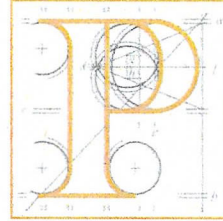


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

Ballymore Codh Athletic Club  
C/o Stephen Pender  
5 Cedar Walk  
Cluain Ard  
Cobh  
Co. Cork  
P24CY81

**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](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  
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	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

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

# Formal Objection to the Proposed Waste Incinerator in Ringaskiddy, County Cork

Submitted on behalf of Ballymore Cobh Athletic Club, Cobh, County Cork

Contact: [ballmorecobhac@gmail.com](mailto:ballmorecobhac@gmail.com)

Postal Address: c/o

Stephen Pender

5 Cedar Walk, Cluain Ard, Cobh P24CY81

To: The Planning Authority / An Coimisiún Pleanála

Date: 14/11/2025

Re: Objection to Planning Application ABP-318802-24 – Proposed Waste-to-Energy Facility, Ringaskiddy, County Cork

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## Introduction and Statement of Interest

We, the undersigned, submit this formal objection to the proposed development of a waste incinerator (waste-to-energy facility) at Ringaskiddy, County Cork, on behalf of Ballymore Cobh Athletic Club, a community-based running club based in Cobh. Our club comprises over 250 members of all ages and abilities, who regularly use the local environment for outdoor exercise, training, and community events. We are deeply invested in the health, wellbeing, and environmental quality of our neighbourhood and the wider Cork Harbour area.

Our objection is grounded in significant concerns regarding the environmental impact, public health risks, air quality degradation, negative effects on outdoor recreational activities, and the overwhelming community opposition to the project. We respectfully urge the Planning Authority to refuse permission for this development, in line with national and European environmental regulations, planning guidelines, and the principles of sustainable development.

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## 1. Procedural and Planning Context

### 1.1. Background and Planning History

The proposal for a large-scale waste incinerator at Ringaskiddy has a long and contentious history. Since its initial application in 2001, the project has faced repeated refusals, legal challenges, and widespread community opposition. Notably, planning permission granted in 2018 was quashed by the High Court in 2022 and remitted to An Coimisiún Pleanála for fresh

consideration. The current application (ABP-318802-24) represents a continuation of this protracted process.

The site in question is now surrounded by significant educational, research, and recreational developments, including the National Maritime College of Ireland, the MaREI Research Centre, and Haulbowline Island Recreational Park. The area has evolved from an industrial peninsula to a hub of education, tourism, and community activity, making the proposed incinerator increasingly incompatible with its surroundings.

## **1.2. Statutory Grounds for Objection**

Under Irish planning law, objections must be based on material planning considerations, including compliance with national and regional guidelines, environmental and public health impacts, effects on residential and recreational amenity, and alignment with the principles of sustainable development. Our submission addresses each of these areas in detail, with reference to relevant Irish and EU regulations.

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## **2. Environmental Impact**

### **2.1. Climate Change and Greenhouse Gas Emissions**

The proposed incinerator is presented as a solution for waste management and energy recovery. However, contemporary research and policy analysis challenge the climate credentials of waste-to-energy incineration. While incineration can reduce landfill volumes, it is a significant source of greenhouse gas emissions, particularly carbon dioxide. Recent studies indicate that the carbon intensity of energy from waste incineration is at least double the EU electricity grid average and exceeds that of fossil fuels like natural gas. As the Irish and European energy grids decarbonise, the relative climate impact of incineration will worsen, undermining Ireland's commitments under the Climate Action Plan, the European Green Deal, and the Paris Agreement.

Moreover, the Waste Action Plan for a Circular Economy (2020–2025) and the National Waste Management Plan for a Circular Economy (2024–2030) both prioritise waste prevention, reuse, and recycling over disposal and incineration, in line with the EU waste hierarchy. The proposed facility risks locking Cork and Ireland into a linear, high-carbon waste management model for decades, contrary to national policy and climate objectives.

### **2.2. Pollution and Biodiversity Loss**

Incinerators emit a range of pollutants, including dioxins, furans, heavy metals, nitrogen oxides (NO<sub>x</sub>), sulphur dioxide (SO<sub>2</sub>), particulate matter (PM), and acidic gases. These emissions contribute to the triple planetary crisis of climate change, pollution, and biodiversity loss, as recognised by the Zero Waste Alliance Ireland and international environmental authorities.

The Cork Harbour area is a designated Special Protection Area (SPA) and supports diverse bird and marine life. The risk of pollutant deposition on sensitive habitats, soils, and waters is

a material concern, particularly given the proximity of the site to the shoreline and the potential for coastal erosion. The Environmental Impact Statement (EIS) and associated modelling have been criticised for underestimating these risks and failing to provide adequate baseline data or robust monitoring frameworks.

