuarine nature of Cork Harbour, and topographical diversity, currents exist that can spread pollution incidents across the harbour area. This could therefore adversely affect habitats and species in different areas, and impact on Species of Conservation interest in Cork Harbour SPA, that are important internationally. By their nature, incinerators burn waste and there are multiple reports across Europe of these facilities going on fire. This poses a potentially significant threat to Qualifying Interests and Species of Conservation Interest of the Great Island Channel SAC, and the Cork Harbour SPA respectively.	As outlined in Chapter 6 - Population and Human Health, a Hazard Identification and Risk Assessment has been undertaken and is included as Appendix 6.1. A total of 111 scenarios were examined in the HAZID&RA exercise, 108 of which were found to present credible accident hazards. Based on the findings of the HAZID&RA exercise, there were no scenarios identified which presented a Priority Risk and there was one scenario which presented a Substantial Risk, which was the bunker fire scenario. This scenario received a Severity Rating of 3 for both Human Health and for the Environment and a Likelihood Rating of 4. The risk associated with this scenario was considered by the HAZID&RA Team to be ALARP (as low as reasonably possible), due to the variety of measures that will be in place to protect against a fire scenario, either by reducing the likelihood of occurrence or mitigating the impacts if it did occur.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			These measures govern all stages of the potential development of this scenario. The measures will protect against the conditions arising under which a fire could occur, they will enable rapid detection and response at the early stages in the event that a fire scenario developing, they will enable extinguishment of the fire even in the event of escalation to a fully developed fire scenario, and protect against the risk of environmental contamination from fire-fighting run off. With these measures in place, the HAZID&RA team found that Indaver would have all necessary measures in place at the bunker, throughout all phases of the operation. As such the risks associated with this scenario were considered to be ALARP (as low as reasonably practicable).
FI Sub - Usna Keating.pdf	Impacts on Biodiversity	Furthermore, in relation to the site-specific context of the current site, the site currently comprises a mosaic of habitats including mature treelines and hedgerows, and semi-mature woodland and scrub. These habitats are of importance locally and in an entire harbour context for a variety of different species of breeding birds and bats (see NIS and Appendix 10), both groups being protected under EU Law. Given recent developments to the direct north of the site, and the development of a large road to the west of the site, there are cumulative impacts of habitat removal locally, that have adverse impacts on this local wildlife. In addition, coastal habitats are essential habitats for migratory species, as they are the first landing point for some species following long migration. The loss of such habitats over a relatively large site context represents a loss of important coastal wildlife habitat in a Harbour context, which has, over time, been subjected to significant cumulative removal through development and agricultural impacts in the surrounding local area.	The surveys and ecological assessment documented in Chapter 12 of the EIS are based on comprehensive data compiled by experts that have long-standing familiarity with the habitats and species within and close to the site. In this context, the chapter concludes that, with the implementation of mitigation measures that have a high likelihood of success, there will be localised slight to imperceptible impacts on habitats and species.
FI Sub - Usna Keating.pdf	Human Health	I have concern in relation to the impact of emissions from the incineration process on public health. It was noted previously at the 2016 oral hearing that "*Under specific weather conditions, stack emissions will tend to drop to a lower level sooner than expected and will cause the airborne particles to settle locally*", "*Even without the consideration of temperature inversion, under high humidity /light wind conditions, a build-up of stack emissions can form over the harbour and then precipitate out locally in the form of a rain shower.*"	As outlined in Chapter 8 - Air Quality, emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, firstly under maximum emissions limits of the EU Directive

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		Given the proximity of coastal and adjacent villages to this incinerator, and thermal inversion potential or potential of local precipitation of stack emissions, it is my opinion that the current proposed location of the incinerator is unsafe. Towns such as Cobh, Crosshaven, Monkstown, Shanbally, Glanmire, Carrigaline, Midleton, and Cork City are all located in and around Cork Harbour. Given the proximity to and characteristics of the harbour (given its unique topography as discussed earlier), this proposal potentially poses a health risk to all these areas.	2010/75/EU and secondly under abnormal operating conditions. AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. Additionally, as outlined in Chapter 6 - Population Human Health, when we look at the other Indaver facility in Ireland in Carranstown, Co. Meath, and its efficient operation it is clear that in practice as well as in theory that there will be no adverse effects on Air Quality. Therefore, it can be concluded, according to evidence in the literature, that modern well-run incinerators will not have a deleterious effect on human health. As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station "*The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007*." Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards.
FI Sub - Usna Keating.pdf	Human Health	The applicant highlights that they *'found no studies indicating that modern-technology waste incineration plants, which comply with the legislation on emissions, are a cancer risk factor or have adverse effects on reproduction or development. There are several factors in favor of this affirmation: (a) the emission levels of the plants currently built in the developed countries are several orders of magnitude lower than those of the plants in whose environments epidemiological studies have been carried out and which have found some kind of negative association in terms of health; (b) risk assessment studies indicate that most of the exposure is produced through the diet and not by a direct route; and (c) monitoring dioxin level studies in the population resident in the environment of incineration plants did not reveal increases of these levels when compared with a population living in reference areas*.' In response to this statement, I believe a precautionary principle should need to be applied when it comes to matters. of human health. The National Cancer Registry of Ireland note that many cancers take 15-20 years to develop. Therefore, insufficient time may have passed to adequately and accurately determine the impact of modern incinerators on public health (in response to point (a) above). In addition, given the potential for thermal inversion in Cork Harbour, and the bowl like topography of the harbour, there is scope for increased direct contact with dioxins, and other discharges in the plume from the incinerator (in response to point (b)). In response to point (c), it is my understanding that nanoparticles would not be measures and PM_{10} and $PM_{2.5}$ particles are measured 4 times per year (information taken from (https://chasecorkharbour.com /no-measuring-of-nan oparticles-not-practical-indaver-tellhearing/).	As outlined in Chapter 6 - Population and Human Health, there have been a large number of studies on the health effects of incineration. There was some evidence particularly with older types of incinerators with higher levels of emissions, of environmental health effects. With modern incinerators with highly controlled levels of emissions no reputable study has shown any significant health effects. While some would caution that some effects could take a long time to materialise, for any realistic assessment this is extremely reassuring and of course very much in keeping with what we would expect due to reduced and strictly controlled emissions associated with modern incinerators. Additionally, the 2025 air quality model incorporated the best available information on weather data, terrain, etc, and forms the basis for the impact assessment conclusions documented in Chapter 8 and the associated appendices of the EIS, which concludes that the operation of the proposed development will not have a significant effect on air quality. As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station *"The influence of the meteorological station on the ambient ground level concentration has been*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007." Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards.
FI Sub - Usna Keating.pdf	Human Health	Therefore with evidence of adverse health impacts of incineration, the harbours geography and thermal conditions, and high population density of surrounding residential areas, in close proximity to the site, I believe the proposed development poses a public health risk to people living within Cork Harbour.	As outlined in Chapter 6 - Population and Human Health, effects on human health from the proposed development during construction and operation were assessed. While some studies, particularly in the past, report health effects in relation to incinerators, nearly all of these studies are, by their nature, historical and refer to toxic or industrial burning processes. These virtually all pre-date modern technology and the associated large decreases in emissions. They also pre-date current regulatory restrictions on allowable emissions such as the EU Air Quality Directive and the EU Industrial Emissions Directive.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			We know from direct experience that modern incinerators operate well within these stringent guidelines. The Indaver waste-to-energy facility in Meath, widely predicted by objectors in advance of it's commissioning to greatly exceed those limits, has in operation been a great example of a well-run facility. Modelling for emissions of particulate matter in the form of PM_{10} and $PM_{2.5}$ does not support any likelihood of a detrimental health effect. There has been nothing published in recent literature which would significantly change this position. Overall, there is little evidence to suggest that waste incinerators are associated with the increased respiratory symptoms, or other medical conditions, in the surrounding population. This is consistent with the data from risk assessments, emissions and ambient air monitoring in the vicinity of incinerators, which indicate that modern, well-managed facilities make a very small contribution to background levels of air pollution. Multiple reputable reviews quoted within Chapter 6 support this position. The fact that the proposed development will be operated in accordance with the strict terms of the EU Industrial Emissions Directive, means that emissions will be lower than from practically all facilities assessed in publications cited herein, reducing even further any possible risk. The Emissions Compliance Report (Indaver, 2025), submitted to the EPA on emissions from the Indaver facility in Carranstown, Co. Meath states that the plant operates well below the Legal licensed limit and there have been no exceedances over the 5 years to 2023. All information available on the proposed development therefore, both from modelling and from actual results of a similar facility in Ireland, indicates that all emissions will be well within the statutory Air

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Quality Standards. These provide strong evidence that there will be no deleterious effect on human health either in the immediate vicinity or in the wider context, due to its operation.
FI Sub - Usna Keating.pdf	Site Suitability	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).	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the proposed development.
FI Sub - Usna Keating.pdf	Zoning	Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the Indaver site area where the incinerator build is proposed (RY-1-09) 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, subject to appropriate ecological consideration and planning. (RY-1-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28) It is of 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 therefore appears to be contrary to the specified objectives for the immediate area as per the County Development Plan.	As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
FI Sub - Veronica Ní Chuilleagáin & Others.pdf	Site Suitability	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.	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the proposed development.
FI Sub - Veronica Ní Chuilleagáin & Others.pdf	Deficient EIS	By all 3 Bord Pleanala Inspectors, the EIS was found to be deficient in substance even where found legally adequate in form. (…) Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement*', the

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development.
FI Sub - Veronica Ní Chuilleagáin & Others.pdf	Site Selection	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)	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Veronica Ní Chuilleagáin & Others.pdf	Flood Risk	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).	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Veronica Ní Chuilleagáin & Others.pdf	Visual Impact	Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development. In addition, as noted in Section 4.5.15 of the EIS, the levels of the low-lying parts of the site will be raised to 4.55mOD '*the ground levels in the western fields area of the site consisting of a 10,000m^2 area*[1] *will be raised by a maximum height of 2.5m above ground*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 will also be raised to 4.55mOD'. This will offer a very high standard of flood protection to the site.
FI Sub - Veronica Ní Chuilleagáin & Others.pdf	Zoning	Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the lndaver site area where the incinerator build is proposed (RY-1-09) 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-1-09, 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 Ma REI 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.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09'*. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan..... Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Vincent Murphy, Claire Murphy and Others.pdf	Site Suitability	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.	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.
FI Sub - Vincent Murphy, Claire Murphy and Others.pdf	Deficient EIS	By all 3 Bord Pleanala Inspectors, the EIS was found to be deficient in substance even where found legally adequate in form. (…) Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement*', the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development.
FI Sub - Vincent Murphy, Claire Murphy and Others.pdf	Site Selection	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	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		have transformed the character of the immediate area in the intervening period since 2000. (Daly 2017)	The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			• **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Vincent Murphy, Claire Murphy and Others.pdf	Flood Risk	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).	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Vincent Murphy, Claire Murphy and Others.pdf	Visual Impact	Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development. In addition, as noted in Section 4.5.15 of the EIS, the levels of the low-lying parts of the site will be raised to 4.55mOD '*the ground levels in the western fields area of the site consisting of a 10,000m^2 area*[1] *will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 will also be raised to 4.55mOD*'. This will offer a very high standard of flood protection to the site.
FI Sub - Vincent Murphy, Claire Murphy and Others.pdf	Zoning	Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the lndaver site area where the incinerator build is proposed (RY-1-09) 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-1-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28) This is dismissed	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09'*. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
		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 Ma REI 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.	*Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'*
FI Sub - Voice Ireland.pdf	The proposed development is not aligned with national policy on circular economy or the national development plan as regards waste.	(…)As such the proposed incinerator is not the optimal or even necessary step in furtherance of the circular economy, or the National Development Plan with respect to waste treatment.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			The National Development Plan states that, in relation to the integrated approach to waste management, thermal treatment with energy recovery will be the preferred option for dealing with residual waste, after achieving ambitious targets in respect of waste prevention, recycling and recovery, see Chapter 2, Section 2.4.1.2 of the 2025 EIS.
FI Sub - Voice Ireland.pdf	The proposed development is not aligned with national policy on circular economy or the national development plan as regards waste.	(…) The current proposed development would exacerbate this over supply of incineration and develop further 'asset lock in' across Europe as whole, impacting on the EU green deal and circular economy strategies.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Voice Ireland.pdf	The proposed development fails to take into account changes in waste segregation and EU recycling and biowaste targets	The national roll out of the 3-bin system in 2023 will increase the collection of organic waste, which makes up 60% of commercial Municipal Solid Waste (MSW) and 14% of household MSW, and remove it from the MSW waste stream. Under the EU Waste Framework Directive, Ireland will have to achieve national recycling targets of 55% by 2025 which would result in the diversion of 400,000 tonnes of material from waste incineration and landfilling. Additionally, the NWMPCE sets out a clear target of 0% growth in waste per person by 2030. The development of incinerations technologies at this stage would undermine the national circular economy ambitions by supporting incineration over waste segregation and the further development of recycling and composting facilities.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Voice Ireland.pdf	The proposed development documentation does not adequately account for the health impact of the emissions to air on the environment, communities and wildlife surrounding.	The existing NIS states that there is no impact from the site in operation on the existing Cork Harbour SAC, however studies have shown the accumulation of POPs, PFAS and metals in the environment up to 5km radius from similar incineration plants. For example (...)	As outlined in Section 5.6.1 of the NIS, and in particular Appendix 11 to the NIS, a detailed air modelling impact assessment of the Proposed Development on ecological receptors associated with Cork Harbour SAC was undertaken. The modelling found that all critical levels and critical loads are in compliance, and below the range where habitats within Cork Harbour SPA could be impacted. The NIS concludes that no adverse effects on receptors

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			within Cork Harbour SPA could occur as a result of air emissions from the proposed development. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration.
FI Sub - Voice Ireland.pdf	The proposed development documentation does not adequately account for the health impact of the emissions to air on the environment, communities and wildlife surrounding.	The NIS does note on page 55 that "*Impacts on the Cork Harbour SPA as a result of air emissions and bioaccumulation, although unlikely, could potentially occur.* " We believe that the likelihood of this occurrence is significant, as shown through bioaccumulation studies elsewhere, and will have a significant effect on the SPA, community as well as amenity users in the area. The proposed development and attached documentation do not adequately take into account "impacts of emissions generated by the new industrial development on the SPA and its qualifying species;" as stated under the local development plan target objectives RY-GO-02 or Ry-GO-09 on cumulative impacts on air quality. The accumulation of dioxins and PFAS in chicken eggshells is also notable in the context of the water birds nesting in the area, which must be taken into account whenconsidering new development proposals under RY-I-11 "*Areas within this zone may be used by Special Conservation Interest bird species for which the Cork Harbour SPA is designated. Account will be taken of this when considering new development proposals in this area"*	The context for this quotation is in the screening section of the NIS document, where potential impacts are identified, in order to screen for Appropriate Assessment. The detailed assessment that follows in the document addresses bioaccumulation, using detailed modelling, as reported in Appendices 11 and 15 to the NIS, and on the basis of this detailed modelling and assessment, the NIS concludes that no adverse effect on receptors within Cork Harbour SPA could occur as a result of emissions from the proposed development. The proposed development therefore also aligns with the relevant zoning objectives for the site. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration.
FI Sub - Voice Ireland.pdf	The management plan for the bottom. boiler and fly ash is vague	The Indaver application is very vague about where the resulting ash will go as they stated that it might be used on roads or disposed in salt caves or exported abroad. It is very important to know where this ash will go as it could contaminate local environs when it is heaped uncovered or transported by truck or ship. Often times, the on-loading or offloading of ash onto trucks and ships is done in the open, with ash entering water bodies and ground sources. As the proposed facility is right next to the water, can they guarantee that ash will not enter local waters? (...)	As outlined in Section 4.13.1 of Chapter 4 - Description of the Proposed Development, there are three types of ash that will be produced in the process namely, bottom ash, boiler ash and flue gas cleaning residues. The handling, loading, transport and treatment options for each residue are described in Sections 4.13.2 to 4.13.4 inclusive. These sections describe how ash will be prevented from escaping the transport vehicles. Additionally, in Chapter 15 - Material Assets further details are provided on the recovery options for bottom ash in Section 15.5.3.9 and the transport requirements and recovery options for boiler ash and flue gas cleaning residues are detailed in Section 15.5.3.10.

ACP Submission Reference	Topic	Submission Statement	Applicant Response
FI Sub - Voice Ireland.pdf	The proposed development is not in line with climate ambitions	Approving the construction of this incinerator will lock Cork and Ireland into an outdated linear waste management treatment process and contradict Ireland's desire to move up the waste hierarchy towards prevention, reduction and recycling and fully embracing the circular economy.	Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
FI Sub - Willie McCarthy and Others.pdf	Site Suitability	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.	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.
FI Sub - Willie McCarthy and Others.pdf	Deficient EIS	By all 3 Bord Pleanala Inspectors, the EIS was found to be deficient in substance even where found legally adequate in form. (…) Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			Impact Statement', the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development.
FI Sub - Willie McCarthy and Others.pdf	Site Selection	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)	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large-scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
FI Sub - Willie McCarthy and Others.pdf	Flood Risk	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).	The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.
FI Sub - Willie McCarthy and Others.pdf	Visual Impact	Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development. In addition, as noted in Section 4.5.15 of the EIS, the levels of the low-lying parts of the site will be raised to 4.55mOD '*the ground levels in the western fields area of the site consisting of a 10,000m^2 area*[1] *will be raised by a maximum height of 2.5m above ground*

ACP Submission Reference	Topic	Submission Statement	Applicant Response
			level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 will also be raised to 4.55mOD'. This will offer a very high standard of flood protection to the site.
FI Sub - Willie McCarthy and Others.pdf	Zoning	Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the lndaver site area where the incinerator build is proposed (RY-1-09) 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-1-09, 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 Ma REI 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.	Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09'*. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan*.'

4.3 Response to Remaining Submissions (By Topic)

Table 4.3: Applicant's Response to Remaining Submissions (By Topic)

ACP Submission Reference	Submission Statement	Applicant Response
TOPIC: AIR QUALITY		
The list of submissions to which this topic relates is included in Appendix B.	**Health Impacts:** The submissions are concerned that there is already too much pollution in the area of the proposed development and the project will only enhance pollution. There is concern that gaseous pollutants and particles will be released with each tonne of waste that is burnt and these materials will enter the atmosphere, sewers, or water and soil. Applicants state that acid gases (HCI,SO_2) irritate airways and can trigger breathing difficulties, throat irritations and respiratory illness such as asthma, bronchitis, they can also cause cardiovascular disease and cancer in both adults and children. They also pose as a direct threat to outdoor exercise, due to exposure to elevated levels of $PM_{2.5}$, NO_2. Despite what Indaver say about filters, it is well documented that air quality in the region of incinerators is poor. The harbour's temperature inversions and coastal wind patterns frequently trap air pollutants at ground level, exacerbating health risks. Prevailing winds will dictate the direction of smoke plumes, blowing air contaminants towards Ringaskiddy, Cobh, Monkstown, Blackrock, Douglas, Crosshaven, Drakes Point and Rochestown. Incinceration does not eliminate waste but transforms it into potentially harmful pollutants in gases, fine dust and ashes.	As outlined in Chapter 6 - Population and Human Health, effects on human health from the proposed development during construction and operation were assessed. While some studies, particularly in the past, report health effects in relation to incinerators, nearly all of these studies are, by their nature, historical and refer to toxic or industrial burning processes. These virtually all pre-date modern technology and the associated large decreases in emissions. They also pre-date current regulatory restrictions on allowable emissions such as the EU Air Quality Directive and the EU Industrial Emissions Directive. Modern incinerators operate well within these stringent guidelines. The Indaver waste-to-energy facility in Meath, widely predicted by objectors in advance of its commissioning to greatly exceed those limits, has in operation been a great example of a well-run facility. Modelling for emissions of particulate matter in the form of PM_{10} and $PM_{2.5}$ does not support any likelihood of a detrimental health effect. There has been nothing published in recent literature which would significantly change this position. Overall, there is little evidence to suggest that waste incinerators are associated with the increased respiratory symptoms, or other medical conditions, in the surrounding population. This is consistent with the data from risk assessments, emissions and ambient air monitoring in the vicinity of incinerators, which indicate that modern, well-managed facilities make a very small contribution to background levels of air pollution. Multiple reputable reviews quoted within Chapter 6 support this position. The fact that the proposed development will be operated in accordance with the strict terms of the EU Industrial Emissions Directive, means that emissions will be lower than from practically all facilities assessed in publications cited herein, reducing even further any possible risk. The Emissions Compliance Report (Indaver, 2025), submitted to the EPA on emissions from the Indaver facility in Carranstown, Co. Meath states that the plant operates well below the Legal licensed limit and there have been no exceedances over the 5 years to 2023. All information available on the proposed development therefore, both from modelling and from actual results of a similar facility in Ireland, indicates that all emissions will be well within the statutory Air Quality Standards. These provide strong evidence that there will be no deleterious effect on human health either in the immediate vicinity or in the wider context, due to

ACP Submission Reference	Submission Statement	Applicant Response
		its operation. As outlined in the EIS Chapter 8 Air Quality Section 8.5.2 Potential Effects Operational Phase note that AERMOD modelling results indicate that the ambient ground level air contaminants concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios.
	Emissions Dispersion: Using data from Cork airport might be a mistake because it seems to addresses the inversion issue by having it above the atmospheric boundary layer. Pollutants are trapped in the harbour basin which will impact those on higher ground across Cobh and Crosshaven. Weather inversions will result in those in lower depressions to experience higher exposures of pollution and dispersed contaminants. The prevailing winds are still mainly southerly so how does a 65% reduction in stack size aid dispersion? The emissions will effcet a radius of over 64km/40-mile radius. The meterological data used in the Air Quality Study and assocaited sensitivity analyses are not representative of real world on-site conditions.	As outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station *"The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007."* Thus, the sensitivity study compared the onsite meteorological station (data from 2007) and the Cork Airport data from 2020 – 2024 with Roches Point data for 2020 – 2024 and found that ambient air quality results changed by only a small fraction and that for all meteorological stations, all pollutants remain well within the ambient air quality standards. Thus, the full range of meteorological data including thermal inversions have been assessed in the air dispersion modelling assessments with all pollutants found to be in compliance with the ambient air quality standards. As outlined in EIS Chapter 8 Air Quality Section 8.4.2 Operational Phase the emissions from the proposed development have been modelled using the AERMOD dispersion model which is the USEPA's regulatory model used to assess pollutant concentrations associated with industrial sources. Emissions have been assessed, under maximum emissions limits of the EU Directive 2010/75/EU and under abnormal operating condition. The AERMOD modelling indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios within a 10km radius of the facility. A 10 km radius of the proposed development site were reported in this study even though, in many cases, no residential receptors were near the location of this maximum ambient concentration. Concentrations at the nearest residential receptors are generally significantly lower than the maximum ambient concentrations reported.

ACP Submission Reference	Submission Statement	Applicant Response
	Policy: Recent research has revealed that incineration is practically as dirty a way to generate energy as coal (average gCO_2e/kwH Coal 730, Incineration 720, Gas 400, Solar 40, Nuclear 12, Wind 11, source IPCC/BBC 2024). Furthermore, potential for carbon capture from incineration emissions is negligible; the only such pilot project to capture carbon in the UK (Ferrybridge WEF) collects. 365 tonnes of CO_2 pa from a facility which produces 500,000 tonnes of CO_2 annually (source BBC 2024). Burning plastics - a significant and increasing component of the waste material (given widely adopted and separated organic waste provision) - which will be treated in the incinerator, produces 175 times more CO_2 than burying it in landfill (UK Government). Commercial incineration is likely to rely on lock-in contracts with waste operators that may discourage the reduce, re-use and recycling imperative and/or prompt the importation of waste material. None of these considerations suggest that incineration is environmentally beneficial.	Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. The facility will emit 124,700 tonnes per annum of CO_2eq prior to net power saving of 55,600 tonnes per annum and savings from diversion from landfilling of 91,800 tonnes per annum leading to a net saving of 22,700 tonnes of CO_2eq per annum. As outlined in Section 9.7.3 of the EIS: "*The assessment has shown that the operational phase will not have a significant effect on climate. Net emissions from the operational phase will be equivalent to a saving of approximately 0.057% of the 2031-2035 Carbon budget thus the effect of the proposed development will be insignificant in the context of aggregated national emission sources as determined after taking into account the benefits associated with energy recovery and displacement of electricity derived from fossil fuel sources and the benefits from the replacement of landfilling with the proposed facility operations*." Thus, the proposed development will reduce GHG emissions helping Ireland met its climate obligations set out in the Climate Act 2015 (as amended). Chapter 2, Section 2.2.2.2 of the 2025 EIS outlines that the policy action (TP14.2) in the National Waste Management Plan for a Circular Economy 2024-2030 calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum to ensure there is adequate active thermal treatment capacity in Ireland and the proposed development would meet that need. The National Waste Management Plan took account of the estimated effect of the planned interventions to incentivise waste prevention and better recycling in the development of its policies.
TOPIC: COASTAL RECESSION AND FLOOD RISK		
The list of submissions to which this topic relates is included in Appendix B.	**Coastal Erosion and Cliff Stability:** Submissions highlight active and ongoing coastal erosion at and adjacent to the site, including documented regression of glacial till cliffs and observed storm damage along Gobby Beach. Submissions argue that erosion is a continuous process rather than an occasional event, with evidence of material loss over time that is not adequately acknowledged in the application. Concerns are raised that proposed "sacrificial" shingle or rock armour represents a short-term intervention that may alter sediment dynamics, transfer erosion pressures elsewhere, or fail under intensified storm conditions. Submissions contend that the scale and persistence of erosion undermine the long-term stability of the site and call into question its suitability for a development of this nature and lifespan.	On the basis of the evidence and modelling presented in Chapter 13 of the EIS (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession), it is concludes that the proposed development will not be adversely affected by coastal erosion and that the site remains suitable for its intended purpose throughout the assessed period. The mitigation and monitoring strategy ensures that residual risks to non-critical infrastructure are effectively managed. As detailed in Sections 13.3.4 and 13.4.4 of Chapter 13 of the EIS, the glacial till cliff at Gobby Beach is undergoing continuous, natural erosion. A conservative forty-year erosion model, which exceeds the design life of the planning permission, was utilised. The results indicate that the waste-to-energy facility is sufficiently set back, thereby avoiding any impact from predicted cliff retreat during its full design life. Beyond this period, only the amenity walkway and viewing platform – situated outside the secure operational boundary as referenced in Section 13.7 of Chapter 7 of the EIS (Roads and Traffic) – may be potentially affected.

ACP Submission Reference	Submission Statement	Applicant Response
		Furthermore, as explained in Section 4.5.16 of Chapter 4 of the EIS (Description of the Proposed Development) and Section 13.5.5 of Chapter 13 of the EIS, the application includes a proposal for a sacrificial shingle berm (beach nourishment) at the base of the cliff to address residual long-term risk. This intervention is intended to dissipate wave energy and minimise direct wave impact on the glacial till face. The EIS confirms that this measure does not accelerate existing erosion rates nor transfer erosion pressures elsewhere, due to the natural sediment transport processes at Gobby Beach as described in Chapter 13. Additionally, Section 13.4.4 of Chapter 13 of the EIS outlines an adaptive management programme, wherein replenishment is triggered if either the average cliff-top retreat exceeds 0.5 metres per year over six years, or a local retreat of approximately three metres is observed, whichever occurs first.
	Flooding and Loss of Safe Access: Multiple submissions emphasise repeated flooding of the sole access road serving the site, noting that flood events have already compromised safe ingress and egress during storms. submissions argue that flooding could isolate the facility, restrict emergency access, and sever critical infrastructure during extreme weather events. The risk is framed as both a public safety issue and a resilience failure, particularly given the hazardous nature of materials associated with the proposed development. Concerns are raised that the application underestimates the operational and emergency implications of access road flooding.	The EIS notes that the current road elevations, which vary between approximately 2.4 mOD and 2.95 mOD, are situated below the predicted 1-in-200-year tidal level of 2.87 mOD. Consequently, certain sections of the road are exposed to risks associated with both tidal and pluvial flooding. These vulnerabilities, such as tide-locking at the existing outfall and the occurrence of ponding or flooding near the Gobby Beach car park when elevated tides inhibit stormwater discharge, are documented in Section 4.5.14 of Chapter 4 of the EIS (Description of the Proposed Development). To address these challenges and ensure the continued functionality of this critical access route during extreme weather events, the proposed development incorporates a comprehensive upgrade of the L2545, as outlined in Section 4.5.14 of Chapter 4 of the EIS. The upgrade includes raising an approximately 190-metre section of the road to a maximum elevation of 3.495 mOD, thereby surpassing the 1-in-200-year design tidal level with a climate-change allowance. The drainage design supporting the upgraded road comprises a kerb-and-gully sealed system connected to dual 1500 mm diameter surface-water pipes, which provide approximately 660 m^3 of underground storage capacity. This configuration is specifically engineered to handle situations where the drainage outfall is tide-locked for up to seven hours during a 1-in-200-year high-tide event combined with a 1-in-30-year rainfall event, effectively intercepting stormwater and preventing its accumulation on the road surface. Additionally, the upgraded drainage design is intended to integrate with the existing 450 mm outfall infrastructure and features multiple concrete chambers to facilitate effective flow control, thereby enhancing system reliability under extreme tidal and rainfall conditions. Further resilience is achieved through the proposed elevation of the site platform to 4.55 mOD, as described in Section 4.5.15 of Chapter 4 of the EIS, which exceeds the calculated minimum flood-defence level of 4.42 mOD, also detailed in the same section. Section 4.5.11 of Chapter 4 of the EIS further outlines the provision of a secondary emergency-only access route to the east of the primary entrance, ensuring

ACP Submission Reference	Submission Statement	Applicant Response
		that emergency services can access the facility even in the unlikely event of temporary obstruction of the primary access.
	Conflict with OPW Guidance and Flood Risk Policy: Submissions assert that the proposal conflicts with OPW flood risk guidance (2009 and 2022), national planning policy, and the Sequential Approach to flood risk management. Submissions point to discrepancies between the application's flood classification and online OPW flood mapping, which identifies parts of the site and associated infrastructure as being at risk. It is argued that policy compliance is asserted rather than demonstrated, with insufficient justification for locating vulnerable development in a coastal flood-prone area.	The proposed development site is not in Flood Zone A or B, as confirmed in Appendix 13.4 of EIS (Flood Risk Assessment); it is designated as Flood Zone C, indicating a very low probability of flooding from rivers or the sea. All flood sources were considered in Chapter 13 of the EIS (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession): fluvial risk is minimal due to the absence of significant watercourses, and most of the site sits above the 1 in 200-year tidal level (2.87 mOD), with only minor peripheral areas below this elevation. Localised pluvial flooding along the L2545 is linked to tide-locking at the outfall. Section 8.3 of Appendix 13.4 of the EIS notes that, as the site is within Flood Zone C, a Justification Test is unnecessary and only mitigation measures for residual risks need be identified. Section 4.5.14 of Chapter 4 of the EIS (Development of the Proposed Development) highlights that, although OPW mapping identifies flood-susceptible areas on the L2545 and parts of the northern boundary, the main design aim for upgrading the L2545 is to enhance surface water drainage and raise the road above the 1 in 200-year tidal flood level, accounting for climate change. Section 4.5.15 further states that low-lying site areas will be raised to 4.55mOD. Policy compliance is demonstrated by a comprehensive Flood Risk Assessment (Appendix 13.4 of the EIS) based on OPW guidance, including detailed tidal level and climate change analysis, hydrological modelling, and site-specific drainage assessments, as covered in Chapter 13 of the EIS.
	Climate Change, Sea-Level Rise, and Future Risk: A recurring concern is that the application relies on outdated data and does not adequately account for climate change, sea-level rise, increased storm intensity, or cumulative coastal impacts over the lifetime of the development. submissions argue that future risk is treated as static rather than dynamic, with insufficient modelling of how erosion and flooding will evolve under projected climate scenarios. The absence of a precautionary, climate-resilient approach is cited as a fundamental deficiency.	Chapter 13 of the EIS (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession) presents comprehensive, site-specific assessments of hydrology, tidal influences, and coastal erosion, utilising the most current information available. This includes long-term monitoring datasets spanning from 2001 to 2025, as well as up-to-date coastal and tidal data. The chapter directly addresses future climate change within the design levels that underpin flood protection measures. In particular, the site's ground-raising strategy is intended to safeguard against tidal events exceeding the 1 in 200-year threshold. While the calculated minimum design flood defence level for the proposed development is 3.42mOD, Arup has recommended a more conservative level of 4.55mOD for the site. Enhanced surface water management systems have also been incorporated to effectively manage extreme rainfall events and to prevent issues such as tide-locking and pluvial flooding. Flood risk, as discussed in Chapter 13 of the EIS, is not regarded as a static concern but rather as the result of dynamic interactions. These include potential tidal inundation during extreme future events, the influence of tide-locking on upgraded drainage systems leading to pluvial flooding, and the ongoing evolution of coastal

ACP Submission Reference	Submission Statement	Applicant Response
		erosion patterns. The project also includes an upgrade to the L2545 road to ensure continued accessibility during future, extreme tidal events, thereby recognising and responding to the changing nature of risk throughout the project's lifespan. As detailed in Sections 13.3.4 and 13.4.4 of Chapter 13 of the EIS, the potential for future erosion of the glacial till face at Gobby Beach has been identified. The proposed mitigation involves the placement of sacrificial beach material, specifically designed to slow erosion rates over the coming decades. This measure is explicitly climate-responsive, accommodating the anticipated evolution of the coastline in response to increasingly energetic storm conditions, rather than assuming a static shoreline. Appendix 13.4 of the EIS (Flood Risk Assessment) provides modelling of projected tidal levels, flooding mechanisms, and dynamic hydrological interactions under evolving climate conditions. The assessment concludes that, with the proposed design levels and mitigation measures in place, the residual flood risk remains very low, even when considering future scenarios.
	Inadequate Engineering Response and Data Deficiencies: Submissions criticise the reliance on raised ground levels, raised road levels, and coastal armouring as reactive engineering measures that do not address underlying geomorphological instability. submissions note gaps in baseline data, missing dynamic coastal modelling, and inconsistencies in assumptions used across assessments. It is argued that these deficiencies weaken the credibility of conclusions on flood safety and long-term site viability.	Engineering measures are evidence-based rather than reactive, as demonstrated in Appendix 13.4 of the EIS (Flood Risk Assessment), with the proposed road elevation and flood defence level offering a high standard of protection against flooding events. Chapter 13 of the EIS (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession) outlines the comprehensive investigation of geomorphological processes both within and around the site, including geotechnical surveys conducted in 2001, 2011, 2012, and 2019 - which are presented in Appendices 13.1 (Soil and Hydrogeological Investigation (K.T. Cullen & Co. Ltd) & Hydrogeological Assessment for Hammond Lane Metal Company) and 13.2 (Coastal Recession Mechanisms Investigation (2012) & Site Investigation - Factual Report by Priority Geotechnical Ltd 2019) of the EIS. These investigations used trial pits, cable percussive and rotary core boreholes, and cliff inspections. Coastal erosion was closely examined and presented in Appendix 13.3 of the EIS (Coastal Erosion Study), considering glacial till slope dynamics, landslide history, coastal recession rates, and storm impacts. The methodologies and conclusions were validated by a Coastal Expert Review, as described in Appendix 13.5 of the EIS (Coastal Expert Review of Arup Coastal Erosion Study), ensuring the findings are robust and reliable. The baseline assessment draws from a broad array of information sources, including data from Geological Survey Ireland, the Office of Public Works, the Environmental Protection Agency, and repeated site walkover surveys since 2008. Dynamic coastal modelling (presented in Appendix 13.3 of the EIS) provided in-depth analysis of sediment transport, predicted beach reshaping under storms and seasonal changes, and long-term cliff recession projections. This modelling supports the proactive management approach: if annual coastal retreat exceeds 0.5 metres over six years, or if localised retreat reaches 3 metres, additional sacrificial shingle will be applied.

ACP Submission Reference	Submission Statement	Applicant Response
		Section 13.3.1.2 of Chapter 13 of the EIS identifies the eastern coastal boundary as moderately prone to landslides, marking it as a well-studied and actively monitored constraint. The chapter also details the history of slope failures, including after Storm Frank in 2015, and confirms no slope failures inland within Areas 2 to 4. The site design includes appropriate set-back distances and mitigation measures, such as sacrificial beach nourishment, to prevent facility-driven coastal retreat and slow erosion rates. Underlying the hydrology, geology, and coastal assessments are standards and guidance from the Environmental Protection Agency, Geological Survey Ireland, Office of Public Works, and international best practices. These assessments are informed by extensive, multi-year data collection and validated through cross-referencing the Flood Risk Assessment, Coastal Erosion Study, groundwater monitoring, and geotechnical investigations. The design also features enhanced drainage systems to prevent tide-locking and pluvial flooding, beach nourishment interventions to reduce erosive energy, and ground raising based on tidal and groundwater modelling, all supported by ongoing monitoring and an adaptive coastal management strategy.
TOPIC: IMPACT ON LANDSCAPE, TOURISM AND HERITAGE		
The list of submissions to which this topic relates is included in Appendix B.	**Tourism Economy & Local Economic Impact:** A significant number of submissions argue that the proposed facility would harm Cork Harbour's tourism economy, which is essential to the livelihoods of surrounding towns. submissions emphasise that Cobh's picturesque maritime setting, cruise-ship tourism, and wider harbour branding would be undermined. Many highlight that marketing Cork Harbour as a world-class destination would become "practically impossible" if the harbour's first impression for visitors arriving by sea or air is a major incinerator.	The effects of the proposed development on tourism, recreation, and amenity in Cork Harbour are thoroughly evaluated in Chapters 6 (Population and Human Health) and 11 (Landscape and Visual Assessment) of the EIS. Tourism impacts are considered as part of the visual and landscape assessment, referencing Fáilte Ireland's guidance. Tourism receptors include views from facilities, scenic routes, parks, walking trails, and heritage sites. Detailed viewpoint analyses show that locations such as Cobh Town Park, White Point, St Colman's Cathedral, Spike Island, Monkstown, Crosshaven, Camden Fort, and Curraghbinny Woods experience slight to moderate, neutral, and permanent impacts, often mitigated by existing screening or the industrial-maritime context. Cruise-ship arrivals and harbour first impressions are specifically addressed, with key viewpoints like Spit Bank Lighthouse showing only slight, permanent, and negative effects that are not significant. The proposed development will occupy a small fraction of the skyline, with dominant views remaining unchanged. Existing tourism viewpoints already feature port and industrial infrastructure, so the development integrates into the established landscape rather than introducing new industrial character. Chapter 11 of the EIS also notes tourism-related improvements, including a new amenity walkway and viewing area from Gobby Beach to Martello Tower, as well as enhanced public access and recreational connectivity. These are described as significant and positive enhancements.

