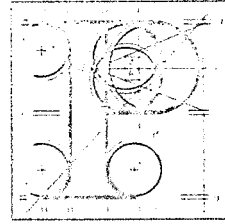


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

The Parents' Association
Scoil Bhríde Girls National School
Crosshaven
Co. Cork

Date: 20 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

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

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

FORMAL OBSERVATION AND OBJECTION

From: The Parents' Association, Scoil Bhríde Girls' National School, Crosshaven, Co. Cork

To: The Secretary, An Bord Pleanála

Re: Proposed Indaver Ringaskiddy "Resource Recovery Centre" (Incinerator), Ringaskiddy, Co. Cork by Indaver NV t/a Indaver Ireland

Case Reference: [PA04.318802]

Date: [17/11/2025]

1. Introduction

We, the Parents' Association of Scoil Bhríde GNS, Crosshaven, submit this formal objection to the proposed Indaver incinerator at Ringaskiddy.

Our school lies within the Cork Harbour environment that would be directly affected by this proposal. As parents and guardians of young children, we are deeply concerned about the health, environmental, educational and community consequences of siting a hazardous-waste incinerator so close to our homes and schools.

We therefore urge An Bord Pleanála to refuse permission in its entirety.

This proposal contravenes multiple elements of Irish and EU law and is fundamentally inconsistent with the principles of proper planning and sustainable development.

2. Observation Details (Date:11/11/2025)

Notwithstanding the information submitted in August 2025, the site remains fundamentally too small for the scale of development proposed and is reducing further through coastal erosion on one side and by the M28 boundary on the other.

As noted by Inspector Derek Daly (2017), "*the actual usable area of the site is inadequate in relation to the scale of development proposed.*"

All three Bord Pleanála Inspectors who previously examined this site—Jones (2004), Yukel Finn (2009) and Daly (2017)—concluded that the site is inherently unsuitable for an incinerator:

- Daly (2017): The Environmental Impact Statement was "deficient in substance even where legally adequate in form"; the material was "insufficient to enable the Board to carry out an environmental impact assessment in an appropriate manner."

- Yukel Finn (2009): “It is my considered opinion that the site is inherently unsuitable for location of a use which processes and generates hazardous compounds.”
- Jones (2004): Found similar deficiencies in siting, flood risk and visual impact.

Despite revisions, the 2025 EIS merely repeats earlier assertions without new evidence or any de novo site-selection process. The justification rests solely on Indaver’s ownership, ignoring the major public and private investments—notably the NMCI and MaREI Campuses—that have transformed the area since 2000.

The site lies within a known flood-risk area, identified in Table 4.1.17 (Specific Development Objectives for Ringaskiddy) of the Cork County Development Plan 2022–2028 and confirmed on OPW floodinfo.ie (Flood Summary IDs 1364, 13082 and 12085). Proposed mitigation by raising ground levels would worsen both flood displacement and visual intrusion, breaching the 2009 Flood-Risk Guidelines and the National Adaptation Framework 2024.

Furthermore, the zoning for RY-I-09 under the County Development Plan designates this land for extension of the Third-Level Educational Campus and enterprise-related development, including marine education, research and innovation.

Indaver’s August 2025 submission dismisses this zoning, but it is of critical importance. The proposed incinerator is in direct contravention of the Development Plan and would undermine Cork Harbour’s educational and clean-technology investments.

We therefore submit that the site is inherently unsuitable, as confirmed by all three Inspectors, and that granting permission would contravene the Cork County Development Plan 2022–2028.

3. Flood and Coastal Safety

- The site lies within Flood Zones A and B—areas of high probability of tidal and coastal flooding—and both site and access road are exposed to storm surge and sea-level-rise risk.
- Engineering “solutions” such as ground-raising do not remove risk; groundwater rises with the tide.
- Flood modelling relies on 2015 data, ignoring 2024 climate projections required under the National Adaptation Framework 2024.

This proposal therefore fails the Justification Test and is contrary to national climate-resilience policy.

4. Waste, Energy and Climate Policy

- The plant does not qualify as energy recovery: it produces electricity only, with no heat export system. Its R_1 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 and Power (CBA) study exists—breaching Article 14 of the Energy Efficiency Directive and s. 7(3) Circular Economy Act 2022.
 - EPA 2023 data confirm that Ireland’s existing facilities already meet national incineration 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).
-

5. Environmental and Health Protection – Risk to Children’s Health

The health of children—especially those attending nearby schools and living in Cork Harbour communities—must be at the centre of environmental decision-making. Under Article 24 of the UN Convention on the Rights of the Child, to which Ireland is a party, children have the right to a safe and healthy environment.