### **2.3. Air Dispersion and Local Environmental Receptors**

Air dispersion modelling for the proposed facility, while indicating compliance with EU limit values under normal operating conditions, does not account for cumulative impacts, abnormal operations, or the evolving understanding of pollutant toxicity at low concentrations. The Plume Plotter tool, using the facility's own data, demonstrates that pollutant dispersal can affect a wide area, including Cobh, Monkstown, and other residential and recreational zones around Cork Harbour.

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## **3. Public Health and Air Quality**

### **3.1. Health Impacts of Incinerator Emissions**

A substantial body of epidemiological research links incinerator emissions to adverse health outcomes, including increased risks of respiratory and cardiovascular diseases, certain cancers (notably non-Hodgkin lymphoma and soft-tissue sarcoma), congenital anomalies, and hormonal disruptions. Dioxins and fine particulate matter (PM<sub>2.5</sub>) are particularly concerning due to their carcinogenicity and ability to penetrate deep into the lungs and enter the bloodstream.

The World Health Organization (WHO) has repeatedly lowered its recommended air quality guideline values in light of mounting evidence that health effects occur even at very low pollutant concentrations, with no safe threshold identified for PM<sub>2.5</sub> and NO<sub>2</sub>. The 2021 WHO guidelines recommend annual mean concentrations of PM<sub>2.5</sub> not exceeding 5 µg/m<sup>3</sup> and NO<sub>2</sub> not exceeding 10 µg/m<sup>3</sup>—levels that are significantly lower than current EU legal limits and which Ireland consistently fails to meet in many areas.

### **3.2. Air Quality in Ireland and Cork Harbour**

While Ireland generally meets EU air quality standards, the Environmental Protection Agency (EPA) reports that the country does not meet the more stringent WHO guidelines for several key pollutants, including PM<sub>2.5</sub>, NO<sub>2</sub>, SO<sub>2</sub>, and ozone. The EPA attributes approximately 1,600 premature deaths annually in Ireland to poor air quality, with fine particulate matter and nitrogen dioxide identified as the main culprits.

The Cork Harbour area, including Cobh, already experiences air quality pressures from traffic, shipping, and industrial activity. The addition of a large-scale incinerator would increase the local pollutant burden, with potential cumulative effects on vulnerable populations, including children, the elderly, and those with pre-existing health conditions.

### **3.3. Critique of Health Impact Assessment (HIA) and EIS**

Expert reviews of the Health Impact Assessment (HIA) and Environmental Impact Statement (EIS) for the Ringaskiddy incinerator have identified serious deficiencies, including inadequate baseline data, insufficient consideration of cumulative and long-term effects, and a lack of robust monitoring and enforcement mechanisms. The EIS has been criticised for relying on outdated or incomplete epidemiological studies, failing to address odour, noise, and traffic-related emissions, and not adequately engaging with affected communities.

The Institute of Public Health's guidance on HIA emphasises the need for comprehensive, participatory assessments that consider the full range of health determinants and involve local stakeholders in decision-making. The current application does not meet these standards.

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## **4. Impact on Outdoor Activities and Recreational Amenity**

### **4.1. Importance of Outdoor Recreation in Cobh and Cork Harbour**

Cobh and the wider Cork Harbour area are renowned for their natural beauty, recreational amenities, and active outdoor culture. Our running club, along with numerous other sports and community groups, relies on clean air, safe environments, and attractive landscapes for regular training, events, and social gatherings. The area hosts parkruns, charity races including our very popular Sonia O'Sullivan Cobh 10 road race, and community walks, all of which contribute to public health, social cohesion, and local tourism.

### **4.2. Effects of Air Pollution on Physical Activity**

Air pollution poses a direct threat to the safety and enjoyment of outdoor exercise. Exposure to elevated levels of PM<sub>2.5</sub>, NO<sub>2</sub>, and other pollutants during physical activity increases respiratory uptake and can exacerbate asthma, cardiovascular conditions, and other health problems. The UK's Daily Air Quality Index and WHO guidance both advise that, while the benefits of physical activity generally outweigh the risks, individuals with health conditions may need to reduce or avoid strenuous outdoor exercise during periods of poor air quality.

The presence of a major incinerator, with associated emissions and perceived health risks, would likely deter participation in outdoor activities, reduce the attractiveness of local amenities, and undermine public health initiatives aimed at increasing physical activity.

### **4.3. Visual and Amenity Impacts**

The proposed facility, with its 75-metre stack and industrial design, would dominate the local landscape, detracting from the scenic and recreational value of the area. The Cork County Development Plan and local zoning objectives emphasise the protection of visual amenity, open space, and the integrity of heritage sites such as the Martello Tower. The incinerator's scale and location are fundamentally at odds with these objectives.

