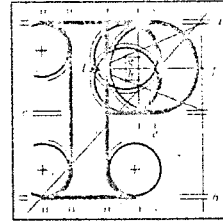


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Siead Quinlan  
Shell Cottage  
Fountainstown  
Co. Cork  
P43 PD80

**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](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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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: Sinead Quinlan DATE\_13/11/2025

**OBSERVER ADDRESS**

Shell Cottage,  
Fountainstown,  
Co Cork  
P43PD80

**OBSERVATION DETAILS**

- Despite the updated information submitted in August 2025, the overall site remains fundamentally undersized for the scale of development proposed. Its usable area continues to diminish — constrained by coastal erosion on one side and the M28 boundary on the other. The actual developable portion of the site is therefore inadequate to accommodate the intended project. (Derek Daly, 2017).
  - All three Bord Pleanála Inspectors previously determined that the Environmental Impact Statement (EIS), though technically compliant in form, was substantially deficient in content. As a result, the documentation provided to the Board was insufficient to support a proper environmental impact assessment or an informed decision on the application. (Daly, 2017). Even with revisions, the updated EIS largely repeats earlier conclusions and offers assertions without substantive evidence.
  - The 2025 submission does not include a fresh or comparative site-selection process. Instead, it relies primarily on the fact that Indaver owns the land, offering limited regard for the significant public and private investments that have reshaped the surrounding area since 2000. (Daly, 2017).
  - The proposed location lies within an identified flood-risk zone, as recorded in Table 4.1.17: *Specific Development Objectives for Ringaskiddy* and the OPW floodinfo.ie database (Flood Summary IDs 1364, 13082, 12085). Proposed mitigation measures involving elevated construction levels would only worsen the visual intrusion of an already large structure. In my professional opinion, this site is inherently unsuitable for any facility that handles or produces hazardous substances. (Oznur Yukel Finn, 2009). Although the wider Ringaskiddy area carries an industrial zoning designation, the specific Indaver site (RY-I-09) is earmarked for the expansion of third-level educational and enterprise-related development — particularly in marine education, research, and innovation. (RY-I-09, Table 4.1.17: *Specific Development Objectives for Ringaskiddy*, Cork County Development Plan 2022–2028). The August 2025 documentation dismisses this, but maintaining the current zoning is essential, given its direct connection to ongoing investment in the NMCI and MaREI campus areas and their growth potential. Consequently, the incinerator proposal directly conflicts with the County Development Plan and contradicts the area’s stated planning objectives.
-

### **Energy Recovery and Regulatory Non-Compliance**

“The proposed facility does not meet the definition of an energy-recovery plant; it would generate electricity only, without any system for heat export. Its  $R_1$  efficiency value of approximately 0.6 falls below the 0.65 threshold required for classification as recovery under the EU Waste Framework Directive (2008/98/EC).

- No heat network or Combined Heat and Power (CHP) feasibility study has been provided — contrary to Article 14 of the Energy Efficiency Directive and Section 7(3) of the Circular Economy Act 2022.
  - EPA 2023 data confirm that Ireland’s existing incineration capacity already meets national demand; additional capacity would breach the forthcoming National Waste Management Plan 2024–2030 and risk locking the country into long-term waste burning.
  - The proposal also conflicts with Ireland’s Climate Action Plan and *Waste Action Plan for a Circular Economy (2020–2025)*.”
- 

### **Climate and Carbon Compliance**

- Ireland has already exceeded its carbon budget; this project would embed new, ongoing fossil-based emissions each year.
  - No carbon-budget assessment, ETS modelling, or full lifecycle GHG analysis has been submitted, so compliance with the Climate Act cannot be demonstrated.
  - An electricity-only incinerator burning fossil plastics would emit more carbon than Ireland’s future power grid and displace cleaner renewable sources.
- 

### **$R_1$ Inefficiency and Misclassification**

- The submission incorrectly presents the plant as a “high-efficiency recovery” facility.
  - Its own figures show it falling below the legal  $R_1$  benchmark, meaning it qualifies as a disposal installation rather than recovery.
  - No heat-recovery infrastructure exists, and the site layout makes a heat network unfeasible, preventing structural compliance.
  - Dublin’s facility only meets  $R_1$  because of CHP; Meath’s narrowly achieves it and still harms carbon performance. Cork’s proposal cannot meet it at all.
- 

### **Waste Policy and Capacity Contradictions**

- Irish legislation now restricts the creation of new residual-waste capacity; policy direction is toward waste reduction, not expansion.
- The claimed “Southern Region capacity gap” relies on outdated planning frameworks that were abolished in 2022. Waste capacity is now managed nationally, and Ireland already satisfies projected requirements.
- Adding further disposal capacity runs counter to national circular-economy objectives.

