

Hendrick Verwey & others
Kenver
Old Church
Cobh
Co. Cork

Date: 12 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. As you have previously made a submission, a refund of €50 will be made to the credit/debit card used to make the online submission.

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

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

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

Hendrick Verwey and family
Kenver
Old Church
Cobh
Co. Cork

5th November 2025

Submission re. proposed Indaver Incinerator in Ringaskiddy
Re: Case Number ABP-318802-24

I write to express my total opposition to the proposed siting of an incinerator in Ringaskiddy. From a planning and sustainable development perspective this has always been the wrong site for a development of this nature. It will be a monstrous building in the centre of Cork Harbour. The natural landscape of Cork Harbour has been destroyed by Industrial development on the western side. It's time to stop Industrial development on the land that remains in Cork Harbour.

In a Climate Emergency this plant will emit between 170,000 and 280,000 tonnes of Carbon dioxide every year for the next 30 years while recovering just 25% - 30% of the energy contained in the waste! That's not just lazy, it's unacceptable and should not be permitted.

Cobh Tidy Towns has outlined in detail in their submission just how much energy could be recovered from this plant through heat recovery. However because of the site chosen and repeatedly chosen by Indaver for the incinerator there are probably just 2 potential users of the heat – National Maritime College of Ireland and the MaREI Centre. That makes heat recovery impossible at this location and this plant cannot be permitted without recovering all of the heat that it is possible to extract.

The Sheffield Energy Recovery Facility and the Eastcroft Energy from Waste Plant in Nottingham are examples of the types of facilities that can justifiably be called Resource Recovery Facilities.

The RINGASKIDDY RESOURCE RECOVERY CENTRE is a proposal for burning waste as cheaply as possible with scant regard for the Climate Change realities that the world faces and the responsibilities and commitments that Ireland has signed up for.

The communities of Cork Harbour have shown incredible foresight, tenacity and above all competency in opposing this proposed incinerator for over twenty years.

The Oral Hearing in 2016 pulled apart documents submitted by Indaver that were written on their behalf in support of their proposal.

Please read carefully the transcripts in full of the Oral Hearing as part of the process of re-evaluating this planning application.

I outline below my responses to a document presented by MR. DAVE COAKLEY who presented a WITNESS STATEMENT OF LAND USE PLANNING POLICY on behalf of Indaver.

It can be viewed in full here https://ringaskiddyrrc.ie/wp-content/uploads/Witness_statement_Dave_Coakley.pdf

My responses were made on behalf of myself AND of Cobh Tourism at the Oral Hearing in 2016 and are outlined here in ***bold red italics***. They are as relevant today as they were in 2016.

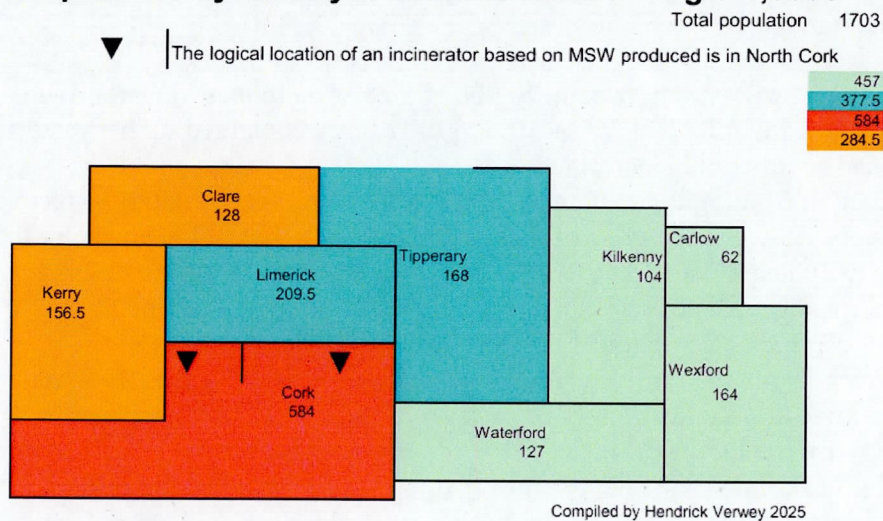
2. Role in the Project My role in the project involved undertaking the land use planning policy appraisal of the proposed development. I prepared the Planning and Policy Framework Chapter of the Environmental Impact Statement [EIS] (Chapter 2) and the planning report submitted with the planning application. I have been working on the project since 2015. 2.1 Conclusion of Planning Policy Appraisal The conclusions of Chapter 2 of the EIS may be summarised as follows:

