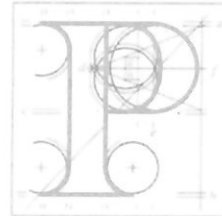


**Our Case Number:** ABP-318802-24



An  
Coimisiún  
Pleanála

Amy and Aidan Bermingham  
22 Ardross Court  
Crosshaven  
Co. Cork  
P43DF34

**Date:** 10 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*

Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
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Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
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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

Anny and Aedan Bernyham

DATE

11/11/2025

OBSERVER ADDRESS

22 Ard Cross Court, Crosshaven  
Co. Cork, P43DF34

### OBSERVATION DETAILS

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) and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site.

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

I enclose fee of €50

I have already submitted in 2016 so have paid prior fee

Additional pages attached (no of)

## Strong Objection & Observations — Incinerator proposal at Cork Harbour

For the health and safety of our children, grandchildren and the future of Cork Harbour.

### Executive summary

We strongly oppose the proposed large-scale waste-to-energy/incinerator at Cork Harbour. The harbour is a protected, internationally important estuary and wildlife site and home to communities whose health would be put at risk by routine and accidental releases, increased heavy-vehicle movements and cumulative pollution. There are safer, cheaper, and climate-compatible alternatives — driven by the waste-hierarchy and circular-economy measures already available to Ireland — that must be pursued instead of building a high-capacity incinerator.

### Key concerns (evidence-based)

#### 1. Serious and persistent public-health risks to children and local communities

Modern incinerators still produce hazardous pollutants (fine particulate matter, metals, nitrogen oxides, acid gases, persistent organic pollutants such as dioxins and furans, plus emerging contaminants like PFAS). These are linked in peer-reviewed literature to increased respiratory disease, adverse birth outcomes, developmental impacts in children and some cancers. Dioxins are highly persistent, bioaccumulative and toxic; public health authorities warn they affect multiple organs and development. The precautionary principle must apply where children's health is at stake.

#### 2. Cork Harbour's special status and ecological sensitivity

Cork Harbour is a Ramsar site/Natura area supporting tens of thousands of wintering and breeding waterbirds and critical intertidal habitats. Pollutants (air and waterborne) and accidental discharges would risk foodchains, sediment quality and biodiversity that are legally and morally imperative to protect. The harbour's ecological importance amplifies the unacceptable nature of siting an incinerator here.

#### 3. Cumulative impacts and limits of "modern" mitigation

Proponents often rely on stack height and emissions controls. Science and independent reviews show that even modern facilities can cause localised increases in fine particles and persistent toxins — and modelling rarely

**captures all real-world cumulative impacts (other industries, shipping, traffic and background pollution). Independent, cumulative health and environmental impact assessments are essential; industry models and developer-funded assessments are insufficient on their own.**

**4. Heavy traffic, road safety and local air pollution**

A facility sized for hundreds of thousands of tonnes per year will generate large numbers of heavy goods vehicle (HGV) trips during construction and operation. This worsens road safety, local NOx and PM pollution, noise, and emissions exposure along vehicle routes — disproportionately affecting nearby communities, schools and playgrounds. Traffic modelling must account for real route choices, ferry or port transfers, queuing, and peak-hour impacts — not only theoretical averages.

**5. Questionable long-term waste strategy and lock-in**

Large incinerators create a demand for feedstock for decades, which can lock the region into burning resources that could otherwise be prevented, reused, or recycled. Ireland's National Waste Management Plan and circular-economy policies aim to reduce residual waste and expand recycling and organics treatment; building new incineration capacity undermines those national objectives and fiscal prudence.

**6. The project under active local and planning scrutiny**

This proposal has been re-activated and remains controversial locally; residents and community groups have been opposing previous iterations of this application. The scale quoted in recent planning documentation is ~240,000 tonnes per year — a very large regional facility with long planning and operational horizons. Any decision must fully reflect local opposition, legal precedent and updated independent science.

**Safer, proven alternatives (practical and scalable)**

A publicly accountable plan must prioritise the waste hierarchy: prevent → reduce → reuse → recycle → recover (non-combustion) → disposal (last resort).

**1. Ambitious waste prevention & producer responsibility (EPR)**

**2. Scaling recycling & high-quality materials recovery**

**3. Biological treatment for organics: Anaerobic digestion (AD) & composting**

**4. Mechanical-biological treatment (MBT) for residuals**

**5. Hazardous waste segregation & better wastewater/sludge management**

**6. Local circular economy, repair hubs, and job creation**

### Legal, moral and intergenerational arguments

- Legal: Planning law and EU nature directives require that developments not adversely affect protected sites.
- Moral/ethical: We have an obligation to apply the precautionary principle where children's health and irreplaceable natural habitats are at risk.
- Economic & climate: Incinerators can become stranded assets as circular policies and recycling improve.

Closing — for our children and grandchildren

This is not just a local planning decision: it is a choice about what kind of legacy we leave. Protecting Cork Harbour, the health of our families, and future generations means choosing prevention, reduction, recycling and biological treatment, not a high-capacity incinerator that risks long-term harm. We owe our children cleaner air, safer roads, thriving wildlife and a resilient, circular economy — and we must demand no less.