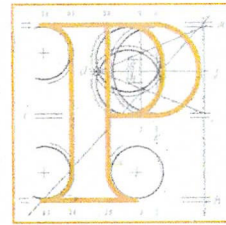


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Emma McCarthy and Others
15 Helms Point
Church Bay Road
Crosshaven
Co. Cork
P43 HN25

Date: 24 November 2025

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

Dear Sir / Madam,

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

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

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

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

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
Executive Officer
Direct Line: 01-8737263

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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

OBSERVATION ON SID APPLICATION - Case reference: PA04.318802, Ringaskiddy Co Cork

Proposed development of a resource recovery centre (including waste-to-energy facility) by Indaver NV t/a Indaver Ireland

OBSERVER NAME: Emma McCarthy

DATE 16/11/25

OBSERVER ADDRESS: 15 Helms Point, Church Bay Road, Crosshaven P43 HN25

OBSERVATION DETAILS

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).*

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)*

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)*

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.

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



I enclose fee of €50.



Additional pages attached (1)

As local residents, the proposed incinerator project, if approved, would have a detrimental impact on the natural beauty and environmental integrity of Cork Harbour, which is a significant asset not only to the local community but also to regional tourism. Cork Harbour is one of the largest natural harbours in the world, and its surrounding areas are key to the local economy, drawing visitors for its scenic views, maritime heritage, and outdoor activities. The construction and operation of a large industrial facility in such a sensitive area would irreparably damage the visual and environmental appeal of the harbour, which is in direct contrast to the sustainable tourism goals set by local authorities.

Furthermore, the proximity of the proposed site to the National Maritime College of Ireland (NMCI) and the MaREI Campus, both of which are central to Cork's growing marine and renewable energy sectors, could hinder future investment and development in these innovative fields. This would have a long-term negative effect on the local community, not only by impacting tourism, but also by limiting employment opportunities in emerging sectors that align with Cork's development as a hub for marine research, education, and sustainable enterprise. The proposed development conflicts with the broader vision for the region, which seeks to balance industrial growth with the preservation of Cork Harbour's natural and economic value.

Regarding our climate responsibility, Ireland is already over its carbon budget; this plant would lock in a large new stream of fossil emissions every year. Electricity-only incineration of fossil plastics is higher-carbon than the future Irish grid and would displace cleaner renewable generation. The European Commission (2017) advised a "moratorium on new incinerators" in favour of waste prevention, reuse, and recycling. 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. Incinerators must be kept fed with waste - this is bad news for waste prevention, bad news for recycling and may lead to importing foreign waste. Incineration creates toxic ash (about one-third the original waste volume).

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.

ON BEHALF OF THESE LOCAL CONCERNED RESIDENTS:

Julie Butters

Barbara, Ann & Tadhg Healy

Monika & John Spillane

Maren & Marcus Hodder

Andelain Keane & Sheila Wilton

ADDRESS: 15 Helms Point, Church Bay Road, Crosshaven P43 HN25

ADDRESS: TAKBA, Coast Road, Fountainstown, Co. Cork. P43 R228

ADDRESS: Gweedore, Fountainstown, Co. Cork P43 DF77

ADDRESS: Fountainstown House, Fountainstown P43 VX23

ADDRESS: 16 Ridgewood, Herons Wood, Carrigaline, Co. Cork P43 YX58