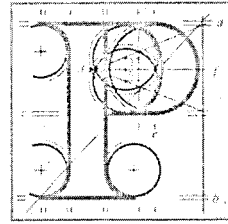


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Jennifer Ardis
5 Woodville
Rochestown Road
Co. Cork
T12X786

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

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1890 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

To: An Coimisúin Pleanála
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: Jennifer Ardis

Date: 13/11/2025

Observer Address: 5 Woodville, Rochestown Road, Cork, T12X786

Observation Details

Flood risk - This site is in a known flood risk area, as marked in Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW floodinfo.ie , (Flood Summary ID-1364, 13082, 12085). The OPW's updated rules require safe, dry access for critical infrastructure, which this location cannot provide. For instance, the access road floods, potentially cutting off the site during storms and surge events.

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). Raising ground levels also does not solve tidal inundation, a rising water table, or coastal surge behaviour. The site fails the Sequential Approach and cannot guarantee egress. Furthermore, this risk will continue to increase as water levels rise with global heating. Locating a plant of this nature on this site is both irresponsible for now and incredibly dangerous for the future.

Environmental Impact Assessment - The EIS was found to be deficient in substance by all three Bord Pleanála Inspectors, 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.

Noncompliance with Climate and Carbon-Law - Ireland is already over its carbon budget. Furthermore, Ireland already meets its projected waste disposal needs (The supposed “Southern Region capacity gap” is based on planning structures abolished in 2022; capacity is now national, and Ireland already meets projected needs). Irish law now prohibits new residual-waste capacity; national policy requires waste reduction. Adding new disposal capacity directly contradicts circular-economy policy.

Building this incinerator would lock Ireland into a large new stream of emissions every year. Electricity-only incineration of fossil plastics is higher-carbon than the future Irish grid and would displace cleaner renewable generation.

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. The proposed plant is not, despite claims on its submission, “high-efficiency recovery”, for the following reasons;

- Their own data place the plant below the legal R_1 threshold, which means it is disposal, not recovery.
- There is no heat-recovery infrastructure, and the site cannot support a heat network, making compliance structurally impossible.

Air Quality, Plume Behaviour, and Scientific Omissions – As a parent raising children (one of whom already has an asthma diagnosis) in the Cork Harbour area, I’m particularly concerned about the toxic load this incinerator would add to the already strained environment of this beautiful Special Protection Area. Thermal inversions in Cork Harbour can trap emissions at ground level rather than allowing safe dispersion. The application omits PFAS assessment, ultrafine-particle analysis, and key pollutant monitoring. Claims of “safety” cannot be made when these pollutants are unmeasured and the dispersion environment is ignored. This is extremely concerning.

False Claims on Safety, Indaver Credibility- The application claims the highest environmental and safety standards, yet excludes heat recovery, carbon modelling, PFAS/UFP analysis, updated flood data, and a compliant R_1 . A proposal missing this many essentials cannot credibly claim high standards. Three Inspectors have previously found Indaver’s Cork claims incomplete or unproven. The last approval was quashed by the High Court because the evidence was not there. The same alarming failings reappear: missing climate analysis, unverifiable R_1 , outdated flood data, and overstated policy claims. This track record undermines confidence in all assurances; Indaver are untrustworthy at this basic level of information and planning. They cannot be trusted to follow through with building a safe plant if this application were to be granted.

Site size: Despite the information submitted in August 2025, the site is too small for the proposed project, and with coastal erosion and the boundary reduction from the M28 project, it will continue to reduce in size.

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

No de novo 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)

Contravention of 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 County Development Plan and contrary to the specified objectives for the immediate area

Tourism

Cork Harbour is the third-largest natural harbour in the world, with tourist attractions that depend on picturesque scenery and a perception of clean water, such as Cobh's cruise sector, Midleton Distillery, Spike Island and more. An industrial stack in this context is in danger of irrevocably damaging the tourism sector of the 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), the proposed project is not needed and would actively damage Ireland's capacity to meet climate obligations, the proposal itself is incapable of showing that the project is safe, 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.