



An
Coimisiún
Pleanála

Our Case Number: ABP-318802-24

Planning Authority Reference Number:

Carrignafoy Community College
C/o Christina Roche
2 Briar Rose
Mount Eaton
Cobh
Co. Cork
P24W427

Date: 21 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
Executive Officer
Direct Line: 01-8737263

PA04

Teil (01) 858 8100
Glao Áitiúil LoCall 1890 275 175
Facs Fax (01) 872 2684
Láithreán Gréasáin Website www.pleanala.ie
Riomhphost Email communications@pleanala.ie

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

TO:

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1, D01 V902

OBSERVATION ON SID APPLICATION

Case Reference: PA04.318802 (Ringaskiddy, Co. Cork)
Proposed Development: Resource Recovery Centre (including "Waste-to-Energy"
Facility)
Applicant: Indaver NV t/a Indaver Ireland
Observer Name: Christina Roche on behalf of
Carrignafof Community College
Observer Address: 2 Briar Rose, Mount Eaton,
Cobh, Co. Cork. P24W427
Carrignafof Community College, Cobh, Co. Cork.
Contact Email: christinaaroch@gmail.com
Date: 16th November
2025

1. Introduction and Standing

I, Christina Roche, make this observation under the Planning and Development Act 2000, s.37G(2)(b), concerning Indaver NV t/a Indaver Ireland's proposal for a Resource Recovery Centre at Ringaskiddy (Case PA04.318802).

38,00 ppl objected in 2001 and we should not be here again 24 years later arguing against this incinerator.

I am local and a teacher at Carrignafof Community College in Cobh. On behalf of senior management and our school community, I adamantly opposed to this incinerator as it will affect the air quality in our area and negatively impact the health of our students, staff, and biodiversity in our harbour.

The incinerator releases harmful chemicals into the air such as dioxins, heavy metals which will reach our water supply and our food chain. This will have an impact on health causing respiratory problems, disrupting hormone levels, damaging immune systems and causing congenital health defects. Millions of tonnes of pollution will be inflicted on us and on our future generations. Already, we smell the fumes from the influx of cruiseliners in our playgrounds, school pitch, and our gardens. We have enough air pollution.

Wrong Site – Indaver have failed to adhere to WHO Guidelines for Toxic Incinerators 1986 which advises that incinerators avoid areas characterised by thermal inversions. Cork harbour is a bowl shaped area ideally suited to thermal inversions. This is evidenced by the R&H Hall Grain Store Fire of 2021 which caused huge public health concerns prompting residents to stay indoors. This response was due to the huge plume of smoke which spread laterally and became trapped at a low level over large communities.

The development of an incinerator conflicts with the EU's approach of preserving our resources in a circular economy. Burning waste is a backward step in line with a linear economy and Ireland needs to focus on recovering their resources.

Flood risk- the main road from Ringaskiddy to Goby Beach floods frequently and the field Indaver proposes to build this incinerator suffers from flooding also. Further development here will worsen flooding on this cul-de-sac road and risks cutting off Haulbowline, including our Irish Naval Base. This area is enjoyed for its varied amenities such as the Public Park, the Maritime College, Paddys Point, the Beaufort Laboratory. Unfortunately, this area as previously been subjected to incremental pollution from Irish Steel, including toxic waste that demanded a decade long clean up operation. Also the two nearby beaches Lu and Goby Beach are hugely popular and valued open spaces which have seen a huge boost in numbers since Covid. Now there are regular sea swimming groups that enjoy the waters. In fact, Luc beach is now used for Scout Jamborees and rowing regattas. However, the proposed site chosen off Gobby Beach is severely impacted by coastal erosion with the tide rising to the edge of the cliff which consists of soft boulder clay and is not suitable for such a huge development. For these reasons, the area is incompatible with an incinerator of this scale and will impact recreational amenities for locals.

We must defend the public funds which have been heavily invested in improving the area. In recent years huge funding in tourism has transformed the area surrounding this proposed development. In the last twenty years there has been major public investment in Spike Island which draws thousands of tourist each year. Spike Island is only 700m from the proposed incinerator. Its close proximity and visual impact will destroy this very precious tourist area. Camden Fort in Crosshaven is also thriving with tourism. Government funding has transformed the character of surrounding areas where the focus is on leisure with public parks, sailing and the increasing presence of world class cruise liners in Cobh. Construction of an incinerator in this area undermines past investment and amenities for locals and tourists alike.

There is now a focus on education in this area, as evidenced by the presence of the world renowned Maritime College which is only 210m from the proposed incinerator, also the Beaufort Research Laboratory, and the naval training college at Haulbowline. This new vision for the area sees the site of the proposed incinerator rezoned from industrial to an area of education, research and development. These new zoning changes have enhanced this area and the proposed planning should not be allowed to negatively impose on this positive change.