- EU and national waste policy requires waste to be managed in an economic, sustainable and environmentally appropriate manner, and that waste should be dealt with at, or as close to, source (the proximity principle).

The choice of this site is diametrically contrary to the Proximity Principle. The Southern Waste Region has the following counties (These population figures are updated to those from the 2022 census)

- Cork 584k
- Limerick 209.5k
- Tipperary 168k
- Wexford 164k
- Kerry 156.5k
- Clare 128k
- Waterford 127k
- Kilkenny 104k

Population by County in Southern Waste Region ,000s



There is a strong correlation between population numbers and the quantity of waste produced. A strategically placed incinerator should make best use of existing infrastructure and be based centrally to where the waste is produced and also close to where the ash will be landfilled. Hence the site chosen in the best interests of sustainable development should be along the M8 corridor or the N20 corridor. Please see attached schematic representation of this population distribution.

Implementing the EU waste hierarchy, waste should be managed as a resource and disposal should be the last resort. EU and national policies support the recovery of energy from residual waste. In particular, the Waste Framework Directive (WFD) and Environmental Protection Agency's National Hazardous Waste Management Plan (NHWMP) require that Ireland should be self-sufficient in waste management.

This proposed plant will only recover about 35% of the energy from the residual waste in the form of electricity. The other 65% is wasted as heat as there are no solid proposals to utilise this. By Indaver's own figures only 17.5% of the energy in the waste can be classed as "renewable energy". Locating the plant in an area with a larger amount of available land can utilise up to 90% of the energy in the waste. The heat could be used to heat glasshouses and the flue gases used to enrich the Carbon dioxide within them to maximise production. The produce would be unmarketable however as people will fear contamination from dioxins and other emissions. The heat could also be used to dry sewage sludge and this then used as a high energy feedstock for the incinerator. The heat could also be used to provide district heating for the new town proposed at Monard.

A facility in Sheffield burns 225,000 tonnes pa of MSW and produces 17MW of electricity and 39MW of Thermal energy. By comparison the Indaver plant in Meath treats 235,000 tonnes per year of residual waste and generates 18MW electricity from this waste <http://www.energyireland.ie/indaver-creating-strategic-infrastructure/>

This is a shocking indictment of a company that professes to solve Ireland's waste problem in a sustainable way by recovering energy.

