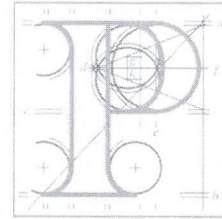


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Aisling O'Callaghan & Others
9 The Copperfields
Rushbrooke
Cobh
Co. Cork
P24FY72

Date: 30 December 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.

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	1800 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

From: aisling o callaghan <aislingmoc@gmail.com>
Sent: Sunday 16 November 2025 22:21
To: LAPS <laps@pleanala.ie>; k.gettigan@pleanala.ie
Subject: Case reference: PA04.318802, Ringaskiddy

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

To whom it may concern,

This is an Observation opposed to the above planning. We already made an observation in 2016. No.131 Aisling O' Callaghan and Bob & Helen Humphries. No cost. Please find the attached document, supporting this submission.

Regards

Aisling O Callaghan

Bob & Helen Humphries



Aisling O'Callaghan & Others

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: Aisling O' Callaghan, Helen & Bob Humphries Date 16/11/2025

OBSERVER ADDRESS: 9 The Copperfields, Rushbrooke, Cobh, Co. Cork P24fy72

OBSERVATION DETAILS

To whom it may concern,

We the above are strongly opposed to the proposed Incinerator. We look to the harbour as part of our daily lives. We enjoy the amenity for leisure for ourselves and our families. Especially since Covid, there is much more appreciation of our harbour and the benefits of swimming, Sailing and so many more activities, in and around the harbour. We in Cobh will be in a direct line from the Site. So much has been developed as a community to embrace our lives in the harbour. It is amazing to see all the amazing amenities that have been developed along with Tourism.

We are also deeply concerned that this is the wrong location on a very poor site, bang in the middle of a very heavily populated community. More detail later in submission.

Bob & Helen and I (Aisling 60 years) live down wind in Cobh, from the site. We have lived and played in the harbour for 85 years.

From my (Aisling) classroom window, I can see the proposed site. Our school seats 65 metres above sea level. The chimney stack is 70 metres. Our 3 homes are in a direct line. Bob Helen, and I never want to worry about opening that classroom/office/house window in warm weather. We want to breathe, clean uncontaminated air. May we ask would you want your sons or daughters, grandchildren attending this school or living here.

Cobh has a history of Cancer in the area. Every family in Cobh has been affected. In fact, when a student from Colaiste Muire, Cobh spoke at the Second oral hearing in 2009 he spoke of the fact that there is a 43% higher rate of cancer in Cobh. Whether 43% is still accurate or not, it is probably much higher. This was mentioned again by the same school in 2016. We know from experience as a school community that cancer is rampant in Cobh.

We know that there are varying causes of cancer, but we are sure you will agree that these figures are too high. What is causing all of these tragic deaths within our community? What is to blame? This cannot be a coincidence! What happened in the past to cause this??? Can we now prevent what can happen in the future?

Cobh has already a far higher than nationally or internationally, percentage of population affected by Cancer and respiratory disease. Yes, we strongly feel this is due to the legacy of Irish Steel (Ispat).

But also, this harbour is a worldwide centre of excellence for the pharmaceutical industry. There is a feeling that there is a poor monitoring of the air in the harbour. Many of the EPA air monitors are out of action. So how can we have a benchmark to compare or evaluate the present air quality with the future? The population in the harbour are not being minded by the EPA.

Whatever the cause of these high cancer rates, it must be investigated before any further risk is introduced. We appeal to those people in a decision-making position to call for a base line health study of the population in the harbour be conducted immediately.

The cruise liners are not allowed to Burn their incinerators at port. Yet, Indaver will operate 24/7 365 days a year!!

The high court has already ruled that the 2018 permission was tainted by objective bias. Reusing the same 2018 evidence does not satisfy the legal duty to determine applications under current law.

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. Also, Is the port side location the incentive to eventually import international waste to feed the 240,000-ton incinerator?

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.

* Huge energy is needed to burn at high heats of 800 degrees Celsius. This is not energy neutral. Incineration must be Removed from National Plan. EU are in deep discussion in removing Incineration by 2030. Some countries are closing Incinerators as the hugely contribute to Climate Change.

