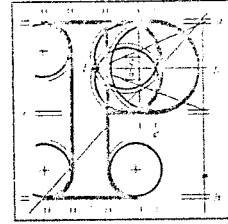


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Jonathan Tuohy
Kaduna
Ringaskiddy
Co. Cork
P43 XY09

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.

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
Glao Aitiúil	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 Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

OBSERVER NAME:

Jonathan Tuohy
Kaduna,
Ringaskiddy,
Co.Cork
P43 XY09

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

Notwithstanding the additional information submitted in August 2025, the site remains fundamentally too small for the scale of project proposed and continues to decrease in size due to coastal erosion on one side and the reduced boundary caused by the M28 on the other. It is considered that the actual usable area of the site is inadequate in relation to the scale of the development proposed (Derek Daly, 2017).

All three previous Bord Pleanála Inspectors found the EIS to be deficient in substance, even where it was deemed legally adequate in form. The information submitted has therefore been insufficient to enable the Board to carry out an environmental impact assessment in an appropriate manner, or to form a basis for an informed decision (Daly, 2017). Despite revisions, the 2025 EIS documentation repeats earlier conclusions and continues to rely on assertions without supporting evidence.

No de novo site selection has been carried out in the 2025 submission. Instead, the justification offered relies solely on Indaver's ownership of the land, with inadequate consideration of major public and private investment in the immediate area which has significantly transformed the character of the site and its surroundings since 2000 (Daly, 2017).

The site is located in a known flood-risk area, as indicated in Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW floodinfo.ie (Flood Summary ID-1364, 13082, 12085). Proposed mitigation measures requiring the facility to be located significantly above projected flood levels would further exacerbate the negative visual impact of the already large structure. It is my considered opinion that the site is inherently unsuitable for a development that processes and generates hazardous compounds (Oznur Yukel Finn, 2009).

Furthermore, although the greater Ringaskiddy area is zoned for industrial use, the specific Indaver site (RY-I-09) is zoned for the extension of the Third-Level Educational Campus and for enterprise-related development, including marine-related education, enterprise, research and development (RY-I-09, Table 4.1.17, Cork County Development Plan 2022–2028). This point is dismissed in the August 2025 submission, yet it is of critical importance: the zoning is directly linked to significant investment in the NMCI and MaREI campuses and is essential for future growth in 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.

CONCERNS REGARDING PUBLIC HEALTH AND AIR QUALITY

The proposed development poses significant risks to public health due to potential emissions of hazardous pollutants, including dioxins, particulate matter, heavy metals, and other toxic by-products associated with waste-to-energy incineration. The greater Cork Harbour area contains a large residential population, schools, healthcare facilities, and vulnerable groups who may be exposed to long-term cumulative air-quality impacts. The EIS documentation does not provide sufficiently robust or independent assessment of the potential public health implications.

CONCERNS REGARDING TRAFFIC AND SAFETY IN CORK HARBOUR

The proposal would considerably increase heavy goods vehicle (HGV) traffic in and around Ringaskiddy, the N28, and Cork Harbour. This raises major safety concerns for commuters, local residents, and maritime operations. The area already experiences significant congestion, and the additional HGV movements may compromise emergency access routes and increase the likelihood of accidents involving hazardous materials.

IMPACT ON CLIMATE GOALS AND RENEWABLE ENERGY POLICY

The construction of a long-term incineration facility is incompatible with Ireland's legally binding climate targets, circular economy commitments, and the national shift toward renewable energy and waste reduction. Incineration locks the region into a high-emissions waste model for decades, contradicting Government policies which prioritise waste prevention, reuse, recycling, and low-carbon alternatives.

VISUAL AND ENVIRONMENTAL DAMAGE TO CORK HARBOUR

The proposed structure would have a severe negative visual impact on Cork Harbour, one of Ireland's most significant cultural, natural, and maritime environments. The large-scale industrial design—combined with elevated site levels required for flood protection—will intensify visual intrusion, damaging the character and amenity of the harbour landscape. Local biodiversity, coastal ecosystems, and protected maritime assets may also be adversely affected.

AVAILABILITY OF ALTERNATIVE AND SAFER WASTE OPTIONS

International best practice and EU policy highlight the availability of safer, cleaner, and more sustainable waste management options than incineration, including advanced recycling technologies, anaerobic digestion, and zero-waste circular systems. The proposal does not adequately assess or compare these alternatives, instead relying on outdated assumptions that incineration is necessary to address waste capacity.

For these reasons, I respectfully request that this planning application be refused on the basis that the site is inherently unsuitable—a conclusion reached by all three Bord Pleanála Inspectors (Jones 2004; Yukel Finn 2009; Daly 2017)—and that the proposal contravenes the zoning outlined in the Cork County Development Plan 2022–2028, while also presenting unacceptable risks to public health, environmental quality, and climate objectives.

I also request that an Oral Hearing be held in order to ensure full public participation in this application.

I enclose the required fee of €50.