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## **5. Community Sentiment and Mobilisation**

## **5.1. Overwhelming Local Opposition**

The proposed incinerator has faced sustained, organised, and widespread opposition from residents, community groups, elected representatives, and civil society organisations for over two decades. The Cork Harbour Alliance for a Safe Environment (CHASE) has led the campaign, gathering over 30,000 signatures and mobilising thousands of submissions and public meeting attendees. Local councillors, TDs, and community leaders have repeatedly called for the project to be abandoned, citing its incompatibility with the area's evolving character and the wishes of its residents.

Recent public meetings in Cobh, Carrigaline, and Ringaskiddy have demonstrated a high level of engagement and anger at the revival of the proposal, particularly given the site's transformation into a centre of education, research, and tourism. The community's determination to protect its environment and quality of life is clear and should be given significant weight in the planning process.

## **5.2. Democratic Deficit and Procedural Concerns**

There is a strong perception among local residents that the planning process has failed to adequately reflect community sentiment or to provide meaningful opportunities for participation and influence. The repeated overruling of inspector recommendations, the prioritisation of national waste policy over local concerns, and the lack of effective enforcement and monitoring have eroded public trust in the system.

The Industrial Emissions Directive and Aarhus Convention both emphasise the importance of public participation, transparency, and access to justice in environmental decision-making. The Planning Authority must ensure that these principles are upheld.

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# **6. Legal and Regulatory Framework**

## **6.1. Irish and EU Environmental Regulations**

The proposed incinerator is subject to a comprehensive legal framework, including:

- **Waste Management Act 1996 (as amended)**
- **European Union (Waste Incineration Plants and Waste Co-Incineration Plants) Regulations 2013 (S.I. No. 148/2013)**
- **Industrial Emissions Directive 2010/75/EU**
- **EU Waste Framework Directive 2008/98/EC**
- **Air Quality Standards Regulations 2011 (S.I. No. 180/2011)**
- **National Waste Management Plan for a Circular Economy 2024–2030**
- **A Waste Action Plan for a Circular Economy 2020–2025**

These regulations require that waste management facilities:

- Apply the waste hierarchy, prioritising prevention, reuse, and recycling over incineration and landfill.

- Operate in accordance with the best available techniques (BAT) to minimise emissions and environmental harm.
- Comply with stringent emission limit values for air and water pollutants, as set out in Annex VI of the Industrial Emissions Directive.
- Undertake robust environmental and health impact assessments, with full public participation and transparency.
- Monitor emissions continuously and report results to the competent authority and the public.

## **6.2. Planning Guidelines and Zoning**

The Cork County Development Plan 2022–2028 and local zoning objectives designate the Ringaskiddy area for industrial use but also emphasise the protection of educational, research, and recreational developments, as well as the integrity of heritage sites and open spaces. The plan requires that large-scale waste facilities be compatible with their surroundings and not adversely affect residential or recreational amenity.

The evolving character of the area, with significant investment in education, tourism, and community infrastructure, renders the site increasingly unsuitable for a major incinerator.

## **6.3. Technical Emissions and Stack Monitoring**

The Industrial Emissions Directive and Irish regulations require continuous monitoring of key pollutants (NO<sub>x</sub>, SO<sub>2</sub>, PM, CO, TOC, HCl) and periodic monitoring of heavy metals, dioxins, and furans. Recent amendments to the Directive mandate monitoring of dioxin emissions during all operating times, including start-up and shutdown, to address concerns about peak emissions during these phases.

However, independent research and biomonitoring studies have revealed that emissions during abnormal operations and start-up/shutdown can be significantly higher than during normal operations, with potential for acute exposure events and cumulative contamination of the local environment.

## **6.4. Health Impact Assessment (HIA) and EIS Critiques**

The Institute of Public Health and academic experts have called for more rigorous, participatory, and transparent Health Impact Assessments for major waste facilities, with particular attention to vulnerable populations, cumulative impacts, and long-term monitoring. The current application does not meet these standards.

## **6.5. Legal and Procedural Avenues**

Should the Planning Authority grant permission for the development, objectors have the right to appeal the decision to An Coimisiún Pleanála and, if necessary, to seek judicial review in the High Court within eight weeks of the decision. The strict timeframes and procedural requirements for appeals and judicial review are set out in the Planning and Development Act 2000 (as amended) and associated regulations.

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## 7. Alternatives to Incineration and Circular Economy Policy

### 7.1. Waste Hierarchy and Circular Economy

Irish and EU waste policy is unequivocal in its prioritisation of waste prevention, reuse, and recycling over incineration and landfill. The Waste Action Plan for a Circular Economy and the National Waste Management Plan for a Circular Economy set ambitious targets for recycling, food waste reduction, and the development of indigenous treatment capacity for recyclable materials.