ACP Submission Reference	Submission Statement	Applicant Response
	Visual/Amenity Impact on Harbour & Surrounding Communities: Several submissions stress that the size, visibility, and 24/7 nature of the facility would degrade the scenic quality of the harbour. Views across the water, valued by residents and visitors alike, would be compromised. Submissions highlight potential loss of amenity for those using coastal walks, recreational spaces, and neighbouring communities who rely on the harbour's visual character as a place of leisure, recreation and social identity.	Section 11.5.2 of Chapter 11 of the EIS (Landscape and Visual Assessment) details viewpoint assessments for communities including Cobh, Monkstown, Crosshaven, Camden Fort, Curraghbinny Woods, Haulbowline Park, and local scenic routes. For each, the magnitude, duration, and significance of visual impacts are evaluated. Across harbour-facing areas, effects on views are consistently slight to moderate, neutral, and permanent. The proposed facility occupies only a small part of the harbour panorama, often set against the Ringaskiddy ridgeline or obscured by landforms and buildings, reducing its prominence.Scenic harbour views remain intact, with Cork Harbour's defining attributes (panoramas, heritage structures, coastal headlands, and wooded promontories) still visually dominant. At Cobh Town Park promenade and the Five Foot Way, views are partly screened by Haulbowline, and the development forms a minor part of the vista, with slight, neutral, and permanent effects. From St Colman's Cathedral, the development is a small segment of a panorama already featuring industrial elements, resulting in moderate, neutral, and permanent effects. While taller structures like the stack are visible, they do not dominate or block key vistas. For coastal walks and recreational areas such as Gobby Beach and Martello Tower paths, significant temporary negative effects are expected during construction, but post-construction views are slight to neutral. Improved access and new walkway connections enhance recreational amenity. Visual effects along Monkstown waterfront, Curraghbinny Woods, and Haulbowline Park are slight to neutral, with screening from vegetation and built features. In Crosshaven-Camden, effects are slight and neutral, with views set in a maritime-industrial context. The EIS finds recreational amenity largely unaffected, and in some cases improved. Section 11.3 of Chapter 11 of the EIS highlights Cork Harbour's existing mixed industrial-maritime character. The development is visually consistent with current industrial features and does not introduce a new landscape type, contributing to the classification of effects as slight to moderate and neutral. Night-time effects, including stack lighting, are similar to existing wind turbine and port facility lighting, and blend into Cork Harbour's complex nightscape. These effects are classified as slight to moderate, neutral, and not significant.
	Impact on Heritage Sites & Cultural Assets: Some submissions specifically reference the threat to historically important sites such as Spike Island, Camden Fort and the Martello Tower. They argue that these culturally significant attractions - integral to Cork Harbour's heritage tourism offer - would be visually dominated or contextually diminished by the presence of a large industrial structure, eroding their historic relationship with the surrounding landscape	The proximity of the proposed development to culturally significant heritage sites in Cork Harbour, including the Ringaskiddy Martello Tower and other recorded archaeological features within the wider 2 km study area, was addressed for this application. Chapter 14 of the EIS (Archaeological, Architectural and Cultural Heritage) confirms that while no recorded monuments lie within the development footprint, the Martello Tower is located approximately 70 m south of the site, and its Zone of Notification overlaps the development area. The EIS recognises that the proposed facility will alter aspects of the historic setting and therefore assesses

ACP Submission Reference	Submission Statement	Applicant Response
		potential impacts on the contextual relationship between these heritage assets and the surrounding landscape. Chapter 11 of the EIS (Landscape and Visual Assessment) further evaluates views from and towards key heritage sites around Cork Harbour, including Martello towers, historical forts, and other culturally significant locations. While some localised significant negative visual effects are identified-particularly at the Martello Tower due to proximity-the assessment concludes that the development integrates with the existing industrial landscape character of Ringaskiddy and will not significantly alter the wider Cork Harbour setting. Mitigation includes sensitive building design and landscape measures to reduce visual prominence and are summarised in Chapter 17 of the EIS (Summary of Impacts and Mitigation Measures). As outlined in Chapter 11 of the EIS, it was considered the visual and contextual sensitivities of heritage sites such as Spike Island, Camden Fort, and the Martello Tower. The predicted impacts-though locally notable-have been assessed, and appropriate mitigation measures have been incorporated to preserve, as far as practicable, the cultural and historic character of these important assets.
	Threat to Natural Landscape & Long-term Harbour Character: A smaller group of submissions warn of irreversible damage to the natural harbour landscape. They fear that incremental industrialisation-symbolised by the incinerator-will degrade the harbour's unique aesthetic and ecological value, leaving "*nothing left of the natural landscape*" for residents, visitors, and future tourism potential.	As outlined in Chapter 11 of the EIS (Landscape and Visual Assessment), it is identified that the receiving landscape is already strongly influenced by existing industrial, port-related and infrastructural development at Ringaskiddy, forming a "*working harbour*" character (Section 11.3). While the proposed development will result in localised significant visual effects in the immediate vicinity (Section 11.7), the assessment concludes that the wider harbour landscape and its scenic value will not be significantly altered, as the development consolidates within an established industrial setting rather than expanding it into previously undeveloped areas (Section 11.5). As outlined in Chapters 12 (Biodiversity) and 17 (Summary of Impacts and Mitigation Measures) of the EIS, the site comprises modified terrestrial habitats adjacent to, but outside, designated Natura 2000 sites (Section 12.2 of Chapter 12 of the EIS). With the implementation of habitat protection, construction controls, and long-term ecological management measures, the EIS concludes that no significant adverse effects on designated habitats or species are predicted, and that some biodiversity enhancements will occur through targeted habitat creation and management (Section 17.3.8 of Chapter 17 of the EIS). It is recognised that perceptual concerns about harbour industrialisation are understandable; however, based on detailed assessment, the development is not predicted to cause irreversible damage to the natural landscape nor to diminish the long-term character of Cork Harbour. Residual landscape and ecological effects are

ACP Submission Reference	Submission Statement	Applicant Response
		assessed as limited, localised, and appropriately mitigated (Section 11.7 of Chapter 11 of the EIS, Section 16.4 of Chapter 16 of the EIS).
	Missing or Insufficient Assessment of Tourism & Socio-economic Impacts: Some submissions assert that the applicant has not provided adequate tourism, socio-economic, or heritage impact assessments. These submissions argue that without comprehensive evaluation of how the proposal interacts with tourism strategies, heritage preservation, and local amenity values, the application is fundamentally incomplete.	As outlined in Chapter 6 of the EIS (Population and Human Health), an evaluation of socio-economic effects notes that the development will provide economic and community benefits while posing no significant health or environmental risks when mitigation measures are implemented. As outlined in Chapter 11 of the EIS (Landscape and Visual Assessment), potential effects on landscape character and visual amenity are evaluated, including views from key tourism receptors around Cork Harbour (Sections 11.3 and 11.5). That chapter concludes that although some localised visual impacts will occur, the wider harbour character and its recreational value will not be significantly altered (Section 11.7). As outlined in Chapter 14 of the EIS (Archaeological, Architectural and Cultural Heritage), potential impacts on cultural heritage assets, which contribute to the area's tourism and amenity offer, are addressed, identifying heritage features within the study area (Section 14.3), assessing impacts on their setting (Section 14.4), and providing appropriate mitigation (Section 14.6). As outlined in Chapter 16 of the EIS (Cumulative Impacts, Other Impacts and Interactions), potential cumulative effects are assessed, including interactions between environmental factors such as population, landscape, and cultural heritage (Section 16.4). This evaluation demonstrates that no significant cumulative tourism- or amenity-related effects are predicted when considered in combination with other existing or permitted developments.
	Conflict with Tourism-focused Development Policy: Several submissions state that the proposal contradicts the Cork County Development Plan's strategic objective to advance Cork Harbour as a premier tourism and recreation destination. They argue the project is incompatible with planned tourism enhancement of beaches, coastal recreation areas, and landmark attractions like Spike Island.	Chapter 2 of the EIS (Policy and Planning Framework and Need for the Scheme) details how the proposed development is consistent with EU, national, and regional policies that promote circular economy practices, support indigenous waste-treatment capacity, and direct such infrastructure to appropriately zoned and industrialised locations. As outlined in Chapter 5 of the Planning Report (Waste and Planning Policy Considerations), the proposed development is located within an established industrial area at Ringaskiddy, designated for strategic employment and industrial activity, which in the Cork County Development Plan 2022-2028. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in '*Industrial Areas*' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed

ACP Submission Reference	Submission Statement	Applicant Response
		development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan. As outlined in Chapter 11 of the EIS (Landscape and Visual Assessment), although localised significant visual effects will occur, the wider Cork Harbour landscape, including key tourism receptors, will not be significantly altered due to the existing industrial character of the site and its surroundings. As outlined in Chapter 14 of the EIS (Archaeological, Architectural and Cultural Heritage), while certain heritage assets contribute to tourism, the development will not significantly impact their wider setting, with mitigation measures addressing localised effects.
TOPIC: EIS/INFORMATION ADEQUACY AND MONITORING		
The list of submissions to which this topic relates is included in Appendix B.	**Structural and Persistent Deficiencies in the Environmental Impact Statement (EIS):** Submissions repeatedly state that the EIS exhibits long-standing and unresolved substantive deficiencies, noting that three previous An Bord Pleanála Inspectors (2004, 2009, 2017) had already concluded that earlier versions were legally adequate in form but deficient in substance. The updated EIS is perceived as largely reiterating previous unsubstantiated assertions rather than addressing the core evidential shortcomings that have been highlighted over two decades. submissions argue that these structural weaknesses undermine the credibility of the document as a reliable basis for environmental assessment, with the continued absence of necessary data, analyses, and justification leaving essential questions unresolved. This systemic failure is viewed not as an isolated weakness but as an entrenched pattern in the Applicant's environmental documentation.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement'*, the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development.
	Omission of Critical Analyses and Essential Environmental Assessments: A dominant cross-cutting concern is the absence of key analytical components required to assess the environmental consequences of the proposal. submissions point to missing carbon-budget modelling, ETS emissions analysis, lifecycle greenhouse-gas evaluations, and PFAS and ultrafine-particle assessments, all of which they identify as fundamental to determining climate compliance and public-health risk. Several submissions also highlight the reliance on outdated OPW flood-risk information despite more recent datasets (e.g., OPW 2022) being available, leading to claims that the updated flood assessment does not reflect current coastal-risk realities. The lack of alternative-site analysis, robust baseline datasets, and tourism and socio-economic impact studies is further cited as evidence that the EIS does not provide decision-makers with the required material to understand the full spectrum of impacts. Collectively, these omissions	The methodology of the comprehensive climate assessment presented in Chapter 9 of the EIS (Climate), is detailed in Section 9.2, showing directly alignment with national and European statutory carbon budgets and sectoral emissions ceilings. It outlines the national five-year carbon budgets for 2021–2025, 2026–2030, and 2031–2035, highlighting Ireland's substantial utilisation of the 2021–2025 budget and underscoring the sensitivity of the climate receptor. The necessity to evaluate changes in greenhouse gas emissions within this context is emphasised. Section 9.3 details Ireland's emissions profile up to 2024, distinguishing between emissions within and outside the EU Emissions Trading System (ETS), and clarifies the impact of the Effort Sharing Regulation and the amended ETS Directive 2023/959, which impose stricter limits on ETS-sector emissions by 2030. As outlined in Section 9.2 of the EIS, the greenhouse gas assessment quantifies operational emissions from the facility, encompassing emissions from waste

ACP Submission Reference	Submission Statement	Applicant Response
	are described as “critical analytical voids” that materially weaken the decision-making framework.	treatment, avoided methane emissions resulting from the diversion of residual waste from landfill, and the displacement of fossil-fuel electricity on the grid, utilising projected grid carbon intensity for 2030. This constitutes a lifecycle greenhouse gas balance, consistent with IPCC inventory methods and IEMA guidance, employing tools such as the IPCC Waste Model and international studies on waste management and climate change. The chapter thereby delivers climate analysis aligned with carbon budgets and the ETS framework, rather than omitting these considerations. As outlined in Chapter 8 of the EIS (Air Quality), the emissions from the proposed development have been modelled using in-depth dispersion modelling analysis (AERMOD) which is the USEPA’s regulatory model used to assess all pollutants regulated under the Industrial Emissions Directive, including nitrogen dioxide, sulphur dioxide, particulate matter (PM_{10} and $PM_{2.5}$), carbon monoxide, total organic carbon, hydrogen fluoride, hydrogen chloride, heavy metals, dioxins/furans, and polycyclic aromatic hydrocarbons. The modelling methodology is presented in Section 8.2. This analysis is supported by extensive baseline monitoring campaigns conducted from 2006–2007, 2008, 2014–2015, 2018–2019 and 2024–2025 (as shown in Section 8.3), demonstrating that predicted concentrations under both maximum and abnormal operating conditions remain well below EU, UK and WHO health-based limit values at the most affected receptors (as presented in Section 8.5.3). Chapter 6 of the EIS (Population and Human Health) evaluates the health significance of these emissions, specifically discussing particulate matter and ultrafine particles. The evidence suggests that modern incinerators have significantly reduced particulate emissions, with modelled PM_{10} and $PM_{2.5}$ levels comfortably below air quality standards. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver’s existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. Chapter 13 of the EIS (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession) delivers a comprehensive assessment of soils, geology, hydrogeology, hydrology and coastal recession, relying extensively on updated national datasets. The baseline dataset is explicitly updated as new versions become available, and it is presented in Section 13.2.3. Section 13.3.3.3 summarised the accompanying Flood Risk Assessment (Appendix 13.4) that confirms that the site is located outside the 1-in-1,000-year tidal floodplain, classified as Flood Zone C. The 1-in-200-year design

ACP Submission Reference	Submission Statement	Applicant Response
		tidal level at the site is estimated at 2.87 mOD, with only minor sections of the site and the L2545 falling below this level. Road upgrades and ground-raising works provide additional protection against tidal and pluvial flooding, thereby mitigating future coastal risk to acceptable levels, as described in Sections 4.5.14 & 4.5.15 of Chapter 4 of the EIS (Description of the Proposed Development) An assessment of alternative locations was completed in 2025 to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.

ACP Submission Reference	Submission Statement	Applicant Response
		Chapter 6 of the EIS address tourism and socio-economic aspects, in accordance with Fáilte Ireland's 2011 guidelines for EIS tourism assessment. The chapter provides a tourism-specific assessment framework, linking determinants such as scenery, unspoilt environment, nature and wildlife, heritage and attractions to relevant specialist chapters. The same chapter identifies and appraises key tourism receptors near the site, including Ringaskiddy Port, Gobby Beach, the Martello Tower and Spike Island, with explicit cross-references to visual and amenity assessments in Chapter 11 of the EIS (Landscape and Visual Assessment) and cultural heritage assessments in Chapter 14 of the EIS (Archaeological, Architectural and Cultural Heritage). Chapter 11 confirms that, although locally significant visual effects are observed at Gobby Beach and the Martello Tower, the broader Cork Harbour landscape and its tourism value remain unaffected. The scheme incorporates positive amenity measures, such as a new coastal walkway and viewing point connecting Gobby Beach and the Martello Tower. Chapter 6 of the EIS also outlines the methodology for socio-economic assessment, covering demographics, employment, economic activity, tourism and amenities, and identifies positive operational impacts, including sustained employment, local spending and a proposed Community Benefit Fund. Chapter 16 of the EIS (Cumulative Impacts, Other Impacts and Interactions) integrates findings across all relevant topics to assess cumulative and interactive effects, ensuring that no significant environmental or tourism-related effect is overlooked.
	Inconsistent, Outdated, or Contradictory Information Within the Submitted Material: submissions claim extensive use of outdated or conflicting data, including the recycling of obsolete policy positions, inconsistencies between narrative chapters and technical appendices, and incorrect or unverified technical values (e.g., disputed R1 efficiency). Several highlight internal contradictions - for example, where the magnitude of impacts presented in appendices does not align with the impact characterisations in the main text. These internal discrepancies, combined with the Applicant's continued reliance on previously critiqued assumptions, reinforce the perception that the updated EIS lacks internal coherence and evidentiary robustness. According to submissions, this inconsistency leads to systematic understatements of adverse effects, undermining the reliability of conclusions reached in the EIS.	A comprehensive review of the submitted EIS chapters does not substantiate the assertion that the information provided is internally inconsistent, outdated, or contradictory. Within the updated EIS, each specialist chapter is based on current baseline data, drawing upon recent surveys, such as noise assessments from 2018 and 2025, multiple periods of air quality monitoring, groundwater data from 2025, and up-to-date ecological fieldwork. These data sources collectively demonstrate that the assessments are underpinned by updated and verified datasets. Furthermore, there is clear alignment between the narrative sections and the technical appendices; this alignment is achieved through the consistent application of EPA, EU, and national guidance, thereby ensuring methodological consistency across all chapters. The characterisation of environmental impacts is handled in a consistent manner throughout the EIS, with each chapter adhering to the same significance criteria. This approach is summarised in Chapter 17 (Summary of Impacts and Mitigation Measures), where all specialist inputs are integrated, and residual effects are reported in a coherent and cross-referenced fashion. In particular, Chapter 2 (Policy and Planning Framework and Need for the Scheme) demonstrates that the policy context has been fully updated to reflect the latest EU Circular Economy Package, revised waste directives, and national climate policy.

ACP Submission Reference	Submission Statement	Applicant Response
		Additionally, claims regarding incorrect or unverified technical values are not substantiated in the submissions. Appropriate references for source data is provided across the assessment chapters in the EIS.
	Major Deficiencies in Environmental Monitoring Capability and Operational Oversight: Several submissions focuses on monitoring inadequacies - both existing and proposed. submissions emphasise that key EPA air-quality stations in Cork Harbour have been offline for extended periods and that two of the three gas-monitoring stations intended to protect residents are currently non-operational, raising concerns about baseline data quality and future compliance assurance. Submissions also point to the absence of ultrafine-particle monitoring, incomplete mechanisms for detecting emissions under abnormal conditions, and the lack of validated methods to verify destruction efficiency at commercial scale. The EIS is further criticised for offering insufficient detail on filter-replacement schedules, leak-detection systems, and long-term emissions-tracking protocols. These monitoring limitations are treated as fundamental, not procedural, flaws, significantly weakening confidence in the Applicant's ability to manage and verify environmental performance.	Chapters 8 (Air Quality) and 17 (Summary of Impacts and Mitigation Measures) of the EIS, presents extensive baseline air quality data for Cork Harbour, collected across multiple monitoring campaigns, including surveys from 2006 to 2019 and an updated programme for 2024–2025. Results confirm that concentrations of all assessed pollutants (such as NO_2, SO_2, PM_{10}, $PM_{2.5}$, CO, VOCs, acid gases (HCl, HF), heavy metals (Cd, Tl, Hg, Sb, As, Pb, Cr, Co, Cu, Mn, Ni, V), dioxins, furans, and benzene) remain well within EU and WHO standards (see Table 8.1). The assessment addresses all pollutants regulated under the Industrial Emissions Directive (IED), with emission limits detailed in Table 8.3. The EIS demonstrates compliance with both ambient and maximum predicted air quality values, as confirmed by AERMOD air-dispersion modelling for standard and abnormal operating conditions. The operational emissions-monitoring regime is closely aligned with IED requirements, employing Continuous Emissions Monitoring Systems (CEMS) for key pollutants, periodic stack sampling for substances like dioxins and heavy metals, and rigorous modelling of abnormal scenarios. Mitigation and monitoring measures are outlined for air, population and health, noise, water, biodiversity, climate, soils, and accident risks. These include construction-phase dust controls, optimised stack design, IED-compliant abatement, automated controls, alarm systems, and an integrated Environmental Management System (EMS). Operational protocols cover filter management, plant automation, and safety, all designed to ensure ongoing compliance and environmental protection. The EIS clarifies that it does not rely solely on EPA roadside stations; instead, project-specific monitoring was conducted at representative locations. While ultrafine particle (UFP) monitoring is not required under the IED, the facility demonstrates compliance with all regulated pollutants. The document also addresses abnormal conditions, confirming emissions remain below regulatory limits. Plant performance and flue-gas treatment adhere to Best Available Techniques (BAT), with long-term monitoring, filter-replacement schedules, and leak detection detailed within the EMS.
	Unsupported Assertions and Conclusions Lacking Evidential Basis: Submissions claim a recurring pattern of assertive but unsubstantiated conclusions, particularly regarding operational safety, environmental performance, policy alignment, and community benefit. Many note that statements of "*no significant impact*" are not supported by the technical analyses required to justify such conclusions - especially where critical data (e.g., ultrafines, PFAS, flood-risk models) has not been provided. Several submissions	As outlined in Chapter 1 of the EIS (Introduction), Section 1.6 (Statutory Requirements) and the methodological sections of each technical chapter, impact conclusions are derived from defined EPA-compliant assessment steps rather than assertion. Air-quality and human-health conclusions are based on multi-period baseline monitoring and AERMOD modelling in Sections 8.3 to 8.5 of Chapter 8 of the EIS (Air Quality), covering all IED pollutants (NO_2, SO_2, PM_{10}/$PM_{2.5}$, CO, TOC, HCl,

ACP Submission Reference	Submission Statement	Applicant Response
	also stress that the Applicant has not meaningfully rebutted or addressed previous Inspector findings regarding site unsuitability and environmental uncertainties. This reliance on unsupported conclusions is viewed as a substantive weakness that materially affects the credibility of the EIS and undermines the transparency expected in a development of this scale.	HF, metals, dioxins), with results compared to EU/WHO standards before significance is assigned. Climate conclusions follow the quantified GHG and climate-risk methodologies in Section 9.2 of Chapter 9 (Climate), which benchmark emissions against carbon budgets and national/EU policy. Noise, traffic, biodiversity, soils/hydrogeology, landscape and cultural heritage each apply the same structured baseline–method–impact–significance approach in their respective chapters. Residual effects are consolidated in Chapter 17 of the EIS (Summary of Impacts and Mitigation Measures). Operational safety and major-accident risk are not asserted but assessed through the health-risk process in Sections 6.4 to 6.7 of Chapter 6 of the EIS (Population and Human Health), which integrate air, water, noise and traffic pathways and apply recognised health-protection standards. The plant's BAT-compliant combustion and abatement systems are detailed in Sections 4.11 to 4.17 of Chapter 4 of the EIS (Description of the Proposed Development), forming part of the certified QESH management system. Topics criticised as "*data-poor*" are addressed explicitly. Chapter 6 of the EIS (Population and Human Health) evaluates the health significance of emissions to air from the proposed development, specifically discussing particulate matter and ultrafine particles. The evidence suggests that modern incinerators have significantly reduced particulate emissions, with modelled PM_{10} and $PM_{2.5}$ levels comfortably below air quality standards. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver's existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. Persistent organic pollutants (dioxins, PCBs, PAHs) and metals are assessed using established methodologies in Sections 8.3 and 8.5 of Chapter 8 of the EIS. As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. Flood-risk and coastal-hazard findings are supported by ground investigations (2001–2019), 2025 monitoring and updated OPW/CFRAM datasets as presented in Chapter 13 of the EIS (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession), confirming Flood Zone C classification and effectiveness of mitigation. Policy alignment and community benefit are addressed in Sections 2.2 to 2.5 of Chapter 2 of the EIS (Policy and Planning Framework and Need for the Scheme), which cross-check the project against the EU Circular Economy Package, Waste and

ACP Submission Reference	Submission Statement	Applicant Response
		Landfill Directives, the Renewable Energy Directive and national/regional waste and climate plans. Socio-economic benefits, including employment and reduced export dependence, are addressed in Section 6.8 of Chapter 6 of the EIS and Sections 15.2 to 15.5 of Chapter 15 of the EIS (Material Assets). As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the key amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIS. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement*', the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance.
	Barriers to Public Understanding and Effective Participation: The Non-Technical Summary (NTS) is frequently described as overly technical, using terminology and analytical constructs that require specialist expertise to interpret. submissions argue that this contravenes the purpose of an NTS, which is intended to facilitate public understanding of environmental impacts. The complexity and specialised language are said to impede meaningful public engagement and create an information barrier that conflicts with the principles of accessible environmental communication. This theme, though represented by fewer submissions, is seen as emblematic of a wider lack of transparency in the EIS documentation.	As outlined in the Preface and Chapter 1 of the EIS (including Section 1.6 on statutory requirements), the Non-Technical Summary (NTS) has been prepared specifically to meet the requirements of the amended EIA Directive (Directive 2014/52/EU), the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, and relevant EPA guidance. Its purpose is to provide an accessible, public-facing overview of the proposed development and the main environmental effects, while the detailed evidence base remains in the specialist chapters and appendices. Consistent with this purpose, the NTS summarises each environmental topic in plain language and uses standard significance terminology (e.g. slight/moderate, temporary/permanent, not significant) rather than specialist matrices, datasets or modelling outputs. Where technical assessment is necessary (for example air quality modelling, flood risk, coastal processes, ecology, noise, and human health), the NTS provides a concise explanation of the key findings and clearly signposts readers to the relevant EIS chapters and appendices where full methodologies, inputs and results are presented. The NTS also includes introductory context on the EIS process, planning history and consultation, and uses figures/visual material to explain the site layout and receiving environment. On this basis, the NTS is structured to support public understanding and meaningful participation, and it does not create an information barrier; rather, it provides an accessible route into the full EIS documentation for anyone seeking further detail.
	Continued Concerns Regarding Site Unsuitability and Unresolved Environmental Risks: While raised across multiple categories, submissions relating to the unsuitability of the site form a coherent overarching theme. submissions highlight persistent environmental risks - including coastal regression, flooding exposure, and	Site suitability and the associated environmental risks (coastal regression, flooding and emergency access) are addressed directly in the updated EIS, primarily through Chapter 13 (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession) and the supporting appendices. The EIS recognises that the glacial till cliff at Gobby Beach is undergoing continuous natural erosion and applies a conservative 40-year

ACP Submission Reference	Submission Statement	Applicant Response
	constrained emergency access - that have been noted repeatedly in past assessments but remain unaddressed in the updated documents. The absence of modern flood modelling and the perceived reliance on outdated erosion data reinforce concerns that the EIS does not adequately account for present-day or future climate-change-driven risks. submissions argue that these unresolved issues render the site inherently unsuitable, creating a foundational vulnerability that no volume of mitigation commitments can rectify.	erosion model (exceeding the permission design life). The results show the waste-to-energy facility is set back sufficiently to avoid predicted cliff retreat over its full design life, with only non-critical amenity features potentially affected beyond that period. Residual long-term risk is managed through an adaptive coastal strategy, including sacrificial beach nourishment and defined replenishment triggers (average retreat >0.5 m/year over six years or localised retreat of ~3 m). Flood risk is assessed in Appendix 13.4 (Flood Risk Assessment) using site-specific analysis and updated datasets (monitoring and surveys up to 2024–2025, plus OPW/CFRAM information). The site is classified as Flood Zone C (very low probability), with localised vulnerability primarily linked to tide-locking and low points on the L2545 access road. Mitigation is engineered into the scheme: (i) raising ~190 m of the L2545 to ~3.495mOD (above the 1-in-200-year tidal level with climate-change allowance) and providing sealed drainage with ~660 m³ of storage to manage tide-locked events, and (ii) raising the site platform to ~4.55mOD (above the recommended flood defence level). Emergency resilience is also specifically addressed through the upgraded access arrangement, including a secondary emergency-only access route. Taken together, these measures demonstrate that the risks identified by submissions have been assessed using current information and modern modelling, and that residual coastal and flood risks are reduced to a very low level through design, mitigation, monitoring and adaptive management.
TOPIC: AIR DISPERSION & MODELLING		
The list of submissions to which this topic relates is included in Appendix B.	**Deficient Meteorological Inputs and Misrepresentation of Harbour Microclimate:** Submissions consistently argue that the air dispersion modelling relies on unsuitable meteorological data-specifically the use of Cork Airport meteorology instead of the Roches Point coastal dataset previously required by the Board. They contend that this inland station fails to represent critical harbour-specific atmospheric processes such as sea breezes, tidally driven humidity, wind channeling, and thermal inversion occurrences, all of which significantly alter plume rise, plume visibility, ground-level deposition, and pollutant transport across Cobh, Haulbowline, Monkstown, and the SPA/SAC sites. As a result, they maintain that the modelling likely under-predicts concentrations by 20% or more in estuarine conditions and is therefore non-compliant with EPA AG4 and AAQD Annex III for "*local*" meteorological inputs in complex coastal environments.	As outlined in Chapter 8 of the EIS (Air Quality), operational emissions from the proposed development were assessed using the USEPA AERMOD dispersion model in accordance with recognised regulatory guidance, including EPA AG4 and the Ambient Air Quality Directive requirements for model inputs and validation. Meteorological data selection followed the standard completeness and representativeness criteria required for regulatory dispersion modelling. Cork Airport is identified in Chapter 8 as the nearest Met Éireann synoptic station that meets the required data capture threshold (≥90%) for the full suite of parameters over the assessment period, and was therefore used as the primary dataset. The EIS does not disregard harbour microclimatic conditions. Chapter 8 explicitly recognises inland–coastal differences and addresses these through additional site-specific verification and sensitivity testing. In particular, the EIS includes a sensitivity assessment (reported in the relevant air quality appendix) examining the influence of alternative coastal surface characteristics (e.g. roughness and land–sea interface effects) on predicted concentrations, and confirms that these adjustments do not result in materially higher ground-level concentrations. In addition, an on-site weather

ACP Submission Reference	Submission Statement	Applicant Response
		station at Ringaskiddy was used to measure wind speed/direction, temperature and relative humidity to provide a local check on the representativeness of the synoptic data. The dispersion assessment was undertaken using conservative inputs, including maximum permitted emission rates and worst-case operational scenarios. The modelling results indicate that predicted ground-level concentrations at residential and ecological receptors remain below the relevant air quality standards and guidelines for all assessed parameters. On this basis, the EIS demonstrates that meteorological inputs have been selected and tested in a manner consistent with AG4/Annex III, and the claim that harbour conditions have been misrepresented or that concentrations are materially under-predicted is not supported by the technical findings presented.
	Inadequate Air Modelling Framework and Omission of Critical Parameters: The submissions claim multiple structural shortcomings in the dispersion and deposition modelling. These include: inconsistent handling of baseline samples; unexplained discrepancies in concentration inputs; missing derivations for calculation steps; exclusion of important pollutant fractions (e.g., DL-PCBs); omission of sub-$PM_{2.5}$ fractions despite instrument capability; failure to model key ecological receptors; incomplete representation of food-chain uptake pathways; and the use of short six-month datasets that cannot represent seasonal variation, particularly winter inversion periods known to exacerbate particulate accumulation in Cork Harbour. The modelling is described as difficult to follow, insufficiently transparent, and not reproducible-undermining confidence in both baseline and operational predictions.	As outlined in Chapter 8 of the EIS (Air Quality) and the supporting appendices, dispersion and deposition have been assessed using the USEPA AERMOD regulatory model in a manner consistent with EPA AG4 guidance, with all key modelling inputs (emission scenarios, stack parameters, terrain, meteorology, receptors and assessment criteria) set out and cross-referenced so that the approach is transparent and reproducible. Baseline air quality is not based on a single short dataset; rather it draws on multiple monitoring campaigns over several years (including an extensive August 2024–January 2025 programme designed to capture seasonal variation, including winter conditions) and these data are used to derive the background concentrations reported in Table 8.1 and applied in the modelling. Meteorological representativeness and worst-case dispersion are addressed through the use of complete Met Éireann synoptic data (with screening of stability/inversion-type conditions via AERMET as described in Appendix 8.1), supplemented by an on-site weather station for local verification and sensitivity testing. Operational emissions are modelled under conservative scenarios, including maximum IED emission limit values and abnormal operating conditions, and predicted ground-level concentrations (including background and cumulative sources) are compared directly against the relevant EU air quality standards and guidelines. The assessment explicitly covers the regulated particulate fractions (PM_{10} and $PM_{2.5}$) and the broader particulate-health context is addressed in Chapter 6 (Population and Human Health), including discussion of ultrafine particles. Persistent organic pollutants and metals are also assessed: Chapter 8 includes deposition modelling for dioxins/furans and other pollutants, while Chapter 6 and the supporting appendices address dioxin-like PCBs and food-chain exposure pathways using long-term soil/sediment datasets, updated intake modelling and available EPA monitoring data (e.g., milk results). Ecological receptors are considered through the air-quality critical level assessment and through Chapter 12 (Biodiversity) and the AA Screening/NIS,

ACP Submission Reference	Submission Statement	Applicant Response
		which evaluate emissions-to-air and bioaccumulation pathways for the relevant SPA/SAC receptors.
	Thermal Inversions, Dispersion Failure, and Underestimation of Ground-Level Concentrations: Several submissions identify the harbour's susceptibility to temperature/thermal inversions, which confine pollutants near the surface and intensify exposure in residential zones and Natura sites. The short baseline sampling window-omitting full winter cycles-fails to capture inversion frequencies, thereby underestimating worst-case dispersion behaviour for PM, dioxins, and furan deposition. submissions argue that the modelling's reliance on non-representative meteorology and incomplete particulate characterisation (e.g., lack of PM1/UFP assessment) prevents an accurate appraisal of inversion-driven pollution peaks.	As outlined in Chapter 6 (Population and Human Health) and 8 (Air Quality) of the EIS, the dispersion assessment has been undertaken using AERMOD (the USEPA regulatory model) with AERMET processing and explicitly includes the stable, low-wind conditions under which thermal inversions and reduced dispersion are most likely to occur. The modelling evaluates each hour of a full meteorological year and, for each averaging period, uses the meteorological year that produces the highest ambient ground-level concentrations from the available datasets (including 2007 and 2020–2024), ensuring that worst-case low-dispersion conditions are captured rather than being dependent on any short monitoring window. Baseline air-quality monitoring in the updated assessment (Aug 2024–Jan 2025) includes winter conditions and is supplemented by extensive multi-season surveys undertaken previously (2006–2007, 2008, 2014–2015 and 2018–2019), providing representative background information across seasons, including inversion-prone periods. Operational impacts are then assessed conservatively by assuming maximum permitted emission concentrations and maximum mass flow (including abnormal operating scenarios) over continuous operation, with predictions reported over a 10 km study area and compared against the relevant statutory air-quality standards and health-based guidelines. The assessment includes regulated particulate fractions (PM_{10} and $PM_{2.5}$) and evaluates deposition for dioxins/furans and other relevant pollutants under the same worst-case meteorology and conservative emission assumptions; results demonstrate compliance with air-quality standards for human health and do not indicate exceedances at residential receptors or ecological receptors (including designated Natura sites). Accordingly, the EIS provides a robust and precautionary appraisal of Cork Harbour dispersion behaviour, including inversion-like stable atmospheric conditions, and concludes that significant adverse air-quality effects are not predicted.
	Plume Visibility, Plume Behaviour, and Landscape/Amenity Impacts: A significant concern relates to omitted or inadequate plume visibility assessments. submissions argue that Directive 2014/52/EU requires explicit characterisation of visible plume formation-including thermal plume modelling, cross-section elevation mapping, and seasonally varying plume density. They highlight that the plume could appear intermittently-morning, absent mid-day, returning in cooler evenings-introducing a major and permanent visual intrusion over highly sensitive landscapes such as Cobh, Rushbrooke, and Cork Harbour's skyline. The lack of a full plume visibility study is considered a material gap,	As outlined in Chapter 11 of the EIS (Landscape and Visual Assessment), the potential for effects on landscape character, visual amenity and the Cork Harbour skyline has been assessed through detailed viewpoint analysis (Section 11.5.2), considering the magnitude, duration and significance of effects, including for plume formation, for key receptors and communities including Cobh, Monkstown, Crosshaven, Camden Fort, Curraghbinny Woods and Haulbowline Park. The assessment concludes that, across harbour-facing areas, the proposed development occupies only a small part of the wider panorama and is frequently read in the context of the existing Ringaskiddy ridgeline and established industrial-maritime setting (Section 11.3), with effects on views consistently classified as slight to moderate, neutral and permanent, and not significant. The EIS also recognises that taller

ACP Submission Reference	Submission Statement	Applicant Response
	particularly given international experience (e.g., Rivenhall, UK) where plume-visibility conditions changed after approval.	elements such as the stack will be visible from certain locations; however, they do not dominate or block key vistas and the defining attributes of Cork Harbour (panoramas, heritage structures, coastal headlands and wooded promontories) remain visually dominant. Tourism and amenity receptors have been specifically considered with reference to Fáilte Ireland guidance (Chapter 11), including cruise-arrival and key visitor viewpoints, and the assessment finds that the wider harbour character and recreational value will not be significantly altered. Localised significant visual effects are acknowledged in the immediate vicinity, and mitigation measures including sensitive design and landscaping are provided and summarised in Chapter 17. Night-time effects, including stack lighting, are assessed as similar to existing port and wind-turbine lighting and are considered to blend into Cork Harbour's complex nightscape. Accordingly, based on the completed landscape and visual assessment, the EIS does not identify significant adverse effects on landscape/amenity arising from the visibility of the development when considered in its receiving environment.
	Under-representation of Sensitive Coastal and Marine Receptors: Several submissions note that the modelling fails to reflect the deposition behaviour of plumes over the marine environment, where airborne pollutants interact with surface waters, intertidal sediment, and the foraging zones of protected birds and otters. They argue that assumptions that pollutants "simply dilute" are scientifically unfounded, and that missing baseline data on bird use of areas with maximum potential deposition undermines any assessment of ecological risk. It is claimed that meteorology errors further compound the issue, as correct plume transport modelling is essential for determining deposition hotspots along estuarine channels.	As outlined in Chapter 12 (Biodiversity), Chapter 8 (Air Quality), Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) and the accompanying Appropriate Assessment/Natura Impact Statement, the EIS explicitly identifies Cork Harbour's coastal and marine environment as a receptor for emissions to air via deposition (including intertidal habitats, protected birds and otter) and assesses the relevant source–pathway–receptor linkages for designated sites including the Great Island Channel SAC, Cork Harbour SPA, Sovereign Islands SPA and Ballycotton Bay SPA. The assessment does not rely on an assumption of '*simple dilution*'; deposition of relevant pollutants (including particulates and the key groups assessed such as metals and organic compounds) is modelled using the AERMOD/AERMET approach and presented across a grid that covers both land and marine waters within the study area, allowing deposition hotspots to be identified irrespective of land/water boundaries in a manner consistent with EPA AG4 guidance. Chapter 12 and the AA/NIS also draw on site-specific baseline field survey information (including 2024–2025 surveys for otter activity and coastal/estuarine bird usage) to inform the ecological sensitivity and exposure pathways, and conclude (taking account of mitigation and operational controls) that predicted deposition levels will not result in significant effects on marine/intertidal habitats or on the conservation objectives of the relevant Natura 2000 sites. Meteorological representativeness and plume transport, which are fundamental to deposition hotspot identification, are addressed within the Chapter 8 modelling inputs and sensitivity considerations, and are carried through to the biodiversity and cumulative assessments; accordingly, the contention that coastal/marine receptors are under-represented or that deposition over the harbour has not been assessed is not supported by the information and conclusions set out in the EIS.

