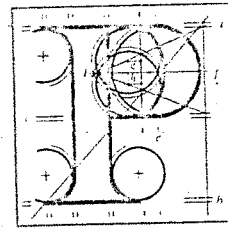


Our Case Number: ABP-318802-24
Planning Authority Reference Number:



An
Coimisiún
Pleanála

Pádraig Rice TD
Leinster House
Kildare Street
Dublin 2

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

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An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

17th November 2025

Ref: PA04.318802

App: Indaver NV t/a Indaver Ireland

For: Proposed Development of a Resource Recovery Centre (including Waste-to-Energy Facility)

Site: Ringaskiddy, Co. Cork

A chara,

I would like to make the following observations in respect of the above application. I have broken the submission down into 3 main parts:

Planning History:

The proposed development has previously been rejected three times by the planning board Inspectors, after public inquiry hearings by the then An Bord Pleanála. All three Inspectors found the EIS to be deficient in substance even where it was held legally adequate in form.

Constituents have expressed concerns to me that the updated EIS material continues to repeat earlier conclusions and provides assertions without evidence. Moreover, the current application fails to effectively address the grounds for refusal on previous An Bord Pleanála decisions for a 240,000 tonnes pa. incinerator.

Climate Policy Targets and Site Location:

The applicant has shown a supposed disregard in relation to site location criteria such as coastal erosion and flooding. The site is known to be at risk of flooding, as recognised by Cork County Council and the Office of Public Works. As highlighted previously by the Planning Inspectors, mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure.

Moreover, the proposed site area 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.” This is dismissed in the applicant’s latest application which demonstrates a failure to recognise the importance of this zoning which is directly linked to investment in the National Maritime College of Ireland and the MaREI Centre Campus areas and the possibility for future growth of this sector. The proposed development is thus in direct contravention of the *Cork County Development Plan 2022-2028* and not in line with the specific objectives for the area.

Scale of Waste Disposal:

Finally, constituents have expressed concerns about the possibility of the importation of hazardous waste into Ireland in order for the proposed development to be economically viable. The proposed facility has a capacity for hazardous waste incineration in the range of 80,000 - 126,000 tonnes. Despite the intention to only incinerate hazardous waste that is currently exported for incineration, it must be recognised that nationally, about 48,000 tonnes of hazardous waste fits into this category based on an EPA report. This indicates that the facility would run at a 42-60% overcapacity. It should be noted that our national

target is to reduce the quantity of hazardous waste for disposal to circa 27,000 tonnes based on the National Hazardous Waste Management Plan.

The applicant has failed to give proper assurances in relation to the importing of hazardous waste material and it must be questioned whether a prohibition on importation could be properly enforced in the context of European competition and trading laws. Furthermore, despite the argument that Cork has a high concentration of pharmaceutical and chemical industries, it must be acknowledged that this sector is likely one of the most efficient at reducing its waste material or treating them on site. There is no evidence that local industry has any intention to provide waste to the applicant for disposal and there is a failure to recognise the existence of small in-house incinerators on-site at local pharmaceutical plants.

I would greatly appreciate acknowledgement of my submission and notice of any further consultations or decision.

Is mise le meas,

Pádraig Rice

TD for Cork South Central