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### **Tourism, Reputation, and Economic Impact**

- Cork Harbour — the world’s third-largest natural harbour — supports major tourism assets including Spike Island and the Cobh cruise terminal.
  - The introduction of a large industrial stack would permanently alter the harbour’s visual character. Tourism branding is highly sensitive and, once harmed, cannot be restored.
  - There is a significant reputational risk to prominent local industries reliant on perceptions of environmental quality, such as Midleton Distillery.
- 

### **Flood Risk and Site Unsuitability**

- Updated OPW guidance requires “safe, dry access” for critical infrastructure — a condition this site cannot meet.
  - The access road is subject to flooding, which could isolate the facility during storm or surge events.
  - Elevating ground levels does not address tidal inundation, a rising water table, or coastal surge dynamics.
  - The proposal fails the Sequential Approach and cannot ensure safe evacuation.
- 

### **Air Quality, Emission Dispersion, and Data Gaps**

- Cork Harbour experiences thermal inversions that can trap emissions near the ground, impeding safe dispersal.
  - The application omits assessment of PFAS, ultrafine particles, and other key pollutants.
  - Assertions of safety lack validity when such critical data are absent and local atmospheric behaviour is not considered.
- 

### **Credibility and Procedural Context**

- Three Bord Pleanála Inspectors have previously deemed Indaver’s Cork proposals incomplete or unsubstantiated.
  - The previous approval was overturned by the High Court due to inadequate supporting evidence.
  - The same shortcomings persist: missing climate data, unverifiable R<sub>1</sub> calculations, outdated flood mapping, and overstated policy consistency.
  - This pattern undermines confidence in the developer’s assurances.
-

### **Misleading Claims on Safety and Standards**

- The applicant asserts compliance with the highest environmental and safety standards, yet omits fundamental elements such as heat recovery, carbon assessment, PFAS and UFP analysis, updated flood data, and a valid R<sub>1</sub> demonstration.
  - A submission lacking these essentials cannot credibly claim best-practice performance.
- 

### **Rebuttal: “The Plant Will Treat Industrial Waste”**

This claim is incorrect. The proposed facility is a general municipal incinerator, not a specialist plant for industrial or hazardous waste. It cannot process the chemical or pharmaceutical waste streams generated in Cork, which are already managed through dedicated, high-specification treatment facilities. This project would not replace any existing infrastructure — it would merely add another municipal-scale burner incapable of handling the very materials it claims to address.

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- Laura Burke, now **Director General of the EPA**, joined the EPA directly from employment by Indaver as Project Manager for their Cork incinerator project.
- Indaver had a **3-year private pre-consultation** with An Bord Pleanála (2012–2015) before lodging their 2016 planning application — **the public was excluded**.
- Dr. Mary Kelly, **chairperson of An Bord Pleanála** when permission was granted to the 2016 planning application, **preselected 8 of 10 Board members** to decide the case, excluding two senior planners.
- Another Board member recused himself for a conflict of interest — **Dr. Kelly did not recuse herself**, despite her public support for incineration in her former role with **IBEC**.
- Then **Vice-Chair of the Board**, Conall Boland, **signed the Board’s final order**. Mr. Boland, formerly of **RPS Engineering** which backed incineration for decades, was subsequently deemed by the High Court to have likely been biased in his decision making.

### **Conclusion**

For the reasons outlined above, and as confirmed by all three Bord Pleanála Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017), the site is fundamentally unsuitable for this development. The proposal is also inconsistent with the Cork County Development Plan 2022–2028 zoning objectives.

I therefore respectfully request that this planning application be refused and that an **Oral Hearing** be convened to ensure continued full public participation in the process.

I enclose fee of €50

Kind Regards  
Sinead Quinlan