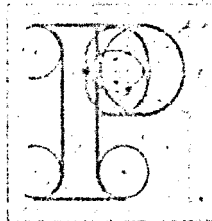


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Donnchadh Ó Laoghaire TD
Constituency Office
Lough Business Park
Togher Road
Togher
Co. Cork

Date: 19 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.

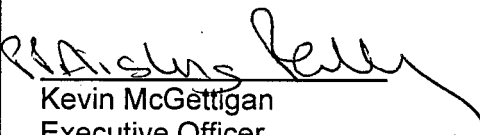
Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Coimisiún Pleanála when they have been processed by the Commission.

Please be advised that, as you made a submission in relation to the previous application (PA0045), you are not required to pay a fee in order to make this submission. Accordingly, a refund for the €50 that you have paid will issue to the debit/credit card used to make the online payment (SID-OBS-004195).

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

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Protect Cork Harbour

No to the proposed Incinerator in Ringaskiddy



Submission to An Coimisiún Pleanála.

Donnchadh Ó Laoghaire TD



Objection to Ringaskiddy Resource Recovery Centre planning application -
PA04.318802, Ringaskiddy Co. Cork

16/11/2025

An Coimisiún Pleanála
64 Marlborough St
Dublin 1

Submitted by

Donnchadh Ó Laoghaire TD,
Constituency Office,
Lough Business Park
Togher Road,
Togher,
Corcaigh

A Chara,

I wish to register, as part of the above-mentioned application, my opposition to the proposed development of the Ringaskiddy Resource Recovery Centre planning application. I am opposed to the application on the following grounds.

Zoning

Parts of the site that this planning application is on has since been rezoned for educational purposes. The zoning of the greater Ringaskiddy area as industrial, the Indaver site area where the incinerator is to be 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. The zoning for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development has been endorsed by two County Development plans since this application has been lodged.

Previous Inspectors Reports & Recommendations

The fact is very simple and clear here that all 3 previous applications have been refused by the planning experts in their recommendations to the board on the basis that the site is inherently unsuitable, concluded by all 3 Bord Pleanala Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017). If a fourth inspector on this occasion also recommends a refusal how would it be credible possible for the board to essential overrule four inspectors also given the fact of the refusal of Jones 2004, Yukel Finn 2009, Daly 2017 have only exacerbated in the time since and the reasonings given them are even more prevalent now along with

additional reasons and issues.

Location

(i) Tourism and the vision for Cork Harbour.

Cork Harbour is one of the most significant assets we in Cork have, and it has seen significant developments in recent years, and there is considerable potential for future positive developments and growth. Such worthwhile developments include the ongoing development of the NMCI, and IMERC campus including the Beaufort Building and Wave energy research lab.

At the same time, more and more use is being made of the Harbour for leisure and tourism purposes, with developments such as the proposed cruise terminal for Cobh, the development of Spike Island as a Tourist attraction, and the development of Fort Camden Meagher at Crosshaven, and new piers at Passage West and planned developments for Blackrock Harbour,

All of these developments, are part of the reorientation of Cork Harbour. Its heavy industrial era is passing, and a new future is opening up, that is potentially kinder to the local community, and the Local environment.

However, the location of a Hazardous Waste Incinerator would potentially be deeply detrimental and damaging to this potential. The possibility of increasing the tourism numbers in the Harbour would surely be discouraged by the location of a significant, 240,000-tonne-per-annum waste-to-energy incinerator in the locality, it is far from conducive to such activity.

It would also be rather perverse to see that an Incinerator, with all the risks, hazards and potential implications for the local environment, would be located almost side by side with a world class research facility examining Wave Energy, with clean, 21st Century Energy being researched adjacent to an incinerator.

(ii) Flooding and Coastal Erosion

The location is wrong entirely in relation to the entire strategy and vision the people of Cork, it's representatives and the County Council hold for the Harbour. This was among the primary reasons that the application in 2011 was rejected, and I believe it remains a reason it should once again be refused on this basis.

The location remains highly unsuitable as the site identified remains vulnerable to flooding, and it is impossible, to eliminate the possibility of a tidal erosion affecting the site over the medium term, having long term implications for the safety of the site, for this particular use. The site has reduced in size since the application was lodged in 2016 and will continue to reduce. This is not a matter of opinion but the facts of the site.

As noted by the group Cork Harbour Alliance for a Safe Environment (CHASE) on their website, the World Health Organisation (WHO) site selection criteria for hazardous waste management facilities advises elimination of areas subject to coastal erosion and flooding stating "Step 1 is to eliminate generally unsatisfactory areas, – coastal areas subject to floods, – coastal wetlands, – areas with limestone deposits."