- The requirement of the Regional Waste Plans includes 300,000 tonnes capacity for residual municipal waste as well as 50,000 tonnes capacity for hazardous waste and an additional but unspecified capacity for industrial waste. It is highlighted that there is currently a spatial imbalance of suitable recovery capacity outside the Dublin region while a large quantity of residual municipal waste in Munster is being exported for recovery in waste to energy facilities in continental Europe. This is not a sustainable long term option as it infringes the proximity principle and does not meet the objective of moving towards self-sufficiency. *The bulk shipping of waste is probably more environmentally friendly than driving it up and down the country in refuse collection trucks.*
- The NHWMP anticipates that the private sector will develop technically and economically feasible treatment options, including thermal treatment. Similarly, the Southern Region Waste Management Plan notes that the required infrastructure will not be delivered by the Local Authorities as the investment is anticipated from the private sector. The combined approach to the management of residual municipal waste, industrial waste and hazardous waste, proposed by Indaver for the proposed Ringaskiddy Resource Recovery Centre will contribute to the attainment of these objectives. *Can Indaver please outline which companies it is in discussions with to treat their industrial or hazardous waste?*
- In addition, the energy recovery from residual waste at the proposed Ringaskiddy Resource Recovery Centre will help Ireland to achieve its renewable energy targets, with the production of clean energy for connection to the grid. *Approximately 17.5% of the energy in the waste can be classified as renewable energy. 17.5% is not renewable as it is the result of burning hydrocarbons and the remaining 65% will be wasted as heat. The plant will also produce large quantities of greenhouse gasses.*
- Local planning policies and objectives, as set out in the Cork County Development Plan, 2014 and the Carrigaline Local Area Plan (2nd Edition), 2015, support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy. *Surely this should read "support the development of a facility such as the proposed Ringaskiddy Resource Recovery Centre on the proposed site in Ringaskiddy and on many other sites.*
- Section 6.4.11 of the Cork County Development Plan 2014 states that the provision of strategic large scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas in the local area plans subject to the requirements of National Policy, future Regional Waste Management Plans and the objectives set out in local area plans. Specifically, strategic large scale waste treatment facilities including waste to energy recovery facilities will be considered in 'Industrial Areas' designated as 'Strategic Employment Areas', by reference to the zoning objective for appropriate uses in Industrial Areas, objective ZU 3-7(b). *The area of the proposed site is currently not industrial in nature. There are green fields, education facilities, research facilities, a beach, a naval base, a proposed park and a world renowned natural harbour all around.*
- Ringaskiddy is one such Industrial Area designated as a Strategic Employment Area. *Yes, but just "one such area". Is there a list of Industrial areas designated as Strategic Employment Areas in Cork County?*
- The proposed development is a strategic large scale waste treatment facility. It is strategic as it addresses an identified need in the Southern Region Waste Management Plan, and of a large scale that is well within the thresholds for hazardous and nonhazardous waste treatment capacity. *If this proposal was for a site that was strategically located to utilise the existing road (and rail) infrastructure and to minimise the journey from point of production to point of treatment then it may be considered strategic. I would suspect that the chosen site is strategically located to facilitate importation of waste to Ireland via the Port of Cork.*

Further development of an industrial nature on the wrong side of the River Lee will force the taxpayer to fund an additional river crossing.

• Therefore, the provision of a strategic large scale waste treatment facility at the proposed development site in Ringaskiddy, which is both an Industrial Area and Strategic Employment Area, is endorsed by Section 6.4.11 of the Cork County Development Plan 2014 and in accordance with policies for its zoning objective as per ZU 3-7(b) of the Plan.

The county development plan as passed by the elected members of Cork County Council and after lengthy public consultation contained no such aspirations. It is only after an instruction by Minister for Housing, Planning and co-ordination of the construction 2020 strategy to amend the plan to suit such objectives that this development can be considered acceptable development. That instruction was undemocratic. Indaver's third application for planning permission on this site isn't breaking any current rules but is also undemocratic and morally unjust.

• In addition, the proposed development is supported by policy objective WS 7-1 of the Cork County Development Plan 2014 in relation to Waste Management, as it is consistent with the provisions of Ireland's national waste policy, and contributes towards the delivery of an effective and efficient waste management service in line with the Southern Region Waste Management Plan 2015. The proposed development is also consistent with the policies of the National Hazardous Waste Management Plan.

3. Submissions and Responses In preparing this witness statement, I have considered each of the observations submitted to An Bord Pleanála by various parties in relation to the planning policy appraisal of the proposed development. I have addressed each of them below.

3.1 Issue No.1 Submission: Observations have been made by An Taisce, CHASE and others in relation to the issue of overdevelopment, maintaining that the proposal is the same in total tonnage and substantially the same in scale and impact as the previous 2008 proposal and, in this respect, the applicant has not addressed the Board's reason for refusal relating to 'overdevelopment'.

3.2 Issue No.1 Response: The total area of the subject site is 13.55 hectares.

The footprint of the proposed development has been significantly reduced from that presented in 2008 and from that permitted in 2001. The proposed process building, aero-condensor and turbine is now less than 9,300m² in area compared with the 2008 proposal (14,168m²) or the 2001 proposal (14,117m²). In effect, the footprint of the proposed development has been reduced by a third of that previously proposed.

