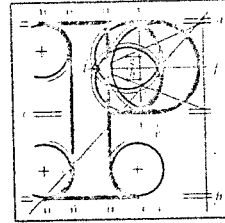


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Catherine Heffernan
100 Brightwater
Crosshaven
Co. Cork

P43 TD30

Date: 19 November 2025

Re: Proposed development of a resource recovery centre (including waste-to-energy facility)
in Ringaskiddy, County Cork.

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Commission will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

More detailed information in relation to strategic infrastructure development can be viewed on the Commission's website: www.pleanala.ie.

If you have any queries in the meantime please contact the undersigned officer of the Commission. Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

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

OBSERVER NAME: Catherine Heffernan
OBSERVER ADDRESS: 100 Brightwater, Crosshaven, Co Cork, P43 TD30
OBSERVER DATE: 14 November 2025

OBSERVATION ON SID APPLICATION

Case reference: PA04.318802, Ringaskiddy Co Cork Proposed development of a resource recovery centre (including waste-to-energy facility) by Indaver NV t/a Indaver Ireland

OBSERVATION DETAILS

Cork Harbour is the 2nd largest natural harbour in the world, is home to the oldest yacht club in the world, is a designated special protection area (SPA) under the European Union Directive on the Conservation of Wild Birds and is an area of incredible natural beauty that I'm incredibly fortunate to call home.

I would like to express my concerns in the strongest possible terms to the proposed development, on a number of grounds...

1. EXPOSING RESIDENTS TO HARMFUL PFAS COMPOUNDS AND TOXINS

- Within the waste the incinerator will burn, I understand that there will inevitably be materials that contain PFAS compounds – found in everything from popcorn bags, to non-stick pans. And that since these 15,000+ manmade chemicals are specifically designed to help resist burning, they will not be destroyed during the incineration process – but merely broken down into smaller pieces. Pieces that will then rain down on people downwind of the incinerator chimney.
- It is also my understanding that exposure to these chemicals by humans is known to be very harmful in high concentration, or with persistent exposure (as will be the case for the local population if the incinerator goes ahead).
- These health effects (according to WHO and IARC) include cancer, heart defects, respiratory illness, immune and hormonal disruption, birth defects and learning difficulties. With children, like my own two young boys, particularly vulnerable.

- This application appears to omit PFAS assessment, ultrafine-particle analysis, and key pollutant monitoring. How can claims of “safety” have any credibility when these pollutants are unmeasured and the dispersion environment is ignored?
- A series of new 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 revealed alarming levels of dioxins, PFAS and heavy metals around the facilities in soil, water, vegetation and even in food such as farm eggs.
- Zero Waste Europe has come out stating “these findings amount to a systematic failure of environmental oversight. Communities living near incinerators are being exposed to toxic chemicals, in some cases at levels far beyond what the law permits. This should raise immediate red flags across the EU.”
- And in fact, it has. In September 2025, more than 150 NGO’s called for an immediate halt to construction of new waste incinerators across the European Union – urging for a moratorium on approving new incinerator facilities, alongside a strategy to gradually phase down existing plants.

2. DERELICTION OF OUR DUTY TO SAFEGUARD A DESIGNATED SPA HABITAT

- Linked to the concerns raised in Point 1, it is not just the local human population that is at risk from toxic chemicals, dioxins and PFAS compounds – if the incinerator is allowed to proceed, all our local wildlife and marine life will be in harm’s way.
- Under the European Union Directive on the Conservation of Wild Bird, Cork Harbour has been designated as a Special Protection Area (SPA) since 2000 due to its high ornithological significance, supporting over 20,000 wintering birds.
- As a Natura 2000 site (code IE0004030), our harbour protects numerous species including dunlin, curlew, and great crested grebe. Shelduck is the most common species of duck, accounting for 9.6% of the national total. There are large populations of Teal and Wigeon at the Great Island Channel. And the harbour also supports an internationally important population of Redshank.
- Whilst a Natura Impact statement was submitted in August 2025, it fails to satisfy my concerns in this regard. If this development is allowed proceed, not only will we be failing in our duty to safeguard these birds, but we will be actively putting these particularly vulnerable populations in harm’s way with the toxins and pollutants it will release.

3. INHERENT UNSUSTAINABILITY OF SITE FOR THE PROPOSED DEVELOPMENT

- Notwithstanding the information submitted in August 2025, the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by M28 on the other. It is considered that the actual

usable area of the site is inadequate in relation to the scale of development proposed. (Derek Daly, 2017).

- The site is located on a known flood risk area, marked as same in Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW floodinfo.ie , (Flood Summary ID-1364, 13082, 12085). Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure. It is my considered opinion that the site is inherently unsuitable for location of a use which processes, and generates hazardous compounds. (Oznur Yukel Finn, 2009)
- This adds further concern, for me, to the immense risks to life that local populations and wildlife are being asked to assume with this development.

