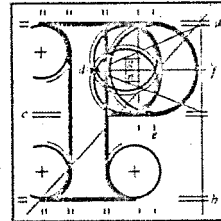


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Pauline Adams
73 Drakes Point
Crosshaven
Cork

P43 Y573

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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D01 V902 D01 V902

OBSERVATION ON SID APPLICATION – Case reference PA04.318802

Proposed development of a Resource Recovery Centre (including Waste-to-Energy Facility) by Indaver NV t/a Indaver Ireland, Ringaskiddy, Co. Cork

Date: 16th Nov 2025

Observer Name: Paulina Adams

Observer Address:

73 Drakes Point

Crosshaven

Co Cork

Ireland

P43 Y573

Dear Sir / Madam,

I am making this **observation and objection** on Strategic Infrastructure Development application **PA04.318802** for the proposed Indaver resource recovery centre and waste-to-energy incineration facility at Ringaskiddy, Co. Cork.

As a resident of Crosshaven within the Cork Harbour airshed, I believe this development is **incompatible with local land uses, contrary to EU and Irish environmental law**, and poses **significant public health, environmental, climate, economic, and amenity risks**.

1. Incompatibility With Existing Land Use and Strategic Employment Zones

The proposed site lies adjacent to one of Ireland's key **pharmaceutical and biopharmaceutical manufacturing clusters**, which require strict air and water-quality standards to maintain Good Manufacturing Practice (GMP) certification. An incinerator producing airborne particulates, NO_x, acid gases, and PFAS residues introduces unacceptable contamination and reputational risks to these strategic employers.

The site's proximity to the **Cork Harbour Greenway**, a core public amenity protected under **Objectives TM 4-4 and EE 7-1** of the **Cork County Development Plan 2022–2028**, further demonstrates incompatibility. The development conflicts with local and regional policy objectives relating to tourism, active travel, health, and environmental amenity.

2. Adverse Impact on Property Values and Local Economy

European evidence shows that proximity to large incinerators reduces residential property values by **5–15%** due to visual impact, odour risk, and perceived health impacts. This directly affects communities in **Crosshaven, Carrigaline, Monkstown, Passage West, and Cobh**.

Such socioeconomic harm is inconsistent with the **proper planning and sustainable development** required under **Section 34(2)(a)** of the Planning and Development Act 2000 (as amended).

3. Non-Compliance With the EU Waste Framework Directive

Under **Directive 2008/98/EC (Waste Framework Directive), Article 4**, the waste hierarchy prioritises prevention, reuse, and recycling over incineration.

Authorising new incineration capacity contradicts:

- The **EU Circular Economy Action Plan (COM/2020/98)**,
- Ireland's **Waste Action Plan for a Circular Economy 2020–2025**, and
- Ireland's statutory requirement to increase recycling rates and reduce residual waste output.

This facility risks locking Ireland into a long-term, high-carbon, residual-waste cycle.

4. PFAS Emissions and Breach of the Industrial Emissions Directive

Peer-reviewed scientific evidence (BMJ 2024; ScienceDirect 2025) confirms that **PFAS compounds are not fully destroyed** in waste incinerators operating at 850–1100 °C. Incomplete combustion produces toxic ultrafine particulates capable of travelling long distances and redepositing in marine and residential areas.

This is incompatible with:

- **Article 14(1)(f) of the Industrial Emissions Directive 2010/75/EU**,
- The requirement to prevent significant pollution,
- BAT conclusions on emissions minimisation.

Given Cork Harbour's meteorological conditions, PFAS and other persistent pollutants pose a sustained threat to human and environmental health.

5. Thermal Inversions and Air Quality Risks

Cork Harbour is highly prone to **temperature inversions**, which trap pollutants at ground level. Met Éireann and EPA air-quality reports identify the area as a **sensitive airshed** with frequent stagnation episodes, particularly during winter and calm coastal conditions.

The application fails to adequately model:

- Inversion frequency,
- Night-time plume entrapment,
- Basin recirculation under sea breezes,
- Impacts on nearby communities (Crosshaven, Carrigaline, Monkstown, Cobh).

This is contrary to:

- **Directive 2008/50/EC (Ambient Air Quality Directive), Annex III, and**
 - EPA atmospheric-modelling guidance.
-

6. Environmental Impact Assessment (EIA) – Non-Compliance With Directive 2011/92/EU (Article 3)

Under **Directive 2011/92/EU, Article 3**, an Environmental Impact Assessment must fully assess **direct, indirect, secondary, cumulative, transboundary, short-term, medium-term, long-term, permanent, temporary, and climate-related effects**.

The EIA submitted with this application is **materially deficient** and does not comply with Article 3 for the following reasons:

6.1 Failure to Assess Cumulative Impacts

Cork Harbour contains:

- major pharmaceutical industries,
- port and shipping emissions,
- existing hazardous installations,
- dense residential settlements,
- multiple ongoing developments.

The EIA does **not** quantify cumulative pollutant load or interactive emissions.
This breaches **Article 3(a)**.

6.2 Incomplete Transboundary and Atmospheric Dispersion Analysis

The EIA fails to:

- Model inversion cycles,
- Model winter stagnation,
- Provide harbour-wide dispersion modelling,
- Assess cross-harbour deposition,
- Evaluate impacts on SPA/SAC marine zones.

This is non-compliant with **Article 3(b)**.

6.3 Absence of Climate and Lifecycle GHG Emissions Assessment

The EIA does **not** quantify lifecycle emissions, including:

- Combustion CO₂e,
- Transport emissions,
- Embodied emissions in construction and operation,
- Long-term residual emissions.

Waste-to-energy is proven to emit **more CO₂ per tonne** than recycling or reuse.
This omission breaches:

- **Article 3(c)**,
- **Ireland's Climate Action and Low Carbon Development Act 2021**,
- EU climate objectives under the **European Green Deal**.

Conclusion on EIA

Because the EIA fails to satisfy mandatory obligations under **Directive 2011/92/EU**, it cannot form the basis of a lawful planning decision.

7. Climate and Marine Ecosystem Impacts

The proposed facility is incompatible with Ireland's statutory climate obligations. Cork Harbour, an EU-designated **Special Protection Area (SPA)**, is at risk of pollutant deposition, PFAS contamination, heavy metal accumulation, and marine-ecosystem disruption.

This contravenes the **Water Framework Directive (2000/60/EC)** obligation to prevent deterioration of water bodies.

8. Formal Request for an Oral Hearing

Under **Section 134 of the Planning and Development Act 2000 (as amended)**, I hereby formally request that **An Bord Pleanála** convene an Oral Hearing for this SID application.

Given the:

- complexity of the environmental, technical, and legal issues,
- public-health implications,
- EIA deficiencies,
- cumulative industrial context,
- strategic regional effects,
- and strong public interest,

A public oral hearing is essential to ensure **transparency, expert scrutiny, and meaningful participation**, consistent with the **Aarhus Convention** and **Directive 2003/35/EC**.

Conclusion

For the reasons outlined above, I respectfully request that An Bord Pleanála:

1. **Refuse permission** for SID application **PA04.318802**, and
2. **Hold a formal Oral Hearing** due to the scale, complexity, and public-interest significance of the proposal.

This development is incompatible with EU law, Irish planning policy, environmental protection obligations, and the sustainable development of Cork Harbour communities.

Yours faithfully,

Paulina Adams

73 Drakes Point

Crosshaven, Co. Cork

Ireland

P43 Y573