The footprint of this proposed development is not the issue here. It is the elevation of this lump of a building when viewed from the South East, East, North East, North, North West and West that is the problem. Even if this building was wafer thin it would still protrude into the skyline. This building is not pretty. It is the type of building that deserves to be hidden in a hollow, not built in the middle of the world's second largest natural Harbour, our Harbour!

Refer to Figure 1.4 of the EIS for a footprint comparison. With respect to the tonnages proposed, it is submitted that the basis of the Board's refusal reason in 2011 was that the proposed treatment of residual municipal waste was not in accordance with the local waste strategy in place at the time of the decision. The proposal is now in accordance with the relevant waste management plans. Additionally, the proposal now involves a single line moving grate operation as opposed to the previously proposed double line and the previously proposed waste transfer station has been omitted. With respect to layout, the proposed development has been designed to address a wide range of factors including the operational requirements of the process and is in line with similar facilities permitted elsewhere. The waste recovery facility at Poolbeg in Dublin is located on a site of 5.5ha and has capacity to treat a significantly higher volume of waste, at 600,000 tonnes. The design of the site meets with all relevant statutory regulations and standards with regard to building design, fire regulations and access for emergency services. In terms of impacts on its immediate environment, the applicant has demonstrated that truck movements will not result in negative impacts on the road network. The scale of the proposed development and potential for visual impact is addressed by witness John Kelly but it is notable that the main building has been broken down into a series of irregular block shapes that respond to the site's topography and context, with the use of colours to integrate the buildings into the surrounding landscape; the stack has been reduced in height from 85m as previously proposed, to 70m, additional landscaping is proposed and Cork County Council's submission to the Board concludes that

the visual impact of the proposed development is acceptable and not overly visually dominant. Overall, it is considered that the scale of the proposal has been significantly reduced so as to successfully address the Board's previous refusal reason and ensure that the proposed development does not constitute overdevelopment of the site.

3.3 Issue No.2 Submission: The submission of Cllr. Marcia Dalton contends that Bottlehill in North Cork is a more appropriate location for the proposed development in planning policy terms while the submission of Cork County Council's Environment Section states that the Council do not share the applicant's contention that the Council's planning policy rules out waste to energy proposals at Bottlehill.

3.4 Issue No.2 Response: It is acknowledged that the Cork County Development Plan states that the Bottlehill landfill facility is a significant piece of existing infrastructure with scope for a specialised role in the area of integrated waste management and waste to energy. In reading the Development Plan as a whole, the development of strategic large-scale waste to energy recovery facilities is directed, by reference in paragraphs 6.4.11 and 11.7.4 and policy objective ZU 3-7(b) of the Plan, to industrially zoned lands within Strategic Employment Areas. *We already know why the Cork County Development Plan states this, but I would like to know how many Strategic Employment Areas there are in a. County Cork and b. the southern waste region?*

The proposed development is strategic (by reference to an identified need in the Southern Region Waste Management Plan), large scale (by reference to the tonnages involved relative to national capacity targets), is located on industrially zoned lands (by reference to zoning objective I-15 of the Carrigaline Local Area Plan) and is within a designated Strategic Employment Area at Ringaskiddy. (See section 2.4.3 of EIS). The consideration of Bottlehill in paragraph 11.7.5 the County Development Plan must be read in the context of the preceding paragraph (11.7.4) which states that that the provision of strategic large scale waste treatment facilities will be considered in 'Industrial Areas' designated as Strategic Employment Areas. Bottlehill is not zoned as an industrial area, nor is it located within a Strategic Employment Area. *However Indaver's Meath is built in an agricultural hinterland.*

The Cork County Development Plan aims to support the sustainable development of the Bottlehill facility for specialised and appropriate uses primarily associated with integrated waste management activities and including the potential for an eco-park. Further, Ringaskiddy, unlike Bottlehill, is located in the County Metropolitan Cork Strategic Planning Area, where policy objective CS 4-1(a) of the Cork County Development Plan 2014 seeks to recognise the importance of the role to be played by Metropolitan Cork in the development of the Cork 'Gateway' as a key part of the Atlantic Gateways Initiative and, in tandem with the development of Cork City, to promote its development as an integrated planning unit to function as a single market area for homes and jobs'. (EIS 2.4.3.1).

