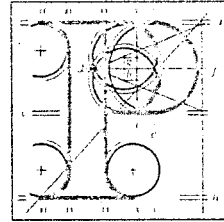


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Caroline Brugess
Mill Cottage
Kilmichael West
Crosshaven
Cork

P43XD43

Date: 26 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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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 : **Caroline Burgess**

OBSERVER ADDRESS : **Mill Cottage, Kilmichael West, Crosshaven, Cork, P43XD43**

OBSERVATION DETAILS DATE 09/11/2025

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.

The Zoning of this land has been changed and has been deemed no longer suitable for industrial use.

PFAS

This incinerator does not meet the requirements to deal with PFAS

- **Monitoring Challenges:** Current methods for measuring PFAS and their potential breakdown products in air emissions have limitations, making it difficult to fully assess the safety and effectiveness of commercial incinerators in real-world conditions.

- PFAS is in everything, AKA (fire retardant) on food containers, garments.

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

I enclose fee of €50 for the online application.

Additional pages below attached (no 5)

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