The area remains vulnerable to flooding, and damage done during recent years adverse weather and storms to parts of the coastline at the Indaver site illustrates the fact that the site is far too close to vulnerable coastline to be suitable. Pictures at this link illustrate this point.

<http://chasecorkharbour.com/storm-frank-erodes-indaver-sites-gobby-beach-boundary/>

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)

(iii) Safety concerns for the Local Community

There is significant concern about the environmental impact that an incinerator located at Ringaskiddy could have for the Local Community, not only in Ringaskiddy, but out to Passage West and Monkstown, in to Carrigaline, and right upstream to Cork City.

This has been heightened by recent events at a major Indaver facility, on the 26th February, an explosion causing a significant response from Local Fire Services, and which led to local residents being forced to close windows and

doors, and closure of a nearby road tunnel. It has been described by Indaver Belgium as a violent explosion followed by three fires.

These are precisely the kind of incidents that local residents fear. There is a significant risk to the local environment and community from such incidents and hazards. It is not possible to guarantee that such a facility will be entirely safe for the local community and it underlines that unquestionably Incinerators are prone to accidents, and dangerous incidents, and Indaver facilities are no exception to that.

It is also worth noting the impact that the facility will have even in its ordinary operations, without accidents, through emissions. This is borne out by the fact that according to the most recent EPA emissions report (EPA Licensed Sites 2014 – Report on Air Emissions), the Indaver Incinerator in Duleek County Meath, was the most significant offender, with a significant 19 emissions limit breaches reported at the facility in 2014. All 19 breaches and exceedances relate to Carbon Monoxide emissions limits.

This has the potential to pose a health risk to the local community, because, as has been noted by CHASE (their source being the US EPA), which means a higher risk of other pollutants such as dioxins and furans which form at lower temperatures.

Carbon monoxide at excess levels has significant health impacts, including, among the general population and otherwise health members of the community, such as unexplained headaches, chest pains or muscular weakness, Sickness, diarrhoea or stomach pains, Sudden dizziness when standing and general lethargy. However it is most serious for those who suffer from cardiovascular disease. This along with other emissions related issues, outlined below, are among the reasons why this incinerator would be entirely unsuitable for Ringaskiddy.

(iv) Size of site.

The Board's direction of June 7th, 2011, stated that "The Board is not satisfied that the provision of incineration capacity to deal with residual municipal waste, in addition to hazardous waste, at this site is appropriate, having regard to both the layout and limited size of the site and to the current strategy of the Cork local authorities in respect of waste management."

This is a consideration which has not changed, the site remains the same, is problematic due to location, and it is a concern held by the local community, that if the site is too small, this may create safety difficulties, and will injure local amenity. It remains the case that the development would constitute overdevelopment of the site and would seriously injure the amenities of the area and of property in the vicinity.

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).

(v) Road Infrastructure, traffic, and Local Disruption

There are also quality of life considerations to be taken in to account in evaluating this application. Ringaskiddy, and Shanbally, are living communities, small villages, with vibrant village life within both, however, already substantially impacted upon by the enormous commercial, industrial imprint on the community, over many many years. This has it's implications for traffic and for quality of life.

In particular, it is clearly the case that there will be an increased traffic impact due to this Incinerator, that this will be significant, and that it will likely be even more significant during construction. Even during it's operations some 70 trucks a day, or perhaps some 140 journeys will pass through the village.

There is no commitment to delay this project until the delivery of the M28, which provide some relief to the village in terms of traffic. But it should also be noted that during construction, there will be works required to construct the flood defences, under the main road, and that significant traffic for Haulbowline, IMERC and other facilities at that end of the village will have to be routed elsewhere. Where they can be routed to is not entirely clear, the entire peninsula operates to some extent as a cul de sac.

Given that the m28 is already some distance from delivery, the construction will also have a significant impact back along the road, including already congested pinch points, such as Ringaskiddy village, Shanbally Village, Shannonpark Roundabout, Carr's Hill, Bloomfield Interchange, and perhaps also the Jack Lynch Tunnel.

There is also the issue of pedestrian safety in the village which would need to be considered, much improvements are already required, in order to cope with the significant scale of traffic, including heavy freight, and the addition of additional heavy freight would potentially make the village even more unsafe for pedestrians, including children in particular, who have to cross that road in order to access the new playground facility.

Incineration

While, in recognising that this application is not likely to be decided on the principle of incineration, as incineration is considered accepted within the Regional Waste Strategy, I feel that as this is a document publicly available, it is necessary and appropriate to put on record the Sinn Féin position on Incineration generally speaking. We are opposed to incineration and do not believe it should have a place within the Regional Waste Strategy.

