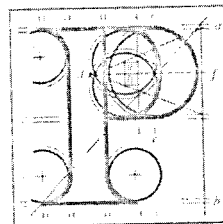


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Ellie Slattery
Woodland Lodge
Hayes Hill
Crosshaven
Co. Cork

Date: 25 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,

Kevin McGettigan

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

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

Observer Details:

Ellie Slattery

Woodland Lodge, Hayes Hill, Crosshaven, Co. Cork

17/11/2025

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:

The proposed incinerator site is fundamentally too small for the project proposed. It is inadequate in relation to the increased scale of amended development proposed. The previously submitted EIS has been found to be deficient in substance, even where found legally adequate in form. Despite subsequent revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.

The planning proposal provides no justification for site selection in the material submitted in 2025, other than one based on site ownership by Indaver. 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.

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

The proposed incinerator is therefore in direct contravention of the County Development Plan and contrary to the specified objectives for the immediate area. Please refuse this planning application on the basis that the site is inherently unsuitable, concluded by all 3 Bord Pleanala Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017) and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site.

The planning documentation also fails to adequately model the cumulative impacts of traffic, existing industry, meteorology/topography, demographic vulnerability, and the proposed facility together. The local terrain (valley + estuary) and meteorological conditions (e.g., inversions, stable layers) may trap pollutants. The landscape of the Cork Metropolitan Area is characterised by a complex topography of river valleys and estuarine basins, combined with an existing heavy-industry zone, increasing susceptibility to pollutant accumulation and exposure. The valley and harbour forms create potential for, particularly under temperature inversion or low-wind conditions which commonly occur in the area. Placing incinerators in this terrain and an already present industrial cluster risks cumulative pollutant buildup (PM, NO_x, heavy metals) that may be channelled toward densely populated areas. Even modern incinerators operating

within current EU emission limits may increase ambient pollutant concentrations, particularly under unfavourable topographical or meteorological conditions. The application does not adequately address these dispersion constraints.

The ageing population and residents with chronic health conditions are among the most vulnerable to these cumulative exposures. Per the Irish Thoracic Society (2018), respiratory disease causes about 1 in 5 deaths in Ireland, the death rate from respiratory disease in Ireland is 38.2% higher than the EU-28 average, with the Cork region being again above the national average.

Moreover, the local community has repeatedly and significantly objected to the proposal, a factor that merits serious consideration in line with public-participation principles. The strength and continuity of local opposition reinforces the need for caution, transparent consultation and justification of any decision to approve the facility. Noting also that, incinerators discourage recycling by providing a guaranteed disposal route for waste. This conflicts with national and EU waste reduction targets where alternative waste management strategies (waste reduction, increased recycling, advanced non combustion technologies) should be prioritised in line with the EU Waste Hierarchy and Circular Economy Action Plan, rather than reinforcing reliance on large scale incineration in a vulnerable environment.

I wish to request an Oral Hearing to continue full public participation in this application.