ACP Submission Reference	Submission Statement	Applicant Response
	Gaps in Monitoring Network and Spatial Coverage for Harbour Dispersion: Submissions emphasise that the air quality baseline relies excessively on a single PM monitoring point near the site, with no continuous particulate measurement across downwind residential areas or within/near SPA/SAC boundaries. The harbour's complex airflow, inversion risk, and maritime plume behaviour make single-site monitoring inadequate for calibration or validation of the dispersion model. Without multi-point data, they argue the EIS cannot demonstrate representative baseline conditions or accurately predict cumulative or worst-case plume impacts, particularly under inversion or sea-breeze stagnation events.	As outlined in Chapter 8 of the EIS (Air Quality) and including the baseline assessment and dispersion modelling described in Sections 8.3 and 8.4, the EIS uses a combination of site-specific baseline monitoring and established ambient air quality datasets to characterise existing conditions, and then applies the USEPA AERMOD model in accordance with recognised regulatory guidance to predict ground-level concentrations and deposition at both human and ecological receptors. AERMOD is a validated regulatory model and is applied using quality-assured meteorological inputs and conservative assumptions (including maximum and abnormal operating scenarios) to ensure that worst-case outcomes are assessed; the purpose of the baseline monitoring is therefore to define representative background concentrations and to support the impact assessment, rather than to 'calibrate' the model. The assessment includes a dense receptor grid and discrete sensitive receptors (including residential locations and designated ecological sites) across the wider study area, and results are reported against the relevant statutory air quality standards and guideline values for the protection of human health and the environment. On this basis, the EIS demonstrates that predicted operational contributions are small relative to background and that overall concentrations remain below the applicable standards/guidelines, including under low-dispersion conditions, such that significant adverse effects are not predicted.
TOPIC: SAFETY, DEFENCE AND EMERGENCY ACCESS		
The list of submissions to which this topic relates is included in Appendix B.	**Critically Constrained Emergency Access and Evacuation Capacity:** Across the submissions, a dominant concern is the severe limitation of evacuation and emergency access routes in Ringaskiddy, Cobh, Haulbowline and surrounding harbour communities. The site's peninsula configuration, multiple single-access roads, and dependence on a claim that a single hump-backed bridge for 15,000+ residents create a scenario in which any incident at the facility-fire, explosion, or chemical release-could render escape impossible and obstruct emergency response vehicles. Multiple submissions highlight that critical workers, students and the public using Ringaskiddy, Haulbowline, Spike Island, and third-level maritime institutions would be trapped if road access were blocked. These issues are framed as unacceptable given the scale of potential accidents at a hazardous-waste-processing installation.	As outlined in Chapter 4 of the EIS (Description of the Proposed Development) and Appendix 13.4 (Flood Risk Assessment), access and emergency resilience for the proposed development have been specifically assessed and designed so that emergency services can reach the site and the facility is not isolated during extreme events. The EIS identifies that sections of the existing L2545 access road are vulnerable to tidal and pluvial flooding due to low levels and tide-locking at the outfall (Section 4.5.14), and therefore includes a comprehensive upgrade of this critical route, including raising approximately 190 m of the L2545 to approximately 3.495 mOD (above the 1-in-200-year tidal level with a climate-change allowance) and providing a sealed drainage system with underground storage (c.660 m^3) to prevent ponding when the outfall is tide-locked. In addition, the site platform is raised to approximately 4.55 mOD (Section 4.5.15), further reducing the risk of flood-related loss of access or operational disruption. Importantly, Section 4.5.11 of Chapter 4 also provides for a secondary emergency-only access route to the east of the primary entrance, ensuring that emergency services can access the facility even in the unlikely event of temporary obstruction of the main access. The proposed development will operate under strict regulatory controls (including the EU Industrial Emissions Directive framework referenced across the EIS), and the combination of engineered access upgrades, flood resilience design levels, and the dedicated secondary

ACP Submission Reference	Submission Statement	Applicant Response
		emergency route demonstrates that the emergency access concerns raised in submissions have been addressed through assessment, design, and mitigation.
	Safety Risks to the Irish Defence Forces and Strategic Harbour Operations Several submissions emphasise the site's proximity to the Irish Naval Base and associated Defence Forces infrastructure. Given that key Defence operations rely on the same restricted road network, any incident could compromise national security logistics by blocking access for Defence personnel, emergency responders, and evacuation routes. Submissions stress that an accident-related closure of the single access point would "*hinder Naval Base operations*" and jeopardise safety at Haulbowline Island, where Defence Forces are stationed and where the public also accesses newly developed recreational amenities. This concern amplifies the critique that the chosen location is incompatible with strategic national assets.	As outlined in Chapter 4 of the EIS (Description of the Proposed Development) and Appendix 13.4 (Flood Risk Assessment), access and emergency resilience have been explicitly assessed and designed so that the facility is not isolated during extreme events and emergency services can reach the site. The EIS identifies that sections of the existing L2545 access road are vulnerable to tidal and pluvial flooding due to low levels and tide-locking at the outfall (Section 4.5.14) and therefore incorporates a comprehensive upgrade of this critical route, including raising approximately 190 m of the L2545 to approximately 3.495 mOD (above the 1-in-200-year tidal level with a climate-change allowance) and providing a sealed drainage system with underground storage (c.660 m^3) to prevent ponding when the outfall is tide-locked. In addition, the site platform is raised to approximately 4.55 mOD (Section 4.5.15), and Section 4.5.11 provides a secondary emergency-only access route to the east of the primary entrance, ensuring emergency access even in the unlikely event of temporary obstruction of the main access. The Roads and Traffic assessment (Chapter 7) considers the wider network and does not identify operational constraints that would impede access to Haulbowline Island or other strategic harbour activities, with long-term network performance expected to improve further once the M28 is operational. Potential major accidents and disasters are assessed in Chapter 6 (Population and Human Health) and, with embedded design safety features and mitigation measures, the EIS does not identify significant risks to surrounding populations or critical facilities. Accordingly, the detailed assessments in the EIS do not support the contention that the proposed development would hinder Irish Defence Forces operations or compromise strategic harbour logistics; rather, it demonstrates that access, emergency response and resilience have been addressed through assessment, design and mitigation.
	Elevated Risk of Accidents and Major Incidents Given Site Context: Submissions consistently argue that incinerators are historically prone to fires, explosions, and abnormal emissions events, citing previous real-world examples in Cork Harbour. They contend that the combination of hazardous processing, coastal exposure, and limited egress routes dramatically increases the probability of severe outcomes during a malfunction. Some residents point to past plume-dispersion behaviour in the harbour-where smoke from unrelated industrial fires settled in low-lying areas for days-as evidence that a similar event involving toxic emissions would be impossible to manage safely. The site is repeatedly described as inherently unsuitable for any hazardous installation because even a relatively small incident would become unmanageable due to the area's geography and constrained transport network.	As outlined in Chapter 6 of the EIS (Population and Human Health) and Chapter 17 (Summary of Impacts and Mitigation Measures), the potential for major accidents and disasters (including fire, explosion and abnormal emissions) has been explicitly assessed using a source–pathway–receptor approach and is addressed through embedded design controls, operational procedures and regulatory oversight. The facility is required to operate under the strict framework of the EU Industrial Emissions Directive and Best Available Techniques, including continuous emissions monitoring and automatic plant control/shutdown arrangements, which are designed to prevent, detect and respond to abnormal operating conditions and to ensure that emissions remain controlled at all times As outlined in Chapter 4 (Description of the Proposed Development), the design incorporates multiple layers of prevention and mitigation for fire and incident

ACP Submission Reference	Submission Statement	Applicant Response
		escalation, including engineered detection and suppression systems, containment and management of firewater, and controlled handling/storage arrangements for incoming waste. The EIS also does not rely on assumption regarding dispersion under upset scenarios: Chapter 8 (Air Quality) assesses operational impacts under both maximum and abnormal operating conditions using AERMOD (the USEPA regulatory model) and reports predicted ground-level concentrations against the relevant statutory standards and guidelines, demonstrating that significant adverse effects are not predicted. The EIS further recognises the coastal setting and access resilience considerations raised in submissions. As outlined in Section 4.5.14 and Section 4.5.11 of Chapter 4 and Appendix 13.4 (Flood Risk Assessment), the L2545 access road is upgraded (including raised levels and sealed drainage with storage to manage tide-locking) and a secondary emergency-only access route is provided, ensuring emergency services access even in the unlikely event of obstruction of the primary route. Taken together, these assessed hazards, conservative modelling and the embedded safety, monitoring and emergency-access measures do not support the contention that the site is inherently unsuitable or that an incident would be unmanageable due to geography or constrained access; rather, the EIS demonstrates that risks have been identified, mitigated and reduced to a level where significant effects are not predicted.
	Inadequate Incident Alarm and Public Notification Systems: A distinct theme concerns the deficiencies of incident-notification and alarm protocols. submissions recount previous harbour-area emergencies where residents learned of dangerous fires from the media rather than official channels, resulting in preventable health risks-particularly for those with respiratory conditions. They argue that the proposed development has not demonstrated a robust, real-time, multi-channel alerting system capable of warning residents, workers, schools, hospitals, Defence installations, and port operations during an abnormal event. This deficiency is viewed as incompatible with the risks of a hazardous-waste incinerator, where delayed notification could compound exposure, impede evacuation, or overwhelm emergency services.	As outlined in Chapter 6 of the EIS (Population and Human Health) and Chapter 17 (Summary of Impacts and Mitigation Measures), the potential for major accidents and disasters (including fire, explosion and abnormal emissions events) has been explicitly assessed and is addressed through embedded design controls, operational procedures and regulatory oversight. The facility is required to operate under the strict framework of the EU Industrial Emissions Directive and Best Available Techniques, including continuous emissions monitoring and automatic plant control/shutdown arrangements, which are designed to prevent, detect and respond rapidly to abnormal operating conditions and minimise any potential off-site consequences. Chapter 4 (Description of the Proposed Development) further describes multiple layers of prevention and mitigation for fire and incident escalation, including engineered detection and suppression systems and containment/management of firewater. In addition, Chapter 8 (Air Quality) assesses operational impacts under both maximum and abnormal operating conditions using AERMOD (the USEPA regulatory model) and reports predicted concentrations against the relevant statutory standards and guidelines, demonstrating that significant adverse effects are not predicted. Within this assessed and controlled framework, incident response arrangements necessarily include defined procedures for escalation and coordination with the emergency services and relevant stakeholders, supported by the enhanced emergency access provisions in Section 4.5.11 and Section 4.5.14 (including the upgraded L2545 and the secondary emergency-only access route). Accordingly, the EIS does not support the contention

ACP Submission Reference	Submission Statement	Applicant Response
		that robust incident response and public safety arrangements have not been demonstrated; rather, it shows that abnormal events have been assessed and controlled through monitoring, automatic safeguards, embedded mitigation and emergency response planning.
	Aviation-Related Safety Considerations (Indirect but Relevant): No explicit "*aircraft risk*" submissions were found. However, the dataset includes related aviation-safety commentary from the Irish Aviation Authority, noting requirements for crane-operation notification and ensuring no interference with regulated air-space activities. While not framed as a formal "aircraft-accident risk," these entries indicate that the development resides within a regulated aviation and navigational environment, suggesting that airborne operations (e.g., cranes, plume behaviour) require oversight to prevent aviation conflicts. Even though not detailed as a major objection theme, this reinforces that the site is safety-sensitive from a multi-modal operational standpoint.	As outlined in the project description and consultation requirements set out within the EIS, construction activities involving cranes or other tall plant/equipment will be subject to Irish Aviation Authority (IAA) notification and compliance procedures to ensure no interference with regulated airspace and navigational activities. This confirms that the proposed development is located within a wider regulated aviation environment and that appropriate oversight and coordination are embedded for the construction phase. The EIS does not identify aviation safety as a significant operational impact pathway: operational emissions and plume dispersion are assessed conservatively in Chapter 8 (Air Quality) using the USEPA AERMOD regulatory model under both maximum and abnormal operating scenarios, with predicted ground-level concentrations remaining below the relevant standards and guidelines, and potential major accidents and emergency response considerations are assessed in Chapter 6 (Population and Human Health) and summarised in Chapter 17 (Summary of Impacts and Mitigation Measures). On this basis, while IAA oversight is required for certain construction activities, the EIS does not predict conflicts with aviation operations or significant aviation-related effects arising from the construction or operation of the proposed development.
TOPIC: HEALTH IMPACT ASSESSMENTS		
The list of submissions to which this topic relates is included in Appendix B.	**Insufficient and Incomplete Health Impact Assessment:** Some submissions argue that the application fails to provide a meaningful Health Impact Assessment (HIA). Concerns highlight the absence of quantitative health studies, baseline health data, or a clear methodology for assessing potential health effects. The lack of robust, site-specific health evidence is seen as a major deficiency, weakening the reliability of conclusions within the Environmental Impact Statement.	As outlined in Chapter 6 (Population and Human Health), the EIS provides a structured assessment of potential health effects during both construction and operation, including review of the relevant evidence base and an evaluation of exposure pathways in the context of the proposed development and its receiving environment. The human health assessment is informed by the operational air quality assessment in Chapter 8, which applies the USEPA AERMOD regulatory dispersion model using conservative assumptions and assesses both maximum permitted emissions (Industrial Emissions Directive) and abnormal operating scenarios. The modelling demonstrates that predicted ambient ground level concentrations remain below the relevant statutory air quality standards and health-based guideline values at residential receptors, and therefore do not indicate a potential for significant adverse health effects. The EIS also places this assessment in the context of modern regulatory controls and continuous monitoring requirements under the Industrial Emissions Directive and associated EPA licensing, noting that published health concerns associated with incineration largely relate to historical or non-compliant operations that pre-date current emission limits and abatement technology. In addition, as referenced in Chapter 6, operational data and emissions compliance reporting from a

ACP Submission Reference	Submission Statement	Applicant Response
		comparable modern facility in Ireland demonstrate emissions well within licensed limits with no exceedances over the reported period. Accordingly, the EIS concludes that, with the embedded design measures, regulatory controls and monitoring in place, the proposed development will not result in a deleterious effect on human health.
	Cumulative Health Effects from Multiple Emission Sources: A further objection stresses that the assessment overlooks the cumulative health burden arising from numerous existing pharmaceutical and industrial incinerators already operating around Cork Harbour. The argument is that cumulative exposure to emissions-when combined with the proposed facility-poses significantly greater risks than the application acknowledges, warranting a comprehensive cumulative HIA.	As outlined in Chapter 6 of the EIS (Population and Human Health) and Chapter 16 (Cumulative Impacts, Other Impacts and Interactions), potential cumulative effects on population and human health have been assessed in combination with other major industrial and infrastructural developments in Cork Harbour, and the EIS concludes that no significant negative cumulative effects are predicted. This conclusion is supported by the topic-specific cumulative assessments, including Chapter 8 (Air Quality), which undertakes detailed cumulative dispersion modelling incorporating emissions from existing industrial point sources in the harbour area alongside the proposed development, and compares the combined predicted concentrations against the relevant statutory air quality standards and health-based guideline values. The modelling is undertaken using the USEPA AERMOD regulatory model with conservative inputs (including maximum and abnormal operating scenarios) and assesses both residential and ecological receptors, demonstrating that overall concentrations remain within the applicable standards. Chapter 10 (Noise and Vibration) similarly considers the receiving environment and confirms that significant cumulative noise effects are not anticipated with the proposed mitigation. Accordingly, while submissions refer to the number of existing emission sources in the area, the EIS addresses cumulative exposure through standards-based assessment and conservative cumulative modelling, and does not indicate that the proposed development would give rise to a significant cumulative adverse effect on human health.
TOPIC: HEALTH CONCERNS		
The list of submissions to which this topic relates is included in Appendix B.	**Emissions:** People living around the harbour area are at risk from the toxic fumes from the proposed Incinerator. Emissions characterised as "within limits" include Persistent Organic Pollutants (POPs),dioxins, heavy metals and particulate matter. There is a major health threat to both local residents and Cork City residents depending on wind direction. Long term chronic exposure to persons has not been ruled out by the applicant. The stack is due to be 75 mts high fumes and particles can be carried around the wider Harbour area as well as into Cork City (and in my front door). There will be a constant plume visible right throughout the harbour, this will have both health and economic impacts in the harbour. The environmental impact of the proposed resource recovery centre will a detrimental effect on the health of the population of the greater Cork harbour region. The site is located in close proximity to the 15,000 residents of Cobh and Great Island. The Irish Doctors Medical association, European	As outlined in Chapter 6 - Population and Human Health, effects on human health from the proposed development during construction and operation were assessed. While some studies, particularly in the past, report health effects in relation to resource recovery facilities, nearly all of these studies are, by their nature, historical and refer to toxic or industrial burning processes. These virtually all pre-date modern technology and the associated large decreases in emissions. They also pre-date current regulatory restrictions on allowable emissions such as the EU Air Quality Directive and the EU Industrial Emissions Directive. We know from direct experience that modern resource recovery facilities operate well within these stringent limits. The Indaver facility in Meath, widely predicted by objectors in advance of its commissioning to greatly exceed those limits, has in operation been a great example of a well-run facility.Modelling for emissions of

ACP Submission Reference	Submission Statement	Applicant Response
	Environmental agency and World Health organisation have grave concerns for the people's health within 50 km of these incinerators. When you weight the potential cost in damage to the environment and the health of the exposed population, these so-called benefits dwindle in value. WHO's 2021 Global Air Quality Guidelines show adverse health effects at $PM_{2.5}$ and PM_{10} levels well below current EU limit values. The proposed development will be detrimental to our mental health due to anxiety about polluted water and air and anxiety about our physical health from the same source of pollution, namely the burning of waste in commercial quantities, both Irish and imported waste. The inevitability of hazardous compounds and particles entering the sea water of the harbour, through flooding of the site, and the air through the burning of waste can only cause harm to the physical health of us sea-swimmers here in Myrtleville, Fountainstown and all the other swimming places in the harbour. We are particularly concerned regarding the long-term impact on the health and well-being of our sailing community.	particulate matter in the form of PM_{10} and $PM_{2.5}$ does not support any likelihood of a detrimental health effect. There has been nothing published in recent literature which would significantly change this position. Overall, there is little evidence to suggest that resource recovery facilities are associated with the increased respiratory symptoms, or other medical conditions, in the surrounding population. This is consistent with the data from risk assessments, emissions and ambient air monitoring in the vicinity of such facilities, which indicate that modern, well-managed facilities make a very small contribution to background levels of air pollution. Multiple reputable reviews quoted within Chapter 6 support this position. The fact that the proposed development will be operated in accordance with the strict terms of the EU Industrial Emissions Directive, means that emissions will be lower than those cited in the directive reducing even further any possible risk. The Emissions Compliance Report (Indaver, 2025), submitted to the EPA on emissions from the Indaver facility in Carranstown, Co. Meath states that the plant operates well below the Legal licensed limit. All information available on the proposed development therefore, both from modelling and from actual results of a similar facility in Ireland, indicates that all emissions will be well within the statutory Air Quality Standards. These provide strong evidence that there will be no deleterious effect on human health either in the immediate vicinity or in the wider context, due to its operation. As outlined in the EIS Chapter 8 Air Quality Section 8.5.2 Potential Effects Operational Phase note that AERMOD modelling results indicate that the ambient ground level air contaminants concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. Water will be contained on the project site and therefore there is no possibility of contamination of aquifers, or consequent contamination in Cork Harbour SPA. Refer to EIS Chapter 13, Soils, Geology, Hydrogeology, Hydrology and Coastal Recession Section 13.6 for details.
	Illness related risk: The submissions state that **t**his region in the harbour has a far higher than average cancer rate so they do not want any additional pollutants spewing into the air, trapped in the harbour basin - with very little monitoring or filtering. The site is adjacent to a very large metropolitan area with increased risk to a broader population of residents who suffer from lung issues and have compromised immunity. The submissions argue that "compliance with limits" does not equal "*no health risk*". As per the WHO and IARC, health effects would include cancer, effects, illnesses, immune system disruption, birth defects and learning difficulties. A major concern is cumulative exposure to a mixture of pollutants. Even if each pollutant is within legal limits, combined exposure can cause: Increased asthma prevalence and greater risk of chronic obstructive pulmonary disease (COPD). A substantial body of epidemiological research links incinerator emissions to adverse health outcomes, including increased risks of	Regulatory restrictions on allowable emissions as outlined in the EU Air Quality Directive and the EU Industrial Emissions Directive ensure resource recovery facilities operate within these stringent limits. While some studies, particularly in the past, report health effects in relation to incinerators, nearly all of these studies are, by their nature, historical and refer to toxic or industrial burning processes. These virtually all pre-date modern technology and the associated large decreases in emissions. They also pre-date current regulatory restrictions on allowable emissions. As outlined in the EIS Chapter 8 Air Quality Section 8.5.2 Potential Effects Operational Phase AERMOD modelling results indicate that the ambient ground level air contaminants concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios within a 10km radius of the facility. A 10

ACP Submission Reference	Submission Statement	Applicant Response
	respiratory and cardiovascular diseases, certain cancers (notably non-Hodgkin lymphoma and soft-tissue sarcoma), congenital anomalies, and hormonal disruptions. Cobh already has a 37% higher incidence of cancer than other parts of the country. The additional pollution caused by the proposed development will only make a bad situation worse. Despite any technological improvements in the operation of incinerators they still pose a health risk with emission of harmful dioxins and substances. The British Society for Ecological Medicine (2005) concluded that no new incinerators should be built due to the health risks of fine particulates. Children and infants are especially vulnerable.International evidence (e.g ., Public Health England, 2019; French National Institute for Public Health, 2020) associates residential proximity to incinerators with higher rates of respiratory illness, low birth weight and certain cancers. Health impacts extend beyond the immediate area, with plausible exposure pathways up to 50 km downwind and extend to residents and visitors of Cobh, Ringaskiddy, Aghada, Whitegate, Crosshaven and beyond. A baseline health study should be undertaken into the cancer cluster, there is no baseline health study undertaken which has been asked for time and time again.	km radius of the proposed development site was reported in this study even though, in many cases, no residential receptors were near the location of this maximum ambient concentration. Concentrations at the nearest residential receptors are generally significantly lower than the maximum ambient concentrations reported. Health impact is assessed in Chapter 6 Population and Human Health of 2025 EIS. Chapter 8 Section 8.6.2.2 confirm that monitoring of air emissions from the main stack will be undertaken on a scheduled basis. The specific monitoring requirements will be specified by the EPA in the Industrial Emissions licence which will be required prior to operations commencing onsite. The submissions express concerns over cumulative pollutant loads or combined future emission scenarios. The EIS includes detailed and systematic cumulative emissions modelling, particularly within Chapter 8 – Air Quality, supported by Chapter 16 – Cumulative Impacts, Other Impacts and Interactions. **1. Cumulative industrial emissions** Chapter 8 confirms that a detailed cumulative assessment was undertaken using USEPA-based methodologies, incorporating all relevant industrial emission sources in the Lower Harbour, including Janssen Biologics, Hovione Cork, Thermo Fisher, ESB Aghada, Recordati, Sterling Pharma, Pfizer and BGE Whitegate. These sources were modelled to assess: - The area of maximum effect of each point source, - The areas where plumes interact, and - The combined maximum ambient pollutant concentrations. All cumulative modelling results are documented in Appendix 8.4, with outcomes demonstrating no significant overlap of plumes and compliance with all ambient air quality standards. **2. Background pollutant levels and combined future scenarios** A major multi-period baseline monitoring programme was undertaken (2006–2025), used to establish worst-case background concentrations, which were then added to modelled process emissions. Background values account for industrial, natural and traffic sources. Future scenarios ("*do-nothing*" and "*do-something*") include projected traffic volumes and other planned developments. **3. Worst-case and conservative meteorological modelling** The EIS applies a conservative modelling strategy designed to over-predict concentrations:

ACP Submission Reference	Submission Statement	Applicant Response
		- Maximum emission limit values assumed 24 hours/day for a full meteorological year. - Abnormal conditions modelled using elevated pollutant concentrations for defined periods. - Meteorological datasets include worst-case years (2007, 2020–2024) from both Cork Airport and onsite weather stations, ensuring robust evaluation of adverse dispersion conditions. - Additional modelling assessed fumigation and plume interactions (e.g., with the DePuy wind turbine). These conservative assumptions ensure cumulative assessments do not underestimate potential impacts. **4. Assessment of nitrogen oxides, particulates, odour surrogates, climate emissions and deposition** Chapter 8 models a full suite of pollutants regulated under the Industrial Emissions Directive, including NO_2, NO_x, SO_2, PM_{10}, $PM_{2.5}$, dioxins/furans, heavy metals, HCl, HF, CO and TOC. Deposition modelling for dioxins/furans, PAHs and heavy metals is explicitly included. Climate-related emissions are quantified separately in Chapter 9, following EU and EPA guidance. **5. Independent standards and validation** The modelling follows USEPA regulatory guidance (AERMOD, AERMAP, AERMET), EPA Air Modelling Guidance (AG4) and EU ambient air quality legislation. These represent internationally accepted standards for independent, regulator-compliant assessment. **Conclusion** The EIS provides a comprehensive, conservative, and standards-based cumulative modelling assessment. It explicitly incorporates all relevant industrial sources, worst-case background concentrations, adverse meteorology, traffic-related emissions and future development scenarios. The cumulative assessment concludes that even under these conservative conditions, predicted concentrations remain within applicable air quality standards and do not result in significant adverse cumulative effects.
TOPIC: CUMULATIVE IMPACT ASSESSMENT		

ACP Submission Reference	Submission Statement	Applicant Response
The list of submissions to which this topic relates is included in Appendix B.	**Existing Industrial Burden on the Lower Harbour:** Submissions repeatedly argue that the Lower Cork Harbour area is already heavily industrialised, hosting pharmaceutical plants, port activities, energy infrastructure and multiple emission sources. They contend that the landscape, air quality and marine environments are at or near saturation, and that introducing another high-emission installation would compound long-standing pressures. Many submissions emphasise that communities such as Cobh and Ringaskiddy have experienced decades of cumulative environmental degradation - citing industrial legacy effects, fish kills, amenity loss and declining ecological resilience - and therefore cannot absorb additional burdens without significant adverse consequences.	As outlined in Chapter 16 (Cumulative Impacts, Other Impacts and Interactions), the EIS recognises the established industrial and port-related character of the Lower Cork Harbour and assesses cumulative effects across air quality, population and human health, biodiversity/Natura 2000 receptors, water and soils, noise, landscape/visual amenity and material assets in combination with existing and reasonably foreseeable developments. In particular, Chapter 8 (Air Quality) includes a detailed cumulative dispersion assessment using the USEPA AERMOD regulatory model, incorporating background concentrations and relevant industrial sources in the Lower Harbour, and assessing both maximum and abnormal operating scenarios; the results demonstrate that predicted ambient concentrations at residential and other sensitive receptors remain below the applicable air quality standards and guidelines. Potential deposition pathways and ecological receptors are also considered through the specialist assessments (including Chapter 12 Biodiversity and the accompanying Appropriate Assessment documentation), and the EIS concludes that, with the embedded design and mitigation measures set out across the topic chapters, the proposed development will not materially add to existing pressures in a manner that would result in significant adverse cumulative effects or a deterioration of environmental quality or ecological resilience.
	Failure to Quantify or Adequately Model Cumulative Emissions: Numerous submissions highlight that the EIS does not quantify cumulative pollutant loads from all existing sources in the harbour, nor does it robustly explore combined future scenarios. They note that emissions modelling is overly narrow, underestimates additive effects from nearby industries, or relies on developer-funded assessments without independent validation. Concerns include insufficient evaluation of combined nitrogen oxides, particulates, odour, climate emissions and deposition effects on sensitive receptors, as well as underrepresentation of worst-case meteorological conditions.	As outlined in Chapter 8 (Air Quality) and Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) of the EIS, cumulative emissions have been quantified and assessed using a standards-based, conservative dispersion modelling approach. Chapter 8 confirms that a detailed cumulative assessment was undertaken using the USEPA AERMOD regulatory model (in accordance with EPA Air Modelling Guidance), incorporating relevant existing industrial point sources in the Lower Harbour (including major nearby facilities such as Janssen Biologics, Hovione Cork, Thermo Fisher, ESB Aghada, Recordati, Sterling Pharma, Pfizer and BGE Whitegate) alongside the proposed development to identify areas of maximum effect, potential plume interaction and combined ambient concentrations, with full outputs reported in the supporting appendices. The assessment also applies worst-case background concentrations derived from the multi-period baseline monitoring programme (2006–2025) and considers future scenarios (including projected traffic and other planned developments) so that combined '*do-nothing*' and '*do-something'* conditions are evaluated. Meteorological inputs and modelling assumptions are intentionally conservative, including use of full-year datasets selected to represent adverse dispersion conditions, maximum emission limit values assumed on a continuous basis, and abnormal operating scenarios, ensuring potential cumulative impacts are not underestimated. The cumulative assessment covers the regulated suite of pollutants (including nitrogen oxides, particulates and relevant trace pollutants) and includes deposition assessment where required, with climate-related emissions addressed separately in Chapter 9. On this basis, the EIS concludes that, even under conservative

ACP Submission Reference	Submission Statement	Applicant Response
		cumulative and worst-case meteorological conditions, predicted concentrations at residential and other sensitive receptors remain within the applicable air quality standards and guideline values, and therefore significant adverse cumulative effects are not predicted.
	Risk of Compounding Air-Quality and Public-Health Impacts: Some submissions link cumulative emissions to heightened risks for local populations already exposed to industrial pollutants. Submissions argue that even modern facilities create localised incremental emissions which - when added to the existing background load - could worsen respiratory and cardiovascular health outcomes, particularly for vulnerable groups. Several raise explicit concern that without a quantified cumulative air-quality assessment, decision-makers cannot determine whether regulatory thresholds, health-based guidelines or amenity protections would be breached once all additive emissions are accounted for.	As outlined in Chapter 8 (Air Quality) and Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) of the EIS, a quantified cumulative air-quality assessment has been undertaken using the USEPA AERMOD regulatory dispersion model, with baseline/background concentrations informed by the monitoring and datasets referenced in the EIS and with emissions from relevant existing industrial sources in the Lower Harbour included for in-combination assessment. The modelling adopts conservative, health-protective assumptions, including the use of representative/worst-case meteorological years, continuous operation at the maximum emission limit values under Directive 2010/75/EU together with separate abnormal operating scenarios, and evaluation of both a dense receptor grid and discrete residential and other sensitive receptors. Predicted process contributions are added to baseline/background concentrations to derive final predicted environmental concentrations and are then compared against the applicable EU ambient air-quality limit values and health-based guidelines, forming the technical basis for the conclusions in Chapter 6 (Population and Human Health). The results demonstrate that cumulative ground-level concentrations for the pollutants assessed remain below the relevant standards/guidelines at residential locations, and therefore the proposed development is not predicted to give rise to significant adverse cumulative effects on air quality or population health.
	Inadequate Consideration of Concurrent Developments and Forecast Industrial Expansion: Submissions identify that cumulative impact must include not only current installations but also planned port expansions, ongoing industrial intensification and future waste-capacity projections for the region. They argue that the submission materials fail to integrate these concurrent developments, resulting in an incomplete forward-looking assessment. Several note that a 10-year permission window, alongside a prolonged construction and operational period, will overlap with other major projects, escalating combined emissions, traffic, noise and marine pressures in ways not assessed.	As outlined in Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) and including Section 16.5 and Table 16.2, the EIS identifies and assesses cumulative effects with existing and committed developments and, where sufficient detail is available, planned projects in the Lower Harbour/Ringaskiddy area, including the Port of Cork redevelopment and berth extensions, the M28 Cork–Ringaskiddy Motorway Scheme, and ongoing pharmaceutical/industrial and utility/energy developments. The EIS recognises that some projects may overlap temporally with the proposed development and tests this through future-year traffic assessment incorporating committed schemes (Chapter 7), cumulative air-quality modelling that includes background levels and concurrent industrial sources under both maximum and abnormal operating scenarios (Chapter 8), and cumulative consideration of noise, landscape/visual, biodiversity (including the AA documentation, where relevant) and material assets across Chapters 10–15, with mitigation and monitoring commitments summarised in Chapter 17. On this basis, the EIS concludes that, even under worst-case overlapping construction or operational scenarios, significant adverse

ACP Submission Reference	Submission Statement	Applicant Response
		cumulative effects on emissions, traffic, noise or the receiving environment are not predicted.
	Potential for Significant Additional Environmental and Community Impacts: Some submissions emphasise that cumulative effects extend beyond emissions - encompassing visual, noise, traffic, maritime, construction-phase and socio-economic pressures. They argue that the addition of a major industrial facility would further industrialise the peninsula, reducing residential amenity and contributing to long-term landscape, ecological and community degradation. These concerns reflect a perception that incremental additions, even if individually modest, collectively produce substantial and irreversible changes to the character of the area.	As outlined in Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) of the EIS, the cumulative assessment extends beyond emissions and explicitly considers in-combination effects across landscape/visual amenity, noise, traffic and transport, biodiversity (including marine/coastal receptors), construction-phase disturbance and socio-economic/community factors in the context of the established industrial and port-related character of the Ringaskiddy peninsula. These topic assessments are integrated through Chapter 16 and the mitigation/monitoring commitments are summarised in Chapter 17. Chapter 11 (Landscape and Visual Assessment) acknowledges localised significant effects in the immediate vicinity during construction/early operation but concludes that wider harbour character and key receptors are not subject to significant cumulative change once design and planting mitigation are implemented; Chapter 10 (Noise and Vibration) assesses construction and operational noise against accepted criteria (including EPA guidance) and does not predict significant cumulative noise effects with existing industrial activity; Chapter 7 (Roads and Traffic) evaluates background growth and committed schemes (including the M28) and concludes that, with traffic management measures, significant long-term cumulative network effects are not anticipated; and Chapter 12 (Biodiversity), together with the Appropriate Assessment documentation, evaluates cumulative ecological and deposition pathways and concludes that significant adverse effects on designated habitats/species are not predicted with mitigation. Chapter 6 (Population and Human Health) also considers amenity and socio-economic effects and does not identify a significant cumulative deterioration in residential amenity or community wellbeing. Accordingly, while submissions express concerns that incremental development could lead to substantial character change, the EIS concludes—based on these coordinated assessments—that the proposed development will not result in significant adverse cumulative environmental or community impacts when considered alongside existing and reasonably foreseeable developments.
TOPIC: VISUAL IMPACT		
The list of submissions to which this topic relates is included in Appendix B.	**Mitigation Measures Would Worsen the Visual Impact:** Many submissions state that the proposed flood-risk mitigation - raising the site several metres above projected flood levels - would significantly increase the visual prominence of the development. The elevated platform is described as increasing the apparent height and massing of the structure, making it more dominant within views from Cobh, Crosshaven, Rushbrooke, Monkstown, Haulbowline Park and coastal recreation routes. Rather than mitigating effects,	As outlined in EIS Volume 2, Chapter 11 (Landscape and Visual Impact Assessment), the LVIA evaluates platform formation/land-raising alongside built-form and landscape mitigation and does not conclude that flood-risk mitigation increases harbour-wide visual dominance. The main process building is intentionally 'set into' the existing slope through ground remodelling/excavation to reduce apparent height and visual mass, and lower-level infrastructure is further screened by boundary mounding (typically 1–3 m) and native planting. The LVIA's viewpoint assessments (including receptors in Cobh, Crosshaven, Rushbrooke, Monkstown, Haulbowline and coastal routes) identify localised significant effects close to the site, but generally

ACP Submission Reference	Submission Statement	Applicant Response
	submissions indicate that the proposed design change amplifies the visual scale and skyline intrusion of the facility when seen across Cork Harbour.	slight–moderate effects at medium/long distances, with the facility read within an established industrial/port context and with mitigation reducing contrast and massing. On this basis, the EIS concludes that the combined mitigation measures manage visual effects rather than amplifying skyline intrusion.
	Loss or Degradation of Scenic Harbour Views: A substantial group of submissions emphasises the importance of the harbour's scenic character and express concern that the proposed development would disrupt established panoramic views. These include views towards Spike Island, key harbour channels, historic vantage points such as St Colman's Cathedral, and long coastal vistas. Submissions consistently describe the facility's height, bulk and industrial form as diminishing the visual quality and coherence of these valued views and altering the established maritime character of the harbour setting.	As outlined in EIS Volume 2, Chapter 11 (Landscape and Visual Impact Assessment), the LVIA assesses panoramic harbour views (including Spike Island, key channels and Cobh/St Colman's Cathedral) using VRPs and photomontages. The assessment finds that while the upper elements and stack may be visible from a range of viewpoints, the development typically occupies a small component of wide harbour panoramas, does not obstruct principal landmarks or strategic sightlines, and is read within the existing port/industrial setting. With embedded design and landscape measures (siting into the slope, tonal cladding, boundary mounding and planting), effects at medium/long-distance scenic receptors are generally slight–moderate and not significant; therefore the EIS does not support a conclusion of wholesale loss or degradation of Cork Harbour's scenic views.
	Visual and Environmental Damage to Cork Harbour's Character: Several submissions frame the proposed development as contributing to cumulative visual degradation of Cork Harbour. This includes concerns about increased industrialisation of a coastal landscape already under aesthetic and environmental pressure. The development is perceived as eroding the harbour's identity as a mixed natural–heritage–recreational environment, instead reinforcing a more industrial visual character. These submissions stress that the development would be visually incompatible with ongoing initiatives to enhance the harbour as a high-quality amenity and cultural asset.	As outlined in EIS Volume 2, Chapters 11 (Landscape and Visual Impact Assessment) and 16 (Cumulative Impacts), Cork Harbour is assessed as a mixed, living and working landscape in which existing port and industrial infrastructure already forms part of the baseline character. The LVIA's photomontages and viewpoint assessments conclude that, while the facility's upper elements/stack may be visible and effects can be significant locally near the site, effects across the wider harbour are generally slight–moderate and not significant, with the development read within the established industrial context. Embedded design measures—siting the main building into the slope, façade colour treatment, boundary mounding and native planting—reduce contrast and visual mass. Accordingly, the EIS does not support the view that the proposal would cause substantial or irreversible degradation of Cork Harbour's overall character or undermine ongoing amenity, heritage or tourism initiatives.
	Impacts on Tourism, Heritage Views and Visitor Experience: Some submissions highlight adverse implications for tourism and the visitor experience. Concerns relate to cruise-ship arrivals, scenic routes, waterfront recreation areas and heritage viewpoints such as Camden Fort and Spike Island. These submissions state that visible industrial infrastructure - particularly a tall stack and high-level building mass - would undermine the harbour's visual appeal and weaken its identity as a maritime heritage destination. Some note that tourism branding can be sensitive to visual change, and that altering the skyline may have irreversible economic and perceptual consequences.	As outlined in EIS Volume 2, Chapter 11 (Landscape and Visual Impact Assessment) significant visual effects are largely localised near the site, with the main building set into existing topography and perimeter mounding/planting reducing apparent height and massing. Potential effects on landscape character and visual amenity are evaluated, including views from key tourism receptors around Cork Harbour (Sections 11.3 and 11.5). That chapter concludes that although some localised visual impacts will occur, the wider harbour character and its recreational value will not be significantly altered (Section 11.7). As outlined in Chapter 14 of the EIS (Archaeological, Architectural and Cultural Heritage), potential impacts on cultural heritage assets, which contribute to the area's tourism and amenity offer, are addressed, identifying heritage features within the

ACP Submission Reference	Submission Statement	Applicant Response
		study area (Section 14.3), assessing impacts on their setting (Section 14.4), and providing appropriate mitigation (Section 14.6). As outlined in Chapter 16 of the EIS (Cumulative Impacts, Other Impacts and Interactions), potential cumulative effects are assessed, including interactions between environmental factors such as population, landscape, and cultural heritage (Section 16.4). This evaluation demonstrates that no significant cumulative tourism- or amenity-related effects are predicted when considered in combination with other existing or permitted developments.
	Visual Impact from Flood-Mitigation Site Raising (~4 m): Within the wider concerns regarding mitigation, numerous submissions specifically highlight that raising the site by roughly four metres would itself create a substantial visual intrusion. This elevated platform is said to disrupt the natural shoreline profile, create an unnatural landform, and substantially increase the facility's visibility from residential and recreational viewpoints. Submissions describe the raised platform as an "*eyesore*" and argue that the visual change produced by this measure would be permanent and unnecessary, given its contribution to overall visual prominence.	As outlined in EIS Volume 2, Chapter 11 (Landscape and Visual Impact Assessment), the LVIA considers platform formation/land-modelling as part of the overall design and does not identify the ~4 m flood-mitigation level changes as a standalone source of significant visual intrusion. While parts of the site are raised to approximately 4.55 mOD for flood protection (Chapters 4 and 13, and Appendix 13.4), the main process building is also set into existing topography through cut-and-fill to reduce apparent height and visual mass, with additional perimeter mounding and planting to screen lower-level elements. The LVIA's photomontages/viewpoint assessments attribute visibility primarily to the stack and upper building massing rather than the modified ground profile, and conclude that effects are generally slight–moderate at medium/long-distance receptors within an established port/industrial harbour context. Accordingly, the EIS does not support the conclusion that the flood-mitigation site raising creates an 'unnatural landform' that materially increases overall visual prominence.
TOPIC: IMPACT ON HARBOUR		
The list of submissions to which this topic relates is included in Appendix B.	**Threats to a Recovering Harbour Landscape and Ecology:** Submissions identify the significant restoration Cork Harbour has undergone, including the €64 million clean-up of the Irish Steel site, the cessation of raw sewage discharge, and broader ecological improvements that have allowed marine biodiversity, bird populations, and intertidal habitats to recover. Many point out that Cork Harbour is internationally recognised for its ecological value, hosting protected wetland habitats, Natura sites, bird species, pollinators, marine life, and bat populations. Introducing a large industrial incinerator is described as fundamentally incompatible with this trajectory of recovery: emissions, pollutant deposition, hazardous materials, accident risks, and surface runoff are cited as pressures that could reverse ecological gains, degrade water quality, and undermine decades of public investment in remediation and conservation.	As outlined in Chapter 12 (Biodiversity) and the accompanying AA Screening/Natura Impact Statement, Cork Harbour's recognised ecological value and designated receptors (including Natura 2000 sites and associated qualifying interests) are explicitly identified and assessed, including relevant pathways such as emissions to air, deposition to terrestrial and intertidal habitats, emissions to water, disturbance, and in-combination effects. Chapter 8 (Air Quality) applies the USEPA AERMOD regulatory model to assess dispersion and deposition for the full suite of IED-regulated pollutants under conservative assumptions, including operation at maximum emission limit values, abnormal operating conditions and cumulative interaction with existing harbour sources, and the assessment concludes that predicted concentrations/deposition at sensitive residential and ecological receptors remain below the relevant standards and guideline thresholds and represent a minor contribution relative to background. Chapter 13 (Soils, Geology, Hydrogeology, Hydrology and Coastal Recession) further confirms that there is no process effluent discharge to Cork Harbour and that potentially contaminated liquids (including