* Why are the government privatising waste management. Instead, they are farming this out to a profit-making private company. The cost of waste per tonne to Incineration is a fraction of the cost per tonne to landfill. No incentive is being made to recycle more fully. We are decades behind our EU counterparts.

* 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.

R₁ Inefficiency and Misclassification

* The submission is built on the false premise that the plant is “high-efficiency recovery”.

* Indaver's 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.

* The design of the 2016 is electricity-only incinerator. The verified efficiency (R=0.597) fails the 0.65 Eu Recovery threshold.

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.

*(As above) Why are the government privatising waste management. Instead, they are farming this out to a profit-making private company. The cost of waste per tonne to Incineration is a fraction of the cost per tonne to landfill. No incentive is being made to recycle more fully. We are decades behind our EU counterparts.

* Adding new disposal capacity directly contradicts circular-economy policy.

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.

* Recently Bord Failte launched an amazing plan for the Harbour area. Surely you can’t have an Incinerator along with this plan. The harbour has seen huge changes over the last 25 years – Spike Island, Haulbowline Park, Camden, Fota Wildlife new Education centres and 125 Cruise liners. All these organisations, to name just a few realise on our beautiful harbour. The knock on and potential from this, in the greater Cork harbour is enormous. Why spoil the great progress and future planned growth? Why invest if this is going to be overshadowed by a huge chimney pumping out constant plume?



Failte Ireland -5
year plan (2).pdf

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

* It is very important to point out that; this site is zoned for Education. The Proposed Incinerator would be alongside the Internationally renowned Maritime College and the MaREI Centre, Environmental Research centre, UCC.

* The Proposed Incinerator is right next to the Glacial sandy beach of Luc, which has become increasingly popular as the nearest and most accessible beach to Cork City.

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.*There is huge coastal erosion at the site which is very strong. This can be seen in the disintegration and decreasing size of the site over the past 25 years.

Air Quality, Plume Behaviour, and Scientific Omissions

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

The **thermal inversion** in the harbour and its surrounding topography, pushes air to stay in the harbour and not disperse a huge amount of the time. The plume will spread a 65 km radius. The plume is majorly unsightly. Plume, depending on the weather conditions (e.g. Fog stuck in Harbour for the last 3 weeks), toxic particles and heat will be maintained in the harbour. This will strongly affect air quality and respiratory problems. This alone should rule out the location of an incinerator at Ringaskiddy.

* 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.

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.



Fact Sheet
Incinerator 2025 (1)

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.

* It is paramount that the defence forces are at risk on the Haulbowline Island. There is no evacuation for the defence force workers. It would also be alongside the Maritime College and the MaREI Centre, Environmental Research centre, UCC.

* For those burying their loved ones at the Crematorium on Rocky Island they would be trapped if an incident happened.

Please We are on our knees pleading with the Bord to refuse planning for this proposed 240,000 tonne Indaver Waste Incinerator.

Regards

Aisling O Callaghan & Bob & Helen Humphries

From: aisling o callaghan <aislingmoc@gmail.com>
Sent: Monday 17 November 2025 16:46
To: LAPS <laps@pleanala.ie>; Kevin McGettigan <k.mcgettigan@pleanala.ie>
Subject: PA04.3188802 Ringaskiddy

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Both submissions are resubmitted from the Objection from 2016.
We object still to the poor location. please find below No.130 and 131 from
the observation list of 2016.

I did not get acknowledgement from 24 hours ago.

Concerned

Aisling and Bob And Helen Humphries

Sally Donegan & Aisling O'Callaghan
0879745945

[Quality assurance](#)

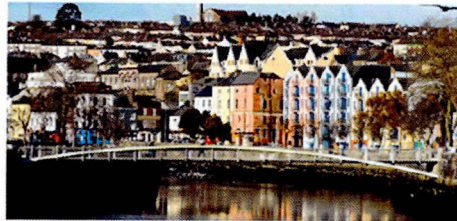
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Fáilte Ireland launches new 5-year tourism development plan for Cork City, Harbour and East Cork



Fáilte Ireland has today [Monday, 4th November 2024] launched a new five-year plan that will help drive and sustain tourism in Cork City, Harbour and East Cork at Blackrock Castle Observatory, Co. Cork.