The EU has dedicated Cork Harbour as an area of special protection for birds. However, the habitats they rely on are decreasing in value as industry grows around them. A recent assessment by Bird Watch Ireland has reported that more of the habitats are highly unfavourable for birds. Less birds are returning to the area each year and an incinerator of this magnitude would further damage wildlife in the area.

The proposal will have a gross visual impact in our harbour due to the enormity of the structure, with the building standing at 50m and the smoke stack at 75m. This is a grotesque proposal in an area of such natural beauty, not to mention that it is an unacceptable risk to aircraft navigation in the area due to the plume, and height of the stack.

Cobh is the most populated town in the harbour and will be most affected by the pollution and emissions that would be emitted due to the prevailing winds. Our school community that consists of local students and staff, and staff who travel from further afield will be subjected to the constant air pollution from this proposed incinerator. Studies have shown that Cobh locals are at greater risks of

common cancers than the rest of the country. A proposed incinerator will cause additional negative impacts on the health of our students, their families, and our staff. As the representative for Carrignafoy Community school, I strongly urge you to reject the proposed plan.

Alarming information about European Incinerators :

Brussels, 1 April 2025 – A series of new studies reveal alarming levels of dioxins, PFAS, and heavy metals in the environments surrounding waste incinerators in Spain, France, and The Netherlands.

Conducted by the independent ToxicoWatch Foundation with support from Zero Waste Europe, the findings show that the areas around Waste-to-Energy (WtE) facilities are contaminated, posing risks to public health, ecosystems, and food safety.

The studies, conducted near WtE facilities in Paris, Harlingen, and Zubieta, revealed widespread and dangerous levels of contamination in soil, water, vegetation, and even food such as farm eggs. Dioxin levels in moss, soil, and backyard chicken eggs exceeded EU limits at all three sites, with serious concerns for one sample site in Paris' Ivry-sur-Seine district, a schoolyard playground. In Harlingen, PFAS concentrations in water were recorded at 138 times the Dutch legal drinking water threshold, while in Zubieta, a backyard egg sample from Hernani showed the highest dioxin levels found by the ToxicoWatch Foundation in Europe over the past 13 years. Heavy metals including lead, mercury, and arsenic were also detected in areas close to homes, parks, and schools.

Janek Vahk, Zero Pollution Manager at Zero Waste Europe, states:

“These findings amount to a systemic failure of environmental oversight. Communities living near incinerators are being exposed to toxic chemicals, in some cases at levels far beyond what the law permits. This should raise immediate red flags across the EU.”

In Zubieta, located in Spain's Basque Country, the situation is just as stark. A backyard egg sampled in Hernani contained 38 pg TEQ/g fat — over 10 times the EU legal limit — representing the highest dioxin reading recorded by ToxicoWatch in Europe. Moss samples show dioxin concentrations up to 300 times higher than baseline levels measured before the incinerator began operating in 2020. PFAS and heavy metals were also found in water, moss, and soil.

In Paris, soil and moss samples taken near schools and public spaces in Ivry-sur-Seine showed dioxin levels above EU safety thresholds. One such site, the Jardin des Plantes — a central Parisian park located 2.5 km from the incinerator — was found to be contaminated. This adds to growing evidence of exposure in urban settings, particularly affecting vulnerable populations such as children. France's national health agency has already confirmed that backyard chicken eggs in the region are too polluted to consume, due to dioxins and PFAS.

In Harlingen, the Netherlands, PFAS levels in eggs were found to be comparable to those found near a major fluorochemical plant — despite no such industry operating nearby. One water sample recorded PFAS concentrations 138 times the Dutch legal limit, and dioxin levels in soil have increased sevenfold since 2013. Heavy metals such as mercury and lead were detected in mosses at levels that exceed thresholds associated with significant health risks.

Abel Arkenbout, Head of Research at ToxicoWatch, states:

“This is a textbook case of toxic accumulation in the environment and food chain.”

Zero Waste Europe is calling on EU institutions and national governments to urgently take action. This includes introducing mandatory, real-time monitoring of POP emissions from all Waste-to-Energy facilities, particularly during non-standard operations (OTNOC), which remain underregulated and are frequently the source of emissions spikes. Regular biomonitoring must also be carried out in areas surrounding incinerators, with a focus on food-producing zones and vulnerable populations. More broadly, the findings reinforce the need for a rapid transition toward non-burn, zero waste alternatives to protect public health and the environment.

“These results dismantle the myth that waste incineration is a clean or safe solution,” added Vahk. “The era of burning waste must end.”

I conclude that I oppose this planning application strongly as this site is entirely unsuitable for an incinerator of this scale.

Signed: Christina Roche

On behalf of Carrignafoy Community College

Date: 16th of November 2025