This might be an opportune moment to ask how many jobs will be provided by this development? Of course these jobs could be provided no matter where the development is sited.

The subject site at Ringaskiddy benefits from closer proximity to producers of hazardous and industrial waste and producers of municipal waste. There are potential users of heat arising from the proposed development at Ringaskiddy which could allow for a possible future district heating network, as is required by the Energy Efficiency Directive. *What are they? Or are we putting the cart before the horse?*

The subject site's location at Ringaskiddy therefore better supports the proximity principle and the development of the Cork Metropolitan Area as an integrated planning unit in line with the provisions of the Cork County Development Plan 2014. For these reasons, it is considered that, in planning policy terms, the Ringaskiddy site represents a more favourable and appropriate location for the proposed development.

3.5 Issue No.3 Submission: Numerous submissions have highlighted to importance of tourism in Cork Harbour and the planning policy provisions set out in the County Development Plan supporting same. The submissions have argued for the incompatibility of the proposed development with these policy provisions.

3.6 Issue No.3 Response: The tourism potential of Cork Harbour is fully acknowledged. The strategic approach to tourism development in the Harbour, and the range of plans that have been developed, are welcomed and supported by the Applicant. (See sections 2.4.3.1 and 6.3.4.1 of EIS). However, it is submitted that developing the Harbour's tourism potential is a long established objective of Cork County

Council and not, as suggested, a new policy objective or initiative. Chapter 7 of the 1996 County Plan addressed 'The Amenity and Tourism Role of Cork Harbour'. Planning policies for tourism and amenity in the Harbour were set out in Chapter 8 of the 2003 Plan. The 2009 Plan was first to recognise the potential for Spike Island to become an internationally recognised tourist attraction and provide policy support to further develop marine leisure in the Harbour. Concurrently, these plans have also acknowledged both the importance of the Harbour area to the economic and industrial development of the Cork Region through being a focus for key industries and the need to manage, in a balanced way, the mix and diversity of land uses within the harbour.

The point of balance in Cork Harbour was reached a long time ago. Some developments need access to the harbour and most don't. Those that don't should be built in areas that don't impact on what is left of the natural landscape of Cork Harbour.

Similarly, paragraph 6.6.1 of the 2014 Cork County Development Plan specifically recognises the diversity of uses in Cork Harbour and policy CS 4-1 (d) seeks to establish an appropriate balance between competing land uses to maximise the area's overall contribution to Metropolitan Cork. It is in this context that Development Plan policies for tourism in the area are set out.

Within the Harbour area, the Ringaskiddy peninsula is largely industrial in use, with a number of pharmaceutical companies having large manufacturing facilities in the area, in addition to Port of Cork facilities. Recent additions to the area include three 100m hub-height wind turbines on industrial sites. A fourth turbine has received planning permission. A further turbine is subject to a current planning application. The Port of Cork has been granted permission for the expansion of their facilities at Ringaskiddy, while current TII proposals for the M28 propose the development of a motorway services area opposite the subject site. In this regard, it is submitted that the proposal is located in an area generally characterised by existing industrial type land uses and will read as part of the established large stand-alone industrial landscape of the Ringaskiddy area.

In the context of Cork Harbour there is no such concept as "stand alone" and this is why Cork Harbour needs a Local Area Plan all of its own and not part of the piecemeal approach where Cork Harbour is torn between four Local Area Plans. Cork Harbour and development within it needs to be considered from the context of where people see it from most. That starts with Cobh and Great Island and other coastal visitor destinations such as Spike Island and Camden Fort Meagher. Of course 100,000 cruise passengers also see it every year from several vantage points on the same day as they sail into and out of the Harbour.