ACP Submission Reference	Submission Statement	Applicant Response
		process waters, leachate and firewater) are retained within bunded, watertight infrastructure and managed via sealed drainage, attenuation/interception and shut-off controls, with construction-phase pollution prevention measures implemented to protect coastal and transitional WFD waterbodies and to avoid deterioration. In addition, the Major Accidents and Disasters assessment (Chapter 6, with mitigation summarised in Chapter 17) considers credible incident scenarios and concludes that, with the embedded design, operational controls and emergency measures, risks are reduced to ALARP and do not present a credible pathway for significant pollution of the harbour. On this basis, the EIS does not support the assertion that the proposed development would reverse Cork Harbour's recovery trajectory; rather, it concludes that the project can operate within the statutory licensing and monitoring framework without giving rise to significant adverse effects on harbour ecology or water quality.
	Misalignment with the Harbour's Evolving Identity, Amenity Use and Strategic Repositioning: Multiple submissions highlight that Cork Harbour has transitioned from a heavy-industrial zone to a nature-based, recreational, educational and tourism-driven landscape. The harbour is depicted as a living environment supporting swimming, sailing, kayaking, rowing, walking routes, naval operations, marine education, research institutions, and coastal communities. The proposed development is described as incompatible with this evolved identity - introducing an industrial skyline, odour, and risk profile that contradicts existing strategic plans for sustainable tourism, outdoor recreation, heritage enhancement, green-tech investment, and community wellbeing. The facility is perceived as limiting future opportunities, reducing amenity value, and eroding the harbour's emerging cultural and recreational narrative.	As outlined in Chapter 11 (Landscape and Visual Impact Assessment) and Chapter 6 (Population and Human Health), the EIS recognises Cork Harbour as a living, multi-use environment combining recreation, tourism, heritage, settlement, port activity and long-established industrial development, and it assesses the proposed development against this mixed-use baseline through viewpoint photomontages and cumulative assessment. Chapter 11 concludes that, while the facility introduces new industrial elements locally, these occur within the established Lower Harbour industrial/port context and do not fundamentally alter the wider harbour character; key heritage assets and principal sightlines (including the Martello Tower/Spike Island fortifications) remain legible, and the scheme provides an additional public amenity in the form of the Gobby Beach–Martello Tower walkway and viewing area. Potential effects on outdoor recreation and community wellbeing are further addressed through Chapter 8 (Air Quality) and Chapter 10 (Noise and Vibration), which conclude—based on AERMOD modelling under conservative maximum and abnormal scenarios and assessment against applicable standards/guidance—that air quality and noise effects at residential and amenity receptors are not significant. Chapter 2 confirms the site's zoning and strategic planning context within a Strategic Employment/industrial area, and Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) assesses interactions with other harbour and transport projects and concludes no significant cumulative effects that would preclude tourism, marine recreation, education/research or community-focused uses. On this basis, the EIS does not support the assertion that the proposal is incompatible with the harbour's evolving amenity identity.
	Risk to Tourism, Branding and Harbour-Based Economic Growth: Submissions frequently describe tourism as a growing pillar of Cork Harbour's economy - strengthened by cruise ship arrivals, coastal attractions, scenic views, heritage destinations such as Spike Island and Camden Fort, and the harbour's maritime culture. The introduction of a visually prominent industrial facility is	As outlined in Chapter 6 (Population and Human Health) and Chapter 11 (Landscape and Visual Impact Assessment), the EIS recognises Cork Harbour as an important amenity, recreation and tourism resource—supporting cruise tourism, maritime culture and heritage destinations such as Spike Island, Camden Fort and Cobh— and it explicitly assesses potential effects on these tourism receptors through a detailed viewpoint/photomontage assessment informed by relevant tourism guidance. Chapter

ACP Submission Reference	Submission Statement	Applicant Response
	characterised as damaging to Cork's environmental reputation and long-term tourism competitiveness. Concerns include deterring visitors, undermining premium leisure offerings, threatening investment in hospitality, and diminishing the harbour's ability to position itself as a world-class maritime and ecological destination. This is seen as antithetical to the harbour recovery narrative, which relies on re-branding Cork Harbour as a place of natural beauty, cultural heritage, and marine recreation.	11 concludes that, while the proposed development introduces new industrial elements locally, it sits within the established Lower Harbour mixed-use context of port, maritime and industrial activity and occupies a relatively small component of wider harbour panoramas; key heritage landmarks and skyline features (including Cobh Cathedral and the harbour fortifications) remain visually legible, and predicted effects at principal tourism viewpoints and cruise-approach routes are generally slight to moderate and not significant. The EIS also identifies tourism-related enhancements, including the proposed Gobby Beach–Martello Tower walkway and viewing area, and Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) assesses in-combination visual change with other committed harbour and transport projects and concludes that cumulative effects do not significantly diminish the tourism or recreational value of Cork Harbour. On this basis, the EIS does not support the assertion that the proposal would undermine Cork Harbour's tourism brand or long-term competitiveness as a maritime and heritage destination.
	Re-Industrialisation Concerns and Loss of Public Confidence After Major Clean-Up Efforts: A strong cross-topic theme is a sense of public guardianship over the harbour following decades of pollution, failed industrial legacies, and costly clean-up efforts. Submissions reference the burden placed on taxpayers to remediate historic contamination and express frustration that a newly restored maritime landscape could be subjected to renewed industrial pressure. The proposed incinerator is framed as a symbolic reversal - replacing recovery with renewed risk, contradicting the ethos that guided investments in environmental repair, Haulbowline Park, and other revitalisation projects. This perceived "*backslide*" undermines confidence in planning oversight, environmental policy coherence, and the harbour's long-term protection.	As outlined throughout the EIS, the existing industrial and port context of the Lower Harbour, together with the history of legacy contamination and subsequent remediation, is recognised in the baseline environment and informs the assessment approach. The proposed development is a modern, tightly regulated installation that will be subject to the EU Industrial Emissions Directive and EPA licensing, including Best Available Techniques, continuous emissions monitoring and enforceable compliance limits, and therefore does not replicate the uncontrolled historical practices that gave rise to past pollution burdens. Potential effects on population and human health are assessed in Chapter 6 and are supported by the Chapter 8 Air Quality assessment (including AERMOD modelling under conservative maximum and abnormal operating scenarios) which demonstrates compliance with the relevant ambient air-quality standards and guidelines at residential and other receptors. Protection of coastal waters and groundwater is addressed in Chapter 13, including containment of potentially contaminated waters (including firewater) and surface-water management measures, while ecological sensitivities and designated sites are assessed in Chapter 12 and the AA documentation, which concludes no adverse effect on site integrity when assessed alone and in-combination. Cumulative interactions with existing and planned harbour activities are considered in Chapter 16, and mitigation and monitoring commitments are summarised in Chapter 17. Accordingly, while submissions express understandable concerns about protecting the harbour following major clean-up efforts, the EIS demonstrates—through baseline data, standards-based assessment and embedded mitigation/monitoring—that the proposal will not result in significant adverse environmental effects or a '*backslide*' in environmental protection.

ACP Submission Reference	Submission Statement	Applicant Response
	Degradation of Harbour Character, Scenic Value and Community Wellbeing: Submissions describe Cork Harbour as a landscape of national significance and exceptional scenic value. Concerns include the loss of views, deterioration of visual coherence, and the introduction of an industrial skyline that would dominate or diminish the harbour's natural and cultural attributes. Communities stress that the harbour functions as a shared civic space - supporting wellbeing, social life, family recreation, and intergenerational connection to place. The proposed development is repeatedly characterised as undermining this shared resource, replacing a recovering, uplifting environment with a visually intrusive and environmentally threatening use.	As outlined in Chapter 11 of the EIS (Landscape and Visual Impact Assessment), Cork Harbour is explicitly recognised as a landscape of very high value and sensitivity, and the assessment evaluates the proposal against that baseline using a comprehensive viewshed and viewpoint appraisal with photomontages (including cumulative scenarios). The LVIA concludes that, while the proposed development introduces new built form and localised significant effects occur in close proximity to the site (including in the vicinity of the Martello Tower), the wider harbour landscape and its key cultural and scenic anchors remain legible and the overall "*Industrial Harbour*" character—already influenced by existing port, energy and industrial infrastructure—can accommodate the proposal such that effects at the principal settlements and recreational/tourism viewpoints around the harbour are generally slight to moderate and not significant. Potential implications for community wellbeing and amenity use are addressed in Chapter 6 (Population and Human Health) with supporting assessments in Chapter 10 (Noise and Vibration) and Chapter 8 (Air Quality), which conclude that operational noise will comply with EPA criteria and emissions will remain within relevant standards/guidelines, such that environmental conditions relevant to recreation and quality of life are not predicted to deteriorate. In addition, Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) considers the proposal in-combination with other committed developments in the Lower Harbour and concludes that, with the mitigation and monitoring set out in Chapter 17, the proposal does not result in significant adverse cumulative effects on harbour character, scenic value or the harbour's role as a shared civic and recreational resource; and the project also incorporates public realm enhancements, including the proposed amenity walkway/viewing area, which supports continued community access to the coastal environment.
	Conflict with Future-Focused Harbour Strategies and Sustainable Development Goals: Submissions argue that Cork Harbour is well positioned for green innovation, renewable marine energy, clean research, and sustainable enterprise. Many reference existing investments in MaREI, NMCI, wind power, coastal amenity upgrades, and harbour-wide strategic planning work. The incinerator is framed as incompatible with these forward-looking objectives - representing an outdated, emissions-intensive model that contradicts both the harbour's sustainability vision and national climate or environmental policy trajectories. The facility is said to risk displacing or deterring future industries aligned with decarbonisation, marine research, and ecological enhancement.	As outlined in Chapter 2 of the EIS (Policy and Planning Framework and Need for the Scheme), the proposed development is located within the Ringaskiddy Strategic Employment Area where strategic large-scale waste-management / circular-economy infrastructure, including waste-to-energy, is supported under the Cork County Development Plan 2022–2028 subject to environmental assessment. Chapters 2 and 9 of the EIS (Climate) further demonstrate that the proposal aligns with national and EU waste and climate policy by reducing reliance on landfill and the export of residual waste, and by recovering energy from otherwise non-recyclable waste streams, thereby displacing fossil-fuel generation and contributing to net greenhouse-gas savings relative to disposal alternatives. The EIS also assesses the proposal in-combination with the wider harbour strategy context and other committed/planned developments (including Port of Cork upgrades, the M28 and wider industrial/energy projects) through the topic chapters and Chapter 16 (Cumulative Impacts, Other Impacts and Interactions), with no significant adverse cumulative effects identified for key receptors (including biodiversity/Natura sites, landscape/seascape character and

ACP Submission Reference	Submission Statement	Applicant Response
		population/amenity) once mitigation is applied. While submissions refer to marine innovation and green-growth initiatives (e.g., MaREI, NMCI and offshore renewables), the EIS provides no evidence that the proposed development would restrict, inhibit or deter such future sectors; rather, it forms part of the harbour's established industrial and employment framework and supports the circular-economy objective of treating residual waste domestically in a controlled, regulated manner.
TOPIC: TRAFFIC AND HAULAGE IMPACTS		
The list of submissions to which this topic relates is included in Appendix B.	**Impacts of Increased Heavy Goods Traffic Carrying Hazardous Materials** Submissions argue that the increase in road traffic of HGVs travelling to and from the development will only add to the existing congestion in the Jack Lynch Tunnel, on the M28, and through Ringaskiddy Village. Increased traffic, especially HGVs, leads to increased air and noise pollution and health and safety risks to locals and to vulnerable road users. Particularly, the transport of hazardous materials into and out of the site from around the country cause carcinogenic health risks to locals and across the road network.	Chapter 7 Roads and Traffic of the 2025 EIS acknowledges that regardless of whether or not the proposed development proceeds, there are ongoing capacity issues on the local road network at a number of key junctions, particularly at Shannon Park and Shanbally roundabouts. However, it is noted that these capacity issues will be relieved upon the completion and operation of the M28 motorway which will result in a significant redistribution of traffic from the N28. The introduction of the proposed development will have a moderate impact during the construction phase in the 18:00-19:00 evening period. This impact is short term in nature as it is associated with construction activity at the site. Post-opening, the facility will not have a significant impact on the local road network. Indaver have committed to scheduling construction traffic during the construction phase, and operational traffic in 2030 (and beyond) so as to have a minimal amount of traffic flow to and from the site in two-hour periods in the morning and evening, thereby avoiding the peak periods in the morning and evening, and instead availing of the capacity on the local road network outside of these times in the scenario where the M28 is not operational. Once the M28 is operational, the restrictions on scheduling of operational traffic shall be no longer required. Haulage, mobility management and transport mitigation measures included in the EIS will be implemented in full to amelioriate potential impacts on the road network and associated junctions for all road users.
	Deficiencies in Transport Related Documentation in Plans Submissions argue that an independent transport impact assessment should be required to model cumulative impacts of traffic and enforcable mitigations be introduced. One states the existing proposal does not take into account "the new road that is nearing completion" (presumably the M28) and another that its acceptance under Strategic Infrastructure provisions is "questionable".	Chapter 7 - Roads and Traffic evaluates the likely significant effects of the traffic expected to be generated by the proposed development during both the construction and operational phases, accounting for both existing transport infrastructure and future proposals, in particular the M28. The impact of the generated traffic on the local road network is assessed and mitigation measures which Indaver intend to include in their proposed development are outlined according to the Assessment Methodology in Section 7.2.
	Impact of the Development on Flight Paths	As outlined in Chapter 4 - Description of the Proposed Development, the top of the stack will be indicated by white strobe (flashing) obstacle warning lights. The lights

ACP Submission Reference	Submission Statement	Applicant Response
	One submission identified that the impact of the development on flight paths is unknown, including flights to and from the naval base.	will be incandescent or of a type visible to Night Vision Equipment. The lights will emit light at the near infra-red (IR) range of the electromagnetic spectrum specifically at or near 850 nanometres (nm) of wavelength. Light intensity is to be of a similar value to that emitted in the visible spectrum of light. The obstacle lighting specification will be in compliance with the requirements of the relevant aviation and military authorities.
TOPIC: HAZARDOUS WASTE AND ABATEMENT SYSTEMS		
The list of submissions to which this topic relates is included in Appendix B.	**Failures of the Technology and the Site Operator** Submissions argue that the filters are not 100% efficient at preventing pass through of hazardous particles, and the incinerator will not be capable of breaking down many modern oxidation-resistant compounds. Submissions doubt the applicants ability to correctly handle concentrates and identify an increased risk associated with poor maintenance and operation of filters and incinerators.	Regulatory restrictions on allowable emissions as outlined in the EU Air Quality Directive and the EU Industrial Emissions Directive ensure resource recovery facilities operate within these stringent limits. While some studies, particularly in the past, report health effects in relation to incinerators, nearly all of these studies are, by their nature, historical and refer to toxic or industrial burning processes. These virtually all pre-date modern technology and the associated large decreases in emissions. They also pre-date current regulatory restrictions on allowable emissions. As outlined in the EIS Chapter 8 Air Quality Section 8.5.2 Potential Effects Operational Phase AERMOD modelling results indicate that the ambient ground level air contaminants concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios within a 10km radius of the facility. As described in Chapter 4 of the EIS, the operation of the facility will be in acordance with the provisions of an Industrial Emissions licence, and subject to planned maintenance and replacement of all relevant abatement technology, including filters.
	Health and Safety Risks Associated With Hazardous Waste Chemical spills, fires, explosions at the site or during transport were identified as potential dangers which may arise as well as pollution of the locality from hazardous waste and the emissions from the development.	As outlined in Chapter 6 - Population and Human Health, a Hazard Identification and Risk Assessment has been undertaken and is included as Appendix 6.1. A total of 111 scenarios were examined in the HAZID&RA exercise, 108 of which were found to present credible accident hazards. Based on the findings of the HAZID&RA exercise, there were no scenarios identified which presented a Priority Risk and there was one scenario which presented a Substantial Risk, which was the bunker fire scenario. This scenario received a Severity Rating of 3 for both Human Health and for the Environment and a Likelihood Rating of 4. The risk associated with this scenario was considered by the HAZID&RA Team to be ALARP (as low as reasonably possible), due to the variety of measures that will be in place to protect against a fire scenario, either by reducing the likelihood of occurrence or mitigating the impacts if it did occur. These measures govern all stages of the potential development of this scenario. The measures will protect against the conditions arising under which a fire could occur, they will enable rapid detection and response at the early stages in the event that a fire

ACP Submission Reference	Submission Statement	Applicant Response
		scenario developing, they will enable extinguishment of the fire even in the event of escalation to a fully developed fire scenario, and protect against the risk of environmental contamination from fire-fighting run off. With these measures in place, the HAZID&RA team found that Indaver would have all necessary measures in place at the bunker, throughout all phases of the operation. As such the risks associated with this scenario were considered to be ALARP (as low as reasonably practicable).
	Submissions refer to previous site inspections which identified the site as being inherently unsuitable for the location of a use which processes and generates hazardous compounds. Submissions suggest that the site and surrounding environment is inherently unsuitable for any developments of the kind and should be refused out of precaution. Submissions are concerned that Indaver have chosen this site in Cork Harbour due to its ability support the importation of international waste which will add to the pollution of local air and carbon emission costs.	An assessment of alternative locations was completed in 2025 to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development.

ACP Submission Reference	Submission Statement	Applicant Response
		Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices. The need for the proposed development is driven by the policy action called for in the National Waste Management Plan which acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "*There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market*." (page 2.11 Chapter 2 of the EIS). Import of waste is not envisaged.
TOPIC: PLANNING HISTORY (REPEATED REFUSAL)		
The list of submissions to which this topic relates is included in Appendix B.	**All Previous Proposals Refused, What Makes This One Different?** Submissions identify that all 3 previous inspectors as well as the High Court have suggested refusing planning permission for the site, yet Indaver have made another application despite modern sustainability practices and local activities which should be greater cause for refusal. Many submissions ask what makes this application any different to those previous?	The need for the proposed development is driven by the policy action called for in the National Waste Management Plan which acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "*There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market*." (page 2.11 Chapter 2 of the EIS). Import of waste is not envisaged.
TOPIC: WASTE SOURCING AND IMPORT RISK		
The list of submissions to which this topic relates is included in Appendix B.	**Submissions Regarding the Importation of Waste to Maintain the Incinerator** Submission argue that the importation of waste from other countries is required to keep the incinerator burning in order to maintain financial viability. This behaviour contradicts modern objectives of reducing waste.	The need for the proposed development is driven by the policy action called for in the National Waste Management Plan which acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: *"There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market*." (page 2.11 Chapter 2 of the EIS). Import of waste is not envisaged.

ACP Submission Reference	Submission Statement	Applicant Response
TOPIC: LACK OF LOCAL CONSULTATION		
The list of submissions to which this topic relates is included in Appendix B.	**Inadequate Consultation with the Community** Submissions argue that Indaver have not conducted sufficient public consultation, which is a breach of international guidelines, namely EIA Directive (2011/92/EU, as amended by Directive 2014/52/EU): Article 6 which requires "*early and effective public participation*" in the EIA process. The majority identify that this inadequacy includes insufficient time to access information and lack of consideration of public sentiment.	The updated EIS and NIS submitted in 2025 are part of the application process commenced in 2016 and build on the application process to date, including the public consultation documented in Section 1.9 of Appendix 1.2 – Consultation. In addition, the updated EIS and NIS submitted in 2025 were the subject of public consultation during 6 October 2025 – 17 November 2025. The setting of the time period allowed for submissions is a matter for An Coimisiún Pleanála, as per section 37(F)(2) of the Planning and Development Act 2000 (as amended). The time period referenced in Indaver's notice met requirements of An Coimisiún Pleanála's RFI dated 4 June 2024, as confirmed in correspondence with ACP.
	Lack of Presentation of Information from Indaver Submissions claim that Indaver have not provided sufficient information to inform the public sufficiently and are not making a case to provide information in their favour. As the application is presented as a reactivation of an application rather than a new application, much of the necessary information may not receive proper public review.	The updated EIS and NIS submitted in 2025 are part of the application process commenced in 2016 and build on the application process to date, including the public consultation documented in Section 1.9 of Appendix 1.2 – Consultation. In addition, the updated EIS and NIS submitted in 2025 were the subject of public consultation during 6 October 2025 – 17 November 2025.
	Accusations of an Unfair Planning Process Submissions state that Indaver had a 3-year private pre-consultation with An Bord Pleanála which led to the preselection of bord members and senior planners, and that they have not sought a new independent assessment of the site after 25 years of objections. These seem to suggest a biased or unfair planning processes which is neglecting the views of the community.	Pre-application consultation is an established element of the Strategic Infrastructure Development consenting process. The Commission's selection of board members or planning inspectors is entirely a matter for the Commission. The updated EIS and NIS submitted in 2025 are part of the application process commenced in 2016 and build on the application process to date, including the public consultation documented in Section 1.9 of Appendix 1.2 – Consultation. In addition, the updated EIS and NIS submitted in 2025 were the subject of public consultation during 6 October 2025 – 17 November 2025.
TOPIC: MITIGATION OF IMPACTS		
The list of submissions to which this topic relates is included in Appendix B.	**Mitigation Measures are Essentially Meaningless** Submissions argue that existence of mitigation measures directly imply that the development will have negative impacts, and that these mitigation measures are essentially "*green washing*", and will not be able to reduce the effects of noise, air, light pollution, contamination of ground water, and loss of habitat on the local environment	The purpose of mitigations is to reduce risks and ameliorate potential negative effects so as to be in compliance with criteria and directives. Chapter 8 - Air Quality states that a number of measures have been incorporated into the design of the proposed development to ensure that emissions from the plant do not exceed regulatory emission limit values as outlined in Industrial Emissions Directive 2010/75/EU. In addition, the stack height has been designed in an iterative fashion in order to ensure that ambient ground level concentrations are minimised. Air modelling predictions indicate that ambient air quality levels from the proposed development will be within the ambient air quality standards at all locations beyond the proposed development site boundary, based on maximum and abnormal operating conditions.

ACP Submission Reference	Submission Statement	Applicant Response
		Thus, no specific additional mitigation measures are required during the operational phase of the proposed development. Chapter 10 - Noise and Vibration assesses noise disturbance. The results of the evaluation indicate that the operational noise levels during daytime and evening periods are all comfortably below the relevant noise criteria at the nearest noise sensitive locations, while during night-time periods are all comfortably at or below the night-time noise criterion of 45dB adopted for the facility at the nearest residential noise sensitive locations. Additionally, the relative increase in noise level associated with traffic movements on the surrounding road network with and without the proposed development was assessed. The change in noise levels during the opening year, with and without the M28 ranges from a not significant to imperceptible effect, while the change in noise levels during Design Year of 2045 with the M28 in operation is imperceptible in all road links assessed. Chapter 11 - Landscape and Visual details that sight lighting will include a mixture of 6m high pole mounted lights to light up entrances and roads with full cut off LED light head fixtures to reduce any light pollution into the surrounding area. There will be 3no. white obstacle lights at the top of the stack. Chapter 12 - Biodiversity states that the likely success of the proposed mitigation measures is high, either in their current form or as they will be adapted on-site to achieve the desired result. The mitigation measures have been drawn up in line with current best practice and include an avoidance of sensitive habitats at the design stage. It is clear in what the mitigation measures are designed to achieve in lowering or reducing the risk of effect to acceptable levels. Chapter 13 - Soils Geology, Hydrogeology and Coastal Recession concludes that it is expected that, with the implementation of the mitigation measures described in Section 13.6, the construction and operation of the proposed development will not result in significant negative effects on soils, geology, hydrology or hydrogeology. and coastal recession
TOPIC: NOISE POLLUTION		
The list of submissions to which this topic relates is included in Appendix B.	**Disruptions to the Peace of the Environment** Some submissions state "*Construction and operational noise from the incinerator will disrupt the peaceful environment currently enjoyed by the residents, particularly in the evenings and weekends*."	Noise disturbance is assessed in Chapter 10 - Noise and Vibration. The results of the evaluation indicate that the operational noise levels during daytime and evening periods are all comfortably below the relevant noise criteria at the nearest noise sensitive locations, while during night-time periods are all comfortably at or below the night-time noise criterion of 45dB adopted for the facility at the nearest residential noise sensitive locations. Additionally, the relative increase in noise level associated with traffic movements on the surrounding road network with and without the proposed development was assessed. The change in noise levels during the opening year, with and without the M28 ranges from a not significant to imperceptible effect,

ACP Submission Reference	Submission Statement	Applicant Response
		while the change in noise levels during Design Year of 2045 with the M28 in operation is imperceptible in all road links assessed.
TOPIC: POLICY CONFLICT / OPPOSITION / REGULATORY COMPLIANCE / GOVERNANCE		
The list of submissions to which this topic relates is included in Appendix B.	**1. Strategic Conflict with National and EU Policy Architecture** Across some submissions there is the assertion that the proposal is fundamentally misaligned with national and EU policy frameworks governing waste, climate, and the circular economy. Objectors argue that the development is incompatible with the Waste Framework Directive, the Climate Action Plan, the Circular Economy Act, and regional planning policies, noting that the plant's D10 classification and sub-threshold R1 value render it ineligible for authorisation under EU law. The project is criticised for locking Ireland into a high-carbon, disposal-heavy waste pathway at a time when policy direction requires prioritisation of prevention, reuse, recycling, and decarbonisation. Submissions emphasise that claimed capacity deficits are outdated and that a new incinerator would contradict Ireland's statutory commitments to waste minimisation and climate neutrality.	Chapter 2 – Policy and Planning Framework and Need for the Scheme sets out the European Union (EU), national, regional and local waste policy and planning framework which underpins the proposed development. The chapter demonstrates the specific need for the proposed development in the context of the waste policy and planning policy framework. In summary, EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management. Indeed, the NWMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development. Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	2. Rejection of Incineration as an Appropriate Technology A consistent international-policy-linked theme is the broad rejection of incineration as a modern waste-management solution. Objectors reference international research and global policy shifts away from thermal treatment due to emissions of PFAS, dioxins, ultrafine particles, and other persistent organic pollutants. Incineration is described as incompatible with circular-economy principles and inconsistent with emerging EU guidance discouraging long-lived, high-emission residual-waste infrastructure. Submissions argue that the	EIS Chapter 2 – Policy and Planning Framework and Need for the Scheme sets out the European Union (EU), national, regional and local waste policy and planning framework which underpins the proposed development. The chapter demonstrates the specific need for the proposed development in the context of the waste policy and planning policy framework. In summary, EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner. Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Circular Economy Package

ACP Submission Reference	Submission Statement	Applicant Response
	technology creates long-term environmental liabilities, depresses recycling rates, and results in health and ecological risks that cannot be sufficiently mitigated. This aligns with concerns about international precedent and Ireland potentially diverging from best practice by continuing to rely on mass-burn incineration.	through the amended Directives on Waste and Landfilling and the National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management. Indeed, the NWMP, National Waste Management Plan and other plans and policies confirm the need for thermal recovery capacity at a waste management facility similar to the proposed development. As outlined in Chapter 8 of the EIS (Air Quality), the emissions from the proposed development have been modelled using in-depth dispersion modelling analysis (AERMOD) which is the USEPA's regulatory model used to assess all pollutants regulated under the Industrial Emissions Directive, including nitrogen dioxide, sulphur dioxide, particulate matter (PM_{10} and $PM_{2.5}$), carbon monoxide, total organic carbon, hydrogen fluoride, hydrogen chloride, heavy metals, dioxins/furans, and polycyclic aromatic hydrocarbons. The modelling methodology is presented in Section 8.2. This analysis is supported by extensive baseline monitoring campaigns conducted from 2006–2007, 2008, 2014–2015, 2018–2019 and 2024–2025 (as shown in Section 8.3), demonstrating that predicted concentrations under both maximum and abnormal operating conditions remain well below EU, UK and WHO health-based limit values at the most affected receptors (as presented in Section 8.5.3). As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. The assessment in Chapter 6 concludes that the proposed development will not pose risks to human health during construction or operation. Earlier studies suggesting health impacts from incinerators relate to outdated technologies and predate modern emissions controls and EU regulatory standards. Evidence from modern facilities such as Indaver's Meath plant, which has consistently operated well below legal emission limits shows that well-managed incinerators contribute minimally to air pollution. Modelling of PM_{10} and $PM_{2.5}$ emissions indicates no expected adverse health effects, and recent scientific literature does not contradict this. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver's existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. As the proposed facility will operate under strict EU Industrial Emissions Directive requirements, emissions are expected to remain far below harmful levels. Taken together, modelling results, regulatory controls, and real-world data demonstrate that the development will not have negative effects on human health locally or more broadly.

ACP Submission Reference	Submission Statement	Applicant Response
		Potential ecological risks are addressed in Chapter 12 - Biodiversity, including mitigation and monitoring measures that will be implemented.
	3. Calls for a Moratorium Pending Policy Clarity, Updated Data, and Full Assessment Some submissions call for a moratorium on any new incineration licensing or approvals until national policy, climate modelling, and waste-generation projections are updated. They argue that the submitted Environmental Impact Statement (EIS) is outdated, missing essential baseline assessments (including climate impacts, PFAS monitoring, and cumulative effects), and therefore cannot serve as a sound basis for decision-making. The perceived inadequacy of the available information - combined with national-level uncertainty on waste policy direction - prompts demands for a pause on approvals until transparent and evidence-based need assessments are completed. A moratorium is positioned as necessary to avoid locking the region into infrastructure that may soon contravene updated national climate and waste legislation.	As noted in Section 2.2.1.3 of Chapter 2 of the EIS, The European Commission published a Communication on the role of waste-to-energy in the circular economy to enhance synergies between the circular economy, resource efficiency and waste-to-energy. It seeks to provide guidance to Member States on how to achieve properly balanced waste-to-energy capacity. It also affirms that the waste hierarchy remains as the cornerstone of EU policy and legislation and is a key to a transition to a circular economy. The Communication also refers to a European Environment Agency study which suggests there is currently no incineration overcapacity in the EU as a whole and in certain Member States where there is excessive reliance on waste to energy (e.g. due to high heat demand from district heating networks) then a moratorium on new facilities may be an appropriate measure. An analogous situation does not arise in Ireland. The need for the proposed development is driven by the policy action called for in the National Waste Management Plan which acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "*There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market*." (page 2.11 Chapter 2 of the EIS). As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIS. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement*', the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development. Baseline assessments regarding climate impacts are addressed in Chapter 9 - Climate. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. Cumulative effects are addressed in Chapter 16 - Cumulative Impacts, Other Impacts and Interactions.
	4. Impartiality, Trust, and Independence of Regulatory Bodies	Most of these issues relate to matters outside the control of the applicant. Information about the planning application and proposed development were made public through

ACP Submission Reference	Submission Statement	Applicant Response
	Some submissions express concerns about regulatory impartiality, citing irregularities in the process, insufficient public participation, and a failure to grant extensions or conduct an Oral Hearing. This perceived inconsistency is said to undermine trust in the planning system and may breach the Aarhus Convention and EU environmental-governance principles. Objectors argue that fragmented documentation, poor transparency, and insufficient engagement with affected communities indicate that the regulatory environment is neither independent nor procedurally fair. These criticisms extend to the adequacy of oversight regarding environmental assessment, licensing, and cross-agency coordination, with a recurring narrative that regulatory bodies have not exercised appropriate scrutiny.	Indaver's website (www.indaver.com). An oral hearing was held by An Bord Pleanála (now An Coimisiún Pleanála) in April and May 2016. The planning documentation is divided into separate files to avoid having large size files which could constrain download and limit access to the environmental information.
	6. Lack of a Credible Accountability Plan and Lifecycle Responsibility A cross-topic theme is the absence of a robust accountability plan outlining governance, monitoring, enforcement, and post-operation obligations. Objectors emphasise that the proposal does not provide a clear system for long-term environmental monitoring, independent emissions verification, or transparent public reporting. There are concerns about who would bear responsibility for legacy contamination, unforeseen pollutant releases, and climate-risk-related impacts over the facility's lifespan. Stakeholders argue that without a credible governance model - including independent oversight, community participation mechanisms, and binding commitments - public confidence cannot be assured.	The operation of the proposed development will be subject to an Industrial Emissions (IE) Licence for which Indaver applied to the EPA in 2019. This remains a live application. Continuous emissions monitoring will be undertaken as part of that IE Licence for the Indaver site, with records available for public access on the EPA website. The EPA is the statutory authority for regulating installations of this kind, and ensures appropriate controls, monitoring, reporting and auditing of all aspects of operations which may have an adverse impact on the environment.
	7. Licensing Vulnerabilities and Legal Exposure Submissions highlight multiple vulnerabilities in the project's licensing pathway, suggesting that the proposal risks non-compliance with EU directives and Irish environmental law. Concerns include: - reliance on an EIS considered incomplete or inadequate; - contradictions between the facility's classification (D10) and EU authorisation requirements; - insufficient demonstration of need, which could invalidate licence justification; - gaps in hazard assessment and emergency-response planning; and - potential for legal challenge under EU environmental-governance and procedural-rights frameworks. Objectors argue that proceeding with licensing under these conditions could expose regulators to judicial review and undermine the integrity of the permitting system.	As outlined in the Preface, the 2016 EIS which accompanied the 2016 planning application was updated to reflect the amendments introduced by the 2014 Directive (Directive 2014/52/EU) relating to the preparation of an EIAR. Noting that An Coimisiún Pleanála (ACP) requested an '*updated Environmental Impact Statement'*, the EIS is in compliance with the amended EIA Directive, the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018 and up to date EIA guidance. All information in the EIS is up-to-date and can be relied upon by the Commission in carrying out EIA of the proposed development. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria. Chapter 2 – Policy and Planning Framework and Need for the Scheme sets out the European Union (EU), national, regional and local waste policy and planning framework which underpins the proposed development. The chapter demonstrates the

ACP Submission Reference	Submission Statement	Applicant Response
		specific need for the proposed development in the context of the waste policy and planning policy framework. As outlined in Appendix 6.1 Hazard Identification and Risk Assessment, there is a metal reclamation works at Hammond Lane, which is directly to the west of the proposed Indaver facility. Due to proximity of this site to the proposed development, the HAZID&RA Team gave consideration to the potential risk that an incident at the metal reclamation works could act as an initiator to an accident scenario the Indaver establishment. The only credible off-risk identified by the HAZID&RA Team which could potentially give rise to an impact at the Ringaskiddy site is in the event of a fire at the adjacent Hammond Lane facility. This site is located immediately to the west of the proposed development. The HAZID&RA Team considered the potential for a fire to occur at the Hammond Lane site. The main stockpiles of material at the site comprise light scrap metal / car shred and so present little fire hazard. Car tyres are removed prior to arrival on site. There are also some smaller stockpiles, comprising foam from car seats and other plastic materials from cars, which would present a more credible potential for fire. In the event of a fire arising in one of these stockpiles, this would require an emergency response to be implemented at the Hammond Lane site. The Emergency Response Team at Indaver would mobilise in such a scenario, to review whether any actions should be taken at the site, but it is not envisaged that any fire scenario arising at Hammond Lane would present any risk of escalation / domino effects to the Indaver facility.
TOPIC: SITE SELECTION RATIONALE / SITE SUITABILITY / ZONING		
The list of submissions to which this topic relates is included in Appendix B.	**1. Fundamentally Flawed Site Selection and Pre-Determined Bias** Across the submissions, there is a claim that the developer's site selection process was never genuinely comparative, but rather predetermined by pre-existing site ownership. Objectors argue that no transparent, multi-criteria analysis was undertaken, and that alternative locations - particularly those aligned with zoning, environmental, and spatial-strategy constraints - were not meaningfully assessed. This apparent ownership-driven decision-making is described as contravening established planning principles and the proper application of the EIA Directive, which requires a robust examination of reasonable alternatives. An ownership-led selection is viewed as structurally incapable of producing a compliant or defensible location for a regionally significant hazardous-waste installation.	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population).

ACP Submission Reference	Submission Statement	Applicant Response
		• **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan. • **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices.
	2. Limited Site Size and Structural Inadequacy for the Proposed Development A major cross-cutting concern is that the chosen site is too small, too constrained, and too physically compromised to safely and effectively accommodate the scale and operational requirements of the proposed incinerator. Objectors highlight that the functional area has been progressively reduced by coastal erosion, infrastructure encroachment (including the M28), and the need for extensive mitigation measures such as platform raising. Spatial limitations are said to compromise buffer distances, emergency-response arrangements, traffic management, hazardous-materials handling, and future adaptability. The plot's restricted dimensions also undermine the ability to address complex environmental-risk factors, making the layout inherently unsafe and non-compliant with modern industrial-facility siting principles	As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the '*Protected Scheme*' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission. The proposed development site is not indicated as being in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment.

ACP Submission Reference	Submission Statement	Applicant Response
		Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site.
	3. Site Unsuitability Due to Flood Risk, Coastal Regression, and Environmental Vulnerability The site is described as fundamentally unsuitable owing to its location within a designated flood-risk zone and an actively eroding coastline. Submissions reference official mapping and long-term climate projections indicating that the area faces escalating hazards from sea-level rise, storm surges, and extreme-weather events. Attempted mitigation (e.g., elevating the facility) is criticised as increasing visual impacts while failing to address underlying instability. The combination of hazardous-waste activities with a site experiencing ongoing land-loss and hydrological exposure is viewed as incompatible with statutory resilience obligations under national climate policy and the EU adaptation framework. Objectors argue that these physical risks render the location inherently unsafe regardless of engineering solutions.	Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission. The proposed development site is not indicated as being in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development. Landscape impacts are also assessed in Chapter 11. The EIS concludes that the effects on the character of the greater Cork Harbour Area will be slight to moderate and neutral due to the existing mix of industrial elements within the area of the proposed development. After the establishment of the new vegetation along the northern, eastern and southern boundaries, the effects will be permanent and neutral.

ACP Submission Reference	Submission Statement	Applicant Response
	4. Zoning Conflicts and Non-Compliance with Local and Regional Planning Frameworks Submissions assert that the site's zoning and broader spatial-strategy context do not support an industrial hazardous-waste incinerator, particularly in an area undergoing strategic transition from heavy industry toward recreation, tourism, and environmental enhancement. The proposal is said to conflict with the Cork County Development Plan, strategic harbour objectives, and local regeneration policies. Objectors stress that statutory plans designate alternative land-use priorities for the area, and that introducing a high-impact industrial facility would undermine regional investment, community expectations, and long-term spatial aims. This zoning conflict is treated as a material breach of the plan-led system and a basis for refusal independent of other environmental concerns.	Section 2.2 of the Planning Report acknowledges that 'the site is predominantly zoned RY-I-15 and part zoned RY-I-09'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states *'Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……..Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.'* Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS outlines how the proposed development is compliant with national and local government policy.
	5. Cumulative Unsuitability When All Spatial and Ownership Factors Are Combined When the topics are viewed together - selection process, ownership influence, limited size, erosion, flooding, zoning inconsistency - the submissions converge on a single integrated conclusion: the site fails on every major siting criterion used for high-risk industrial infrastructure. Objectors argue that even if one factor could be mitigated, the combined effect of spatial constraint, environmental exposure, policy misalignment, and flawed selection methodology leads to a location that is structurally indefensible from a regulatory, climate-risk, and public-interest perspective. The cumulative nature of these weaknesses is presented as evidence that the proposal cannot be made acceptable through conditions, modifications, or mitigation, and therefore merits outright refusal.	An assessment of alternative locations was completed in 2025, to supplement the assessments carried out in 2016, 2008 and 2001. The 2025 assessment was carried out under the following headings – • **National and Regional Context** – including an assessment into the location of existing thermal treatment facilities on the island of Ireland, which are located predominantly in the Eastern Midlands region. Two waste to energy facilities are located in this region in Dublin and Meath. No dedicated waste to energy recovery capacity currently exists in the Southern region (only 2% of consented national thermal recovery capacity is located in the Southern Waste Region despite it representing 33% of the national population). • **Cork County Development Plan Review** – an examination was undertaken in order to ascertain if the selection of a suitable site within the Southern region may be said to be compatible with the zoning and land use policies of the plan.

