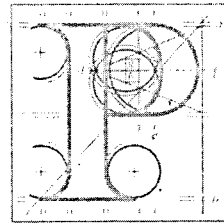


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Susan Lenihan
Eden Harbour
Camden Road
Crosshaven
Co. Cork
P43TX43

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

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

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: Susan Lenihan

OBSERVER ADDRESS: Eden Harbour, Camden Road, Crosshaven, Co. Cork, P43TX43.

DATE: 17/11/25

OBSERVATION DETAILS

I would like to include the following points:

(a) Climate and Carbon-Law Non-Compliance

- * Ireland is already over its carbon budget; this plant would lock in a large new stream of fossil emissions every year.
- * The developer has provided no carbon-budget analysis, no ETS modelling, and no lifecycle GHG accounting, so compliance with the Climate Act cannot be demonstrated.
- * Electricity-only incineration of fossil plastics is higher-carbon than the future Irish grid and would displace cleaner renewable generation.

(b) R₁ Inefficiency and Misclassification

- * The submission is built on the false premise that the plant is “high-efficiency recovery”.
- * Their own data place the plant below the legal R₁ threshold, which means it is disposal, not recovery.
- * There is no heat-recovery infrastructure, and the site cannot support a heat network, making compliance structurally impossible.
- * High efficiency in Dublin depends on CHP; Meath only narrowly clears the threshold and still damages Ireland’s carbon performance. Cork cannot meet it at all.

(c) Waste-Policy and Capacity Contradictions

- * Irish law now prohibits new residual-waste capacity; national policy requires waste reduction, not expansion.
- * The supposed “Southern Region capacity gap” is based on planning structures abolished in 2022; capacity is now national, and Ireland already meets projected needs.
- * Adding new disposal capacity directly contradicts circular-economy policy.

(d) Tourism, Brand, and Economic Reputational Damage

- * Cork Harbour is the third-largest natural harbour in the world, anchored by Spike Island tourism and Cobh’s cruise sector.
- * A single industrial stack permanently alters the harbour’s visual identity; tourism branding is fragile and once damaged cannot be restored.

* Reputational risk extends to internationally known local brands that depend on clean-water perception, including Midleton Distillery.

(e) Flood-Risk and Site Unsuitability

* OPW's updated rules require safe, dry access for critical infrastructure; this location cannot provide it.

* The access road floods, making the site isolatable during storms and surge events.

* Raising ground levels does not solve tidal inundation, a rising water table, or coastal surge behaviour.

* The site fails the Sequential Approach and cannot guarantee egress.

(f) Air Quality, Plume Behaviour, and Scientific Omissions

* Thermal inversions in Cork Harbour can trap emissions at ground level rather than allowing safe dispersion.

* The application omits PFAS assessment, ultrafine-particle analysis, and key pollutant monitoring.

* Claims of "safety" cannot stand when these pollutants are unmeasured and the dispersion environment is ignored.

(g) Credibility and Procedural History

* Three Inspectors have previously found Indaver's Cork claims incomplete or unproven.

* The last approval was quashed by the High Court because the evidence was not there.

* The same deficiencies reappear: missing climate analysis, unverifiable R₁, outdated flood data, and overstated policy claims.

* This track record undermines confidence in all assurances.

(h) False Claims on Safety and Standards

* The application claims the highest environmental and safety standards, yet excludes heat recovery, carbon modelling, PFAS/UFP analysis, updated flood data, and a compliant R₁.

* A proposal missing this many essentials cannot credibly claim high standards.

REBUTTAL: "This plant will deal with industrial waste"

It won't. This is a municipal-grade burner, not a specialist industrial or hazardous-waste facility. It cannot accept the chemical, pharmaceutical, or high-spec industrial streams produced in Cork. Those already go to dedicated treatment plants with far stricter controls. This project doesn't replace any of that infrastructure—it simply adds a general waste incinerator that cannot treat the very materials people think it will.

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), the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site and for the points made under (a) - (h) above.

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

Regards

Susan Lenihan