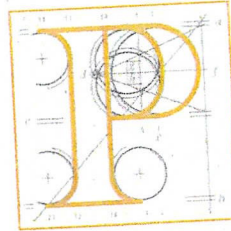


**Our Case Number:** ABP-318802-24  
**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Mary Douglas Magill  
46 Brightwater  
Crosshaven  
Co. Cork  
P43 DX01

**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](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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Mary Douglas Magill

46 Brightwater

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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: **Mary Douglas Magill**

DATE: **16-11-2025**

OBSERVER ADDRESS: **46 Brightwater, Crosshaven, Co. Cork, P43 WT04**

**OBSERVATION DETAILS:**

This proposal is structurally & legally non-compliant with current Irish & EU law, including the Circular Economy & Miscellaneous Provisions Act 2022, the Climate Action & Low-Carbon Development (Amendment) Act 2021, the National Waste Management Plan for a Circular Economy 2024 – 2030, and Regulation (EU) 2021/1119 (EU Climate Law)

The plant will not qualify as energy recovery as it will be producing electricity only, with no heat export system. Its R<sub>1</sub> Score = 0.6 below the 0.65 threshold for recovery under the EU Waste Framework Directive (2008/98/EC). No heat network or combined Heat & Power (CBA) study exists – breaching article 14 of the Energy Efficiency Directive and s.7(3) Circular Economy Act 2022.

EPA 2023 data confirms that Ireland's existing facilities already meet national incinerator capacity; additional capacity would breach the forthcoming National Waste Management Plan 2024 – 2030 and risk 'lock-in' to waste burning.

The proposal contradicts Ireland's Climate Action Plan and Waste Action Plan for a Circular Economy (2020 – 2025)

This issue spans a 65km radius, it is our air, our food chain, our wildlife, our beautiful harbour & we must do everything we can to protect it. The EPA are entrusted to protect & improve the environment as a valuable asset for the people of Ireland, this includes protecting them from the harmful effects of radiation and pollution.

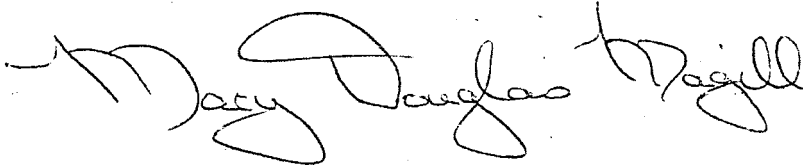
- Notwithstanding the information submitted in August 2025, the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by M28 on the other. It is considered that the actual usable area of the site is inadequate in 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 they were 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.
- The area in which the development is proposed is beside a heavily used public area consisting of a Beach and recreational area in constant use by joggers. Swimmers and walkers.
- The Site is located on the Evacuation Route for Haulbowline, home to more than 1000 personnel at Naval HQ, Should there be an incident at the incinerator site, the only escape route available to them is across Haulbowline Bridge. The most basic understanding of evacuation determines that people are *NEVER* evacuated toward the incident they are fleeing, but this is exactly what Incinerator owners Indaver suggested as a practical & safe option when questioned at the Planning Hearing in 2016.
- Previous objections from the Naval base reiterate that the site has been rezoned & that there is a move across Europe to be a cessation on all future incinerators & plans to wind down existing ones.
- Incinerators are known high value targets for terrorism & an incinerator & Naval base in a country without a robust air defence, makes us sitting ducks.
- Where is all the waste material being stored so that the plant can be fed 24/7, 365 days a year. How is the smell going to be controlled and monitored and more importantly what measures are being put in place to ensure there is no risk of fire. Incinerator fires are a reported occurrence in the last five years, with a BBC Investigation highlighting fires at UK facilities and the resulting environmental and safety concerns.

- The EIS omits proper integration of hydrological pathways & emission fallout to Cork Harbour SPA contrary to regulation 42 of S.I.477/2011 & Holohan C-461/17 (requirement to consider all possible interactions). They omit GHG & pollutant links to protected habitats. No assessment of atmospheric deposition or acidification impacts on Cork Harbour SPA (004030) & great island channel SAC (001058). Breach of regulation 42 of S.I.477/2011 & article 6 (3) of the habitat directive.
- Ireland is already over its carbon budget. This plant would lock in an added 190,000 tonnes of annual fossil emissions. Indaver has omitted the legally require carbon budget & ETS impact analysis, so their application cannot demonstrate compliance with the national climate law.

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), further to which 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.

A handwritten signature in black ink, reading "Mary Douglas Magill". The signature is written in a cursive style with large, flowing letters.