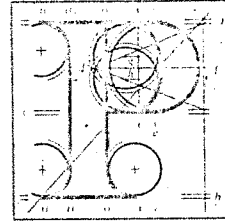


Our Case Number: ABP-318802-24
Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Dr. Elizabeth Scott Hall
15 Oakridge
Castleheights
Carrigaline
Cork

P43 KP95

Date: 20 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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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 of a resource recovery centre (including waste-to-energy
facility) by Indaver NV t/a Indaver Ireland**

OBSERVER NAME Dr Elizabeth Scott Hall

DATE 17th November 2025

OBSERVER ADDRESS 15 Oakridge, Castleheights,
Carrigaline, Cork P43KP95

I write to ask that the following observations be taken into account in relation to the proposed development .

Tourism, Recreation and Education

Specific Development Objectives for Ringaskiddy: Cork County Development Plan 2022 - 28) It is of critical importance that this zoning be upheld as it is directly linked to the Cork Harbour Tourism Plan to position Cork Harbour as a world-class sustainable visitor destination

- It is part of Fáilte Ireland's 5-year Destination and Experience Development Plan for Cork City, Harbour and East Cork
- It was developed in partnership with Cork City and County Councils and Port of Cork

On 22 February 2024, Fáilte Ireland, in partnership with Cork County Council, Cork City Council and Port of Cork announced their plans to develop a Cork Harbour Tourism Plan, which will enhance the visitor experience and unlock the tourism potential of Cork Harbour. This will be a key element of Fáilte Ireland's 5-year Destination and Experience Development Plan (DEDP) for Cork City, Harbour and East Cork, aims to position Cork Harbour as a world-class tourism destination and support the sustainable development of this area into a must-visit destination. This plan outlines a significant sustainable tourism development opportunity for Cork Harbour, which is the largest natural harbour in the Northern Hemisphere but is currently underutilised from a leisure tourism perspective. There is an opportunity to increase visitor numbers to the Cork Harbour area by building on the uniqueness offered by the Cork Harbour islands, which are supported by great on-water experiences linking the harbour islands and harbour communities.

With regard to Harbour communities, it is also of critical importance that this zoning be upheld as it is directly linked to the investment in the National Maritime College of Ireland and MaREI Centre 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.

Developing on the existing greenways, blueways and transport links will increase the accessibility of Cork Harbour and its communities to Cork City, and enabling improved land and sea linkages between the City and Harbour will create something that is unique on the island of Ireland. (failteireland.ie)

In 2025, over 170,000 cruise visitors sailed into Cobh, (Port of Cork) and 300,000 people visited Cobh. The proposed incinerator, which may have been appropriate from the zoning aspect, now contravenes current plans for tourism and leisure development, and would be a blot on the harbour landscape, with Camden Fort, Haulbowline and Spike Island offering recreation and tourism activities within view of the proposed site.

Indaver has clearly not given the Ringaskiddy site adequate consideration to the many major public and private investment initiatives which have transformed the character of the immediate area in the intervening period since 2000. (Daly 2017)

The visual impact of a 75 metre high stack emitting a visible and hazardous smoke plume, and the concomitant buildings for incoming waste and outgoing ash storage can only harm the image of this, the second biggest natural harbour of world renown.

Environmental concerns

The UNEnv Prog Chemicals office states that the major source of dioxins in the US and Europe is incineration. Nanoparticles cannot be trapped by stack filters, and have come under increasing scrutiny in recent years. They cause low grade chronic inflammation resulting in chronic respiratory disease and over time attack on lining of the arteries causing cardiovascular issues. There is no risk assessment, nor any safe level of exposure to such particulates.

The site is located on a known flood risk area, and there is coastal erosion with clear slope failure at the southern section of the site. WHO recommendations (Sloan, W. M. 1993) are that coastal areas subject to floods should be eliminated as potential areas for siting of a waste incineration plant. S. M. Bennett & Co Ltd.'s Report (2016) reported that, apart from the coastal erosion and flooding risks that the GHG emissions of the incinerator will be in excess of the Kyoto limits.

The site was identified, in previous planning applications, to be inherently unsuitable, concluded by all three 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.

An incinerator buys into the linear model of waste disposal. The National Waste Management Plan for a circular economy 2024-2030 (Rialtas Átúil Éireann) is underpinned by "a transition to renewable energy and materials. Transitioning to a circular economy entails decoupling economic activity from the consumption of finite resources. This represents a systemic shift that builds long-term resilience, generates business and economic opportunities, and provides environmental and societal benefits". The Circular Economy Act 2022 provides a legal basis for Ireland's transition from a linear ("take-make-

waste") model to a circular one by incentivizing sustainable practices, restructuring funding, and introducing new regulations to keep resources in use for as long as possible. The UN Environment Programme (<https://www.unep.org/ietc/resources/toolkits-manuals-and-guides/waste-energy-incineration>) states "While WtE incineration is one of the options for waste volume reduction and energy recovery, only a circular economy will ensure the decline of per capita waste generation and offer a long-term solution to the global waste problem".

The building of waste incineration plants supports the linear economy, and should be, in line with worldwide environmental regulations, brought to an end.

Please refuse this planning application on the basis that the site is inherently unsuitable, and the proposal ignores The National Waste Management Plan for a circular economy 2024-2030, and 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



Dr Elizabeth Scott Hall