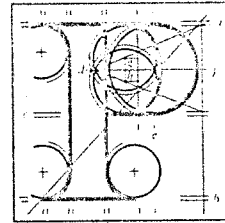


**Our Case Number: ABP-318802-24**

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Jonathan Meany  
50 Helms Point  
Crosshaven  
County Cork

P43 AP02

**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,

*Lauren Griffin*

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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	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

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** Jonathan Meany **DATE** 15/11/2025  
**OBSERVER ADDRESS** 50 Helms Point, Crosshaven, County Cork P43 AP02  
\_\_\_\_\_

**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

I have already submitted in 2016 so have paid prior fee

6 Additional pages attached (no of)

## Submission to An Coimisiún Pleanála

RE: Objection to Proposed Ringaskiddy Resource Recovery Centre. Ref: PA04.318802

### 1. Introduction

This submission is lodged in strong objection to the proposed **Ringaskiddy Resource Recovery Centre** (waste-to-energy incinerator) in Ringaskiddy, Cork Harbour. The proposed development lies immediately adjacent to internationally protected habitats within the **Cork Harbour Special Protection Area (SPA)** (Site Code 004030) and within close proximity to residential, recreational, and strategic maritime infrastructure.

Having reviewed the proponent's overall submission including in detail its Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), and Hazard Identification and Risk Assessment (HIRA), it is clear that the proposal presents unacceptable and unmitigable risks that are inconsistent with EU and Irish environmental law, including:

- **Directive 2009/147/EC** (Birds Directive)
- **Council Directive 92/43/EEC** (Habitats Directive)
- **Directive 2008/98/EC** (Waste Framework Directive)
- **Environmental Liability Directive 2004/35/EC**
- **EU Floods Directive 2007/60/EC**
- **Planning and Development Act 2000** (as amended)
- **National and Regional Waste Management Plans**
- **Climate Action and Low Carbon Development Acts 2015–2023**

For these fundamental reasons, planning permission must be refused.

### 2. Ecological Grounds: Adverse Effects on Cork Harbour SPA

#### 2.1 Statutory Protection of the SPA

The **Cork Harbour SPA** is protected under:

- **Birds Directive** (2009/147/EC) – Articles 4(1) and 4(2)
- **Habitats Directive** (92/43/EEC) – Article 6(3)
- **S.I. 477 of 2011** (European Communities (Birds and Natural Habitats) Regulations)

These laws impose a strict legal test: An Bord Pleanála may not grant permission unless it is proven, beyond reasonable scientific doubt, that "*no adverse effects on site integrity will occur*" (CJEU Waddenzee Case C-127/02). The proposal is located just 405m from the SPA boundary, creating an unusually high-risk interface between a major emission source and a highly sensitive ecological receptor.

#### 2.2 Bioaccumulation of Persistent Pollutants (Dioxins, Mercury, Heavy Metals)