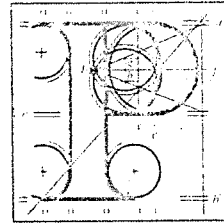


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Helena and Alan Hunter  
5 Waterside  
Castleheights  
Carrigaline  
Co. Cork  
P43 TX30

**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](http://www.pleanala.ie).

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

Yours faithfully,

Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

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OBSERVATION DETAILS regarding proposed incinerator in Rhingaskiddy Cork on behalf of

Helena and Alan Hunter  
5 Waterside  
Castleheights  
Carrigaline  
Co Cork  
P43TX30  
[Hele2me@gmail.com](mailto:Hele2me@gmail.com)

I object strongly to the submission by Indaver for planning permission for an Incinerator in rhingaskiddy Cork. For the health of my family and my future family, I would like to object on the following grounds.

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.

Under Irish and EU law (PDA 2000 s.37G(2)(b) and EIA Directive 2014/52/EU), the Board cannot approve a materially incomplete EIAR. I cannot rule out the possibility that something is buried in the files, but the following items appear to be required and absent. Any one of them would normally require refusal or re-advertisement.

Missing:

- \* Carbon-budget test.
- \* ETS (carbon-allowance and cost) analysis.
- \* PFAS assessment.
- \* Ultrafine-particle (PM0.1) assessment.

- \* Modern flood-risk assessment (OPW 2022).
- \* Tourism and socio-economic impact assessment.
- \* Modern alternatives analysis.
- \* Required Population and Human Health content.
- \* Up-to-date baseline data.
- \* Current waste-policy assessment (Circular Economy Act; 2024–2030 Plan).

Present but technically defective:

- \* R1 efficiency: provided but wrong; correct value seems to me to be about 0.597 (disposal, not recovery).
- \* Flood-risk: provided but invalid; uses outdated maps and omits 2022 requirements.
- \* Plume modelling: provided but incomplete; omits thermal inversions (the plume will sit on the harbour like a pancake), coastal trapping, ultrafines.
- \* Waste-policy narrative: provided but misleading; relies on outdated plans.
- \* “Need” case: provided but contradicted by current national capacity data.
- \* Energy-benefit claims: provided but misleading; electricity-only and inconsistent with grid trends.
- \* Zoning discussion: provided but incomplete.
- \* Hazardous-waste description: provided but incomplete; no PFAS or combustion-adequacy analysis.

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