4. DIRECT CONTRAVENTION OF THE COUNTY DEVELOPMENT PLAN

- Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the Indaver site area where the incinerator build is proposed (RY-I-09) is zoned as suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. (RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28)
- This is dismissed in the August 2025 information but it is of critical importance that this zoning be upheld as it is directly linked to the investment in the NMCI and MaREI Campus areas and the potential for future growth of this sector. The proposed incinerator is therefore in direct contravention of the Cork County Development Plan 2022 - 2028 and contrary to the specified objectives for the immediate area.

5. UNSTATISFACTORY, UNSUBSTANTIATED ENVIROMENTAL IMPACT STATEMENT

- By all 3 Bord Pleanala Inspectors, the EIS was found to be deficient in substance even where found legally adequate in form. The information as submitted to the Board is therefore insufficient to enable the Board to carry out an environmental impact assessment in an appropriate manner, and to form a basis for an informed decision on the application. (Daly, 2017).
- Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence. There is no de novo site selection in the material submitted in 2025, but instead a justification based on site ownership by Indaver, with inadequate consideration given to major public and private investment initiatives which have transformed the character of the immediate area in the intervening period since 2000. (Daly 2017).

6. VISUAL IMPACT, TOURISM AND LOCAL ECONOMIC IMPACT

- The harbour is the 2nd largest natural harbour in the world and huge tourist draw attracting over 100 cruise liners annually. It is home to the oldest yacht club in the world and newly re-developed Fort Camden Meagher and Spike Island visitor attractions.
- A single industrial stack, 75 metres tall, permanently alters the harbour's visual identity; in a way that is totally out of keeping with this scenic coastal, recreational and tourism national asset.

7. EXTRA INCINERATOR CAPACITY CONFLICTS WITH WASTE REDUCTION GOALS

- Indaver's claim that there is a "Southern Region capacity gap but the new Circular Economy Act (2022) and the National Waste Management plan for a Circular Economy (2024 – 2030) run the system nationally, not by region.
- They have set a per-person target to cut residual waste from 0.37 to 0.3478 by 2030, and commit to zero waste growth. We already have 1.26 million tonnes within our existing infrastructure with a further approved, currently unbuilt capacity to bring it to 1.5 million tonnes. Would this capacity not fully meet our reduced 2030 requirement?
- Furthermore, across Europe, as part of the call for a moratorium on new builds, it was highlighted that there is significant overcapacity in incineration across the EU – with facilities currently able to process more than 60 million tonnes of municipal waste annually.
- Expanding this infrastructure, they warned, risks locking member states into a 'linear' and high-emission waste model, undermining both the EU Green Deal and ambitions for climate neutrality.

8. INCREASED CAPACITY WILL FORCE FURTHER NON-COMPLIANCE WITH CLIMATE LAW

- Ireland is currently 10,000,000 tonnes over its carbon budget and the independent Climate Change Advisory Council has warned government that the biggest block to Ireland achieving legally-binding cuts in carbon emissions "remains our dependence on expensive and harmful fossil fuels".
- While calls and strategies to cut emissions by at least 50% are ongoing, and at a time where the European Commission is considering a "moratorium on new incinerators" how could approval for an incinerator which could lock in another 190,000 tonnes of fossil emissions every year be given?
- And to aggravate the situation, 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.

8. A CORRUPT, DEEPLY FLAWED PROCESS WITHOUT ACCOUNTABILITY

- Three Bord Pleanala Inspectors (in 2004, 2011 and 2017) recommended refusal, citing site overdevelopment, site unsuitability, and serious incompatibility with educational, amenity and heritage investment in the local Cork Harbour Area. Yet here we are again, with it falling to ordinary, local people to fight and stop the same flawed plan again.
- 30,000 people objected to Indaver's first application!!! Plus Cork County Council rejected the first application and rezoned the Indaver site from industrial to educational.
- The last approval was overturned by the High Court in 2021 due to objective bias which I still feel to deeply impacting on this entire application process, where;
 - Laura Burke, now Director General of the EPA, joined the EPA directly from employment by Indaver as project manager for their Cork incinerator project.
 - Indaver has a 3-year private pre-consultation with An Bord Pleanala (2012 – 2015) before lodging their 2016 application. The public was excluded.
 - Dr Mary Kelly, chairperson of An Bord Pleanala when permission was granted to the 2016 planning application, preselected 8 of 10 Board members to decide the case, excluding two senior planners.

Please refuse this planning application once and for all, on the basis that the site is inherently unsuitable, additional incinerator capacity is in direct conflict with targets to cut waste and emissions and that the applicant has failed to reassure on all environmental, safety and ethical grounds.

And most importantly, please refuse it, for the future health and life-expectancy of those of us that will be stuck living under its shadow including my two very young sons who I fear could now be facing a future with a higher risk of cancer, respiratory issues, heart defects, immune issues hormonal issues, learning difficulties or of one day passing these on to their own children.

Your sincerely,

Catherine Heffernan