ACP Submission Reference	Submission Statement	Applicant Response
		• **Locational Context – Individual Site Appraisals** - Five areas were identified as possible areas for siting a large scale waste facility, as they comprise Strategic Employment Locations (Carrigtwohill, Kilbarry, Little Island, Ringaskiddy and Whitegate). In addition, Bottlehill (which is not listed as a Strategic Employment Location) was also examined as policy objective BE 15-15b in relation to Waste Prevention and Management of Waste Facilities seeks to: '(b) Support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with achieving the aims of the circular waste economy' • **Comparison of Environmental Effects for Reasonable Alternative Sites** – A comparison of environmental effects at each aforementioned site was carried out under the following topics –air quality, biodiversity, hydrology (flood risk), cultural heritage, roads and traffic, population and human health, material assets, landscape and visual and major accidents and disasters. • **Locational Context – Heat Feasibility** – An assessment of the aforementioned areas was carried out in relation to their suitability for the development of a district heating/heat network system in conjunction with the proposed development. Further details on the alternative site selection assessment are included in Chapter 3 of the 2025 EIS and associated appendices. As outlined in Section 4.4.1 of Chapter 4 – Description of the Proposed Development, the site is approximately 13.55 hectares in area, which is split into two distinct parts, one to the east and one to the west. The layout of the waste-to-energy facility will be confined to the eastern part. As outlined in Section 4.2 of Chapter 4, the 'Protected Scheme' element of the M28 Cork to Ringaskiddy project will be located within the northwestern boundary of the proposed development site. The waste-to-energy facility is confined to the eastern side of the site and therefore will have no direct interaction with the Protected Scheme. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission. The proposed development site is not indicated as being in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above

ACP Submission Reference	Submission Statement	Applicant Response
		ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site. Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09'*. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan*.' Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS outlines how the proposed development is compliant with national and local government policy.
TOPIC: COMMUNITY AND SOCIO-ECONOMIC IMPACTS		
The list of submissions to which this topic relates is included in Appendix B.	**1. Deterioration of Community Wellbeing, Safety, and Social Cohesion** Across submissions, there is an expressed concern that the development would impose significant negative impacts on the local community's quality of life. Residents anticipate heightened anxiety linked to pollution risks, hazardous-waste traffic, industrialisation of the harbour, and long-term uncertainty about environmental health. These cumulative psychological strains - rooted in fears of cancer clusters, toxic emissions, and ecosystem degradation -	As outlined in the Non-Technical Summary, there will be a number of benefits for the local community. An amenity walkway, incorporating a viewing platform, is proposed as part of the proposed development. The upgrade of the local road (L2545) will alleviate local flooding issues which constitutes a significant planning gain for the benefit of existing and future users of the immediate area. In addition, the project will support a significant number of jobs off-site in construction industry suppliers and service providers, with the employment provided contributing to the economy of the South Cork area both directly and indirectly through the supply of goods and services.

ACP Submission Reference	Submission Statement	Applicant Response
	are seen as eroding social cohesion and deepening mistrust in regulatory bodies. Community identity, grounded in maritime character, recreation, and increasingly education and tourism, is perceived as being fundamentally threatened by the imposition of a heavy industrial facility at odds with the area's evolving ethos.	Finnaly, Indaver is proposing a community fund which would fund environmental and other community projects and initiatives in the Ringaskiddy area. As outlined in Chapter 6 - Population and Human Health, the proposed development will be designed and constructed to best industry standards, with an emphasis being placed on the health and safety of employees, local residents and the community at large. The technology to be employed in the proposed development is well understood and has been used successfully in equivalent projects internationally, with no implications for health and safety. Additionally, many of the mitigation measures described elsewhere, such as in relation to emissions to air and noise will have the effect of mitigating any effects on human health. To minimise any potential psychological effects in relation to worry about human health effects, even though the overwhelming evidence is that there are none, ongoing information and education of the community will be made available. This may be facilitated by information and performance of the facility and emissions being available on a website for the public to review. Seeing the real values will likely reassure reasonable persons. The potential effects on recreational amenity have been assessed in Chapter 6 - Population and Human Health. Coastal protection works will be undertaken with the placement of sacrificial beach material (shingle) at the toe of the glacial till face on Gobby Beach designed to remain on site and help lower the natural erosion rate over a number of years. Monitoring of the sacrificial material and the cliff face will take place on an annual basis. To ensure the safety of the general public, it is envisaged that the area of the beach, in which the construction works will take place and the area of the car park in which the materials will be stored, and which will be used by the machinery, will be closed to the public for the duration of the proposed works, approximately three weeks. However, access to the rest of the beach will be maintained for the duration of the works. The operation of the proposed development will not encroach on the shoreline amenity. As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in its visual and landscape character in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this

ACP Submission Reference	Submission Statement	Applicant Response
		landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape.
	2. Socio-Economic and Local Economic Harm: Reputational Damage and Loss of Investment Submissions claim that the incinerator would inflict broad harm on the region's socio-economic fabric, limiting future investment and undermining the area's strategic development trajectory. The harbour is undergoing transformation toward tourism, sustainable enterprise, and education, yet industrialisation risks deterring investors, reducing commercial attractiveness, and reversing progress made under local and regional plans. Key industries - particularly tourism, hospitality, educational institutions, and environmentally dependent enterprises - are seen as vulnerable to reputational damage associated with emissions, odour, and visual intrusion. The area's brand value, essential for drawing both domestic and international visitors and students, is considered at serious risk.	As outlined in Chapter 8 - Air Quality, AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. As outlined in Chapter 6 - Population and Human Health, the tipping hall and bunker will be under negative pressure to prevent odours from the facility impacting on local residents. There will not be a significant effect from odours resulting from the proposed development. Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development.
	3. Depressed Property Values and Reduced Residential Attractiveness A persistent theme relates to the anticipated decline in property values arising from proximity to a hazardous-waste incinerator. Residents argue that the proposal introduces multiple disamenities - visual dominance, vehicle noise, flood-risk amplification, and potential air-quality impacts - that directly undermine neighbourhood attractiveness. Concerns include slower resale rates, reduced buyer confidence, and stigma associated with living near industrial waste infrastructure. These fears are compounded by longer-term climate-risk projections, with community members warning that increased flood exposure and coastal erosion could further diminish market stability and erode homeowner security.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development. As outlined in Chapter 10 - Noise and Vibration, for the construction phase during the morning peak hour, noise levels are calculated to increase at residential properties along the L2545 Road east of the ferry port by up to 4.8dB. A change in noise levels of this magnitude is categorised as moderate change in accordance with the referenced standards and guidelines. The overall effect determined as negative, moderate and temporary. During all other periods outside of this peak hour, effects are lower. Whilst the calculated increase in traffic noise is categorised as perceptible and of moderate effect, the specific noise level (58 to 61dB LAeq, 1hr) is not out of line with traffic noise levels calculated noise levels at NSLs along the N28 west of the ferry port in the absence of any construction traffic. The assessment assumes the M28 Road is not operational prior to the construction phase of the proposed development. During the operational phase, the results of the evaluation indicate that the operational noise levels during daytime and evening and night-time periods are all comfortably below the relevant noise criteria at the nearest noise sensitive locations. The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.

ACP Submission Reference	Submission Statement	Applicant Response
		As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site. AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. Chapter 9 - Climate includes a full Climate Change Risk Assessment (CCRA), covering exposure, sensitivity and vulnerability to climate hazards, including coastal flooding and extreme weather. Adaptation measures to increase project resilience are identified. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the proposed development.
	4. Impacts on Local Students, Educational Assets, and Youth Wellbeing Given the proximity of educational campuses and training centres, many submissions highlight risks to local students. These include concerns about exposure to hazardous pollutants, disruption of the learning environment from increased HGV traffic, and the long-term psychological burden placed on young people living near a high-risk industrial installation. The project is seen as directly contradicting the area's educational zoning objectives, which envision a safe, innovation-driven environment rather than one associated with industrial hazards. Submissions argue that these impacts could deter student enrolment and impair the region's ability to develop as an educational hub.	As outlined in Chapter 8 - Air Quality, AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. As outlined in Chapter 7- Roads and Traffic, with proposed scheduling, peak-hour restrictions, and mobility management, HGV impacts during both construction and operation are predicted to be moderate, short-term during construction, and not significant in the long term, particularly once the M28 becomes operational. As outlined in Chapter 6 - Population and Human Health, the proposed development will be designed and constructed to best industry standards, with an emphasis being placed on the health and safety of employees, local residents and the community at large. The technology to be employed in the proposed development is well understood and has been used successfully in equivalent projects internationally, with no implications for health and safety. To minimise any potential psychological effects in relation to worry about human health effects, even though the overwhelming evidence is that there are none, ongoing information and education of the community will be

ACP Submission Reference	Submission Statement	Applicant Response
		made available. This may be facilitated by information and performance of the facility and emissions being available on a website for the public to review. Seeing the real values will likely reassure reasonable persons. As outlined in Chapter 2 - Policy and Planning Framework and Need for the Scheme, the proposed development site is part zoned RY-I-09 and part zoned RY-I-15, with the latter defined as follows: Objective No. RY-I-15: (c. 28.84ha) Suitable for large stand-alone industry with suitable provision for appropriate landscaping and protection of the access points and provision for open space buffer to the Martello Tower and its associated pedestrian accesses. Any development proposals will need to protect the special function and integrity of the setting of the Martello Tower and maintain the existing line of sight from the Martello Tower to the other four fortifications in the Harbour (Fort Camden Meagher, Carlisle Davis, Westmorland and the Martello Tower on Haulbowline Island). Notwithstanding the above, the provision of a strategic large-scale waste treatment facility at the site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Objective EC:8-3 of the Cork County Development Plan 2022 and is in accordance with policies for its zoning objective as per ZU 18-16 of the Plan.
	5. Degradation of Public Recreational Areas, Harbour Amenity, and Landscape Character Cork Harbour's status as a world-class recreational, ecological, and scenic environment is a central component of many submissions. The proposed development is perceived as visually intrusive and incompatible with the harbour's amenity value, undermining activities such as walking, sailing, angling, paddle sports, and heritage tourism. Elevated platform construction required for flood mitigation is seen as exacerbating visual and landscape impacts. Concerns also focus on the loss of tranquillity, potential odours, and overall degradation of the natural experience that residents and visitors depend on. This erosion of public-realm quality is framed as irreversible and fundamentally contrary to sustainable coastal-zone planning principles.	Visual impacts are assessed in Chapter 11 - Landscape and Visual Assessment. The EIS concludes that the visual impact of the waste-to-energy facility ranges from slight, permanent and neutral to significant, permanent and negative. Mitigation and monitoring measures are included in Section 11.6 of Chapter 11 which will reduce the visual impact of the proposed development. In addition, as noted in Section 4.5.15 of the EIS, the levels of the low-lying parts of the site will be raised to 4.55mOD 'the ground levels in the western fields area of the site consisting of a 10,000m^2 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 will also be raised to 4.55mOD'. This will offer a very high standard of flood protection to the site. Chapter 6 Population and Human Health of the 2025 EIS states '*it is considered that there will be a minor residual effect on the recreational amenity of the site and its immediate vicinity as the site will have somewhat more of an industrial character than it does at present. However, the industrial context is in keeping with its location within a Strategic Economic Area'*. As outlined in Chapter 6 - Population and Human Health, the tipping hall and bunker will be under negative pressure to prevent odours from the facility impacting on local

ACP Submission Reference	Submission Statement	Applicant Response
		residents. There will not be a significant effect from odours resulting from the proposed development.
	6. Cumulative Economic, Environmental, and Social Disbenefits Submissions claim the development would impose intertwined economic, environmental, and social burdens. These include potential loss of tourism revenue, diminished community morale, constrained educational development, environmental risk amplification, and deterioration of the region's international reputation. Submissions maintain that the cumulative disbenefits far outweigh any purported advantages, especially given the area's strategic shift away from heavy industry. The project is therefore described not merely as a poor fit, but as a structural threat to the harbour's long-term vitality and resilience.	As outlined in Chapter 6 - Population and Human Health, the lower harbour area is currently and will continue to undergo process of change in its visual and landscape character in the short, medium and long term with the other planned and permitted developments in the area including the M28 Cork to Ringaskiddy Motorway Scheme and redevelopment of the Ringaskiddy Port and continued development of other industrial, renewable energy and pharmaceutical projects in the lower harbour area. The cumulative effect of these developments on the landscape character will be negative in the short term but is deemed to the positive in the medium to long term once operational as the area transitions from a slightly unkempt, semi-industrial area, to a more developed cluster of industry, energy and education campus style landscape. The proposed development will be seen in many ways as an extension of this landscape. Overall, the greater surrounding area is deemed capable of absorbing the development without changing the character of Cork Harbour landscape. As such, it is considered that the proposed development is compatible with the plans for greater tourist amenities in the Lower Harbour. Section 2.2 of the Planning Report acknowledges that '*the site is predominantly zoned RY-I-15 and part zoned RY-I-09'*. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan……..Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan*.'

ACP Submission Reference	Submission Statement	Applicant Response
TOPIC: ECOLOGY & BIODIVERSITY IMPACTS		
The list of submissions to which this topic relates is included in Appendix B.	**1. Threats to Ecologically Sensitive Habitats and Harbour Biodiversity** A stated concern is the vulnerability of Cork Harbour's ecologically rich and internationally significant habitats. The area supports protected species, migratory bird populations, marine ecosystems, and delicate intertidal zones, all of which are highly sensitive to emissions, deposition, noise, light pollution, and construction disturbance. Objectors argue that the development risks undermining the ecological integrity of Special Protection Areas and adjacent conservation designations, with particular emphasis on cumulative exposure pathways for pollutants such as PFAS, dioxins, heavy metals, and ultrafine particulates. The harbour's environmental sensitivity is repeatedly cited as incompatible with high-risk industrial infrastructure, especially given the facility's potential to introduce long-range pollutant dispersal and chronic ecological stress.	The Natura Impact Statement submitted in 2025 concluded that '*following a comprehensive evaluation of the potential direct, indirect and in-combination impacts on the qualifying interests and conservation objectives for the Cork Harbour SPA, it has been concluded that the proposed development will not have an adverse effect on the integrity of the Cork Harbour SPA*'. As outlined in Chapters 12 (Biodiversity) and 17 (Summary of Impacts and Mitigation Measures) of the EIS, the site comprises modified terrestrial habitats adjacent to, but outside, designated Natura 2000 sites (Section 12.2 of Chapter 12 of the EIS). With the implementation of habitat protection, construction controls, and long-term ecological management measures, the EIS concludes that no significant adverse effects on designated habitats or species are predicted, and that some biodiversity enhancements will occur through targeted habitat creation and management (Section 17.3.8 of Chapter 17 of the EIS). Specifically, as outlined in Section 8.7 of Appendix 8.1 of the EIS & Appendix 11 of the NIS, a detailed air modelling assessment of the Proposed Development on ecological impact was undertaken. The assessment was conducted on all nearby SACs, SPAs and pNHAs. The modelling found that all critical levels and critical loads are in compliance with the impact from the facility and not significant. Assessment of risk of long term environmental contamination was undertaken following Human Health and Ecological Risk Assessment Support to the Development of Technical Standards for Emissions from Combustion Units Burning Hazardous Wastes, US EPA Contract No. 68-W6-0053, US EPA Washington, 1999 and Van Hall Institut, Leeuwarden/Groningen for the Dutch Institute of Public Health and Environmental Protection (RIVM), on behalf of the Dutch Ministry for Spatial Planning, Housing and the Environment, February, 2000 and provided in Appendix 6.3 of the EIS and Appendix 15 of the NIS. Both assessments concluded that the predicted impact from the proposed development is not significant. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration.
	2. Exposure of Human and Non-Human Sensitive Receptors to Hazardous Emissions Submissions highlight the presence of numerous sensitive receptors - including schools, residential areas, health-care users, recreational coastline users, wildlife populations, and marine organisms - situated within the incinerator's likely impact zone. Concerns focus on the vulnerability of children, the elderly, and immunocompromised individuals to airborne contaminants that the EIS is	The combustion of waste produces a number of emissions, the discharges of which are regulated by the EU Directive on Industrial Emissions (IED) (2010/75/EU). The emissions to atmosphere which have been regulated are: • Nitrogen Dioxide (NO_2) • Sulphur Dioxide (SO_2)

ACP Submission Reference	Submission Statement	Applicant Response
	considered to have inadequately assessed. The absence of robust baseline health data, incomplete pollutant modelling, and gaps in ultrafine-particle and PFAS analysis heighten fears that receptor-specific risks cannot be reliably quantified. For wildlife and marine life, the risk of bioaccumulation of persistent pollutants is highlighted as particularly harmful, with the potential to cascade through food webs and threaten long-term ecosystem viability.	• Total Dust (although there is no regulated Total Dust standard, standards exist for PM_{10} and $PM_{2.5}$ (particulate matter less than 10 and 2.5 microns respectively)) • Carbon Monoxide (CO) • Total Organic Carbon (TOC) • Hydrogen Fluoride (HF) and Hydrogen Chloride (HCl) • Dioxins/Furans (PCDD/PCDFs) • Cadmium (Cd) & Thallium (Tl) • Mercury (Hg) • and the sum of Antimony (Sb), Arsenic (As), Lead (Pb), Chromium (Cr), Cobalt (Co), Copper (Cu), Manganese (Mn), Nickel (Ni) and Vanadium (V) The effect of the pollutants outlined above has been assessed in chapter 8 - Air Quality of the EIS in addition to any potential construction phase emissions. In addition, Ammonia (NH_3) and Polycyclic Aromatic Hydrocarbons (PAHs) have been assessed as incineration is a potential emission source for this group of compounds. AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. Chapter 6 of the EIS (Population and Human Health) evaluates the health significance of emissions to air from the proposed development, specifically discussing particulate matter and ultrafine particles. The evidence suggests that modern incinerators have significantly reduced particulate emissions, with modelled PM_{10} and $PM_{2.5}$ levels comfortably below air quality standards. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver's existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. As outlined in Section 8.7 of Appendix 8.1 of the EIS & Appendix 11 of the NIS, a detailed air modelling assessment of the Proposed Development on ecological impact was undertaken. The assessment was conducted on all nearby SACs, SPAs and pNHAs. The modelling found that all critical levels and critical loads are in compliance with the impact from the facility and not significant. Assessment of risk of long term environmental contamination was undertaken following Human Health and Ecological Risk Assessment Support to the

ACP Submission Reference	Submission Statement	Applicant Response
		Development of Technical Standards for Emissions from Combustion Units Burning Hazardous Wastes, US EPA Contract No. 68-W6-0053, US EPA Washington, 1999 and Van Hall Institut, Leeuwarden/Groningen for the Dutch Institute of Public Health and Environmental Protection (RIVM), on behalf of the Dutch Ministry for Spatial Planning, Housing and the Environment, February, 2000 and provided in Appendix 6.3 of the EIS and Appendix 15 of the NIS. Both assessments concluded that the predicted impact from the proposed development is not significant. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration.
	3. Cumulative Ecological Risk from Persistent and Bioaccumulative Pollutants A submission theme is the site's projected release of pollutants that resist breakdown and accumulate in soils, sediments, and biological tissues. Objectors emphasise that PFAS, heavy metals, and persistent organic pollutants pose chronic risks to both terrestrial and marine ecosystems, with long-term ecological degradation disproportionately affecting species already under pressure from climate change and habitat fragmentation. The harbour's semi-enclosed nature amplifies concerns about concentration and persistence of contaminants, particularly in shellfish beds, sediment layers, and feeding grounds. This cumulative accumulation is described as incompatible with statutory protections, international ecological obligations, and the precautionary principle.	The combustion of waste produces a number of emissions, the discharges of which are regulated by the EU Directive on Industrial Emissions (IED) (2010/75/EU). The emissions to atmosphere which have been regulated are: • Nitrogen Dioxide (NO_2) • Sulphur Dioxide (SO_2) • Total Dust (although there is no regulated Total Dust standard, standards exist for PM_{10} and $PM_{2.5}$ (particulate matter less than 10 and 2.5 microns respectively)) • Carbon Monoxide (CO) • Total Organic Carbon (TOC) • Hydrogen Fluoride (HF) and Hydrogen Chloride (HCl) • Dioxins/Furans (PCDD/PCDFs) • Cadmium (Cd) & Thallium (Tl) • Mercury (Hg) • and the sum of Antimony (Sb), Arsenic (As), Lead (Pb), Chromium (Cr), Cobalt (Co), Copper (Cu), Manganese (Mn), Nickel (Ni) and Vanadium (V) The effect of the pollutants outlined above has been assessed in chapter 8 - Air Quality of the EIS in addition to any potential construction phase emissions. In addition, Ammonia (NH_3) and Polycyclic Aromatic Hydrocarbons (PAHs) have been assessed as incineration is a potential emission source for this group of compounds. AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of

ACP Submission Reference	Submission Statement	Applicant Response
		human health for all parameters under both the maximum and abnormal operation scenarios. Chapter 6 of the EIS (Population and Human Health) evaluates the health significance of emissions to air from the proposed development, specifically discussing particulate matter and ultrafine particles. The evidence suggests that modern incinerators have significantly reduced particulate emissions, with modelled PM_{10} and $PM_{2.5}$ levels comfortably below air quality standards. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver's existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. As outlined in Section 8.7 of Appendix 8.1 of the EIS & Appendix 11 of the NIS, a detailed air modelling assessment of the Proposed Development on ecological impact was undertaken. The assessment was conducted on all nearby SACs, SPAs and pNHAs. The modelling found that all critical levels and critical loads are in compliance with the impact from the facility and not significant. Assessment of risk of long term environmental contamination was undertaken following Human Health and Ecological Risk Assessment Support to the Development of Technical Standards for Emissions from Combustion Units Burning Hazardous Wastes, US EPA Contract No. 68-W6-0053, US EPA Washington, 1999 and Van Hall Institut, Leeuwarden/Groningen for the Dutch Institute of Public Health and Environmental Protection (RIVM), on behalf of the Dutch Ministry for Spatial Planning, Housing and the Environment, February, 2000 and provided in Appendix 6.3 of the EIS and Appendix 15 of the NIS. Both assessments concluded that the predicted impact from the proposed development is not significant. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that: "*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific $PM_{2.5}$*

ACP Submission Reference	Submission Statement	Applicant Response
		component or group of components associated with any source categories of fine particles". (USEPA, 2015b)
	4. Inadequacy of Ecological Baseline Data and Failures in Receptor-Specific Assessment Submissions claim insufficient baseline ecological information provided in the EIS. Reference is made to outdated surveys, absence of critical monitoring data (including PFAS and ultrafine particle baselines), and inadequately characterised habitats. The perceived failure to conduct receptor-specific risk assessments - particularly regarding sensitive bird species, marine mammals, and intertidal communities - creates uncertainty about the project's true impact footprint. Stakeholders argue that without accurate baseline conditions, modelling outputs cannot reliably predict harm, resulting in unacceptable ecological and regulatory risk.	The surveys and ecological assessment documented in Chapter 12 of the EIS are based on comprehensive data compiled by experts that have long-standing familiarity with the habitats and species within and close to the site. In this context, the chapter concludes that, with the implementation of mitigation measures that have a high likelihood of success, there will be localised slight to imperceptible impacts on habitats and species. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that: "*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific $PM_{2.5}$ component or group of components associated with any source categories of fine particles*". (USEPA, 2015b)
	5. Amplified Ecological Vulnerability Due to Site-Specific Physical Risks Submissions argue that the site's flood risk, coastal erosion, and climate-driven instability exacerbate ecological vulnerability. Potential inundation events may mobilise contaminated residues, ash, or stored materials into the surrounding marine environment, significantly magnifying harm to sensitive receptors. The combination of coastal regression, storm-surge exposure, and the presence of hazardous substances is seen as an unacceptable ecological hazard, particularly in a harbour system already experiencing climate-induced stressors.	Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission. The proposed development site is not indicated as being in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low. As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during

ACP Submission Reference	Submission Statement	Applicant Response
		the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site.
TOPIC: ENERGY PERFORMANCE AND DEMAND CLAIMS		
The list of submissions to which this topic relates is included in Appendix B.	**1. Structural Plant Inefficiency and Failure to Meet Energy-Recovery Standards** Some submissions claim that the proposed facility is intrinsically inefficient, failing to reach the R1 energy-recovery threshold required under the EU Waste Framework Directive. Stakeholders argue that the plant's reliance on electricity-only operation - without feasible heat export - results in an efficiency level far below modern EU recovery standards and reclassifies the operation as D10 disposal, not energy recovery. This reclassification is deemed fatal, as it renders the proposal incompatible with national and EU policy and deprives it of the regulatory status needed to justify incineration as part of a circular-economy pathway. Objectors emphasise that the facility would be built on outdated assumptions regarding calorific value, plant utilisation, and waste composition, making it a high-emission, low-efficiency installation that cannot integrate into Ireland's decarbonised future energy system.	While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development. The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive. Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria.
	2. Absence of Viable Heat Recovery Infrastructure and Incompatible Site Context Submissions highlight the absence of any realistic heat-recovery option due to the site's coastal location, lack of district heating networks, and absence of proximate heat customers. Without heat export infrastructure, the plant's thermal efficiency is inherently constrained, eliminating the primary mechanism through which modern waste-to-energy facilities achieve environmental and regulatory compliance. Objectors argue that the developer has provided no viable pathway - technical, economic, or spatial - to deliver heat recovery, and that attempts to frame electricity-only generation as energy recovery are misleading. The site's zoning for marine education and enterprise, rather than industrial heat users, further reinforces the conclusion that heat recovery is structurally impossible.	Section 2.2 of the Planning Report acknowledges that 'the site is predominantly zoned RY-I-15 and part zoned RY-I-09'. Section 5 of the Planning Report discusses Waste and Planning Policy Considerations and states '*Local planning policies and objectives, as set out in the Cork County Development Plan 2022-2028, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. Section 6.4.11 of the Plan states that the provision of strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. Therefore, the provision of a strategic large-scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Plan.....*

ACP Submission Reference	Submission Statement	Applicant Response
		Furthermore, the proposed development is supported by the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). Specifically, strategic large-scale waste treatment facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas'. The proposed Ringaskiddy Resource Recovery Centre is located in an industrial area designated as a Strategic Employment Area, in which large scale waste facilities will be considered, in accordance with zoning objective ZU 3-7(b) of the Plan.' Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS outlines how the proposed development is compliant with national and local government policy. While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development. The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date.
	3. Overstated Electricity Demand Claims and Misrepresentation of Energy Contribution Another cross-cutting theme is the claim that the plant's purported electricity contribution is substantially overstated. Submissions note that as Ireland's grid continues to decarbonise through offshore wind, solar, and battery storage, a fossil-dependent incinerator producing low-efficiency baseload power would displace cleaner forms of generation, increasing rather than reducing total emissions. Submissions argue that the applicant inflates the strategic value of the electricity output by omitting the grid-carbon trajectory and by failing to acknowledge that the plant would operate continuously even when renewable curtailment is high. This mismatch between claimed energy need and actual	The proposed development treats waste which cannot be re-used, composted or recycled. As outlined in Chapter 2 of the 2025 EIS, the National Waste Management Plan reports that '*the State has a continued reliance on export to manage residual MSW and other waste streams which is unsuitable and while an emphasis on prevention and reuse may reduce this reliance, there remains a need for additional indigenous recovery infrastructure'*. Furthermore, the proposed development will recover heat and will use this to generate 21MW of electricity, of which 18.5MW will be exported to the grid. As described in Section 2.3 (of Chapter 2), approximately 50% or 9.25MW could be renewable electricity, which would contribute to meeting Ireland's target of an 80% share of electricity from renewable sources in gross final consumption by 2030. The majority of renewable electricity capacity has been delivered by wind turbines to date, and so the contribution of renewable electricity from biomass at the proposed development

ACP Submission Reference	Submission Statement	Applicant Response
	system characteristics is cited as a significant weakness that undermines the proposal's justification under climate legislation and national energy policy.	will not only support the achievement of the target but will also help to diversify Ireland's renewable energy supply.
	4. High Parasitic Loads Undermining Net Energy Yield and Overall Viability Submissions emphasise that the plant's parasitic loads - energy consumed internally for flue-gas treatment, fans, pumps, and emission-control systems - significantly erode the facility's claimed net output. Objectors argue that once parasitic demand is accounted for, the effective net energy exported to the grid becomes minimal, further invalidating claims of strategic energy contribution. These internal loads are expected to increase over time as emission standards tighten, meaning the plant's efficiency would deteriorate rather than improve. Combined with the absence of heat recovery, high parasitic consumption reinforces the argument that the facility is economically and environmentally non-viable, likely to become a stranded asset as waste volumes decline and regulatory pressures increase.	The proposed development will recover heat and will use this to generate 21MW of electricity, of which 18.5MW will be exported to the grid. As described in Section 2.3 (of Chapter 2), approximately 50% or 9.25MW could be renewable electricity, which would contribute to meeting Ireland's target of an 80% share of electricity from renewable sources in gross final consumption by 2030. The majority of renewable electricity capacity has been delivered by wind turbines to date, and so the contribution of renewable electricity from biomass at the proposed development will not only support the achievement of the target but will also help to diversify Ireland's renewable energy supply. While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development. The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date.
	5. Combined Implications: Non-Compliance and Long-Term Stranded-Asset Risk When these issues - plant inefficiency, lack of heat recovery, overstated electricity benefits, and high parasitic loads - are considered together, it is claimed that the proposal represents an obsolete model of incineration incompatible with Ireland's policy direction. The facility is characterised as offering minimal energy benefit, significant emissions, and no credible pathway to compliance with future waste-policy, energy-efficiency, or climate-law requirements. As national recycling performance improves and circular-economy legislation accelerates, the plant is viewed as increasingly reliant on waste imports to maintain throughput, intensifying concerns about operational viability and environmental justification. The combined effect is a projected long-term stranded-asset risk, borne by the public, regulators, and local communities.	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS '*The NWMP (National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market." Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to*

ACP Submission Reference	Submission Statement	Applicant Response
		protect, promote and ensure continuity of supply in the market." (page 2.11 Chapter 2 of the EIS). Import of waste is not envisaged.
TOPIC: IMPACT ON WATER AND SOILS		
The list of submissions to which this topic relates is included in Appendix B.	**1. Risk of Contamination to Soils Through Persistent and Hazardous Pollutants** There is a concern that the facility would pose long-term contamination risks to soils, driven by deposition of persistent pollutants such as PFAS, dioxins, heavy metals, and combustion by-products. These substances are highlighted as resistant to degradation, capable of accumulating in surface soils, agricultural land, sediment layers, and biologically active zones. Objectors argue that incomplete pollutant modelling and inadequate baseline data mean the extent of soil exposure cannot be reliably assessed. The proximity of the site to eroding coastal areas further amplifies risks, as storm events, tidal surges, or structural failure could mobilise contaminated materials into surrounding terrestrial environments.	As outlined in Section 8.7 of Appendix 8.1 of the EIS & Appendix 11 of the NIS, a detailed air modelling assessment of the Proposed Development on ecological impact was undertaken. The assessment was conducted on all nearby SACs, SPAs and pNHAs. The modelling found that all critical levels and critical loads are in compliance with the impact from the facility and not significant. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. Assessment of risk of long term environmental contamination was undertaken following Human Health and Ecological Risk Assessment Support to the Development of Technical Standards for Emissions from Combustion Units Burning Hazardous Wastes, US EPA Contract No. 68-W6-0053, US EPA Washington, 1999 and Van Hall Institut, Leeuwarden/Groningen for the Dutch Institute of Public Health and Environmental Protection (RIVM), on behalf of the Dutch Ministry for Spatial Planning, Housing and the Environment, February, 2000 and provided in Appendix 6.3 of the EIS and Appendix 15 of the NIS. Both assessments concluded that the predicted impact from the proposed development is not significant. Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission.
	2. Threats to Water Quality Due to Flooding, Coastal Regression, and Hydrological Vulnerability A cross-topic issue is the hydrological vulnerability of the site, located within an active flood-risk area and subject to coastal regression. Submissions emphasise that tidal flooding, storm-surge inundation, rising groundwater, and future sea-level rise present credible pathways for contaminants to enter marine and freshwater systems. Concerns extend to the potential washout of ash residues, leachates, or accidentally released materials, which could be mobilised directly into Cork Harbour. The harbour's semi-enclosed nature is noted as exacerbating	Appendix 13.3 Coastal Erosion Study concluded that the waste-to-energy facility section of the proposed development has been located far enough away from the edge of the cliff to ensure that the waste-to-energy facility will not be impacted by the predicted retreat rates (even in the absence of any mitigation measures) over the design life of the planning permission. The proposed development site is not located in Flood Zone A or B, as noted in the Appendix 13.4 Flood Risk Assessment. Therefore, the site is classified as Flood Zone C which means that the probability of flooding from rivers and the sea is very low.

ACP Submission Reference	Submission Statement	Applicant Response
	the persistence and concentration of pollutants. Submissions argue that these hydrological risks fundamentally undermine the suitability of the location and elevate the probability of pollutant transfer into both marine and freshwater receptors.	As outlined in Section 4.5.15 of Chapter 4, the levels of the low-lying parts of the site will be raised to 4.55mOD. The ground levels in the western fields area of the site consisting of a 10,000m^3 area[1] will be raised by a maximum height of 2.5m above ground level. A small area of land within the waste-to-energy side of the site adjacent to the L2545 road will also be raised to 4.55mOD. This level will offer a very high standard of flood protection to the site. This high standard may be beneficial during the construction phase where the main site accommodation complex will be situated. It also establishes the site level for flood protection for any future uses of this part of the site. The principal design objective for the upgrade of the L2545 road is to improve the surface water drainage so that the road does not flood after prolonged rainfall and to raise the level of the road above the 1 in 200-year tidal flood event with an added allowance for climate change. Section 4.5.14 of Chapter 4 Description of the Proposed Development provides a description of the L2545 upgrade.
	3. Impacts on Water Courses from Pollutant Pathways and Infrastructure Limitations Submissions also highlight the potential for harmful impacts on local water courses, including streams, drainage networks, and engineered outfalls that connect the site to the broader harbour ecosystem. Concerns include insufficient assessment of stormwater management, inadequate modelling of runoff quality, and the potential overflow of containment systems during extreme rainfall events. Pollutants such as heavy metals, dissolved organics, and PFAS are identified as likely to migrate via surface water pathways, with risks heightened by the site's constrained footprint and the need for extensive ground-raising. The cumulative effect is described as a high likelihood of contamination reaching water courses that support aquatic life, recreational use, and downstream ecological receptors.	As outlined in Section 8.7 of Appendix 8.1 of the EIS & Appendix 11 of the NIS, a detailed air modelling assessment of the Proposed Development on ecological impact was undertaken. The assessment was conducted on all nearby SACs, SPAs and pNHAs. The modelling found that all critical levels and critical loads are in compliance with the impact from the facility and not significant. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. As outlined in Chapter 13 - Soils, Geology, Hydrogeology, Hydrology and Coastal Recession, there are no watercourses within the site of the proposed development. The closest, Glounatouig Stream, flows into Monkstown Creek at Raffeen. Potential effects on surface water quality were assessed for Glounatouig Stream which is within the catchment of Hilltown_010. Potential effects during the construction phase will be negative, temporary, local, small adverse and slight, while during the operational phase will be negative, permanent, local, negligible and not significant. The existing storm water drainage system along the road was recently upgraded as part of the recently completed Ringaskiddy urban realm and active travel scheme. Key features of the proposed development include upgrading the road drainage by installing additional large diameter pipes under the road and new road gullies in the road. The proposed L2545 upgrade works will include raising a 190m section of the road to a maximum height of 3.495m OD between the car park and the eastern end of the Hammond Lane Metal Company. This is approximately 0.9m above the existing

ACP Submission Reference	Submission Statement	Applicant Response
		road level. This will elevate the road to above the 1 in 200 year design tidal water level plus an allowance for climate change. This will offer a high level of protection to the road from tidal flooding. The road will be raised over a length of approximately 190m in order to ensure a smooth transition down to existing road levels, in accordance with road design standards. The recently constructed footpath on the northern side of the road will also be raised to the new road level. The proposed road drainage network upgrade will extend along the entire northern boundary of the proposed development. It has been designed to cater for a 7 hour period when the storm water outfall is tide locked during a 200 year tidal event and a 1 in 30 year rainfall event plus an allowance for climate change. During operation, surface water will be contained within the site. The surface water discharge will be monitored prior to discharge and if an out of specification reading is detected the pumps will be shut off and all contaminated runoff will be contained within the retention tank system i.e. both surface water tanks. As documented in Appendix 13.7 of the EIS, hydrological effects on WFD status are negligible and not significant and no significant risk to Cork Harbour, transitional waters, or connected estuarine ecosystems.
	4. Cumulative Ecological and Chemical Pressures on the Harbour System A cross-cutting thematic concern links both soils and water impacts to wider ecological degradation of Cork Harbour. Submissons claim that the combination of atmospheric deposition, soil infiltration, surface runoff, and flood-mobilised contaminants could create a chronic, multi-pathway pollution burden. The risk is seen as particularly acute due to the harbour's role as a feeding ground for protected species, shellfish areas, and sensitive intertidal habitats. The cumulative nature of these inputs heightens the long-term chemical pressure on the ecosystem, threatening both biodiversity and statutory conservation objectives.	As outlined in Chapter 13 - Soils, Geology, Hydrogeology, Hydrology and Coastal Recession, during operation surface water will be contained within the site. The surface water discharge will be monitored prior to discharge and if an out of specification reading is detected the pumps will be shut off and all contaminated runoff will be contained within the retention tank system i.e. both surface water tanks. The levels of the low-lying parts of the site will be raised to 4.55m OD. This development level will offer a very high standard of flood protection to the site. Refer to Appendix 13.4 Flood Risk Assessment for further details. This measure will ensure that the risk of flooding to the site is very low. The finished floor level of the buildings on the site will be set at even more conservative levels, all above 5m OD. It is proposed to upgrade the L2545 to address the risk of flooding of the road. The upgrade works will include raising a 190m section of the road to a maximum height of 3.495m OD between the car park adjacent to Gobby Beach and the eastern end of the Hammond Lane Metal Company site. This is approximately 1.0m above the existing road level. This will elevate the road to above the 200-year design tidal water level plus an allowance for climate change. This will offer a high level of protection to the road from tidal flooding and ensure that access and egress routes are maintained during extreme flood events.

