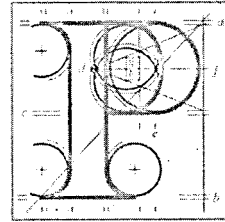


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Ellen O'Neill
Achinver
Rushbrooke
Cobh
Co. Cork

Date: 27 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

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Name: Ellen O' Neill

Address: Achinver, Rushbrooke, Cobh, Co. Cork

I am vehemently opposed to this planning application for the following reasons.

I am a resident of Cobh, Co. Cork all my life. In recent years we have witnessed a significant increase in tourism in this town. The beauty of Cork harbour attracts people from near and afar. The proposal to place a hazardous waste incinerator in the heart of Cork harbour is at extreme odds with future plans for the area's tourism branding. This site is not suitable for a waste incinerator for many reasons as outlined below.

- 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.

Climate and Carbon-Law Non-Compliance

- * Ireland is already over its carbon budget; this plant would lock in a large new stream of fossil emissions every year.
- * The developer has provided no carbon-budget analysis, no ETS modelling, and no lifecycle GHG accounting, so compliance with the Climate Act cannot be demonstrated.
- * Electricity-only incineration of fossil plastics is higher-carbon than the future Irish grid and would displace cleaner renewable generation.

R₁ Inefficiency and Misclassification

- * The submission is built on the false premise that the plant is “high-efficiency recovery”.
- * Their own data place the plant below the legal R₁ threshold, which means it is disposal, not recovery.
- * There is no heat-recovery infrastructure, and the site cannot support a heat network, making compliance structurally impossible.
- * High efficiency in Dublin depends on CHP; Meath only narrowly clears the threshold and still damages Ireland’s carbon performance. Cork cannot meet it at all.

Waste-Policy and Capacity Contradictions

- * Irish law now prohibits new residual-waste capacity; national policy requires waste reduction, not expansion.
- * The supposed “Southern Region capacity gap” is based on planning structures abolished in 2022; capacity is now national, and Ireland already meets projected needs.
- * Adding new disposal capacity directly contradicts circular-economy policy.

Tourism, Brand, and Economic Reputational Damage

- * Cork Harbour is the third-largest natural harbour in the world, anchored by Spike Island tourism and Cobh’s cruise sector.
- * A single industrial stack permanently alters the harbour’s visual identity; tourism branding is fragile and once damaged cannot be restored.
- * Reputational risk extends to internationally known local brands that depend on clean-water perception, including Midleton Distillery.

Flood-Risk and Site Unsuitability

- * OPW’s updated rules require safe, dry access for critical infrastructure; this location cannot provide it.
- * The access road floods, making the site isolatable during storms and surge events.
- * Raising ground levels does not solve tidal inundation, a rising water table, or coastal surge behaviour.
- * The site fails the Sequential Approach and cannot guarantee egress.

Air Quality, Plume Behaviour, and Scientific Omissions

- * Thermal inversions in Cork Harbour can trap emissions at ground level rather than allowing safe dispersion.

- * The application omits PFAS assessment, ultrafine-particle analysis, and key pollutant monitoring.
- * Claims of “safety” cannot stand when these pollutants are unmeasured and the dispersion environment is ignored.

Credibility and Procedural History

- * Three Inspectors have previously found Indaver’s Cork claims incomplete or unproven.
- * The last approval was quashed by the High Court because the evidence was not there.
- * The same deficiencies reappear: missing climate analysis, unverifiable R₁, outdated flood data, and overstated policy claims.
- * This track record undermines confidence in all assurances.

False Claims on Safety and Standards

- * The application claims the highest environmental and safety standards, yet excludes heat recovery, carbon modelling, PFAS/UFP analysis, updated flood data, and a compliant R₁.
- * A proposal missing this many essentials cannot credibly claim high standards.

REBUTTAL: “This plant will deal with industrial waste”

It won’t. This is a municipal-grade burner, not a specialist industrial or hazardous-waste facility. It cannot accept the chemical, pharmaceutical, or high-spec industrial streams produced in Cork. Those already go to dedicated treatment plants with far stricter controls. This project doesn’t replace any of that infrastructure—it simply adds a general waste incinerator that cannot treat the very materials people think it will.