The Cork City, Harbour and East Cork Destination and Experience Development Plan (DEDP) aims to create a sustainable tourism destination by extending the tourism season and spreading business across all parts of the region over the next five years.

Key stakeholders in the area were consulted and contributed to the plan including Cork City Council, Cork County Council, Local Tourism Industry, Port of Cork, Cork Airport, Chambers of Commerce, Leader, Local Economic Groups as well as local Communities.

The development of the five-year plan provides a shared vision and clear direction towards improved development, strengthening the promotion of the area's unique features by growing the destination's market share through the delivery of priority projects and hero experiences that seek to maximize the key strengths of the area.

The plan provides the strategic framework to prioritise tourism development projects that will attract more visitors to the region and encourage them to stay longer. This includes the development of a visitor attraction of scale for Cork City and enhancing the harbour's accessibility to create a sustainable visitor amenity that connects communities to the City. It also suggests leveraging the county's rich food provenance to position it as a world-class gastronomy destination.

Speaking at the launch, CEO of Fáilte Ireland, Paul Kelly said:

"This five-year Destination and Experience Development Plan captures the unique themes that are central to Cork City, Harbour and East Cork and features key priority projects which will transform the tourism offering across the region. The development of a new Attraction of Scale, creating a World Class Harbour Experience as well as positioning the Cork Food Story as an inherent part of the visitor offering will strengthen Cork's position as an internationally compelling destination in Ireland's Ancient East.

"Fáilte Ireland is committed to and focused on the sustainable development of tourism across Ireland which is an important economic driver and source of employment. We are confident that this DEDP has the potential to significantly increase Cork City, Harbour and East Cork's domestic and international appeal, and grow the visitor economy to create sustainable, high-quality jobs in the sector that will serve to support and strengthen local communities."

Cork City, Harbour and East Cork DEDP Co Chairs Aileen Murray and Derry Cronin said:

"We look forward to the roll out of this ambitious 5-year plan for Cork City,

No Incinerator in Cork Harbour

An Urgent Appeal from CHASE and Local Communities

Background

Indaver is a waste management company of Belgian origin, now with centres of operation in many countries across Europe.

Indaver purchased a site in Ringaskiddy from Irish Ispat (who took over from Irish Steel) in 2000.

In 2001, Indaver lodged a planning application to build two incinerators. An Bord Pleanála's Senior Planning Inspector recommended refusal. The Board overturned his recommendation.

In 2008, Indaver lodged a planning application to build one incinerator. An Bord Pleanála's Senior Planning Inspector recommended refusal. The Board agreed with her recommendation. Indaver sought a Judicial Review of the Board's decision, retreating from the High Court a year later announcing their intention to lodge a third planning application.

In 2016, Indaver lodged a planning application to build one incinerator. Again, An Bord Pleanála's Senior Planning Inspector recommended refusal. The Board overturned his recommendation. CHASE sought a Judicial Review of the Board's decision. In 2021, the High Court adjudicated the Board's decision to be affected by 'objective bias'. The planning decision was 'quashed' and the application was sent back to the Board for reconsideration.

In June 2024, the Board invited Indaver to update all its planning application documentation. In August 2025, Indaver submitted extensive new documentation to the Board. Public consultation was reopened for a period of six weeks. It will end on 17th November.



Is the Ringaskiddy Site Suitable?

- The application **contradicts national and local government policy** from maritime, educational, and tourism perspectives.
 - **Cork Harbour**, once polluted by Irish Steel, has undergone a **€64 million clean-up**, transforming into a place of beauty and economic value — attracting **over 100 cruise liners annually**, and with **Spike Island** and **Fort Camden** redeveloped for tourism.
 - The State has made a **multi-million-euro commitment** to developing the harbour through the **National Maritime College** and **Beaufort Institute**.
 - Three **An Bord Pleanála inspectors** (in 2004, 2011 and 2017) **recommended refusal**, citing site overdevelopment, site unsuitability, and serious incompatibility with educational, amenity and heritage investment in the local Cork Harbour area.
 - **30,000 people objected** to Indaver's first application.
 - **Cork County Council** rejected the first application and **rezoned the Indaver site from industrial to educational**.
 - **Road access is inadequate** — an extra **150 truck movements per day** would strain infrastructure.
 - The site poses **public safety risks** in the event of an accident, with a **single access road** serving Haulbowline Island and **UCC's National Maritime College** and **Beaufort Institute**.
 - In the event of an accident at the incinerator, **15,000 residents** on Cobh and Great Island depend on a single hump-backed bridge for access.
 - The **Irish Defence Forces** are also stationed on a cul de sac past the proposed site.
 - **Haulbowline Island Park** at a cost of 25 million euro opened in 2021
 - **Meaningful public consultation** was not carried out, in breach of international guidelines.
-

