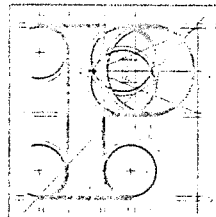


**Our Case Number: ABP-318802-24**



**An  
Coimisiún  
Pleanála**

Liam & Josephine Hughes  
'An Cuan'  
Copperfields  
Rushbrooke  
Cobh  
Co. Cork

**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.

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.

Please be advised that, as you made a submission in relation to the previous application (PA0045), you are not required to pay a fee in order to make this submission. Accordingly, a refund for the €50 that you have paid will issue to the debit/credit card used to make the online payment (SID-OBS-004102).

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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Glaó Áitiúil	LoCall	1800 275 175
Fax	Fax	(01) 872 2684
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**Teil**  
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64 Marlborough Street  
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**TO:** An Coimisiun 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:** Liam & Josephine Hughes

**DATE:** 14<sup>th</sup> Nov. 2025

**OBSERVER ADDRESS:** 'An Cuan', 5 Copperfields, Rushbrooke, Cobh, Co. Cork, P24DX01

**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 Pleanála 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 Pleanála 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.

The proposed operator of this facility does not appear to have provided comprehensive or correct information relating to the proposed facility, particularly in relation to the EIA. Incorrect details were submitted with the original application in 2016, which also 'split' the development into a number of phases, thereby avoiding conditions specified within relevant Seveso Directives.

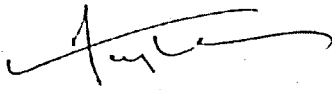
To my knowledge, no fully comprehensive EIA has been conducted and provided for the entire proposed development. Further, no expert medical opinion was provided by the company relating to the impact of the facility, in particular, dioxins. The control of dioxins is a key concern and is not adequately addressed within the application information provided piecemeal to date.

A key concern is the risk posed by this facility and a possible 'worst-case' scenario, which has not been properly addressed within this planning application, in the event of a credible systems or procedural failure.

The track record of the proposed operator raises serious questions as to the confidence and robust nature of both the facility and applicable Standard Operating Procedures. There have been a number of specific environmental incidents within their Irish operations to date; emissions exceedance, including Zinc levels almost twice the permitted level (2017), TOC concentrations above control limits (2024), an Emergency Shutdown of their Dublin plant (2025) and numerous odour complaints and noise complaints. Within the Cork harbour area and the proximity to a significant population, the risk posed by this facility and potential for significant environmental incident is too great and not in line with the development plans for the area.

We live in the second largest natural harbour in the world, and the local population affected by the decision to site a major hazard in their midst here deserve to have all the facts presented in a timely manner and have all those facts fully considered. This includes a more comprehensive EIA and due consideration of the effects on human health, air quality, noise and odour issues.

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



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Liam & Jo Hughes