Incineration is recognised as a lower-tier option in the waste hierarchy, to be used only for residual waste that cannot be prevented, reused, or recycled. Over-investment in incineration risks creating a “lock-in” effect, discouraging investment in higher-value circular economy solutions and undermining Ireland’s ability to meet its climate and resource efficiency targets.

### 7.2. Proven Alternatives

Numerous European cities and regions have demonstrated the feasibility and benefits of zero-waste strategies, mechanical-biological treatment, advanced recycling, and composting as alternatives to incineration. These approaches create more jobs, reduce greenhouse gas emissions, and support the transition to a sustainable, circular economy.

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## 8. Summary Table: Key Concerns and Regulatory References

Issue Area	Key Concern	Relevant Regulation/Guideline
Climate Impact	High carbon intensity, undermines climate targets	Climate Action Plan, EU Green Deal, Waste Action Plan, IPCC
Air Quality	Emissions of PM2.5, NO <sub>2</sub> , dioxins, heavy metals; cumulative impacts	WHO AQG 2021, Air Quality Standards Regs, Industrial Emissions Dir.
Public Health	Increased risk of respiratory, cardiovascular diseases, cancers	WHO, EPA, HIA Guidance, EIS requirements
Outdoor Activities	Deterioration of amenity, reduced participation in exercise	Cork County Dev. Plan, WHO, DAQI, EPA
Community Sentiment	Overwhelming opposition, democratic deficit	Aarhus Convention, Planning Acts
Biodiversity/Environment	Risk to SPA, marine and bird life, coastal erosion	Habitats Directive, Cork County Dev. Plan

Issue Area	Key Concern	Relevant Regulation/Guideline
Waste Policy	Contradicts waste hierarchy, circular economy goals	Waste Action Plan, National Waste Management Plan
Monitoring/Enforcement	Inadequate baseline data, risk of under-reporting, abnormal emissions	Industrial Emissions Dir., S.I. 148/2013, EPA Guidance
Legal/Procedural	Deficiencies in HIA/EIS, limited access to justice	Planning and Development Act, Judicial Review provisions

Each of these concerns is elaborated in the preceding sections, with detailed references to the relevant statutory instruments, policy documents, and scientific evidence.

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## 9. Conclusion and Request

In light of the above, we respectfully but firmly request that the Planning Authority refuse permission for the proposed waste incinerator at Ringaskiddy, County Cork, on the following grounds:

- **Environmental Impact:** The facility would contribute significantly to greenhouse gas emissions, pollution, and biodiversity loss, contrary to national and European policy.
- **Public Health Risks:** Emissions of dioxins, particulates, and other pollutants pose unacceptable risks to the health of local residents, particularly vulnerable groups.
- **Air Quality Degradation:** The project would exacerbate existing air quality pressures, undermining efforts to meet WHO guidelines and protect public health.
- **Negative Impact on Outdoor Activities:** The presence and perception of pollution would deter participation in outdoor exercise and community events, harming public health and social cohesion.
- **Community Opposition:** The overwhelming and sustained opposition of local residents, community groups, and elected representatives must be given due weight in the decision-making process.
- **Incompatibility with Circular Economy Policy:** The project contradicts the waste hierarchy and risks locking Ireland into an outdated, linear waste management model.
- **Deficiencies in Assessment and Monitoring:** The HIA and EIS are inadequate, and the proposed monitoring and enforcement mechanisms do not provide sufficient assurance of safety or compliance.
- **Legal and Procedural Concerns:** The planning process has not adequately addressed the requirements for public participation, transparency, and access to justice.

We urge the Planning Authority to uphold the principles of sustainable development, public health protection, and democratic participation by refusing this application.

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## 10. References to Irish Regulations and Guidance

Throughout this submission, we have referenced the following key regulations and policy documents, as required for formal objections:

- Waste Management Act 1996 (as amended)
- European Union (Waste Incineration Plants and Waste Co-Incineration Plants) Regulations 2013 (S.I. No. 148/2013)
- Industrial Emissions Directive 2010/75/EU
- EU Waste Framework Directive 2008/98/EC
- Air Quality Standards Regulations 2011 (S.I. No. 180/2011)
- National Waste Management Plan for a Circular Economy 2024–2030
- A Waste Action Plan for a Circular Economy 2020–2025
- Cork County Development Plan 2022–2028
- WHO Global Air Quality Guidelines 2021
- Institute of Public Health HIA Guidance 2021

We have also drawn on the latest scientific research, EPA reports, and community consultation records to support our arguments.

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## **11. Declaration and Contact Details**

We declare that the information provided in this submission is accurate to the best of our knowledge and is submitted in good faith on behalf of Ballymore Cobh AC, Cobh, County Cork.

**Contact Person:** Stephen Pender - 0876624834

**Date:**

14/11/2025

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**We thank the Planning Authority for considering this submission and for upholding the rights and wellbeing of the people of Cobh and Cork Harbour.**

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

**End of Submission**