ACP Submission Reference	Submission Statement	Applicant Response
		A new dedicated surface water drainage system will also be installed as part of the upgrade works to collect, convey and attenuate the runoff from the road before connecting back into the existing drainage to discharge to the foreshore. As documented in Appendix 13.7 of the EIS, hydrological effects on WFD status are negligible and not significant and no significant risk to Cork Harbour, transitional waters, or connected estuarine ecosystems. As outlined in Chapter 12 (Biodiversity), Chapter 8 (Air Quality), Chapter 16 (Cumulative Impacts, Other Impacts and Interactions) and the accompanying Appropriate Assessment/Natura Impact Statement, the EIS explicitly identifies Cork Harbour's coastal and marine environment as a receptor for emissions to air via deposition (including intertidal habitats, protected birds and otter) and assesses the relevant source–pathway–receptor linkages for designated sites including the Great Island Channel SAC, Cork Harbour SPA, Sovereign Islands SPA and Ballycotton Bay SPA. The assessment does not rely on an assumption of '*simple dilution*'; deposition of relevant pollutants (including particulates and the key groups assessed such as metals and organic compounds) is modelled using the AERMOD/AERMET approach and presented across a grid that covers both land and marine waters within the study area, allowing deposition hotspots to be identified irrespective of land/water boundaries in a manner consistent with EPA AG4 guidance. Chapter 12 and the AA/NIS also draw on site-specific baseline field survey information (including 2024–2025 surveys for otter activity and coastal/estuarine bird usage) to inform the ecological sensitivity and exposure pathways, and conclude (taking account of mitigation and operational controls) that predicted deposition levels will not result in significant effects on marine/intertidal habitats or on the conservation objectives of the relevant Natura 2000 sites. Meteorological representativeness and plume transport, which are fundamental to deposition hotspot identification, are addressed within the Chapter 8 modelling inputs and sensitivity considerations, and are carried through to the biodiversity and cumulative assessments; accordingly, the contention that coastal/marine receptors are under-represented or that deposition over the harbour has not been assessed is not supported by the information and conclusions set out in the EIS.
	5. Inadequate Baseline Assessment and Monitoring Weaknesses Submissions target the lack of robust baseline data and insufficient analysis of soils, groundwater, and water courses within the application. Missing or outdated assessments of pollutant profiles, groundwater flow, sediment quality, and water-course sensitivity are cited as critical gaps that prevent a reliable evaluation of risk. Submissions argue that the absence of receptor-specific assessment - particularly for groundwater and sediment-laden environments - undermines the credibility of the EIS and exposes the regulatory decision to substantial uncertainty.	As outlined in Chapter 13 - Soils, Geology, Hydrogeology, Hydrology and Coastal Recession, the magnitude of the potential effects on soils and subsoils ranges from negligible to moderate adverse as it results in the permanent loss of grassland and subsoil under the footprint of the proposed development and a reduction in soil quality within the proposed development boundary. Hence, the significance of this effect ranges from imperceptible to significant / moderate. The EIS concluded that potential effects on groundwater quality from the proposed waste-to-energy facility will be negative, temporary, local, small adverse and slight during the construction phase, while the operational phase will have an overall

ACP Submission Reference	Submission Statement	Applicant Response
		imperceptible long-term effect on the groundwater. Mitigation measures are included which will reduce any potential effects on groundwater. Potential effects on surface water quality were assessed for Glounatouig Stream which is within the catchment of Hilltown_010. Potential effects during the construction phase will be negative, temporary, local, small adverse and slight, while during the operational phase will be negative, permanent, local, negligible and not significant. Cork Harbour is adjacent to the proposed development, and Outer Cork Harbour, Lough Beg/Curraghbinny, Lough Mahon and Owenboy Estuary are hydrologically connected to the proposed development and were all assessed for potential effects on WFD waterbody status as documented in Appendix 13.7 using a source-pathway-receptor model. During the construction phase potential effects will be negative, temporary, local, negligible and not significant, while during the operational phase will be negative, permanent, local, negligible and not significant for all waterbodies. Mitigation measures are included which will reduce any potential effects on surface and groundwater bodies.
TOPIC: WASTE HIERARCHY AND ALTERNATIVES		
The list of submissions to which this topic relates is included in Appendix B.	**1. Strengthened Viability of Alternative Waste Management Options** Submissions note that Ireland now has robust, scalable, and policy-aligned alternatives to incineration. These include intensified prevention measures, expanded reuse systems, advanced materials recovery, mechanical–biological treatment, improved source-segregation infrastructure, and accelerated circular-economy interventions. Many submissions argue that these options are already proving more flexible, less carbon-intensive, and better aligned with legislative requirements than mass-burn incineration. The submissions highlight that modern waste policy now prioritises upstream solutions, emphasising that additional thermal treatment capacity would directly undermine investment in waste prevention and high-value recycling pathways.	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*The NWMP (National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market.*"'
	2. Priority of Recycling, Reuse, and Circular Economy Measures Over Incineration Submissions claim an incompatibility between the proposed incinerator and the waste-hierarchy obligations at the core of Irish and EU circular-economy law. It is noted that incineration sits low on the hierarchy and must not displace recycling or reuse initiatives. Numerous submissions argue that continuing to build residual-waste burn capacity will cannibalise recyclate streams, depress national recycling performance, and create perverse incentives to divert	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*The NWMP (National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported*

ACP Submission Reference	Submission Statement	Applicant Response
	recyclable material into the plant to maintain throughput. Concerns centre on the risk that long-lived incineration assets require high feedstock volumes for 25–40 years, structurally locking Ireland into a disposal-led system that conflicts with statutory recycling targets, producer-responsibility schemes, and upcoming EU circular-economy reforms.	*38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market*."'
	3. Demonstrated and Growing Reduction in the Need for Incineration Capacity Submissions claim that Ireland no longer requires new incineration capacity. Multiple submissions argue that capacity projections cited by the applicant rely on outdated tonnage assumptions and do not reflect current or imminent policy conditions - particularly the National Waste Management Plan for a Circular Economy (2024–2030), which does not support new residual-waste infrastructure. Submissions note improving recycling performance, reduced residual fractions, expanding producer responsibility regimes, increasing repair and reuse activity, and flatter waste-generation trends are collectively reducing - and will continue to reduce - the need for thermal treatment. Submissions also assert that Ireland risks entering a phase of overcapacity, which creates a market-driven incentive to import foreign waste to keep the plant operational, contradicting both the Proximity Principle and national policy commitments.	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*The NWMP (National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market*."'
	4. Incineration as a Policy-Inconsistent and Backwards-Looking Waste Strategy Submissions claim that approving a new incinerator now would lock Ireland into an outdated waste-management model at odds with national climate law, EU waste directives, and evolving international best practice. The development is depicted as a residual-waste solution suitable for an older policy era - one preceding modern carbon budgets, circular-economy legislation, and sectoral-decarbonisation pathways. The planned facility's reliance on fossil-derived plastic feedstocks is described as directly counterproductive to Ireland's decarbonisation trajectory, with submissions stating that electricity-only incineration of plastics increases greenhouse-gas emissions relative to the greenening grid. These arguments collectively present incineration not only as unnecessary but as actively obstructive to national waste and climate objectives.	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*The NWMP (National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market*."' Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy.
	5. Risk of Undermining National Investment in Prevention, Recycling, and Reuse Infrastructure	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need.

ACP Submission Reference	Submission Statement	Applicant Response
	Submissions claim that new incineration capacity would undermine ongoing and planned investments in recycling, reuse, deposit-return systems, composting, anaerobic digestion, and circular-economy infrastructure. It is argued that thermal treatment requires high, steady waste inputs, which introduces economic pressure that conflicts with Ireland's strategic direction - reducing preventable waste streams, supporting domestic recycling markets, and transitioning to low-carbon materials circularity. The presence of a large incinerator is described as locking in feedstock demand that could divert material away from high-value recovery and suppress circular-economy innovation.	As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*The NWMP (National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market."*'
	6. Integrated Interpretation Ireland's current and future waste-policy environment is oriented toward prevention, reuse, recycling, carbon reduction, and circular-economy advancement, leaving diminishing justification - practical, economic, legal, and environmental - for constructing new incineration capacity. Submissions position the proposed development as redundant, counterproductive, and incompatible with the trajectory of Irish and EU waste governance.	The National Waste Management Plan (2024-2030) calls for additional dedicated thermal recovery capacity of up to 300,000 tonnes per annum and the proposed development would meet that need. As noted in Chapter 2 – Policy and Planning Framework and Need for the Scheme of the 2025 EIS notes that '*The NWMP (National Waste Management Plan which was published in 2024) acknowledges the waste treatment capacity deficit in Ireland and the need for a reduction in exports: "There is a waste treatment capacity deficit within the State which is illustrated by high levels of waste export (Ireland exported 38% of MSW in 2021 for thermal recovery and recycling). Reliance on export is not sustainable and the identification of existing and future critical infrastructure for the final treatment of municipal waste is essential to protect, promote and ensure continuity of supply in the market."*'
TOPIC: TOXIC POLLUTANTS (DIOXINS/PFAS/HEAVY METALS)		
The list of submissions to which this topic relates is included in Appendix B.	**Bioaccumulation:** Submissions identify studies from the independent ToxicoWatch Foundation with support from Zero Waste Europe that has been examining the environments surrounding waste incinerators in Paris, Harlingen and Zubieta has identified high levels of dioxins, PFAS and heavy metals (Lead and arsenic) around the facilities in soil, water, vegetation and even infood such as farm eggs. Cork Harbour, an EU-designated Special Protection Area (SPA), is at risk of pollutant deposition of dioxins (PCDDs), nitrogen oxides, PFAS contamination, heavy metal accumulation in soil and water entering the food chain threatening Ireland's €7 billion agri-food industry, the marine-ecosystem and residential areas, schools, healthcare facilities, and the wider Cork Harbour community. Rural serum dioxin levels near such facilities have been measured 2-5 times higher than in control populations, persisting for decades due to bioaccumulation in local food chains.The results definitively concluded Dioxin contaminated eggs exceeding EU limits and indicating industrial incineration as a source. In humans bioaccumulation is linked to endocrine disruption, reduced fertility and developmental delays.Even small quantities of hazardous waste	The air dispersion model and associated dioxin/furan-uptake model documented in Appendices 11 and 15 to the NIS is an environmental model, and is attempting to look at likely effects on a very large open system where PCDD/F concentrations will be predicted to be at a maximum at a particular location within a very wide area but will fall off rapidly when one moves away from this point. The SPA will be exposed to PCDD/F deposition rates which are a small fraction of the maximum deposition rate and even the maximum predicted deposition rate will rarely if ever occur as the proposed plant will rarely if ever operate at its maximum operational rate. The modelling therefore has orders of magnitude of conservative emissions data built into its assumptions – actual impacts will be orders of magnitude lower than the likely predicted impacts. Since 2011 Indaver has been operating a waste to energy plant in Duleek and has many years of data which show that PCDD/F emissions are negligible and well below the very low air emission limit value imposed on waste to energy plants and the EPA

ACP Submission Reference	Submission Statement	Applicant Response
	emissions can accumulate over years: Mercury in fish, lead and cadmium in soil and vegetables, dioxins in dairy, meat and breast milk. There is no plan for measuring dioxins, PCBs, or metals in local soil, shellfish, or dairy.	milk monitoring data which has been undertaken for many years in the Duleek area which shows consistently low levels of PCDD/F in milk in the area. The submission cites three recent studies from Belgium, France and the Netherlands carried out by ToxicoWatch. These studies recorded elevated levels of dioxins and furans (in soil, moss and eggs) were recorded in the vicinity of WtE facilities. These publications are not peer reviewed, but the DR CALUX bioassay method (although relatively new) has been verified by the French public health authority and that therefore these studies should be assumed to be scientifically valid. However, the issue with these publications is that they are not scientifically rigorous and they do not follow the proper scientific methods/design that would be required if the publication were peer reviewed (and published scientific literature). The studies do not use controls, do not look at any other sources of emissions in these areas and these are not longitudinal studies looking at patterns of emissions/deposition over time. A number of these sites are also dealing with historical issues, as they have been operational prior to stricter controls such as the IED and directives before it. Persistent organic chemicals can come from a range of sources. There are many confounding variables which are not accounted for or discussed in these reports e.g. were these facilities operational before the tightening of emission guidelines, in the Netherlands a survey site over 125km the WtE facility has much higher levels of dioxins than the sites adjoining the facility, the Paris facility has significant non-compliance issues (over 7,000 hours of exceedances in 2 years). These studies note that further research is needed to determine the extent to which the waste incineration contribute to this contamination. Following a review of these studies, there is no change to the conclusions in the NIS and EIS i.e. that when best operational practices (and compliance monitoring) are carried out, then the levels of emissions do not create human (or avian) health issues.
	Pollutants: Submissions identify studies that document high levels of dioxins, PFAS, a substance called 2378TCDD and heavy metals in the environments surrounding waste incinerators in Spain, France, and The Netherlands.Air particle emissions eg dioxins and PFAS are known to cause damage to human health. Although UFPs remain largely unregulated, the World Health Organization has published good practice statements regarding measuring UFPs in 20215, however Chapter 8 Air Quality of the Indaver ElAR makes no reference to this emerging contaminant of concern. At the 2016 Oral Hearing, toxicologist Prof. Vyvyan Howard highlighted that chronic exposure to ultra-fine particulates can reduce life expectancy and that existing filtration does not reliably capture them. The composition of the off-gases - regardless of plume or plume suppression methods include toxic particulates and gases. Very often to reduce the running costs, the required temperature of 1100 to 1200 degrees Celsius is not reached, therefore fly ash and bottom ash are highly contaminated	Since 2011 Indaver has been operating a waste to energy plant in Duleek and has many years of data which show that PCDD/F emissions are negligible and well below the very low air emission limit value imposed on waste to energy plants. The proposed development will operate to a similar standard. The air dispersion model results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios. As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized

ACP Submission Reference	Submission Statement	Applicant Response
	with dioxins and other chemicals such as perfluoroalkyl and polyflouroalkyl substances (PFAs) which once released a direct cause of many cancers.	particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that: "*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific PM2.5 component or group of components associated with any source categories of fine particles*". (USEPA, 2015b) PFAS & UFP's are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, Chapter 6 of the EIS (Population and Human Health) evaluates the health significance of emissions to air from the proposed development, specifically discussing particulate matter and ultrafine particles. The evidence suggests that modern incinerators have significantly reduced particulate emissions, with modelled PM_{10} and $PM_{2.5}$ levels comfortably below air quality standards. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver's existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. As described in Sections 4.7.3 and 4.7.4 of Chapter 4 of the EIS, the proposed development will operate at temperatures in excess of the minimum required operating temperature of 850°C, Secondary air will be provided to assist in the combustion process, to provide mixing of the flue gases and ensure complete combustion of the volatile gases. The higher temperatures referenced are required when treating highly chlorinated hazardous wastes which are not proposed as part of this application (refer to the list of wastes proposed in Appendix 4.1 of the EIS). The bottom ash, fly ash (boiler ash) and flue gas cleaning residues are described in Section 4.13 of Chapter 4 of the EIS
	PFAS: Peer-reviewed scientific evidence (BMJ 2024; ScienceDirect 2025) states at 850℃-1000℃ the combustion temperature of the facility is too low to fully break down PFAS and results in emissions to air of non-combusted PFAS. According to Indaver's own website temperatures of 1150℃ should be used to ensure that PFAS are safely treated (indaver.com).Dioxins and furans are produced during incineration through high-temperature processes where chlorine is present, particularly from the incomplete combustion of organic matter and chlorine-containing wastes, are of concern as human carcinogens and are often incompletely removed in incinerator flue gas treatment, posing a public health risk to local communities. Even under modern standards, incinerators release a	As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. PFAS is not a relevant parameter for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. The reference to higher temperatures is applicable to the treatment of highly chlorinated hazardous wastes. Highly chlorinated wastes will not be accepted at the facility as can be seen in the list of wastes proposed for acceptance in Appendix 4.1 of

ACP Submission Reference	Submission Statement	Applicant Response
	mix of pollutants, including: a) Particulate Matter ($PM_{2.5}$ and PM_{10}) ... b) Nitrogen Oxides (NOx) ... c) Acid Gases ... d) Heavy Metals ... e) Dioxins and Furans.	the EIS. The potential for dioxin and furan reformation are managed via the implementation of BAT techniques - see Appendix 4.4 of the EIS. Since 2011 Indaver has been operating a waste to energy plant in Duleek and has many years of data which show that PCDD/F emissions are negligible and well below the very low air emission limit value imposed on waste to energy plants. The proposed development will operate to a similar standard. The modelling of emissions to air from the Ringaskiddy Resource Recovery Centre indicates that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for all compounds emitted from the facility even under abnormal operating conditions. In terms of dioxins/furans it was assumed that abnormal operations, including startup and shutdown, occurred for 11 days (264 hours) per year at a concentration 0.5 ng/m3 which is at a level over eight times the licence limit. Under these circumstances the impact of dioxins and furans from the facility was insignificant and a small fraction of existing ambient levels.
	Monitoring: There are no active air monitoring stations currently functioning in Cork, leaving public health unprotected and unmonitored. The implementation of UFP monitoring (particle number concentration) at fence-line and community sites, with open public reporting should happen. The application omits key pollutant monitoring in the EIAR.	As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Article 5, each Member State is required to designate the competent authority to undertake air quality assessments and install an appropriate monitoring network in compliance with the Directive. "*Article 5 Responsibilities* *Member States shall designate at the appropriate levels the competent authorities and bodies responsible for the following:* *(a) assessment of ambient air quality, including ensuring an adequate functioning and maintenance of the monitoring network*;" The EPA is the competent authority to undertake this task. It is not the responsibility of an individual facility or development to set up and operate a monitoring network in line with EU 2024/2881. Detailed site-specific baseline air monitoring data for both the period 2018 – 2019 and 2024 – 2025 was however undertaken as outlined in Section 8.4 of Appendix 8.1 of the EIS in line with the recommendations of EPA "*Air Dispersion Modelling From Industrial Installations Guidance Note – AG04*" (EPA, 2020).
	Inadequete EIS: The application omits PFAS assessment, ultrafine-particle analysis in the EIAR. Irregularities in Indaver's dioxin figures were discovered during the 2016 oral hearing. Scientific and Ecological Uncertainty - PFAS and UFP omissions -+ record incomplete under IED Art 11(b).The application claims the highest environmental and safety standards yet lacks heat recovery, carbon modelling, PFAS/UFP analysis, updated flood-risk data, and a compliant R1	As outlined in Directive (EU) 2024/2881 on Ambient Air Quality And Cleaner Air for Europe, under Annex I, the relevant pollutants in terms of particulate matter ambient air quality limit values are PM_{10} and $PM_{2.5}$. In relation to ultrafine particles (UFPs) and nanoparticles, there are currently no limit values up to 2030 and there also will be no limit values coming into force after 2030. A review of the UFP / nano-sized

ACP Submission Reference	Submission Statement	Applicant Response
	calculation. Assertions of safety lack validity when such critical data are absent and local atmospheric behaviour is not considered.	particle health risks was presented by the USEPA at the USEPA Workshop on Ultrafine Particles, February 2015 with the USEPA noting that: "*Currently available scientific information does not provide a sufficient basis for supplementing mass based, primary fine particle standards with standards using a separate indicator for ultrafine particles or a separate indicator for a specific $PM_{2.5}$ component or group of components associated with any source categories of fine particles*". (USEPA, 2015b) PFAS & UFPs are not relevant parameters for inclusion in the assessment as there are no limit values specified in the Industrial Emissions Directive or in the BAT conclusions on Waste Incineration. However, Chapter 6 of the EIS (Population and Human Health) evaluates the health significance of emissions to air from the proposed development, specifically discussing particulate matter and ultrafine particles. The evidence suggests that modern incinerators have significantly reduced particulate emissions, with modelled PM_{10} and $PM_{2.5}$ levels comfortably below air quality standards. International evidence, such as findings from the US EPA workshop, indicates no definitive proof that ultrafine particles are more harmful than other particulate fractions (Section 6.5.1.7). Drawing on operational data from Indaver's existing facility in Meath, it is concluded that the human health effects from particulate emissions, including ultrafine particles, are negligible. As outlined in Appendix 4.1 of the EIS, hazardous PFAS-containing wastes will not be accepted at the facility. However, activated carbon injection is a recognised abatement technique for removal of PFAS compounds. While heat recovery infrastructure in the form of a district heating/heat network system is not included as part of the proposed development, an appropriately qualified expert was consulted to assess the heat network feasibility of Ringaskiddy, among other locations. This assessment considered the suitability of these areas for the future development of a district heating/heat network system in conjunction with the proposed development. The findings of this assessment are set out in a report prepared by Fichtner, entitled "*Heat Network Feasibility Study – Review of the Potential for District Heating in Six Areas of County Cork*", which is included in Appendix 3.2 of the EIS. The study concluded that a heat network could be feasible in Ringaskiddy and identified it as the most suitable of the six areas assessed, due to the higher number of potential customers and a larger average heat load. The proposed development has been designed and sited to facilitate the potential future implementation of heat recovery infrastructure, should a district heating/heat network system be progressed at a later date.

ACP Submission Reference	Submission Statement	Applicant Response
		Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. A Greenhouse Gas Assessment was carried out as part of the 2025 EIS and is documented in Chapter 9 – Climate. Chapter 9 concluded that the proposed development will have a '*short-term, not significant and negative'* effect as a result of construction traffic and construction works/equipment. During the operational phase of the proposed development the significance of effect is predicted to be *'long-term, not significant and negative'*. Full details are provided in Chapter 9 – Air Quality. A Flood Risk Assessment is included as Appendix 13.4 to the 2025 EIS, which utilises the most up to date data available including aerial mapping and topographical survey information. The proposed development has been designed and located to ensure that any safety concerns relating to flood risk have been comprehensively addressed. As stated in EIS Chapter 2 in Section 2.2.1.4, the proposed development will be designed to meet the R1 efficiency criteria. The criteria are set out in Annex II of the Waste Framework Directive.Therefore, the proposed development will be a recovery facility similar to Indaver's existing waste to energy facility in Carranstown, Co Meath which meets the R1 efficiency criteria. In relation to meteorological stations and the presence of thermal inversions in Cork Harbour, as outlined in Appendix 8.5 of the EIS, a sensitivity study was undertaken for a range of parameters including meteorological station. Under Section 8.5.3 of Appendix 8.5 of the EIS, it is stated that: 8.5.3 Meteorological Station *"The influence of the meteorological station on the ambient ground level concentration has been investigated. For the detailed modelling Cork Airport (2020 – 2024) and the onsite station (2007) were used. As part of the sensitivity assessment Roches Point data (2020 – 2024) was also modelled to determine the sensitivity of this parameter to the modelled concentration (Roches Point is an automated station which does not record cloud cover and thus Cork Airport cloud cover was substituted for the missing data). As shown in Table A8.15, changing the meteorological station leads to small increase in the maximum one hour (as a 99.97th%ile) and a small decrease in the 95.1th%ile of 24-hour means and annual average compared to the onsite station in 2007."*
	Technology: rural waste profiles (often including agricultural residues, pharmaceutical and clinical waste) introduce variable moisture and chlorine content, promoting hydrochloric acid (HCI) formation and corrosion in the	The applicant successfully operates a similar plant in Meath, which has the same feedstock profile as that for the proposed development. Appropriate design,

ACP Submission Reference	Submission Statement	Applicant Response
	combustion chamber. This not only shortens equipment lifespan but also increases operational downtime, rendering the plant uneconomical over its 20-30-year lifecycle.	technology and operation, as described in Chapter 4 of the EIS will ensure the long-term safe and efficient operation of the facility.
	Climate Change: Waste incineration has a negative impact on the environment emitting pollutants like dioxins and heavy metals and significant greenhouse gas emissions contributing to climate change. Products of Incomplete Combustion (PICs) - many of which are also known or suspected to be toxic and some of which are known to have global warming potentials tens of thousands of times higher than CO_2.	Appendix 9.1 - Compliance with Section 15 of the Climate Action & Low Carbon Development Act (Amended) 2021 sets out how the proposed development aligns with long-term national climate action strategy. A Greenhouse Gas Assessment was carried out as part of the 2025 EIS and is documented in Chapter 9 – Climate. Chapter 9 concluded that the proposed development will have a '*short-term, not significant and negative*' effect as a result of construction traffic and construction works/equipment. During the operational phase of the proposed development the significance of effect is predicted to be *'long-term, not significant and negative'*. The proposed development has been designed and will be operated to ensure that complete combustion occurs within the facility, and the contribution of PICs associated with the facility to climate impact will be negligible. As outlined in Chapter 8 - Air Quality, AERMOD modelling results indicate that the ambient ground level concentrations will be below the relevant air quality standards or guidelines for the protection of human health for all parameters under both the maximum and abnormal operation scenarios.
	Circular Economy: The incineration process also destroys valuable phosphates which could otherwise have been recycled and prevent the diminishment of finite planetary supplies of phosphates.	The proposed development forms part of a wider integrated approach to waste management, in accordance with the waste hierarchy, as documented in Chapter 4 of the EIS. While it is acknowledged that the industrial wastewater treatment sludges that will be treated at the facility may contain phosphorous, these sludges cannot be landspread, and it is appropriate to thermally treat them. With the proper implementation of these wider measures, only materials that cannot be reused, recycled, composted or otherwise recovered will be treated in the facility, and combustion of finite resources, including phosphorus, will therefore be minimised.
TOPIC: IMPACT ON SOLAR EXPOSURE		
The list of submissions to which this topic relates is included in Appendix B.	The submission indicates concern that the proposed development may negatively affect sunlight availability or overshadow surrounding properties or public areas. However, the dataset does not include any explanatory text describing how or why solar exposure would be affected, nor does it provide detail on the nature, scale, or context of the shading impact alleged by the submitter.	As outlined in Chapter 11 of the EIS (Landscape and Visual Assessment), a detailed baseline review and viewpoint assessment (Table 11.1 and the associated Visual Representation Points) was undertaken to evaluate potential effects of the proposed development on surrounding receptors. The assessment concludes that, due to the location, orientation and separation distances of the proposed buildings and structures, there are no residential, recreational or public receptors that would experience sunlight, daylight or overshadowing effects as a result of the proposed development.

Appendix A

List of Submissions Relating to Proforma #1

Proforma #1	
FI Sub - 5 Lake Road Group.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - 55th Cork (Carrigaline) Scout Group.pdf	FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf
FI Sub - A & R Geary.pdf	FI Sub - June Fitzgerald.pdf
FI Sub - Abbi Ni Loingsigh.pdf	FI Sub - Justyna and Ireneusz Ksiazek.pdf
FI Sub - Ada O'Sulllivan.pdf	FI Sub - Karen Donegan Mannix.pdf
FI Sub - Adrian Moriarty.pdf	FI Sub - Karen Nash.pdf
FI Sub - Aisling Stone.pdf	FI Sub - Katarzyna Bernat and Bartosz Bernat.pdf
FI Sub - Alan and Mairead Buckley.pdf	FI Sub - Katarzyna Finn.pdf
FI Sub - Alan O'Shea.pdf	FI Sub - Kate & Colm Damery.pdf
FI Sub - Alan Venner.pdf	FI Sub - Kate & Ray Toomey and Others.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kate Cunningham.pdf
FI Sub - Alec Little.pdf	FI Sub - Kate Darragh and Susan Hackett.pdf
FI Sub - Alex Heaslip.pdf	FI Sub - Kate McGrath.pdf
FI Sub - Alexander Dawson.pdf	FI Sub - Kate Murphy.pdf
FI Sub - Alison Cambridge.pdf	FI Sub - Kate Power.pdf
FI Sub - Alison Gash.pdf	FI Sub - Katherine Barry.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Katherine Mac Cann.pdf
FI Sub - Allan J Navratil.pdf	FI Sub - Kathleen Leahy.pdf
FI Sub - Amanda and Derek Crowley.pdf	FI Sub - Kathleen Nilsen.pdf
FI Sub - Amanpreet Singh.pdf	FI Sub - Katie Bermingham.pdf
FI Sub - Amechi Cyril Ude.pdf	FI Sub - Katie Cullinane.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Kayde Aherne.pdf
FI Sub - Amy Browne and Sean O Driscoll.pdf	FI Sub - Kenah O'Driscoll and Others.pdf
FI Sub - Amy Whitson & Conor Brougham.pdf	FI Sub - Kevin & Denise Herlihy.pdf
FI Sub - Ana Rita do Rosario Pinto & Others.pdf	FI Sub - Kevin & Louise Twomey.pdf
FI Sub - Anaelle Goupil.pdf	FI Sub - Kevin Desmond.pdf
FI Sub - Anastasiya Stepnova.pdf	FI Sub - Kevin Halpin.pdf
FI Sub - Andreas Stavrianos.pdf	FI Sub - Kevin Hilliard.pdf
FI Sub - Andrew Brown and Others.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Andrew Findlay.pdf	FI Sub - Kevin O'Grady.pdf
FI Sub - Andrew O'Grady.pdf	FI Sub - Kieran O'Hara.pdf
FI Sub - Angela Britton.pdf	FI Sub - Kieran Stack.pdf
FI Sub - Angela Histon Cobh Boxing Club.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Angela Histon.pdf	FI Sub - Laura & Emma McDonagh.pdf
FI Sub - Angela Purcell & Others.pdf	FI Sub - Laura and David McGrath.pdf
FI Sub - Aniko Igali-Nath & Others.pdf	FI Sub - Lauren and Jamie Coleman.pdf
FI Sub - Anita Venczel and Istvan Juhasz.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Ann Enright.pdf	FI Sub - Leila Pender & Others.pdf
FI Sub - Ann Fogarty.pdf	FI Sub - Leonie Morehan.pdf
FI Sub - Anna Artemiuk.pdf	FI Sub - Liam & Elizabeth Coakley.pdf

Proforma #1	
FI Sub - Anna Van Der Steen.pdf	FI Sub - Liam & Josephine Hughes.pdf
FI Sub - Anne Hennessy.pdf	FI Sub - Linda Burke and Others.pdf
FI Sub - Anne O'Connell.pdf	FI Sub - Linda Nicholson.pdf
FI Sub - Anne O'Connor.pdf	FI Sub - Linda O' Callaghan.pdf
FI Sub - Anne Stack.pdf	FI Sub - Lisa O'Sullivan and Others.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Liz Hales.pdf
FI Sub - Annunciata O'Mahony.pdf	FI Sub - Lorna Hyde.pdf
FI Sub - Anthony & Sally O'Leary.pdf	FI Sub - Louise Brierley.pdf
FI Sub - Anthony Coole.pdf	FI Sub - Louise Sajda.pdf
FI Sub - Anthony Forde and Others.pdf	FI Sub - Louise Welland.pdf
FI Sub - Anthony Hennessy.pdf	FI Sub - Lucie Marie Dehouck.pdf
FI Sub - Aoibhin Quain & Others.pdf	FI Sub - Lucie Zdenkova.pdf
FI Sub - Aoife & Shane Relihan.pdf	FI Sub - Lucy How & Glenn How.pdf
FI Sub - Aoife O'Donovan.pdf	FI Sub - Luke Forde.pdf
FI Sub - Aoife O'Mahony.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Ardcross Crosshaven Residents 1.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Ardcross Residents Crosshaven 2.pdf	FI Sub - Lynne Bannon.pdf
FI Sub - Ardcross Residents Crosshaven 3.pdf	FI Sub - Mags and Peter Webb.pdf
FI Sub - Ashling & Gerry McHugh.pdf	FI Sub - Malgotzata Wiecek-Szumska.pdf
FI Sub - Audra Busfeed and Others.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Audrey Brophy & Neil Phelan.pdf	FI Sub - Manfred Schewe.pdf
FI Sub - Ballymore Community Association Ltd.pdf	FI Sub - Marc Egan.pdf
FI Sub - Barbara O'Connell.pdf	FI Sub - Margaret Curtin.pdf
FI Sub - Batt O'Leary.pdf	FI Sub - Margaret Doherty.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Margaret Hennessy.pdf
FI Sub - Ben O Mahony.pdf	FI Sub - Margaret O'Callaghan & Others.pdf
FI Sub - Ben Walsh.pdf	FI Sub - Margaret O'Mahony.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Maria Conway and Others.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Maria O'Brien & Seamus Murphy.pdf
FI Sub - Bernadette Ryan Rowe.pdf	FI Sub - Marian Dawson.pdf
FI Sub - Bernard F Stack.pdf	FI Sub - Marian Hughes and Others.pdf
FI Sub - Bill O'Leary & Elspeth Cameron.pdf	FI Sub - Marie-Laurie Seecharan and Aga Makowska.pdf
FI Sub - Billy Norris.pdf	FI Sub - Marina Rose.pdf
FI Sub - Birthe Ringsted & Others.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Mario Guglielmo.pdf
FI Sub - Breeda Harrington.pdf	FI Sub - Marion & John Horgan.pdf
FI Sub - Brenda Brierley.pdf	FI Sub - Marion Dowd.pdf
FI Sub - Brenda O'Donoghue.pdf	FI Sub - Marita Foster.pdf
FI Sub - Brenda O'Donovan.pdf	FI Sub - Mariusz Bomba.pdf
FI Sub - Brendan O'Callaghan & Jude Law.pdf	FI Sub - Mark Deaves.pdf
FI Sub - Brian & Denise Healy.pdf	FI Sub - Mark McCasker and Aaron Farry.pdf
FI Sub - Brian Stokes.pdf	FI Sub - Mark O'Sullivan.pdf
FI Sub - Brid McEvoy.pdf	FI Sub - Mark Perry.pdf
FI Sub - Bryan Hassett.pdf	FI Sub - Mark Riordan.pdf

Proforma #1	
FI Sub - Cara & Andrew Jenkins.pdf	FI Sub - Mark Warren.pdf
FI Sub - Carmel O'Connor & Others.pdf	FI Sub - Martin and Carmel Creaner.pdf
FI Sub - Carol O'Donovan.pdf	FI Sub - Martin Chavdarov.pdf
FI Sub - Carole Morrissey and Neighbours.pdf	FI Sub - Martin Murtagh & Others.pdf
FI Sub - Carole Morrissey and Others.pdf	FI Sub - Martin Tobin.pdf
FI Sub - Carolie Harper.pdf	FI Sub - Mary Andrews.pdf
FI Sub - Caroline Anthon & Others.pdf	FI Sub - Mary Connolly.pdf
FI Sub - Caroline Brugess.pdf	FI Sub - Mary Coveney and Bekim Paushi.pdf
FI Sub - Carrie Denham and Others.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Carrigaloe Community Association.pdf	FI Sub - Mary English.pdf
FI Sub - Catherine Ann Celeste Quinlan.pdf	FI Sub - Mary Enright.pdf
FI Sub - Catherine Desmond.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Catherine Jefferson.pdf	FI Sub - Mary McCormack.pdf
FI Sub - Catherine McGonagle.pdf	FI Sub - Mary O'Brien.pdf
FI Sub - Catherine Ryan.pdf	FI Sub - Mary O'Donovan.pdf
FI Sub - Catriona Lynch.pdf	FI Sub - Mary Osbourne.pdf
FI Sub - Ceara Kenneally.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Celine Hyde.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Chairman Cobh Golf Club.pdf	FI Sub - Mary White.pdf
FI Sub - Chandra Mohan Sharma & Upma Rani.pdf	FI Sub - Matthew Hackett.pdf
FI Sub - Charlie Kenneally.pdf	FI Sub - Maureen Kenneally.pdf
FI Sub - Chloe Espitalier Noel.pdf	FI Sub - Maurice and Mary Kidney.pdf
FI Sub - Chris O'Mahony & Others.pdf	FI Sub - Meg O'Reagan.pdf
FI Sub - Chris O'Sullivan.pdf	FI Sub - Megan & Chris Forde.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Megan O'Driscoll & Miguel Amado.pdf
FI Sub - Christina Keating.pdf	FI Sub - Mel Conway and Others.pdf
FI Sub - Christine & Carmel Conroy & Samantha Byrne.pdf	FI Sub - Melanie Murphy.pdf
FI Sub - Christine & David Ring.pdf	FI Sub - Melissa & Barry O'Brien & Others.pdf
FI Sub - Christine Daly & Others.pdf	FI Sub - Michael & Paula Flannery.pdf
FI Sub - Cian Duggan.pdf	FI Sub - Michael Byrne.pdf
FI Sub - Cian Ronayne.pdf	FI Sub - Michael Collins.pdf
FI Sub - Cian Twomey.pdf	FI Sub - Michael Farrell.pdf
FI Sub - Ciara Aherne.pdf	FI Sub - Michael Fogarty.pdf
FI Sub - Ciaran & Tara Kelleher.pdf	FI Sub - Michael Griew.pdf
FI Sub - Ciaran Aherne.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Ciaran Moore.pdf	FI Sub - Michael Martin.pdf
FI Sub - Cillian Moore.pdf	FI Sub - Michael Meade.pdf
FI Sub - Clair & Danny Walsh.pdf	FI Sub - Michael O'Flynn.pdf
FI Sub - Clair Browne.pdf	FI Sub - Michael Rider and Aileen Rider.pdf
FI Sub - Clair O'Donovan.pdf	FI Sub - Michael Spillane.pdf
FI Sub - Claire & Chris Swain.pdf	FI Sub - Michael Wren.pdf
FI Sub - Claire O'Callaghan.pdf	FI Sub - Micheal and Denise O'Driscoll.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Claire Stack and Others.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf

Proforma #1	
FI Sub - Clara Cooney.pdf	FI Sub - Michelle Finn.pdf
FI Sub - Clara O'Grady.pdf	FI Sub - Mick O'Connor.pdf
FI Sub - Cliodhna Buckley.pdf	FI Sub - Mike Whelan and Others.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Miriam & Brendan Twomey.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Miriam Deane.pdf
FI Sub - Clodagh Cunningham.pdf	FI Sub - MK Platts Group.pdf
FI Sub - Clodagh Monks and Others.pdf	FI Sub - M-Noelle Gaynor.pdf
FI Sub - Clodagh O'Regan.pdf	FI Sub - Mokopuna Ltd (Cronins Pub).pdf
FI Sub - Cobh Animation Team.pdf	FI Sub - Molly Donato & Kim Junge.pdf
FI Sub - Cobh Basketball Club (Damien Leahy).pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Cobh Biodiversity Group.pdf	FI Sub - Monica Twomey & Damien O'Brien.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Monika Zuparic-Iljic.pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - MTU Cork Students' Union.pdf
FI Sub - Cobh Ladies Gaelic Football Club.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Cobh Triathlon Club.pdf	FI Sub - Natalia Bozhko.pdf
FI Sub - Coláiste Mhuire (Tony Kenneally Chairperson).pdf	FI Sub - Natalie Moore.pdf
FI Sub - Colette Sullivan & Others.pdf	FI Sub - Nataliya Buckley.pdf
FI Sub - Colin Barry.pdf	FI Sub - National 18ft Dinghy Class (John Coakley).pdf
FI Sub - Colm McConville.pdf	FI Sub - Neil Hemlock and Mary McGill.pdf
FI Sub - Colum & Una Horgan.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Colum Stack.pdf	FI Sub - Niall Bradley & Claire O'Mahony.pdf
FI Sub - Con & Eileen Twomey.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Conor & Kate Middleton.pdf	FI Sub - Nichola Power and Cathal Power.pdf
FI Sub - Conor Phelan.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Corey & Caroline Griffin.pdf	FI Sub - Nick and Tina Emerson.pdf
FI Sub - Cork Dragons.pdf	FI Sub - Nicola Sheehan.pdf
FI Sub - Cormac Mac Coitir.pdf	FI Sub - Nicolas and Denis Venci.pdf
FI Sub - Cormac O Dubhghaill.pdf	FI Sub - Nicole O'Neill and Others.pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Noel & Orla Murtagh.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Noel McKeown.pdf
FI Sub - Damien Haberlin & Others.pdf	FI Sub - Noel O'Riordan.pdf
FI Sub - Dan Wyatt & Others.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Darin O'Driscoll.pdf	FI Sub - Noreen Brierley & Carmel O'Brien.pdf
FI Sub - Darina Allen.pdf	FI Sub - Noreen Collins.pdf
FI Sub - Dave & Aine Perrott & Others.pdf	FI Sub - Noreen Healy and Others.pdf
FI Sub - Dave O'Brien.pdf	FI Sub - Noreen O'Sullivan & Christine Harrington.pdf
FI Sub - David and Theresa Barry.pdf	FI Sub - Noreen Plunkett.pdf
FI Sub - David Cush.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - David Hurby.pdf	FI Sub - Norma O'Driscoll.pdf
FI Sub - David O'Shea.pdf	FI Sub - Norma Stafford.pdf
FI Sub - David Pollard Others.pdf	FI Sub - Nyhan & Deirdre Doyle.pdf
FI Sub - Deborah Hayes.pdf	FI Sub - Olivia & Michael Buckley.pdf
FI Sub - Declan & Anita Allen.pdf	
FI Sub - Declan Murphy.pdf	