Sinn Fein is committed to the promotion of environmental renewal through investment in reduction, recycling and policies working towards a zero waste economy.

National Policy, which favour increasing the use of incinerators as an alternative to diminishing landfills is a wrong headed approach starting at the bottom of the hierarchy. Such an approach is neither sustainable nor eco-friendly.

We believe that we must put the emphasis on to the promotion of strategies at the top of the waste hierarchy (reduction, reuse, recovery where it is without damaging consequences) instead of the status quo which focuses on strategies at the bottom.

A reliance on incineration does nothing to create a public understanding of waste as a resource, fails to adequately tackle over-packaging and over-consumption and needs to be fundamentally revised. In the hierarchy of reduction, re-using, recycling and re-use, reduction remains the most important and yet remains the one which we have made least progress on.

Sinn Fein remains opposed to incineration which can cause air pollution, the emission of toxic fumes and an increased volume of traffic generated by the transportation of waste to and from incinerators.

One other aspect of incineration is that after burning, the remaining ash still needs to be disposed of in landfill. A further amount, approximately 7%, known as fly ash, is classified as toxic waste which cannot even be disposed of in landfill and requires further treatment.

In addition, naturally building an incinerator is a large capital cost. Once built, it must be used on a continuous basis for it to pay for itself, which will 'lock in' incineration as a substantial, or even a primary method of waste disposal.

To sum up, as a Party we are specifically opposed to incineration because of

- Ash which remains after incineration needs to be disposed of
- Toxic fly-ash produced through incineration process and how that must be dealt with
- It will increase volume of traffic to and from incinerators
- Air emissions of sulphur dioxide, nitrogen dioxide, chlorine, dioxin and fine particulates
- Emissions of greenhouse gases of CO₂ and nitrous oxide

Sinn Fein calls for incineration to be phased out and ultimately abandoned and favours removing the option of incineration or thermal treatment from regional and central waste management strategies.

Strategic Infrastructure Act

I retain significant concerns as regards this piece of legislation. It is not for the Board to adjudicate on this matter, however I feel it necessary to put on record my view that this legislation is heavily weighed against local Communities. The process is entirely unfair, and allows major projects like this incinerator, to be potentially allowed, providing those making the proposals which a much more favourable set of circumstances. The reality is that the Local Community has had six weeks to process and consider the detail of years of detailed work by Indaver yet again.

It is a gross inequality that the people of this community have had to face this process, at great cost to them personally, twice already. I have listened to residents express their anguish and frustration at the efforts that have gone in to fundraising, and the knowledge that these efforts could have gone towards things in their personal lives, or in improving their community in other ways. It

is wrong that the community is forced to deal with this exhausting process yet again, for the third time. I think the legislation is problematic even for a single application, but that it is possible to use the Machinery of the Planning and Development (Strategic Infrastructure) Act 2006, for a third time, is grossly unfair to local communities, and is hugely advantageous to the applicants.

Indeed, I note that Cork County Council passed a resolution in opposition to this in the past, proposed by Cllr D'alton, and which I support. The Council, Fáilte Ireland, Cllrs in both Cork City & County and other state bodies are opposed to this now and will all be making submissions.

Inadequate Information Submitted

Found by all 3 Bord Pleanála Inspectors, the EIS was found to be deficient in substance even were 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 not 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)

Conclusion

I believe that the above submission outlines clearly that the location for which Indaver have made a planning application, notwithstanding the general issues with the planning process and with incineration, is unsuitable.

It is unsuitable because it is in clear contrast and opposition the overall vision held by the people of Ringaskiddy, of Cork, by the County Council, by Failte Ireland, by our defence forces, the shared vision for Cork Harbour, for a clean harbour, promoting tourism, research, education, leisure, and clean industry, connectivity on our waters and there is no way in which an incinerator can fit in with this vision.

It is unsuitable as it is still very near a vulnerable coastline, and is at risk of flooding, which impacts upon the safety of the facility.

It is unsuitable as the site is too small and eroding, and because it will have a huge impact on traffic and community life in Ringaskiddy.

In addition, I note that this is not only an issue for Ringaskiddy and Shanbally. Naturally these are the communities most affected by the immediate effects of it, however traffic issues, health issues, tourism will affect the entire Harbour area, and the impact of any emissions or pollution due to industrial accidents, will be felt throughout Cork City and County for many kilometres from the incinerator.

I hope that An Coimisiún Pleanála will consider these factors and refuse the application at hand 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

Is mise le meas

Donnchadh Ó Laoghaire TD