Health Concerns

- **Incineration doesn't eliminate waste** — it transforms it into gases, fine dust and ash, all containing harmful pollutants.
- Emissions can spread within a **40-mile radius**, affecting **Crosshaven, Carrigaline, and Cork City**.
- Health effects (per **WHO** and **IARC**) include **cancer, heart defects, respiratory illness, immune and hormonal disruption, birth defects, and learning difficulties**.
- The **British Society for Ecological Medicine (2005)** concluded that no new incinerators should be built due to the health risks of fine particulates.
- **Children and infants** are especially vulnerable.
- **No Health Impact Assessment** was conducted or required by An Bord Pleanála.

- **No state body** monitors health impacts near incinerators.
 - **Dioxins** from emissions contaminate soil and water, entering the **food chain** — threatening Ireland's **€7 billion agri-food industry**. **Belgium's 1999 dioxin crisis** cost €465 million.
 - **Irregularities** in Indaver's dioxin figures were discovered during the 2016 oral hearing.
 - **Accidents:**
 - 2017: 11 workers hospitalised after an incident at Dublin's Poolbeg incinerator.
 - 2016 and 2018: Explosion at Indaver's plant in Antwerp, Belgium
 - 2025: Fire at Indaver's plant in Doel, Belgium.
 - Other recent incinerator fires: UK (Bolton, 2017); Germany (Wuppertal, 2019); Netherlands (Rotterdam, 2023); France (Montbéliard, 2025); Germany (Mainz, 2025).
-

Does Ireland Need Another Incinerator?

- The **European Commission (2017)** advised a "*moratorium on new incinerators*" in favour of **waste prevention, reuse, and recycling**.
 - **Ireland's national policy on waste** (*National Waste Management Plan for a Circular Economy* and the *National Hazardous Waste Management Plan*) prioritises **waste prevention**, reuse and recycling.
 - Incinerators must be kept fed with waste - this is **bad news** for waste prevention, **bad news** for recycling and may lead to **importing foreign waste**.
 - Incineration creates **toxic ash** (about one-third the original waste volume).
-

What Are the Alternatives?

- The EPA (2023) warns that waste generation is increasing, Ireland is not on track to meet EU municipal waste recycling targets, the municipal recycling rate has remained stagnant for 10+ years and Ireland risks over-relying on incineration and waste export.
- The EU encourages **cross-border cooperation** in waste management while countries focus on **recycling, reuse, and product redesign** towards achieving a circular economy.
- Countries like **New Zealand, Canberra, and Nova Scotia** have **rejected incineration**, opting for **waste separation, recycling, and biological treatment**, creating **10 times more jobs** than incineration.
- Even **Denmark**, once a leader in incineration, is now **phasing it out** in favour of a shift towards a circular economy and increased recycling.

Did You Know?

- 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.
-

A Message from Local #CrossWomen

This flyer was created by a group of **local women from Crosshaven** who believe that neither a **dysfunctional planning system** nor a **dysfunctional waste management system** should endanger the **health and well-being** of communities within a **40-mile radius of Ringaskiddy**.

If we stay silent, **it is our children and grandchildren who will suffer**. Cork is proud to be the **Rebel County**, and we remember those who fought in the 1970s against the disposal of asbestos in Fort Camden and Ringaskiddy.

Together, the **people of Cork Harbour can stop this development**.

Expect to see more from us soon in **Crosshaven, Carrigaline, Monkstown, Cobh, Ringaskidy, East Cork** and beyond.

Support CHASE **Cork Harbour Alliance For A Safe Environment**

www.chasecorkharbour.com

Get Informed Get On Board With Us

crosswomencrosshaven@gmail.com
