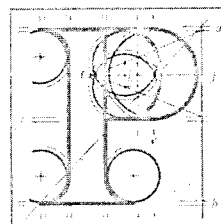


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Yvonne Hurley
Iona
Graball Hill
Crosshaven

P43EW86

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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OBSERVER NAME:

Yvonne Hurley

OBSERVER ADDRESS:

Iona, Graball Hill, Crosshaven, P43EW86

TO:

An Coimisiún 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

The €50 observation fee will be paid online during the submission process.

1. Site Suitability, Scale, and Established Findings

Notwithstanding the information submitted in August 2025, the site remains fundamentally too small for a development of this scale. The usable area continues to diminish due to coastal erosion on one side and the reduced boundary following the M28 scheme on the other. Inspector Derek Daly (2017) clearly identified this issue, which remains unresolved.

All three previous Inspectors concluded that the Environmental Impact Statement was deficient in substance. The updated material submitted in 2025 continues to recycle previous assertions and does not remedy the evidential gaps identified by Jones (2004), Yukel Finn (2009), or Daly (2017). Accordingly, the information before the Board remains insufficient for a lawful and fully informed environmental impact assessment.

There has been no genuine site-selection exercise in the new submission. Instead, the applicant relies on land ownership, disregarding extensive public and private investment in the NMCI and MaREI campus, which has significantly transformed the strategic function of the Ringaskiddy peninsula.

2. Climate and Carbon-Law Non-Compliance

The proposed development is incompatible with Ireland's statutory climate obligations. Ireland is already above its national carbon budget, and the plant would introduce a large and continuous stream of fossil-fuel emissions. No carbon-budget analysis, ETS modelling, or lifecycle GHG accounting has been provided. As such, compliance with the Climate Action and Low Carbon Development Act cannot be demonstrated.

Electricity-only incineration of fossil plastics is higher-carbon than Ireland's future grid, displacing cleaner renewable energy rather than complementing it.

3. R1 Efficiency and Legal Misclassification

The application incorrectly asserts that the plant will operate as high-efficiency recovery. The developer's own figures place it below the legal R1 threshold, rendering it disposal rather than recovery. The location has no viable heat-recovery infrastructure, and the site cannot support district heating, making compliance structurally impossible.

4. Waste-Policy and Capacity Contradictions

Irish law now prohibits new residual-waste capacity. Claims of a "Southern Region capacity gap" rely on outdated regional structures abolished in 2022. Waste capacity is now assessed nationally, and Ireland already meets projected residual-waste requirements. Adding new disposal capacity contradicts circular-economy policy and locks in long-term emissions.

5. Tourism, Branding, and Economic Reputational Damage

Cork Harbour is the third-largest natural harbour in the world and a major tourism asset. A large industrial incinerator stack would permanently alter its visual identity, placing at risk the branding of Spike Island, Cobh's cruise sector, and environmentally dependent local brands such as Midleton Distillery.

6. Flood Risk and Site Unsuitability

The site lies in a known flood-risk zone, as identified in the Cork County Development Plan and OPW floodinfo.ie. The access road floods during storms, preventing compliance with OPW requirements for safe, dry access for critical infrastructure. Raising site levels does not address risks from tidal inundation or a rising water table. The site fails the Sequential Approach.

7. Air Quality, Plume Behaviour, and Scientific Omissions

Thermal inversions in Cork Harbour can trap emissions near ground level. The application omits PFAS analysis, ultrafine-particle modelling, and several key pollutants. Claims of safety cannot be sustained where pollutant behaviour is unassessed and the dispersion environment is disregarded.

8. Credibility, Procedural History, and Recurrence of Deficiencies

Indaver has repeatedly failed to provide evidence sufficient for approval. The High Court quashed the 2018 permission due to inadequate supporting evidence. The same deficiencies persist today: missing climate analysis, unverifiable R1 performance, outdated flood data, and overstated policy claims.

9. False Claims Regarding Standards

The application claims the highest environmental and safety standards yet lacks heat recovery, carbon modelling, PFAS/UFP analysis, updated flood-risk data, and a compliant R1 calculation. A proposal missing essential components cannot credibly claim high standards.

10. Zoning Conflicts

While parts of Ringaskiddy are zoned industrial, the specific Indaver site (RY-I-09) is zoned for third-level educational expansion and marine-related research and enterprise. This zoning reflects major ongoing investment in the NMCI and MaREI campus. The proposed development directly contravenes the Cork County Development Plan 2022–28.

Conclusion and Request

For all the reasons above, and consistent with the findings of Inspectors Jones (2004), Yukel Finn (2009), and Daly (2017), the site is inherently unsuitable and the proposal conflicts with the Cork County Development Plan. I respectfully request that An Coimisiún Pleanála refuse this application.

I also request an Oral Hearing to ensure continued full public participation.

DATE: 17/11/2025