(a) Scientific evidence on children’s vulnerability

- World Health Organization (WHO, 2021) and European Environment Agency (EEA, 2022) research shows that fine particulate matter ($PM_{2.5}$ and ultrafine particles) penetrates deep into the lungs and bloodstream of children, impairing lung development, immune function and neurological health.
- Dioxins, heavy metals, nitrogen oxides and PFAS (“forever chemicals”)—all emitted from waste incineration—bioaccumulate in the food chain and are linked to endocrine disruption, reduced fertility and developmental delays.
- Children breathe more air per kilogram of body weight than adults and spend more time outdoors during daylight, increasing exposure risk.

(b) Local exposure and dispersion

The proposed 75-metre stack would disperse pollutants widely across Cork Harbour. Schools, playgrounds and homes in Crosshaven, Monkstown, Carrigaline and Cobh lie within the potential deposition zone identified by Indaver’s own modelling. The harbour’s temperature inversions and coastal wind patterns frequently trap air pollutants at ground level, exacerbating health risks.

(c) Deficiencies in the EIS health assessment

The submitted EIS provides no independent human-health risk assessment and relies on generic emission limits rather than actual cumulative exposure data. It omits assessment of sensitive receptors, such as children, pregnant women and older adults, contrary to the EIA Directive (2014/52/EU).

No baseline health data or long-term monitoring framework has been proposed. This failure makes the application inadequate and non-compliant under the EU Environmental Impact Assessment regime.

(d) Long-term community consequences

International evidence (e.g., Public Health England, 2019; French National Institute for Public Health, 2020) associates residential proximity to incinerators with higher rates of respiratory illness, low birth weight and certain cancers. Whether these are causal or correlative, they underline the scientific uncertainty that requires precaution.

The precautionary principle, enshrined in Article 191 of the Treaty on the Functioning of the EU, mandates that where there is a plausible risk of serious or irreversible harm and scientific uncertainty remains, regulators must err on the side of prevention.

Approving this facility would therefore violate Ireland's obligations to protect child health under both international and EU law.

6. Landscape and Visual Impact

A 75 m stack, the tallest structure in the Lower Harbour, would dominate views from Cobh, Crosshaven, Spike Island and Carrigaline.

Night lighting would make it visible for kilometres, contravening the Cork County Development Plan protections for scenic coastal landscapes and constituting a clear ground for refusal on visual-dominance and amenity grounds.

7. Local Amenity and Community Impact

- Continuous 24-hour operation, industrial noise, HGV traffic and odour would degrade residential amenity and harm tourism.
- The facility would employ fewer than 50 people post-construction, offering negligible benefit while deterring research, tourism and clean-tech investment envisioned for the harbour.

8. Trust, Planning History and Legal Context

- Previous refusals (2003, 2011) by An Bord Pleanála cited flood risk, visual impact and sensitive proximity—all still applicable.
 - The High Court in *CHASE v ABP [2021] IEHC 629* quashed the prior permission for procedural bias and identity errors, affirming that legality and impartiality are prerequisites for any approval.
 - Current law—the Circular Economy Act 2022, EU EIA Directive and Habitats Directive—requires refusal where policy conflict, flood risk or inadequate assessment persists.
-

9. Educational and Societal Considerations

Cork Harbour has evolved into a hub of education, research and sustainable marine enterprise. Permitting an incinerator beside these institutions would directly contradict the County Development Plan's vision and the environmental values our children are taught.

This project teaches the wrong lesson: that short-term industrial convenience outweighs children's health, science education and sustainability. As parents, we cannot accept that.

10. Conclusion and Request for Oral Hearing

For all of the above reasons, the Parents' Association of Scoil Bhríde GNS respectfully requests that An Bord Pleanála REFUSE permission for the Indaver Ringaskiddy Incinerator in full.

Grounds for refusal:

1. Site inherently unsuitable (Jones 2004; Yukel Finn 2009; Daly 2017).
2. Contravention of the Cork County Development Plan 2022–2028, zoning RY-I-09.
3. Conflict with national flood-risk, waste, energy and climate policy.
4. Deficient and outdated Environmental Impact Statement.
5. Unacceptable public-health risk; especially to children.
6. Adverse visual, amenity and socio-economic effects on Cork Harbour communities.

We further request an oral hearing to ensure continued full public participation in this application.

Thank you for your consideration.

Yours sincerely,

Parents' Association

Scoil Bhríde Girls' National School, Crosshaven, Co. Cork