Proforma #1	
FI Sub - Deirdre and Steve Hampson.pdf	FI Sub - Olivia Moriarty and Others.pdf
FI Sub - Deirdre Cambridge.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Deirdre Collins.pdf	FI Sub - Orla Busteed.pdf
FI Sub - Deirdre Desmond.pdf	FI Sub - Orla Linehan.pdf
FI Sub - Deirdre Harding.pdf	FI Sub - Orla Murray.pdf
FI Sub - Deirdre McCann, Kieran Enright & Others.pdf	FI Sub - O'Sullivan & McGrath Families.pdf
FI Sub - Deirdre O'Callaghan & Others.pdf	FI Sub - Owen Brickley.pdf
FI Sub - Denis & Annamarie Murphy.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Denis and Cora Lane.pdf	FI Sub - Paddy and Carmel Donnachie.pdf
FI Sub - Denis Cole and Others.pdf	FI Sub - Paddy Whitty.pdf
FI Sub - Denis Cronin.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Denis Mulcahy & Others.pdf	FI Sub - Pamela Newenham & Others.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Pat & Helena Barry.pdf
FI Sub - Denise Emerson.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - Dennis Henderson.pdf	FI Sub - Pat Tobin.pdf
FI Sub - Dermot Butler.pdf	FI Sub - Patrick Carey.pdf
FI Sub - Derval O'Shea.pdf	FI Sub - Patrick Guilfoyle.pdf
FI Sub - Diane Beckingham.pdf	FI Sub - Patrick Keenan and Others.pdf
FI Sub - Diane Deaves.pdf	FI Sub - Patrick Kim Cook.pdf
FI Sub - Dominic Daly.pdf	FI Sub - Patrick Quinlan.pdf
FI Sub - Don McAleese & Others.pdf	FI Sub - Patrick Tuohy.pdf
FI Sub - Don Ryan.pdf	FI Sub - Patrycja Artemiuk.pdf
FI Sub - Donagh Murphy.pdf	FI Sub - Patsy Sheehan.pdf
FI Sub - Donal O Mahony.pdf	FI Sub - Paul Kiernan & Others.pdf
FI Sub - Dorothea Lambe.pdf	FI Sub - Paul O'Halloran.pdf
FI Sub - Dr Jennifer Hayes.pdf	FI Sub - Paul O'Sullivan.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Paula & Teddy Donnachie.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Paula O'Neill.pdf
FI Sub - Dr Lynda Meiklejohn & Lee Meiklejohn.pdf	FI Sub - Pavao Milicevic & Family.pdf
FI Sub - Dr Mary Cornyn-Dunphy.pdf	FI Sub - Peter & Stephanie Coughlan.pdf
FI Sub - Dr Mary Scannell.pdf	FI Sub - Peter and Carmel Daly and Others.pdf
FI Sub - Dr. John B. Dunphy.pdf	FI Sub - Peter and Carol Cave.pdf
FI Sub - Eadaoin Dunkin Marie McGrehan.pdf	FI Sub - Peter and Pauline Crowley.pdf
FI Sub - Eamonn Brierley.pdf	FI Sub - Peter Creighton.pdf
FI Sub - Eamonn Doyle.pdf	FI Sub - Peter Dunphy.pdf
FI Sub - Eamonn Leahy.pdf	FI Sub - Peter Gibson.pdf
FI Sub - Eamonn Ring and Megan Condon.pdf	FI Sub - Peter Haferkamp.pdf
FI Sub - Edmund Mansworth.pdf	FI Sub - Peter Magill.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Peter O'Donovan.pdf
FI Sub - Eileen & Lynda Foley.pdf	FI Sub - Peter Welland.pdf
FI Sub - Eileen Barb and Others.pdf	FI Sub - Prasanna Dhanasekaran.pdf
FI Sub - Eileen Collins.pdf	FI Sub - Priscilla Woodhouse.pdf
FI Sub - Eileen Lane.pdf	FI Sub - Rafal Bajerski.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Raimonda Noreikiene.pdf

Proforma #1	
FI Sub - Eileen Pearson.pdf	FI Sub - Rakesh Agarwal.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Rankin Dinghy Group.pdf
FI Sub - Eilis Leahy.pdf	FI Sub - Raymond & Berna Gordon.pdf
FI Sub - Eimear Dromey.pdf	FI Sub - Rebecca O'Riordan.pdf
FI Sub - Eithne Farr.pdf	FI Sub - Richard & Sue Gibson.pdf
FI Sub - Eithne O'Connor and Others.pdf	FI Sub - Richard Thompson.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Ringolds Kupis.pdf
FI Sub - Eleanor O'Dwyer & Others.pdf	FI Sub - Rob & Chris Brownlow.pdf
FI Sub - Elena O'Driscoll.pdf	FI Sub - Robert & Lisa Jeffers.pdf
FI Sub - Elinor Allen.pdf	FI Sub - Robert and Aine Jones.pdf
FI Sub - Elizabeth & Eamonn Leahy.pdf	FI Sub - Robert Perrem.pdf
FI Sub - Elizabeth O'Brien.pdf	FI Sub - Roderick & Siobhan De Lacy Staunton.pdf
FI Sub - Elma Leonard.pdf	FI Sub - Roger Kelleher.pdf
FI Sub - Emily Aherne.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Emily Montague.pdf	FI Sub - Ronan Kenneally.pdf
FI Sub - Emily O'Donovan.pdf	FI Sub - Rosaleen Mackeown.pdf
FI Sub - Emma Cronin & Eileen, John, & Sarah Armstrong.pdf	FI Sub - Rose O'Halloran.pdf
FI Sub - Emma Crowley and Others.pdf	FI Sub - Rose Savage and Others.pdf
FI Sub - Emma Horgan.pdf	FI Sub - Rose Wallace.pdf
FI Sub - Emma McCarthy & Others.pdf	FI Sub - Rosemarie McCormick & Others.pdf
FI Sub - Emma McCarthy and Others.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Emma O'Brien and Others.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Eric Wolsztynski.pdf	FI Sub - Ruth Phelan.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Ryan & Marie-Claire O'Sullivan Keating.pdf
FI Sub - Esther-Anna Bennett and Anthony Shannon.pdf	FI Sub - Sabine Menz.pdf
FI Sub - Ewa and Michael Plichta.pdf	FI Sub - Sally Cush.pdf
FI Sub - Ewen Barry.pdf	FI Sub - Sally Orren.pdf
FI Sub - Fergal and Majella Simpson & Others.pdf	FI Sub - Sandra Farrell.pdf
FI Sub - Finbarr O'Connor.pdf	FI Sub - Sandra Harrington.pdf
FI Sub - Fiona Fox.pdf	FI Sub - Sandra Henderson.pdf
FI Sub - Fiona Hennessy.pdf	FI Sub - Sarah Healy.pdf
FI Sub - Fiona James (1).pdf	FI Sub - Sarah Leahy.pdf
FI Sub - Fiona James.pdf	FI Sub - Sarah McDevitt.pdf
FI Sub - Fiona O Reilly.pdf	FI Sub - Sarah O'Driscoll.pdf
FI Sub - Fiona Power.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Fiona Young.pdf	FI Sub - Sarah Slattery and Mark Slattery.pdf
FI Sub - Fionnula Ryan.pdf	FI Sub - Sarah Venner.pdf
FI Sub - Fleur Quinlan.pdf	FI Sub - Sean Manning.pdf
FI Sub - Florence Zanetti.pdf	FI Sub - Sean O'Callaghan.pdf
FI Sub - Fr Tom McDermott.pdf	FI Sub - Sean O'Neill.pdf
FI Sub - Francesco Mazzotta.pdf	FI Sub - Senator Laura Harmon.pdf
FI Sub - Francis James.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Frank Drummond & Others.pdf	FI Sub - Shanbally Parent's Association.pdf
FI Sub - Fred Richmond.pdf	FI Sub - Shane and Olivia O'Connor.pdf

Proforma #1	
FI Sub - Freda Desmond.pdf	FI Sub - Shane Hughes.pdf
FI Sub - Gaia Baranowsha and Marcin Baranowsha.pdf	FI Sub - Shane O'Connell.pdf
FI Sub - Gary Stack.pdf	FI Sub - Shane O'Donnell.pdf
FI Sub - Gavin Cotter.pdf	FI Sub - Sharon Buckley.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Sharon Griffin.pdf
FI Sub - Gemma Dickens.pdf	FI Sub - Sharon Hannigan.pdf
FI Sub - Gemma Spillane.pdf	FI Sub - Sharon Murphy.pdf
FI Sub - Georgina Alderman.pdf	FI Sub - Sharon O'Halloran & Lorenzo Dal Santo.pdf
FI Sub - Ger O'Flaherty & Others.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Gerard Collins.pdf	FI Sub - Sheelagh O Dwyer.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Sheila and Ciara O'Reilly.pdf
FI Sub - Gerard O'Donovan.pdf	FI Sub - Sheila Curley.pdf
FI Sub - Gertie O'Driscoll.pdf	FI Sub - Sheila Griffin.pdf
FI Sub - Gillian O'Mahony.pdf	FI Sub - Sheila McCormick & Colm O'Donoghue.pdf
FI Sub - Gillian Sheeran.pdf	FI Sub - Shirley Andrews.pdf
FI Sub - Giorgia Anile.pdf	FI Sub - Sigita Kscenaviciute.pdf
FI Sub - Giuseppe Acocella.pdf	FI Sub - Silvane Fiorini & Others.pdf
FI Sub - Goretti Sweeney and Others.pdf	FI Sub - Simon Kelly.pdf
FI Sub - Grace and John Ross Hunt.pdf	FI Sub - Simone Hassett.pdf
FI Sub - Grace Kidney and Mary Kidney.pdf	FI Sub - Sinead and Barry Kiely.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sinead and Sean Murphy.pdf
FI Sub - Grainne Crowley.pdf	FI Sub - Sinead Donnachie.pdf
FI Sub - Grainne McAullife.pdf	FI Sub - Sinead Gilroy.pdf
FI Sub - Grattan Roberts.pdf	FI Sub - Sinead Hanlon.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Siobhan & Michael Cregan.pdf
FI Sub - Helen & Ruaidhri Nolan McGiobuin.pdf	FI Sub - Siobhan Collins.pdf
FI Sub - Helen Corcoran.pdf	FI Sub - Siobhan Crowley.pdf
FI Sub - Helen McCarthy.pdf	FI Sub - Siobhan Mulcahy.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Siobhan Murray.pdf
FI Sub - Helena Sheridan.pdf	FI Sub - Siobhan Nolan.pdf
FI Sub - Honor O'Leary & Others.pdf	FI Sub - Sophie Carlin.pdf
FI Sub - Hugh, Veronica & Anna Geary.pdf	FI Sub - Sr Ann Lenihan & The Sisters of Mercy.pdf
FI Sub - Ian Manning.pdf	FI Sub - Staff of Shanbally National School.pdf
FI Sub - Ian Moore and Others.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Stanley Browne.pdf
FI Sub - Ian Venner.pdf	FI Sub - Stephen Dawson.pdf
FI Sub - Irish Barisch.pdf	FI Sub - Stephen O'Driscoll.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Susan Carmody.pdf
FI Sub - Íta Coonan.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Ivan Gash & Others.pdf	FI Sub - Susan Lenihan.pdf
FI Sub - Iwona, Martyna, Adam & Jan Wiktorowicz.pdf	FI Sub - Susan O'Flynn.pdf
FI Sub - J.A. David Bird.pdf	FI Sub - Susanne Leutenegger.pdf
FI Sub - Jacinta Clancy & Angela Lawless.pdf	FI Sub - Susie O'Sullivan.pdf
FI Sub - Jacqui Churcher.pdf	FI Sub - Suzanne & Diarmuid Kirwan.pdf

Proforma #1	
FI Sub - Jakub Saluda & Others.pdf	FI Sub - Suzanne Black.pdf
FI Sub - James J. Grannell.pdf	FI Sub - Sylvia Krasnodebska & Others.pdf
FI Sub - James O'Brien (2).pdf	FI Sub - Tania McCollum.pdf
FI Sub - James O'Mahony.pdf	FI Sub - Tara Brown.pdf
FI Sub - James Spillane.pdf	FI Sub - Tara O'Donovan and Others.pdf
FI Sub - Jan Walsh.pdf	FI Sub - Ted & Margaret O'Sullivan.pdf
FI Sub - Jane O'Callaghan.pdf	FI Sub - Teresa Bennett.pdf
FI Sub - Janice Edwards and Others.pdf	FI Sub - Teresa Coveney.pdf
FI Sub - Jason Boyle.pdf	FI Sub - Teresa Stack.pdf
FI Sub - Jason Corkery.pdf	FI Sub - The Bluebell Swimmers.pdf
FI Sub - Jen Wallace & Neil Mangan.pdf	FI Sub - The Brierley & O'Rourke Family.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - The Committee of Rushbrooke Rowing Club.pdf
FI Sub - Jennifer Miller & John O'Connor.pdf	FI Sub - The Downey Family.pdf
FI Sub - Jennifer O'Sullivan.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Jenny Moylan.pdf	FI Sub - The Howie Family.pdf
FI Sub - Jer Coveney.pdf	FI Sub - The O'Sullivan Family.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	FI Sub - Theresa Felsmann.pdf
FI Sub - Jillian O'Leary.pdf	FI Sub - Theresa Murphy.pdf
FI Sub - Jim McCarthy and Others.pdf	FI Sub - Theresa Stack.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - Therese Loesberg.pdf
FI Sub - Jimmy Lynch & Claire Sibut (1).pdf	FI Sub - Thomas & Catherine Concannon.pdf
FI Sub - Jimmy Lynch & Claire Sibut.pdf	FI Sub - Thomas Airieau.pdf
FI Sub - Joan Bradley.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - Joan Buckley and Paul O'Sullivan.pdf	FI Sub - Tim & Hilda McCormack.pdf
FI Sub - Joan Hayes.pdf	FI Sub - Tim O'Connor & Therese Ryan.pdf
FI Sub - Joan Kelleher.pdf	FI Sub - Tina Fegan.pdf
FI Sub - Joan Slattery.pdf	FI Sub - Tina O'Flynn.pdf
FI Sub - Joanna Dawson.pdf	FI Sub - Tobiasz Dawson.pdf
FI Sub - Joanne Goodyear.pdf	FI Sub - Tom and Nuala Wren.pdf
FI Sub - Joanne O'Keefe.pdf	FI Sub - Tom Browne and Carmel Browne & Others.pdf
FI Sub - Joe & Mary Burns.pdf	FI Sub - Tom McGrath & Family.pdf
FI Sub - Joe Aherne.pdf	FI Sub - Tomas & Justyna Pietrzela.pdf
FI Sub - Joe Leonard.pdf	FI Sub - Tony & Eimear Bruen.pdf
FI Sub - Joe McCarthy.pdf	FI Sub - Tracey Speakman & Joan O'Galligan.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - Tracy Canny.pdf
FI Sub - John and Jackie Kiely.pdf	FI Sub - Trish Hofler.pdf
FI Sub - John Baker.pdf	FI Sub - Trish Miller & Others.pdf
FI Sub - John Buckley.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - John Cleary.pdf	FI Sub - Una O'Donovan and Others.pdf
FI Sub - John Coakley.pdf	FI Sub - Veronica Kelleher.pdf
FI Sub - John Cunningham & Others.pdf	FI Sub - Veronica Ní Chuilleagáin & Others.pdf
FI Sub - John Doyle & Others.pdf	FI Sub - Vickie Harrington.pdf
FI Sub - John Dunphy.pdf	FI Sub - Vince O'Shea.pdf
FI Sub - John Fitzgerald.pdf	FI Sub - Vincent Murphy, Claire Murphy and Others.pdf

Proforma #1	
FI Sub - John O Brien.pdf	FI Sub - Vivian Garde.pdf
FI Sub - John O'Donovan.pdf	FI Sub - Vivienne Twomey & Others.pdf
FI Sub - John O'Regan.pdf	FI Sub - Wade Cuppage.pdf
FI Sub - Jon McClean.pdf	FI Sub - Walterstown Group Water Scheme.pdf
FI Sub - Jonathan Fleury & Others.pdf	FI Sub - Walterstown National School.pdf
FI Sub - Jonathan Meany.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Jonathan Tuohy.pdf	FI Sub - William Hackett & Eimear O'Leary.pdf
FI Sub - Jonathan Wren.pdf	FI Sub - William O'Meara & Others (typed).pdf
FI Sub - Joseph and Maire Keenan.pdf	FI Sub - William Tague.pdf
FI Sub - Joseph Byrne.pdf	FI Sub - Willie McCarthy and Others.pdf
FI Sub - Judi Cronin.pdf	FI Sub - Wouther Groenendijk and others.pdf
FI Sub - Judith Cuppage & Others.pdf	FI Sub - Yvonne & David Gregory.pdf
FI Sub - Judith Kamlah Byrne and Others.pdf	FI Sub - Yvonne & John Barry.pdf
FI Sub - Judy Horgan and Others.pdf	FI Sub - Yvonne Garcia.pdf
FI Sub - Judy O'Brien & Clodagh Cremen.pdf	FI Sub - Yvonne Redmond.pdf
FI Sub - Jules Roberts.pdf	FI Sub - Zbigniew Olszewski.pdf
FI Sub - Julie McCall.pdf	FI Sub - Zoe Fitzpatrick and Others.pdf
FI Sub - Julie McCarthy.pdf	FI Sub- Inma Pierce.pdf
	FI Sub -Peter O'Donovan.pdf

Appendix B

List of Submissions Relating to Each Topic

Air quality	
FI Sub - Alan Cavanagh.pdf	FI Sub - Kate Irish.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Mary Kate Lindon.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Mary Lawless.pdf
FI Sub - Cait & Derry O'Donovan.pdf	FI Sub - Mary Murphy & Others.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Monkstown Bay Sailing Club.pdf
FI Sub - Chris O'Mahony & Others.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Padraigin O'Donoghue.pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Cobh Tidy Towns (Ruth Ring).pdf	FI Sub - Paul and Pauline McCarthy.pdf
FI Sub - Colette Murphy.pdf	FI Sub - Paul Reid.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Paula Courtney.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Prof. Patrick O'Flanagan.pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Richard Leonard & Beibhinn O'Leary.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Ringaskiddy Tidy Towns.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Robert Flanagan.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Dr Paul McCarthy.pdf	FI Sub - Ross Meade.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Edward White.pdf	FI Sub - Ruth Prendergast and Others.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Scoil Barra Naofa.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Ghyslaine & Neil Hegarty.pdf	FI Sub - Shane & Deirdre Behan.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Susan Gibson & Others.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Jim Doyle.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Jim Ronayne.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - John Fitzgerald.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Julie Moynan, Catherine Griffen and Others.pdf	FI Sub - Valerie McCarthy.pdf
FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf	

Coastal recession and flood risk	
FI Sub - Aideen Kelleher.pdf	FI Sub - Kate Power.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Kevin & Lynda Forde.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Laura and David McGrath.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Laura and Gary Hanrahan.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Laura Harte.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Allison Leahy.pdf	FI Sub - Liam & Josephine Hughes.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Liam Quaide TD.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Andrew Brown and Others.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Anne O'Connell.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Malgotzata Wiecek-Szumska.pdf
FI Sub - Aoife & Roy Sexton.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Mandy Collins.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Manfred Schewe.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Marc Egan.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Margaret O'Callaghan & Others.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Maria Buckley.pdf
FI Sub - Bernard F Stack.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Bill O'Leary & Elspeth Cameron.pdf	FI Sub - Mark Perry.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Brian Twomey.pdf	FI Sub - Mary Jordan.pdf
FI Sub - Bryan Hassett.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Cait & Derry O'Donovan.pdf	FI Sub - Mary Murphy & Others.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Catherine Heffernan.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Megan & Chris Forde.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Mella Leonard & Others.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Michael Griew.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Chris O'Mahony & Others.pdf	FI Sub - Michael Martin.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Michael Middleton & Others.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cllr Eoghan Fahy.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Cllr Jack White & Robert White.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Cllr Úna McCarthy.pdf	FI Sub - Natalie Moore.pdf

Coastal recession and flood risk	
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - National 18ft Dinghy Class (John Coakley).pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Colette Finn.pdf	FI Sub - Nicholas Lester & Others.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Nick and Tina Emerson.pdf
FI Sub - Cork Geological Association (Bettie Higgs).pdf	FI Sub - Nicola Sheehan.pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Orla Berkley.pdf
FI Sub - David O'Shea.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - David Quinlan.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Deirdre O'Callaghan & Others.pdf	FI Sub - Paddy and Carmel Donnachie.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Derna Dwyer.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - Diane Beckingham.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Donncadh Ó Laoghaire TD.pdf	FI Sub - Paul Nash.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Peter and Carmel Daly and Others.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Peter Magill.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Rebecca O'Riordan.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Richard Leonard & Beibhinn O'Leary.pdf
FI Sub - Edward White.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Eileen Lane.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Ringaskiddy Tidy Towns.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Ross Meade.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Elizabeth Shanahan.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Sally Orren.pdf
FI Sub - Emma McCarthy and Others.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Sarah Jordan & Ciaran O'Sullivan.pdf
FI Sub - Eve O'Mahony.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Frances Boyton & Others.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Gary Jordan.pdf	FI Sub - Sharon Buckley.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Shirley Andrews.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sinead Donnachie.pdf
FI Sub - Gwen Bowen.pdf	

Coastal recession and flood risk	
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Ian Manning.pdf	FI Sub - Sinead Reen.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Siobhan Mulcahy.pdf
FI Sub - Ian Venner.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Springfield AFC.pdf
FI Sub - Jaci Szymanski and Sonya Towler.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - James Deacon & Others.pdf	FI Sub - Stephen O'Driscoll.pdf
FI Sub - James McLay.pdf	FI Sub - Steven & Terezia Foott.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Jerry Buttimer TD.pdf	FI Sub - Susan Walsh.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - Suzanne & John O'Brien.pdf
FI Sub - Joan Hayes.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - Teresa Stack.pdf
FI Sub - John Doyle & Others.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - John Fitzgerald.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Joleen Cronin.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Jon McClean.pdf	FI Sub - Therese Loesberg.pdf
FI Sub - Jonathan Meany.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - Jonathan Wren.pdf	FI Sub - Tom McGrath & Family.pdf
FI Sub - Joseph and Maire Keenan.pdf	FI Sub - Trish Hofler.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - Judi Cronin.pdf	FI Sub - Una & Kieran Cantwell.pdf
FI Sub - Judith Cuppage & Others.pdf	FI Sub - Valerie McCarthy.pdf
FI Sub - Julie McCarthy.pdf	FI Sub - Wade Cuppage.pdf
FI Sub - Julie Moynan, Catherine Griffen and Others.pdf	FI Sub - Walterstown Group Water Scheme.pdf
FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Karen Donegan Mannix.pdf	FI Sub - William O'Meara & Others (typed).pdf
FI Sub - Kate & Ray Toomey and Others.pdf	FI Sub - Yvonne & David Gregory.pdf
FI Sub - Kate Cunningham.pdf	FI Sub - Yvonne Hurley.pdf
FI Sub - Kate Darragh and Susan Hackett.pdf	
FI Sub - Kate Irish.pdf	

Impact on landscape, tourism & heritage	
FI Sub - Aidan O'Brien.pdf	FI Sub - Joleen Cronin.pdf
FI Sub - Aideen Kelleher.pdf	FI Sub - Jonathan Wren.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Judi Cronin.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Judith Cuppage & Others.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Julie McCarthy.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Karen Donegan Mannix.pdf
FI Sub - Alyson O'Brien.pdf	FI Sub - Kate Power.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Kevin & Lynda Forde.pdf

Impact on landscape, tourism & heritage	
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Bernard Kiely.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Blathin Verwey.pdf	FI Sub - Liam Fitzgerald.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Lisa McCarthy & Others.pdf
FI Sub - Cait & Derry O'Donovan.pdf	FI Sub - Lisa O'Sullivan.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Catherine Jefferson.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Mandy Collins.pdf
FI Sub - Charles Daly.pdf	FI Sub - Maria Buckley.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Mariusz Bomba.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Mark Mendel.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Mary Jordan.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Mary Kate Lindon.pdf
FI Sub - Cllr Eoghan Fahy.pdf	FI Sub - Mary McCaffrey.pdf
FI Sub - Cllr Ger Curley.pdf	FI Sub - Mella Leonard & Others.pdf
FI Sub - Cllr Jack White & Robert White.pdf	FI Sub - Michael Martin.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Michael Middleton & Others.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cobh Comhaltas.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cobh Traditional Music & Folk Festival Committee.pdf	FI Sub - Mick Keating.pdf
FI Sub - Colette Finn.pdf	FI Sub - Monkstown Bay Sailing Club.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Con & Eileen Twomey.pdf	FI Sub - Natalie Moore.pdf
FI Sub - Cork Council of Trade Unions.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Cove Sailing Club.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Nicola Sheehan.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Noel C. Condon.pdf
FI Sub - Deirdre O'Sullivan.pdf	FI Sub - Noel McCarthy TD.pdf
FI Sub - Denis Ellis & Others.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Derna Dwyer.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Diane Beckingham.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Donncadh Ó Laoghaire TD.pdf	FI Sub - Pat McGrath.pdf
FI Sub - Donncha & Alisha O'donovan.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Dr Michael H Quinlan.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Dr Paul McCarthy.pdf	FI Sub - Paula Courtney.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Richard and Mary Leonard.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf

Impact on landscape, tourism & heritage	
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Roberta Cappieri.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Elizabeth Shanahan.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Emily O'Brien and Others.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Emma McCarthy and Others.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Shane & Deirdre Behan.pdf
FI Sub - Frances Boyton & Others.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Gary Jordan.pdf	FI Sub - Sinead Hurley.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Siobhan and Robert Cahill.pdf
FI Sub - Ghyslaine & Neil Hegarty.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - Helen Carroll & Family.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Susan Walsh.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Suzanne & John O'Brien.pdf
FI Sub - Ian Manning.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Ian Murphy.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Ian Venner.pdf	FI Sub - The Ring Family.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - James O'Brien.pdf	FI Sub - Una & Kieran Cantwell.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Valerie McCarthy.pdf
FI Sub - Jerry Buttimer TD.pdf	FI Sub - Wade Cuppage.pdf
FI Sub - Johanna Murphy.pdf	FI Sub - Walterstown Group Water Scheme.pdf
FI Sub - John Adams.pdf	FI Sub - Yvonne & David Gregory.pdf
FI Sub - John Doyle & Others.pdf	FI Sub - Yvonne Hurley.pdf
FI Sub - John Fitzgerald.pdf	

EIS/Information adequacy & monitoring	
FI Sub - Aideen Kelleher.pdf	FI Sub - Kate Darragh and Susan Hackett.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Kate Irish.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Kate O'Neill.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Kate Power.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Katharina Walter & Paul Linehan.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Allison Leahy.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Laura and David McGrath.pdf
FI Sub - Andrew Brown and Others.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Angela Morrissy Lawless.pdf	FI Sub - Liam & Josephine Hughes.pdf

EIS/Information adequacy & monitoring	
FI Sub - Anne O'Connell.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Anthony O'Reilly & Mary Molloy.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Aoife & Roy Sexton.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Malgotzata Wiecek-Szumska.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Mandy Collins.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Manfred Schewe.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Marc Egan.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Margaret O'Callaghan & Others.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Bernard F Stack.pdf	FI Sub - Mariusz Bomba.pdf
FI Sub - Bill O'Leary & Elspeth Cameron.pdf	FI Sub - Mark Perry.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Bryan Hassett.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Catherine Heffernan.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Catherine Jefferson.pdf	FI Sub - Mary Murphy & Others.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Chris O'Mahony & Others.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Megan & Chris Forde.pdf
FI Sub - Christopher Adams.pdf	FI Sub - Michael Griew.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Michael Martin.pdf
FI Sub - Cllr Úna McCarthy.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Con & Eileen Twomey.pdf	FI Sub - Natalie Moore.pdf
FI Sub - Conor Foley.pdf	FI Sub - National 18ft Dinghy Class (John Coakley).pdf
FI Sub - Cork Geological Association (Bettie Higgs).pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Nick and Tina Emerson.pdf
FI Sub - David O'Shea.pdf	FI Sub - Nick Brennan.pdf
FI Sub - David Quinlan.pdf	FI Sub - Nicola Sheehan.pdf
FI Sub - Deirdre O'Callaghan & Others.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Denis Eugene O'Sullivan.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Norma Stafford.pdf
FI Sub - Derna Dwyer.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Diane Beckingham.pdf	
FI Sub - Dr Elizabeth Scott Hall.pdf	

EIS/Information adequacy & monitoring	
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Paddy and Carmel Donnachie.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - Dr. Gordon Reid.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Paul Reid.pdf
FI Sub - Edward White.pdf	FI Sub - Paula Courtney.pdf
FI Sub - Eileen Lane.pdf	FI Sub - Pauline Adams.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Peter Magill.pdf
FI Sub - Eileen Pearson.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Richard Leonard & Beibhinn O'Leary.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Roberta Cappieri.pdf
FI Sub - Emma McCarthy and Others.pdf	FI Sub - Rodney Daunt.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Eve O'Mahony.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Ross Meade.pdf
FI Sub - Gaia Baranowsha and Marcin Baranowsha.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Gerard O'Mahony & Others.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sally Orren.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Sarah Jordan & Ciaran O'Sullivan.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Ian Manning.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Ian Murphy.pdf	FI Sub - Sharon Buckley.pdf
FI Sub - Ian Venner.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Shirley Andrews.pdf
FI Sub - Jaci Szymanski and Sonya Towler.pdf	FI Sub - Sinead Donnachie.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - James Deacon & Others.pdf	FI Sub - Sinead Reen.pdf
FI Sub - James McLay.pdf	FI Sub - Siobhan Mulcahy.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	FI Sub - Stephen O'Driscoll.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - Steven & Terezia Foott.pdf
FI Sub - Joan Hayes.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Johanna Keating.pdf	FI Sub - Suzanne & John O'Brien.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - Teresa Stack.pdf
FI Sub - John Doyle & Others.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - John Fitzgerald.pdf	

EIS/Information adequacy & monitoring	
FI Sub - Joleen Cronin.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Jon McClean.pdf	FI Sub - Therese Loesberg.pdf
FI Sub - Jonathan Meany.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - Jonathan Tuohy.pdf	FI Sub - Tom McGrath & Family.pdf
FI Sub - Jonathan Wren.pdf	FI Sub - Trish Hofler.pdf
FI Sub - Joseph and Maire Keenan.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Una & Kieran Cantwell.pdf
FI Sub - Judi Cronin.pdf	FI Sub - Valerie Elliffe and John Power.pdf
FI Sub - Judith Cuppage & Others.pdf	FI Sub - Wade Cuppage.pdf
FI Sub - Julie McCarthy.pdf	FI Sub - Walterstown Group Water Scheme.pdf
FI Sub - Julie Moynan, Catherine Griffen and Others.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf	FI Sub - William O'Meara & Others (typed).pdf
FI Sub - Karen Donegan Mannix.pdf	FI Sub - Yvonne & David Gregory.pdf
FI Sub - Kate & Ray Toomey and Others.pdf	FI Sub - Yvonne Hurley.pdf
FI Sub - Kate Cunningham.pdf	

Air dispersion & modelling	
FI Sub - Aideen Kelleher.pdf	FI Sub - Jim Sheeran.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - John & Coralie Carter.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - John Fitzgerald.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Joleen Cronin.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - Angela Morrissy Lawless.pdf	FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf
FI Sub - Anne O'Connell.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Christopher Adams.pdf	FI Sub - Michael Griew.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Derna Dwyer.pdf	FI Sub - Paul Nash.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Pauline Adams.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Prof. Patrick O'Flanagan.pdf
FI Sub - Edward White.pdf	FI Sub - Rodney Daunt.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Geraldine Farrell & Others.pdf	FI Sub - Sinead Reen.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Ian Venner.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Stephen Barrett and Laura Morrison.pdf
FI Sub - James Deacon & Others.pdf	FI Sub - Steven & Terezia Foott.pdf
FI Sub - James O'Brien.pdf	FI Sub - Susan Walsh.pdf

Air dispersion & modelling	
FI Sub - Janet O'Leary and Ann Coughlan.pdf	FI Sub - Suzanne & John O'Brien.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Jim Doyle.pdf	FI Sub - Yvonne Hurley.pdf

Safety, defence & emergency access	
FI Sub - Aideen Kelleher.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Maria Coen.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Mary Jordan.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Michael Middleton & Others.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Natalie Moore.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Cobh Traditional Music & Folk Festival Committee.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Cork Council of Trade Unions.pdf	FI Sub - Padraigin O'Donoghue.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Paul Nash.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Paula Courtney.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Peter Magill.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Gary Jordan.pdf	FI Sub - Ringaskiddy Tidy Towns.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Gerard O'Mahony & Others.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - James Deacon & Others.pdf	FI Sub - Shane & Deirdre Behan.pdf
FI Sub - John Doyle & Others.pdf	FI Sub - Sinead Reen.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Julie Moynan, Catherine Griffen and Others.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf	FI Sub - Teresa Stack.pdf
FI Sub - Liam Quaide TD.pdf	FI Sub - The Environmental Forum.pdf
	FI Sub - The Ring Family.pdf

Safety, defence & emergency access	
FI Sub - Louise Jordan.pdf	FI Sub - Trish Hofler.pdf

Health Impact Assessments (HIA)	
FI Sub - Angela Morrissy Lawless.pdf	FI Sub - Janet O'Leary and Ann Coughlan.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Johanna Keating.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Judi Cronin.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Kate O'Neill.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Cobh Comhaltas.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Conor Foley.pdf	FI Sub - Mary McCaffrey.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Donal O'Shea.pdf	FI Sub - Padraigin O'Donoghue.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Paul Reid.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Emily O'Brien and Others.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Trish Hofler.pdf

Health Concerns	
FI Sub - Aideen Kelleher.pdf	FI Sub - Joseph O'Hara.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Judi Cronin.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Karen Donegan Mannix.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Katarzyna Starenczak.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Kate O'Neill.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Kay Abernathy.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Laura Anthon.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Liam Fitzgerald.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Lisa McCarthy & Others.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Lisa O'Sullivan.pdf
FI Sub - Bernard F Stack.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Bernard Kiely.pdf	FI Sub - Lyndon & Carmel O' Hea.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Cait & Derry O'Donovan.pdf	FI Sub - Maria Buckley.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Maria Coen.pdf

Health Concerns	
FI Sub - Catherine Jefferson.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Mary Jordan.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Mary Kate Lindon.pdf
FI Sub - Claire & Oliver Ahern.pdf	FI Sub - Mary Lawless.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Mary McCaffrey.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Cllr Ger Curley.pdf	FI Sub - Michael Martin.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Michael Middleton & Others.pdf
FI Sub - Cobh Comhaltas.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Cobh Traditional Music & Folk Festival Committee.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Colaiste Muire.pdf	FI Sub - Miriam O'Shea.pdf
FI Sub - Colette Murphy.pdf	FI Sub - National 18ft Dinghy Class (John Coakley).pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Neil Kenefick.pdf
FI Sub - Conor Foley.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Cork Council of Trade Unions.pdf	FI Sub - Nicholas Lester & Others.pdf
FI Sub - Cove Sailing Club.pdf	FI Sub - Nick Brennan.pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Noel McCarthy TD.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - David O'Shea.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - David Quinlan.pdf	FI Sub - Paul and Pauline McCarthy.pdf
FI Sub - Deirdre O'Sullivan.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Paul Nash.pdf
FI Sub - Denise Phelan.pdf	FI Sub - Rebecca O'Riordan.pdf
FI Sub - Donal O'Shea.pdf	FI Sub - Richard and Mary Leonard.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Dr Paul McCarthy.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Ruth Prendergast and Others.pdf
FI Sub - Eamonn Horgan.pdf	FI Sub - Sally Orren.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Edward White.pdf	FI Sub - Scoil Barra Naofa.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Eileen Pearson.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Eimer Kelly.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Sinead Hurley.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Sinead O'Mahony.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Sinead Reen.pdf
FI Sub - Frances Boyton & Others.pdf	FI Sub - Sonja McEnroe & Others.pdf
	FI Sub - Sonya & Michael O'Shea.pdf

Health Concerns	
FI Sub - Gaia Baranowsha and Marcin Baranowsha.pdf	FI Sub - Stephen Barrett and Laura Morrison.pdf
FI Sub - Gary Jordan.pdf	FI Sub - Steven & Terezia Foott.pdf
FI Sub - Gavin Hesse.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Susan Gibson & Others.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Gerard O'Mahony & Others.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Teresa Stack.pdf
FI Sub - Helen Carroll & Family.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - The Ring Family.pdf
FI Sub - Jim Ronayne.pdf	FI Sub - Trish Hofler.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - John Adams.pdf	FI Sub - Una & Kieran Cantwell.pdf
FI Sub - John Doyle & Others.pdf	
FI Sub - John O'Shea.pdf	
FI Sub - Joseph and Maire Keenan.pdf	

Cumulative Impact Assessment	
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - John Adams.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Jonathan Wren.pdf
FI Sub - Christopher Adams.pdf	FI Sub - Katharina Walter & Paul Linehan.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Cllr Jack White & Robert White.pdf	FI Sub - Maria Coen.pdf
FI Sub - Conor Foley.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Cork Geological Association (Bettie Higgs).pdf	FI Sub - Mary Lawless.pdf
FI Sub - Deirdre Sexton.pdf	FI Sub - Michael Wren.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Neil Barry.pdf
FI Sub - Eamonn Horgan.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Pauline Adams.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Robert Flanagan.pdf
FI Sub - Isabelle Sutton.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Jerry Buttimer TD.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Johanna Keating.pdf	FI Sub - Valerie Elliffe and John Power.pdf
FI Sub - Johanna Murphy.pdf	FI Sub - Valerie McCarthy.pdf

Visual Impact	
FI Sub - Aidan O'Brien.pdf	FI Sub - Julie McCarthy.pdf
FI Sub - Aideen Kelleher.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Karen Donegan Mannix.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Katarzyna Starenczak.pdf

Visual Impact	
FI Sub - Alan Cavanagh.pdf	FI Sub - Kate & Ray Toomey and Others.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Kate Cunningham.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kate Darragh and Susan Hackett.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Kate Irish.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Kate Power.pdf
FI Sub - Alyson O'Brien.pdf	FI Sub - Katharina Walter & Paul Linehan.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Anne O'Connell.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Kevin & Lynda Forde.pdf
FI Sub - Aoife & Roy Sexton.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Laura and Gary Hanrahan.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Laura Anthon.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Laura Harte.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Blathin Verwey.pdf	FI Sub - Liam Quaide TD.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Bryan Hassett.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Carrigaline Community Association Ltd.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Catherine Heffernan.pdf	FI Sub - Marc Egan.pdf
FI Sub - Catherine Jefferson.pdf	FI Sub - Margaret O'Callaghan & Others.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Maria Coen.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Mariusz Bomba.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Mark Perry.pdf
FI Sub - Claire & Oliver Ahern.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Mary Murphy & Others.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Michael Martin.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Michelle & Margaret Cahill.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Mick Keating.pdf
FI Sub - Cobh Comhaltas.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Cobh Tidy Towns (Ruth Ring).pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Cobh Traditional Music & Folk Festival Committee.pdf	FI Sub - Neil Barry.pdf
FI Sub - Colaiste Muire.pdf	FI Sub - Neil Kenefick.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Con & Eileen Twomey.pdf	FI Sub - Nicholas Walsh.pdf

Visual Impact	
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Nick Brennan.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Noel C. Condon.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - David O'Shea.pdf	FI Sub - Orla Berkley.pdf
FI Sub - David Quinlan.pdf	FI Sub - Paddy and Carmel Donnachie.pdf
FI Sub - Deirdre O'Callaghan & Others.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - Derna Dwyer.pdf	FI Sub - Paul and Pauline McCarthy.pdf
FI Sub - Diane Beckingham.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Paul Reid.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Rebecca O'Riordan.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Richard and Mary Leonard.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Eileen Pearson.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Eimer Kelly.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Ross Meade.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Sally Orren.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Sarah Jordan & Ciaran O'Sullivan.pdf
FI Sub - Frances Boyton & Others.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Gaia Baranowsha and Marcin Baranowsha.pdf	FI Sub - Scoil Barra Naofa.pdf
FI Sub - Gavin Hesse.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Geraldine Farrell & Others.pdf	FI Sub - Sharon Buckley.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Helen Carroll & Family.pdf	FI Sub - Sinead Donnachie.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Sinead Hurley.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Siobhan Mulcahy.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Ian Venner.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Stephen Barrett and Laura Morrison.pdf
FI Sub - Jaci Szymanski and Sonya Towler.pdf	FI Sub - Stephen O'Driscoll.pdf
FI Sub - James Deacon & Others.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - James McLay.pdf	FI Sub - Susan Gibson & Others.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - Suzanne & John O'Brien.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	