The primary intended land use on the Ringaskiddy peninsula is defined as industrial by reference to the relevant zoning objectives set out in the Carrigaline Local Area, 2015. The Plan's Strategic aims for Ringaskiddy are to reaffirm its strategic industrial and port related roles and seek to promote its potential for large-scale stand-alone industry. The Plan further states in paragraph 2.2.23 that it is envisaged that Ringaskiddy will continue to adequately meet the needs of the pharmaceutical industry and other large stand-alone activities. The Council's submission to the Board in this instance concludes that the proposal is not contrary to the tourist policy designation or vision for Spike Island, noting that its success in terms of tourism development is dependent on investment, product development and marketing. ***Spike Island's future success depends primarily on offering an authentic and engaging experience to the people that visit it. I was involved in the successful campaign in 2006 to have Spike Island recognised for its tourism and amenity potential, as well as to have its heritage protected and outlined. Spike Island is just one of four coastal defences in Cork Harbour and maintaining the integrity of the landscape is integral to this. Dropping a monstrous building on the shoreline within 1km of the jewel in the crown of Cork Harbour will damage the experience. The fact that this building is an incinerator and that public perception of incineration is overwhelmingly negative will further damage it and Ireland's reputation as an emerald isle.***

It is further noted that the proposed development will not impact on activities in the harbour area as there is no physical element proposed that will affect the use of the harbour for leisure, amenity or tourist activities, as is the case with existing pharmaceutical plants.

Tourism in the immediate Ringaskiddy area is not a key economic driver of this primarily industrial area. ***Tourism is however a key economic driver of both the Cork and the Irish economy.***

- *Tourism is the island of Ireland's largest indigenous industry; responsible for in excess of 4% of GNP in the Republic of Ireland and employing approximately 200,000 people.*
- *In 2014, we welcomed 8.4 million overseas visitors to the island of Ireland, delivering revenue of about €4.1 billion (source Tourism Ireland)*

That said, the proposed development will include additional tourism infrastructure in the form of a public amenity walkway and viewing platform to attract additional visitors to the Ringaskiddy area, and to improve the variety of the tourism offer in wider Cork Harbour. *You can't be serious by suggesting that this development will "improve the variety of the tourism offer in wider Cork Harbour".*

Proposed works to the public roadway will improve accessibility to existing and proposed amenities in the area, including the proposed park at Haulbowline. (Also see sections 6.5.7.3 and 11.5.4.10 of EIS). With respect to the location at Ringaskiddy, it is notable An Bord Pleanála, in granting permission for the relocation of Port of Cork facilities (Ref: 04.PA0035), concluded it would not compromise the amenities of Cork Harbour in terms of tourism, heritage and recreation. *Many people may not agree with that conclusion. However, most people understand that port facilities need to be located on the edge of a Harbour. This development does not need to be anywhere near Cork Harbour. I question if proximity to the Port is the real reason for Indaver's fixation with this site?*

In this regard, it is submitted that the proposed development supports the objective of policy CS 4- 1(d) of the Cork County Development Plan, 2014 which seeks to establish an appropriate balance between competing land uses in Cork Harbour to maximise the area's overall contribution to the sustainable development of the Metropolitan Cork region.

3.7 Issue No.4 Submission: The submission of Cllr. Marcia Dalton makes reference to the subject site's coastal location with reference to its incompatibility with Paragraph 4.9.4 of the Cork County Development Plan, 2014, (which highlights increased pressure for development of recreational uses in coastal and marine areas and enhanced recreational access to Cork Harbour) and policy EE6-2, which seeks to protect harbour side land for industrial and marine related developments dependent on access to deep water. 3.8 Issue No.4 Response: The proposed development does not restrict access to Gobby beach and incorporates a public amenity walkway leading towards the Martello Tower and a viewing platform overlooking the Harbour. The coastal area where the proposed development is located is not a deep water area and therefore does not result in the loss of harbour side land for industrial and marine related developments dependant on access to deep water.

4. Conclusion In summary, having regard to the provisions of the national, regional and local waste management policy frameworks and strategies, regional and local planning policies and objectives, the planning history of the site together with the revised development scheme now proposed, it is considered that the development of a strategic large scale waste treatment facility on the subject, industrially zoned, site within a strategic employment area would be in accordance with the proper planning and sustainable development of the area.

END OF DAVE COAKLEY DOCUMENT

I trust that my submission and those of others will once again highlight why this proposal is unsuitable on the site selected by Indaver and why it should be rejected once and for all.

Signed:
Hendrick Verwey
November 2025