Visual Impact	
FI Sub - Jim Ronayne.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Joan Hayes.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Johanna Keating.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Johanna Murphy.pdf	FI Sub - Therese Loesberg.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - John Adams.pdf	FI Sub - Tom McGrath & Family.pdf
FI Sub - John Fitzgerald.pdf	FI Sub - Trish Hofler.pdf
FI Sub - Jon McClean.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - Jonathan Meany.pdf	FI Sub - Una & Kieran Cantwell.pdf
FI Sub - Jonathan Tuohy.pdf	FI Sub - Valerie Elliffe and John Power.pdf
FI Sub - Jonathan Wren.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Joseph and Maire Keenan.pdf	FI Sub - William O'Meara & Others (typed).pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Yvonne & David Gregory.pdf

Impact on Harbour	
FI Sub - Aimie Hodnett.pdf	FI Sub - Liam Fitzgerald.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Lisa O'Sullivan.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Angela Morrissy Lawless.pdf	FI Sub - Maria Coen.pdf
FI Sub - Aoife & Roy Sexton.pdf	FI Sub - Mary Lawless.pdf
FI Sub - Brian Twomey.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Mella Leonard & Others.pdf
FI Sub - Claire & Oliver Ahern.pdf	FI Sub - Michael Martin.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cllr Ger Curley.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cllr Jack White & Robert White.pdf	FI Sub - Miriam O'Shea.pdf
FI Sub - Cobh Comhaltas.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Colaiste Muire.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Conor Foley.pdf	FI Sub - Neil Barry.pdf
FI Sub - Cork Council of Trade Unions.pdf	FI Sub - Noel C. Condon.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Noel Corcoran.pdf
FI Sub - David Quinlan.pdf	FI Sub - Noel McCarthy TD.pdf
FI Sub - Deirdre O'Sullivan.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Deirdre Sexton.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Denis Eugene O'Sullivan.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Pat McGrath.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Dr Paul McCarthy.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Paul Nash.pdf
FI Sub - Edward White.pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Eileen Pearson.pdf	

Impact on Harbour	
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Richard and Mary Leonard.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Rodney Daunt.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Gavin Hesse.pdf	FI Sub - Ruth Prendergast and Others.pdf
FI Sub - Geraldine Farrell & Others.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Sharon Buckley.pdf
FI Sub - Ian Venner.pdf	FI Sub - Stephen Barrett and Laura Morrison.pdf
FI Sub - Isabelle Sutton.pdf	FI Sub - Steven & Terezia Foott.pdf
FI Sub - Jim Ronayne.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - John Adams.pdf	FI Sub - Susan Walsh.pdf
FI Sub - Joleen Cronin.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Jonathan Wren.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - Kitty Moynchan and Others.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - Laura Harte.pdf	FI Sub - Yvonne & David Gregory.pdf
FI Sub - Liam & Josephine Hughes.pdf	

Traffic & Haulage Impacts	
FI Sub - Aidan O'Brien.pdf	FI Sub - Jill and Matt O'Luasaigh.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Jim Ronayne.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Johanna Keating.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Jonathan Tuohy.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - Avril Russell.pdf	FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Katarzyna Starenczak.pdf
FI Sub - Brian Twomey.pdf	FI Sub - Kate Irish.pdf
FI Sub - Caroline Buckley.pdf	FI Sub - Katharina Walter & Paul Linehan.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Claire & Oliver Ahern.pdf	FI Sub - Kieran & Lisa Jordan.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Laura Anthon.pdf
FI Sub - Cllr Audrey Buckley & Others.pdf	FI Sub - Laura Harte.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Cllr Eoghan Fahy.pdf	FI Sub - Maria Buckley.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Maria Coen.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Mariusz Bomba.pdf
FI Sub - Cobh Traditional Music & Folk Festival Committee.pdf	FI Sub - Mary Lawless.pdf
FI Sub - Colaiste Muire.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Michael Griew.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Mick Keating.pdf
FI Sub - Deirdre O'Sullivan.pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Nora Noonan.pdf
	FI Sub - Padraigin O'Donoghue.pdf

Traffic & Haulage Impacts	
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Paul Nash.pdf
FI Sub - Eiblish Buckley.pdf	FI Sub - Peter and Carmel Daly and Others.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Elizabeth Shanahan.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Emily O'Brien and Others.pdf	FI Sub - Ross Meade.pdf
FI Sub - Gavin Hesse.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - Isabelle Sutton.pdf	FI Sub - Trish Hofler.pdf
FI Sub - James O'Brien.pdf	FI Sub - Valerie Elliffe and John Power.pdf

Hazardous Waste & Abatement Systems	
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Joan Hayes.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - John & Coralie Carter.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - John Fitzgerald.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Jon McClean.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Jonathan Meany.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Joseph O'Hara.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Kate & Ray Toomey and Others.pdf
FI Sub - Bryan Hassett.pdf	FI Sub - Kate Darragh and Susan Hackett.pdf
FI Sub - Carrigaline Community Association Ltd.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Catherine Jefferson.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Manfred Schewe.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Marc Egan.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Denise Phelan.pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Eileen Pearson.pdf	FI Sub - Paul Reid.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Rodney Daunt.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Sally Orren.pdf
FI Sub - Gaia Baranowsha and Marcin Baranowsha.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Gary Jordan.pdf	

Hazardous Waste & Abatement Systems	
FI Sub - Gerard Menihane.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - William O'Meara & Others (typed).pdf
FI Sub - Jennifer Ardis.pdf	

Planning History (Repeated Refusal)	
FI Sub - Aideen Kelleher.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Charles Daly.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Paul Nash.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Paul Reid.pdf
FI Sub - Cobh Tidy Towns (Ruth Ring).pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Karen Donegan Mannix.pdf	FI Sub - Ruth Prendergast and Others.pdf
FI Sub - Kathryn Foskin.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Laura and Gary Hanrahan.pdf	FI Sub - Scoil Barra Naofa.pdf
FI Sub - Liam Quaide TD.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Lyndon & Carmel O' Hea.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Maria Buckley.pdf	FI Sub - Steven & Terezia Foott.pdf
FI Sub - Mary Poulter and Others.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Michael Murphy and Others.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Michelle A. Hardwick & John F. Smith.pdf	FI Sub - Susan Walsh.pdf
FI Sub - Mick Keating.pdf	FI Sub - Valerie McCarthy.pdf
FI Sub - Niamh & Jim Quain.pdf	FI Sub - Yvonne Hurley.pdf

Waste Sourcing & Import Risk	
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Michelle & Margaret Cahill.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Edward White.pdf	FI Sub - Paul Kelly.pdf

Waste Sourcing & Import Risk	
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Paul Reid.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - Robert Flanagan.pdf
FI Sub - Mary K O'Connor.pdf	FI Sub - Ruth Prendergast and Others.pdf
FI Sub - Michael Higgins.pdf	FI Sub - Shane & Deirdre Behan.pdf

Lack of Local Consultation	
FI Sub - Alan Cavanagh.pdf	FI Sub - Elizabeth Quinlan.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Gerard O'Mahony & Others.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - John Adams.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Kate Irish.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Noel Corcoran.pdf
FI Sub - Cllr Ger Curley.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Cork Council of Trade Unions.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Ross Meade.pdf
FI Sub - Denis Eugene O'Sullivan.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Dr. Gordon Reid.pdf	FI Sub - Trish Hofler.pdf

Mitigation of Impacts	
FI Sub - Barry McAuley.pdf	FI Sub - Mandy Collins.pdf
FI Sub - Dara Fitzpatrick.pdf	

Noise Pollution	
FI Sub - Alan Cavanagh.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Ross Meade.pdf
FI Sub - Kate Irish.pdf	

Policy Conflict / Opposition / Regulatory Compliance / Governance	
FI Sub - Aidan O'Brien.pdf	FI Sub - Joseph O'Hara.pdf
FI Sub - Aideen Kelleher.pdf	FI Sub - Judith Cuppage & Others.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Julie McCarthy.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Katarzyna Starenczak.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Kate & Ray Toomey and Others.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Kate Irish.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Katharina Walter & Paul Linehan.pdf
FI Sub - Allison Leahy.pdf	FI Sub - Kathleen MacSweeney.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Kay Abernathy.pdf
FI Sub - Angela Morrissy Lawless.pdf	FI Sub - Kieran & Lisa Jordan.pdf

Policy Conflict / Opposition / Regulatory Compliance / Governance	
FI Sub - Anthony O'Reilly & Mary Molloy.pdf	FI Sub - Laura Anthon.pdf
FI Sub - Aoife & Roy Sexton.pdf	FI Sub - Liam & Josephine Hughes.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Liam Quaide TD.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Avril Russell.pdf	FI Sub - Lisa O'Sullivan.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Lyndon & Carmel O' Hea.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Mandy Collins.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Maria Coen.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Brian Twomey.pdf	FI Sub - Mark Perry.pdf
FI Sub - Cait & Derry O'Donovan.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Caroline Buckley.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Catherine Heffernan.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Mary Lawless.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Mary Murphy & Others.pdf
FI Sub - Chris O'Mahony & Others.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Mella Leonard & Others.pdf
FI Sub - Christopher Adams.pdf	FI Sub - Michael Griew.pdf
FI Sub - Claire & Oliver Ahern.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Michael Middleton & Others.pdf
FI Sub - Cllr Audrey Buckley & Others.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Cllr Jack White & Robert White.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Cllr Úna McCarthy.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Mick Keating.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Miriam O'Shea.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Cobh Tidy Towns (Ruth Ring).pdf	FI Sub - Natalie Moore.pdf
FI Sub - Cobh Traditional Music & Folk Festival Committee.pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Neil Barry.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Colm Lyons.pdf	FI Sub - Niall Fitzgerald.pdf
FI Sub - Conor Foley.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Noel C. Condon.pdf
FI Sub - David Quinlan.pdf	FI Sub - Noel Corcoran.pdf
FI Sub - Deirdre Sexton.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Denis Eugene O'Sullivan.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Dr Jon McClean.pdf	

Policy Conflict / Opposition / Regulatory Compliance / Governance	
FI Sub - Dr Michael H Quinlan.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Eamonn Horgan.pdf	FI Sub - Paul Nash.pdf
FI Sub - Eiblish Buckley.pdf	FI Sub - Paul Reid.pdf
FI Sub - Eileen Lane.pdf	FI Sub - Pauline Adams.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Peter and Carmel Daly and Others.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Eimer Kelly.pdf	FI Sub - Ringaskiddy Tidy Towns.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Elizabeth Shanahan.pdf	FI Sub - Robert Flanagan.pdf
FI Sub - Emily O'Brien and Others.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Emma McCarthy and Others.pdf	FI Sub - Rory Fitzpatrick.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Ross Meade.pdf
FI Sub - Eve O'Mahony.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Gavin Hesse.pdf	FI Sub - Sally Orren.pdf
FI Sub - Geraldine Farrell & Others.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Gerard O'Mahony & Others.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Ghyslaine & Neil Hegarty.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Shane & Deirdre Behan.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - Stephen Barrett and Laura Morrison.pdf
FI Sub - Irene Lynch Fannon & Tom Fannon.pdf	FI Sub - Stephen O'Driscoll.pdf
FI Sub - Isabelle Sutton.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - James O'Brien.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Teresa Stack.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Joan Hayes.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Johanna Keating.pdf	FI Sub - The Ring Family.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - Trish Hofler.pdf
FI Sub - John Adams.pdf	FI Sub - Valerie Elliffe and John Power.pdf
FI Sub - John Baker.pdf	FI Sub - Valerie McCarthy.pdf
FI Sub - John O'Shea.pdf	FI Sub - Wade Cuppage.pdf
FI Sub - Joleen Cronin.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Jon McClean.pdf	FI Sub - Yvonne Hurley.pdf
FI Sub - Jonathan Meany.pdf	
FI Sub - Jonathan Tuohy.pdf	

Site Selection Rationale / Site Suitability / Zoning	
FI Sub - Aidan O'Brien.pdf	FI Sub - Karen Donegan Mannix.pdf
FI Sub - Aideen Kelleher.pdf	FI Sub - Kate & Ray Toomey and Others.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Kate Cunningham.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Kate Darragh and Susan Hackett.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Kate Irish.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Kate Power.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kevin & Lynda Forde.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Laura and David McGrath.pdf
FI Sub - Andrew Brown and Others.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Anne O'Connell.pdf	FI Sub - Liam & Josephine Hughes.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Anthony O'Reilly & Mary Molloy.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Aoife & Roy Sexton.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Lyndon & Carmel O' Hea.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Malgotzata Wiecek-Szumska.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Mandy Collins.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Manfred Schewe.pdf
FI Sub - Bernard F Stack.pdf	FI Sub - Marc Egan.pdf
FI Sub - Bernard Kiely.pdf	FI Sub - Margaret O'Callaghan & Others.pdf
FI Sub - Bill O'Leary & Elspeth Cameron.pdf	FI Sub - Maria Buckley.pdf
FI Sub - Blathin Verwey.pdf	FI Sub - Maria Coen.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Mariusz Bomba.pdf
FI Sub - Bryan Hassett.pdf	FI Sub - Mark Mendel.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Mark Perry.pdf
FI Sub - Catherine Heffernan.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Catherine Jefferson.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Mary Jordan.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Mary K O'Connor.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Mary Kate Lindon.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Mary Murphy & Others.pdf
FI Sub - Chris O'Mahony & Others.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Megan & Chris Forde.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Michael Griew.pdf
FI Sub - Cllr Eoghan Fahy.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Cllr Patrick Donovan.pdf	FI Sub - Michael Martin.pdf

Site Selection Rationale / Site Suitability / Zoning	
FI Sub - Cllr Úna McCarthy.pdf	FI Sub - Michael Middleton & Others.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cobh Tidy Towns (Ruth Ring).pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Monkstown Bay Sailing Club.pdf
FI Sub - Con & Eileen Twomey.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Cork Geological Association (Bettie Higgs).pdf	FI Sub - Natalie Moore.pdf
FI Sub - Cove Sailing Club.pdf	FI Sub - National 18ft Dinghy Class (John Coakley).pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Nicholas Lester & Others.pdf
FI Sub - David O'Shea.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - David Quinlan.pdf	FI Sub - Nick and Tina Emerson.pdf
FI Sub - Deirdre O'Callaghan & Others.pdf	FI Sub - Nick Brennan.pdf
FI Sub - Denis Ellis & Others.pdf	FI Sub - Nicola Sheehan.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Noel Corcoran.pdf
FI Sub - Derna Dwyer.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Diane Beckingham.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Norma Stafford.pdf
FI Sub - Donncadh Ó Laoghaire TD.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Donncha & Alisha O'donovan.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Paddy and Carmel Donnachie.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Dr. Gordon Reid.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Eamonn Horgan.pdf	FI Sub - Paul Nash.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Paul Reid.pdf
FI Sub - Edward White.pdf	FI Sub - Paula Courtney.pdf
FI Sub - Eileen Lane.pdf	FI Sub - Peter and Carmel Daly and Others.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Peter Magill.pdf
FI Sub - Eileen Pearson.pdf	FI Sub - Prof. Patrick O'Flanagan.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Rebecca O'Riordan.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Richard and Mary Leonard.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Elizabeth Shanahan.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Roberta Cappieri.pdf
FI Sub - Emma McCarthy and Others.pdf	
FI Sub - Erica Brierley & Others.pdf	

Site Selection Rationale / Site Suitability / Zoning	
FI Sub - Felix Butschek.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Frances Boyton & Others.pdf	FI Sub - Ross Meade.pdf
FI Sub - Gaia Baranowsha and Marcin Baranowsha.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Gary Jordan.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Gerard O'Mahony & Others.pdf	FI Sub - Sally Orren.pdf
FI Sub - Ghyslaine & Neil Hegarty.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sarah Jordan & Ciaran O'Sullivan.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Helen Carroll & Family.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Shane & Deirdre Behan.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - Sharon Buckley.pdf
FI Sub - Ian Manning.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Shirley Andrews.pdf
FI Sub - Ian Venner.pdf	FI Sub - Sinead Donnachie.pdf
FI Sub - Irene Lynch Fannon & Tom Fannon.pdf	FI Sub - Sinead Hurley.pdf
FI Sub - Isabelle Sutton.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Siobhan Mulcahy.pdf
FI Sub - Jaci Szymanski and Sonya Towler.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Springfield AFC.pdf
FI Sub - James Deacon & Others.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - James McLay.pdf	FI Sub - Stephen Barrett and Laura Morrison.pdf
FI Sub - Janet O'Leary and Ann Coughlan.pdf	FI Sub - Stephen O'Driscoll.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Steven & Terezia Foott.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	FI Sub - Susan Gibson & Others.pdf
FI Sub - Jim Doyle.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - Susan Walsh.pdf
FI Sub - Joan Hayes.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Johanna Keating.pdf	FI Sub - Teresa Stack.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - John Doyle & Others.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - John Fitzgerald.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - John O'Shea.pdf	FI Sub - Therese Loesberg.pdf
FI Sub - Joleen Cronin.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - Jon McClean.pdf	FI Sub - Tom McGrath & Family.pdf
FI Sub - Jonathan Meany.pdf	FI Sub - Trish Hofler.pdf
FI Sub - Jonathan Tuohy.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - Jonathan Wren.pdf	FI Sub - Una & Kieran Cantwell.pdf
FI Sub - Joseph and Maire Keenan.pdf	FI Sub - Valerie McCarthy.pdf
FI Sub - Joseph O'Hara.pdf	

Site Selection Rationale / Site Suitability / Zoning	
FI Sub - Judi Cronin.pdf	FI Sub - Wade Cuppage.pdf
FI Sub - Judith Cuppage & Others.pdf	FI Sub - Walterstown Group Water Scheme.pdf
FI Sub - Julie McCarthy.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Julie Moynan, Catherine Griffen and Others.pdf	FI Sub - William O'Meara & Others (typed).pdf
FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf	FI Sub - Yvonne & David Gregory.pdf
	FI Sub - Yvonne Hurley.pdf

Community & Socio-Economic Impacts	
FI Sub - Aidan O'Brien.pdf	FI Sub - Joleen Cronin.pdf
FI Sub - Aideen Kelleher.pdf	FI Sub - Judi Cronin.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Judith Cuppage & Others.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kate O'Neill.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Kate Power.pdf
FI Sub - Anne O'Connell.pdf	FI Sub - Katharina Walter & Paul Linehan.pdf
FI Sub - Anthony O'Reilly & Mary Molloy.pdf	FI Sub - Kay Abernathy.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Avril Russell.pdf	FI Sub - Kieran & Lisa Jordan.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Laura and David McGrath.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Laura and Gary Hanrahan.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Laura Harte.pdf
FI Sub - Brian Twomey.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Caroline Buckley.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Manfred Schewe.pdf
FI Sub - Catriona Reid.pdf	FI Sub - Maria Coen.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Charles Daly.pdf	FI Sub - Mark Mendel.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Christopher Adams.pdf	FI Sub - Mary Kate Lindon.pdf
FI Sub - Cllr Audrey Buckley & Others.pdf	FI Sub - Mary McCaffrey.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Cllr Eoghan Fahy.pdf	FI Sub - Mella Leonard & Others.pdf
FI Sub - Cllr Jack White & Robert White.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Michael Martin.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Michael Middleton & Others.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Colaiste Muire.pdf	FI Sub - Mick Keating.pdf
FI Sub - Colette Murphy.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Nicholas Lester & Others.pdf
FI Sub - Colm Lyons.pdf	FI Sub - Nicholas Walsh.pdf

Community & Socio-Economic Impacts	
FI Sub - Conor Foley.pdf	FI Sub - Nick and Tina Emerson.pdf
FI Sub - Cork Council of Trade Unions.pdf	FI Sub - Nicola Sheehan.pdf
FI Sub - Cork Geological Association (Bettie Higgs).pdf	FI Sub - Noel Corcoran.pdf
FI Sub - Cove Sailing Club.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Deirdre O'Sullivan.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Deirdre Sexton.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Denis Ellis & Others.pdf	FI Sub - Padraigin O'Donoghue.pdf
FI Sub - Denise Phelan.pdf	FI Sub - Pat McGrath.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Patrick O'Mahoney & Others.pdf
FI Sub - Donal O'Shea.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Donncadh Ó Laoghaire TD.pdf	FI Sub - Paul Nash.pdf
FI Sub - Dr Paul McCarthy.pdf	FI Sub - Paul Reid.pdf
FI Sub - Eamonn Horgan.pdf	FI Sub - Pauline Adams.pdf
FI Sub - Edward White.pdf	FI Sub - Peter Magill.pdf
FI Sub - Eiblish Buckley.pdf	FI Sub - Phil Goulding.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Prof. Patrick O'Flanagan.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Elizabeth Shanahan.pdf	FI Sub - Rob Bateman.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Robert Flanagan.pdf
FI Sub - Emma McCarthy and Others.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Frances Boyton & Others.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Gary Jordan.pdf	FI Sub - Ruth Prendergast and Others.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Geraldine Farrell & Others.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sinead Hurley.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Sinead Reen.pdf
FI Sub - Helen Carroll & Family.pdf	FI Sub - Siobhan and Robert Cahill.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - St. Mary's Primary School.pdf
FI Sub - Ian Manning.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Susan Gibson & Others.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Susan O'Mahony.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - Suzanne & John O'Brien.pdf
FI Sub - Jerry Buttimer TD.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Jim Ronayne.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Johanna Keating.pdf	FI Sub - The Ring Family.pdf
FI Sub - Johanna Murphy.pdf	FI Sub - Trish Hofler.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - Valerie Elliffe and John Power.pdf
FI Sub - John Adams.pdf	FI Sub - Valerie McCarthy.pdf
FI Sub - John Fitzgerald.pdf	

Community & Socio-Economic Impacts	
	FI Sub - Yvonne & David Gregory.pdf

Ecology & Biodiversity Impacts	
FI Sub - Aimie Hodnett.pdf	FI Sub - Katharina Walter & Paul Linehan.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Kathryn Foskin.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Laura Harte.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Liam Quaide TD.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Brian Cotter.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Catherine Heffernan.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Chantel NG & Daniel Kelleher.pdf	FI Sub - Mary Kate Lindon.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Colaiste Muire.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Natalie Moore.pdf
FI Sub - Cork Geological Association (Bettie Higgs).pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Deirdre Sexton.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Eimer Kelly.pdf	FI Sub - Ringaskiddy Tidy Towns.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Rodney Daunt.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Ghyslaine & Neil Hegarty.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - Sinead Reen.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - Janet O'Leary and Ann Coughlan.pdf	FI Sub - Susan Walsh.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - John Adams.pdf	FI Sub - Tom McGrath & Family.pdf
FI Sub - Joleen Cronin.pdf	FI Sub - Valerie Elliffe and John Power.pdf
FI Sub - Jonathan Meany.pdf	

Energy Performance & Demand Claims	
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Mary Douglas Magill.pdf

Energy Performance & Demand Claims	
FI Sub - Allison Leahy.pdf	FI Sub - Miriam O'Shea.pdf
FI Sub - Blathin Verwey.pdf	FI Sub - Niall Fitzgerald.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Paul Nash.pdf
FI Sub - Cobh Tidy Towns (Ruth Ring).pdf	FI Sub - Robert Flanagan.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Teresa Stack.pdf
FI Sub - Julie McCarthy.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf

Impact on Water & Soils	
FI Sub - Aimie Hodnett.pdf	FI Sub - Jackelina Pando Kelly.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Joseph O'Hara.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Julie McCarthy.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Kate Irish.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Louise Jordan.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Marc Egan.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Mary McCaffrey.pdf
FI Sub - Colette Murphy.pdf	FI Sub - Mick Keating.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Paul Nash.pdf
FI Sub - Colm Lyons.pdf	FI Sub - Ray O'Connor.pdf
FI Sub - Cork Geological Association (Bettie Higgs).pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Rodney Daunt.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Ross Meade.pdf
FI Sub - Edward White.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Elizabeth Duant-White & Others.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Felix Butschek.pdf	FI Sub - Shane & Deirdre Behan.pdf

Waste Hierarchy & Alternatives	
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Laura Anthon.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Liam Fitzgerald.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Liam Quaide TD.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Andrea, Alfie, and Ruairi Cotter.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Mary Lawless.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Blathin Verwey.pdf	FI Sub - Michael Wren.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf

Waste Hierarchy & Alternatives	
FI Sub - Brian Cotter.pdf	FI Sub - Mick Keating.pdf
FI Sub - Cait & Derry O'Donovan.pdf	FI Sub - Miriam O'Shea.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Natalie Moore.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Charlotte O'Connor, Stephen Clarke & Family.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Claire & Oliver Ahern.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Cobh Comhaltas.pdf	FI Sub - Padraigin O'Donoghue.pdf
FI Sub - Cobh Tidy Towns (Ruth Ring).pdf	FI Sub - Pat McGrath.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Conor Foley.pdf	FI Sub - Paul Nash.pdf
FI Sub - David O'Shea.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Denis Eugene O'Sullivan.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Denise Phelan.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Dominick Donnelly.pdf	FI Sub - Ross Meade.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Eamonn Horgan.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Ruth Prendergast and Others.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Gavin Hesse.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Shane & Deirdre Behan.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Ian Venner.pdf	FI Sub - Sinead Hurley.pdf
FI Sub - Isabelle Sutton.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - John Baker.pdf	FI Sub - Sonya & Michael O'Shea.pdf
FI Sub - Jonathan Tuohy.pdf	FI Sub - Stephen Barrett and Laura Morrison.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Susan Gibson & Others.pdf
FI Sub - Katarzyna Starenczak.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Kate Irish.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Ken and Sabina Nagle.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf

Toxic Pollutants (Dioxins/PFAS/Heavy Metals)	
FI Sub - Aideen Kelleher.pdf	FI Sub - Julie Moynan, Catherine Griffen and Others.pdf
FI Sub - Aimie Hodnett.pdf	FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf
FI Sub - Aisling O'Callaghan & Others.pdf	FI Sub - Kate & Ray Toomey and Others.pdf
FI Sub - Aisling O'Callaghan & Sally Donegan.pdf	FI Sub - Kate Irish.pdf
FI Sub - Alan Cavanagh.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Kevin & Lynda Forde.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Laura and Gary Hanrahan.pdf
FI Sub - Allison Leahy.pdf	FI Sub - Laura Harte.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Lauren Bates.pdf

Toxic Pollutants (Dioxins/PFAS/Heavy Metals)	
FI Sub - Angela Morrissy Lawless.pdf	FI Sub - Liam & Josephine Hughes.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Liam Quaide TD.pdf
FI Sub - Aoife & Roy Sexton.pdf	FI Sub - Lisa Myers.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Ballymore Cobh Athletic Club.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Bernard F Stack.pdf	FI Sub - Mandy Collins.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Brian Twomey.pdf	FI Sub - Martin G Jennings & Associates.pdf
FI Sub - Carrigaline Community Association Ltd.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Carrignafoy Community College.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Catherine Heffernan.pdf	FI Sub - Michelle & Margaret Cahill.pdf
FI Sub - Christopher Adams.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Mick Keating.pdf
FI Sub - Cllr. Dominic & Cheralyn Finn.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - Colette Murphy.pdf	FI Sub - Niall Fitzgerald.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Colm Lyons.pdf	FI Sub - Nick and Tina Emerson.pdf
FI Sub - Conor Foley.pdf	FI Sub - Pat Neville and Paula Neville.pdf
FI Sub - Dana & Derval Dempsey.pdf	FI Sub - Paul Reid.pdf
FI Sub - Dara Fitzpatrick.pdf	FI Sub - Pauline Adams.pdf
FI Sub - Denis Eugene O'Sullivan.pdf	FI Sub - Peter and Carmel Daly and Others.pdf
FI Sub - Denise Phelan.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Dr George Fitzgerald.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Robert Flanagan.pdf
FI Sub - Dr Stephen Thornhill.pdf	FI Sub - Ross Meade.pdf
FI Sub - Eadaoin O'Donovan.pdf	FI Sub - Ruth Deane.pdf
FI Sub - Eileen Lane.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Emily O'Brien and Others.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Eve O'Mahony.pdf	FI Sub - Shane & Deirdre Behan.pdf
FI Sub - Gary Jordan.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Sinead Quinlan.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Siobhan and Robert Cahill.pdf
FI Sub - Hendrick Verwey and Others.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Ian Heffernan.pdf	FI Sub - Susan Walsh.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Teachers of Colaiste Muire Secondary School.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Teresa Stack.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Jon McClean.pdf	FI Sub - Therese Loesberg.pdf
FI Sub - Jonathan Tuohy.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Yvonne Hurley.pdf
FI Sub - Julie McCarthy.pdf	

Toxic Pollutants (Dioxins/PFAS/Heavy Metals)	
Contravention of development plan/CCDP	
FI Sub - Aideen Kelleher.pdf	FI Sub - Ken and Sabina Nagle.pdf
FI Sub - Alan, Gayle & Kienan Kearney.pdf	FI Sub - Kevin O'Driscoll.pdf
FI Sub - Albert Terrace Cobh Residents.pdf	FI Sub - Kieran & Lisa Jordan.pdf
FI Sub - Alison & Tim Garrad.pdf	FI Sub - Kitty Moynchan and Others.pdf
FI Sub - Alison Kay & Others.pdf	FI Sub - Laura and David McGrath.pdf
FI Sub - Allison Leahy.pdf	FI Sub - Laura and Gary Hanrahan.pdf
FI Sub - Amy and Aidan Bermingham.pdf	FI Sub - Lauren Bates.pdf
FI Sub - Andrew Brown and Others.pdf	FI Sub - Liam & Josephine Hughes.pdf
FI Sub - Anne O'Connell.pdf	FI Sub - Liam Quaide TD.pdf
FI Sub - Anne, Gill, Jen, Rachel Ahern.pdf	FI Sub - Luke Walsh.pdf
FI Sub - Anthony O'Reilly & Mary Molloy.pdf	FI Sub - Lynda Behan.pdf
FI Sub - Audrey Hogan and Others.pdf	FI Sub - Lyndon & Carmel O' Hea.pdf
FI Sub - Ava Long and Others.pdf	FI Sub - Mairead Harte.pdf
FI Sub - Avril Russell.pdf	FI Sub - Malgotzata Wiecek-Szumska.pdf
FI Sub - Barry McAuley.pdf	FI Sub - Malores MacCarthy.pdf
FI Sub - Beckie Coole.pdf	FI Sub - Manfred Schewe.pdf
FI Sub - Ben, Brenda Flaherty & Family.pdf	FI Sub - Marc Egan.pdf
FI Sub - Bernadette Murphy.pdf	FI Sub - Margaret O'Callaghan & Others.pdf
FI Sub - Bernard F Stack.pdf	FI Sub - Maria Buckley.pdf
FI Sub - Bill O'Leary & Elspeth Cameron.pdf	FI Sub - Marina Ten and Others.pdf
FI Sub - Bonnie & Kevin Morata.pdf	FI Sub - Mariusz Bomba.pdf
FI Sub - Bryan Hassett.pdf	FI Sub - Mark Perry.pdf
FI Sub - Caroline Buckley.pdf	FI Sub - Mary Douglas Magill.pdf
FI Sub - Catherine Jefferson.pdf	FI Sub - Mary Fogarty & Ashlee Downing.pdf
FI Sub - Charlie & Mary Nash & Others.pdf	FI Sub - Mary Jordan.pdf
FI Sub - Chris O'Mahony & Others.pdf	FI Sub - Mary McCaffrey.pdf
FI Sub - Christian Hahnel.pdf	FI Sub - Mary Murphy & Others.pdf
FI Sub - Christopher Adams.pdf	FI Sub - Mary Poulter and Others.pdf
FI Sub - Claire O'Halloran.pdf	FI Sub - Mary Sheehan.pdf
FI Sub - Clean Coasts Cobh.pdf	FI Sub - Megan & Chris Forde.pdf
FI Sub - Cliona Coleman & Others.pdf	FI Sub - Michael Griew.pdf
FI Sub - Cllr Audrey Buckley & Others.pdf	FI Sub - Michael Higgins.pdf
FI Sub - Cllr Cathal Rasmussen.pdf	FI Sub - Michael Martin.pdf
FI Sub - Cllr Ger Curley.pdf	FI Sub - Michael Murphy and Others.pdf
FI Sub - Cllr Úna McCarthy.pdf	FI Sub - Michael Wren.pdf
FI Sub - Cllr. Peter Horgan.pdf	FI Sub - Michele Boyle & Kevin Fielding.pdf
FI Sub - Cobh Camogie Club.pdf	FI Sub - Michelle A. Hardwick & John F. Smith.pdf
FI Sub - Cobh GAA Club.pdf	FI Sub - Mondral Demesne Residents Assoc. (Norma Hahnel).pdf
FI Sub - Colette Finn.pdf	FI Sub - Monkstown Bay Sailing Club.pdf
FI Sub - Colin Bradley.pdf	FI Sub - Myles F McCarthy and Others.pdf
FI Sub - Colm & Martini McDonagh.pdf	FI Sub - Natalie Moore.pdf
FI Sub - Con & Eileen Twomey.pdf	

Toxic Pollutants (Dioxins/PFAS/Heavy Metals)	
FI Sub - Conor Foley.pdf	FI Sub - National 18ft Dinghy Class (John Coakley).pdf
FI Sub - Crosshaven GAA Club.pdf	FI Sub - Nature Network Ireland.pdf
FI Sub - Cuskinny Open Water Swimmers.pdf	FI Sub - Neil Powell Commodore Choir.pdf
FI Sub - David Quinlan.pdf	FI Sub - Niall Fitzgerald.pdf
FI Sub - Deirdre O'Callaghan & Others.pdf	FI Sub - Niamh & Jim Quain.pdf
FI Sub - Denis O'Donoghue.pdf	FI Sub - Nicholas Walsh.pdf
FI Sub - Derna Dwyer.pdf	FI Sub - Nick and Tina Emerson.pdf
FI Sub - Diane Beckingham.pdf	FI Sub - Nicola Sheehan.pdf
FI Sub - Dr Elizabeth Scott Hall.pdf	FI Sub - Nora Noonan.pdf
FI Sub - Dr Jon McClean.pdf	FI Sub - Norma Hahnel obo Mondral Demesne Residents Assoc.pdf
FI Sub - Dr Lisa Glynn & Dr Ciaran McDonald.pdf	FI Sub - Norma Stafford.pdf
FI Sub - Dr Michael H Quinlan.pdf	FI Sub - Orla Berkley.pdf
FI Sub - Eamonn Horgan.pdf	FI Sub - Owen O'Connell.pdf
FI Sub - Edward & Michelle Graves.pdf	FI Sub - Owen O'Leary.pdf
FI Sub - Edward White.pdf	FI Sub - Paddy and Carmel Donnachie.pdf
FI Sub - Eiblish Buckley.pdf	FI Sub - Padraig Rice TD.pdf
FI Sub - Eileen Lane.pdf	FI Sub - Pat & Paulette Carey.pdf
FI Sub - Eileen O'Brien & Pat Murphy.pdf	FI Sub - Pat McGrath.pdf
FI Sub - Eileen Pearson.pdf	FI Sub - Paul Kelly.pdf
FI Sub - Eileen Van Leeuwen.pdf	FI Sub - Paul Nash.pdf
FI Sub - Eimer Kelly.pdf	FI Sub - Paul Reid.pdf
FI Sub - Elaine Nicholson & Brian Murphy.pdf	FI Sub - Paula Courtney.pdf
FI Sub - Elanor O'Dwyer & Others.pdf	FI Sub - Rebecca O'Riordan.pdf
FI Sub - Elizabeth Quinlan.pdf	FI Sub - Residents Of Drakes Point.pdf
FI Sub - Ellie Slattery.pdf	FI Sub - Richie Harrington.pdf
FI Sub - Emma McCarthy and Others.pdf	FI Sub - Ringaskiddy & District Residents' Association.pdf
FI Sub - Erica Brierley & Others.pdf	FI Sub - Ringaskiddy Tidy Towns.pdf
FI Sub - Eve O'Mahony.pdf	FI Sub - Roberta Cappieri.pdf
FI Sub - Felix Butschek.pdf	FI Sub - Ronan Jordan.pdf
FI Sub - Finbarr O'Flaherty.pdf	FI Sub - Rosemary & Nicholas Roberts.pdf
FI Sub - Gaia Baranowsha and Marcin Baranowsha.pdf	FI Sub - Ross Meade.pdf
FI Sub - Gary Jordan.pdf	FI Sub - Ruth Houlihan & Carl Jackson.pdf
FI Sub - Gavin Williamson.pdf	FI Sub - Ruth Lachs.pdf
FI Sub - Gerard Menihane.pdf	FI Sub - Sally and Paul Hudson.pdf
FI Sub - Grainne and Peter Fealy.pdf	FI Sub - Sally Orren.pdf
FI Sub - Gwen Bowen.pdf	FI Sub - Sara O'Hara.pdf
FI Sub - Helen Carroll & Family.pdf	FI Sub - Sarah Jordan & Ciaran O'Sullivan.pdf
FI Sub - Helena and Alan Hunter.pdf	FI Sub - Sarah O'Grady.pdf
FI Sub - Ian Murphy.pdf	FI Sub - Seamus McGrath TD.pdf
FI Sub - Isadora Fitzgerald.pdf	FI Sub - Serghei Semenciuc.pdf
FI Sub - Jaci Szymanski and Sonya Towler.pdf	FI Sub - Shanbally National School (David Nolan).pdf
FI Sub - Jackelina Pando Kelly.pdf	FI Sub - Sharon Buckley.pdf
FI Sub - James Deacon & Others.pdf	FI Sub - Sharon O'Keefe.pdf
FI Sub - James McLay.pdf	

Toxic Pollutants (Dioxins/PFAS/Heavy Metals)	
FI Sub - Janet O'Leary and Ann Coughlan.pdf	FI Sub - Shirley Andrews.pdf
FI Sub - Jennifer Ardis.pdf	FI Sub - Sinead Hurley.pdf
FI Sub - Jenny & Sean O Loingsigh.pdf	FI Sub - Sinead O'Mahony.pdf
FI Sub - Jill and Matt O'Luasaigh.pdf	FI Sub - Siobhan Mulcahy.pdf
FI Sub - Jim Sheeran.pdf	FI Sub - Sonja McEnroe & Others.pdf
FI Sub - Joan Hayes.pdf	FI Sub - Stan Reynolds.pdf
FI Sub - John & Coralie Carter.pdf	FI Sub - Stephen O'Driscoll.pdf
FI Sub - John Doyle & Others.pdf	FI Sub - Susan d'Esterre Roberts.pdf
FI Sub - John Fitzgerald.pdf	FI Sub - Susan Gibson & Others.pdf
FI Sub - Jon McClean.pdf	FI Sub - Teresa Stack.pdf
FI Sub - Jonathan Meany.pdf	FI Sub - The Environmental Forum.pdf
FI Sub - Jonathan Tuohy.pdf	FI Sub - The Green Party Cork Branch.pdf
FI Sub - Jonathan Wren.pdf	FI Sub - The Parents Association (Scoil Bhríde GNS, Crosshaven).pdf
FI Sub - Joseph and Maire Keenan.pdf	FI Sub - Therese Loesberg.pdf
FI Sub - Joseph O'Hara.pdf	FI Sub - Thomas Dwyer.pdf
FI Sub - Judi Cronin.pdf	FI Sub - Tom McGrath & Family.pdf
FI Sub - Judith Cuppage & Others.pdf	FI Sub - Trish Hofler.pdf
FI Sub - Julie McCarthy.pdf	FI Sub - Twomey Family & McCarthy Family.pdf
FI Sub - Julie Moynan, Catherine Griffen and Others.pdf	FI Sub - Una & Kieran Cantwell.pdf
FI Sub - Julie, Derek, Harry & Lucy Moynan.pdf	FI Sub - Wade Cuppage.pdf
FI Sub - Karen Donegan Mannix.pdf	FI Sub - Walterstown Group Water Scheme.pdf
FI Sub - Kate & Ray Toomey and Others.pdf	FI Sub - Wendy A Daly.pdf
FI Sub - Kate Cunningham.pdf	FI Sub - William O'Meara & Others (typed).pdf
FI Sub - Kate Darragh and Susan Hackett.pdf	FI Sub - Yvonne & David Gregory.pdf
FI Sub - Kate Power.pdf	FI Sub - Yvonne Hurley.pdf
FI Sub - Kathryn Foskin.pdf	

Impact on solar exposure
FI Sub - Pat McGrath.pdf