

Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Joseph O'Hara
Berryhill House
Ballynacrusa
Cobh
P25 YY57

Date: 16 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. 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.

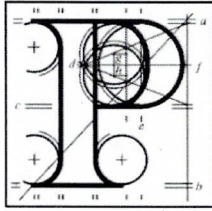
Yours faithfully,

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

Teil	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



An
Bord
Pleanála

Observation on a Planning Appeal: Form.

Your details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

Joseph O'Hara

(b) Address

Berryhill House, Ballynacrusha, Cobh P25YY57

Agent's details

2. Agent's details

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not Applicable

(b) Agent's address

Not Applicable

Postal address for letters

3. During the appeal process we will post information and items to you or to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

You (the observer) at the address in Part 1

The agent at the address in Part 2

Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

(a) Planning authority

(for example: Ballytown City Council)

Cork County Council

(b) An Bord Pleanála appeal case number (if available)

(for example: ABP-300000-19)

Click or tap here to enter text.

(c) Planning authority register reference number

(for example: 18/0123)

PA04.318802

(d) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Ringaskiddy Co.Cork

Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

1. The site proposed is unsuitable and inadequate for the facilities and activities proposed as follows:
 - a. The site is subject to erosion from storms and tides and a substantial part is within the flood risk zone. The flood risk will become more severe in the lifespan of the proposed facility based on current flood risk projections.
 - b. As the installation ages over its 15–20-year max design lifetime, it will become increasingly more vulnerable to climatic effects and events.
 - c. Emissions dispersion across the harbour will impact those on higher ground across Cobh and Cross Haven and weather inversions will result in those in lower depressions (bowls) to experience higher exposures of pollution and dispersed contaminants.
 - d. The site is prominent and central in the harbour and highly visible due to its very low elevation at sea level. The resultant stack and plume will overshadow the skyline and be unsightly. No amount of camouflage and green cladding will avoid the dramatic visual impact.
 - e. The site is not adequately served by infrastructure – it is landlocked at the end of a cul-de-sac and has no sea jetty/dock access for alternative shipments/haulage. Emergency services are potentially blocked and delayed if an incident were to occur during Heavy traffic times. This situation has become more acute since the original EIS was submitted.
 - f. The site is unsuitable for hazardous activities and poorly situated to deal with emergencies such as leaks, spillages and emissions due to fires or failure of plant or equipment including the incinerator and its components such as pollution abatement (filters) and fire prevention systems.
 - g. The site (RY-1-09) is not zoned for industrial use and failed the WHO site selection criteria for such activities.

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

2. The activity proposed presents a health risk to Myself, My Family, neighbours and the local community due our location upwind or within the emissions dispersal zones due to the follow:
 - a. The incineration of waste is not completely efficient and gives rise to toxic/polluting emissions. The dispersal of these contaminants into the atmosphere via a stack does not abate the polluting nature but merely reduces the ground level concentration.
 - b. Filters and off-gas treatments are not 100% efficient and are vulnerable to poor maintenance and operation complexities caused by weather and other climatic conditions.
3. The composition of the off-gases – regardless of plume or plume suppression methods include toxic particulates and gases.
 - a. particles can penetrate deep into the lungs and even enter the bloodstream, causing serious health problems such as heart attacks, asthma attacks, and strokes. Abatement filters employed on incinerators reduce but do not eliminate such emissions during normal operation and during an upset condition can be further compromised. There is no science-based data that supports a narrative of acceptable level of risk or that there is zero risk due to dispersal.
 - b. Uncharacterised waste and household waste enveloped in plastic bags as is required by CCC is proposed to be incinerated and emissions will therefore be highly likely to contain dioxins and other toxic gases and substances. Abatement filters employed on incinerators reduce but do not eliminate such emissions during normal operation and during an upset condition can be further compromised. There is no science-based data that supports a narrative of acceptable level of risk or that there is zero risk due to dispersal.
4. The composition of liquid waste streams produced by condensate from waste burning will produce toxics liquid waste streams. This will have to be further treated but the same issue with treatment efficiency and subsequent transport or release of treated water to the harbour presents another unacceptable risk to the residents and users of harbour as a water source for the swimming and sailing amenities.

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

5. The composition of solid waste “so called fly ash” is unreliably characterized from incinerated waste when sourced from local industrial (pharmaceutical) or from municipal waste and will be variable and contain heavy metal and other toxic contaminants. Incineration does not destroy but concentrates such constituents. Handling and further disposal of these concentrates is not adequately addressed by the submission. There is no science-based data that supports a narrative of acceptable level of risk or that there is zero risk due to the handling of concentrated toxic waste of this nature.
6. The Incineration process reduces but does not eliminate waste. It produces toxic concentrates both solid and liquid which presents a magnified hazardous operation. I have no confidence in the applicant’s ability to perform the duties associated with the handling of such concentrates and they neither have the track record or reputation to do so as a primary function.
7. Incineration is not a form of recycling and promotes the increase of waste generation to meet the optimum capacity and volume of waste needed to run an incinerator effectively and efficiently. The application therefore is a last resort and does not present a sound environmentally responsible approach to waste treatment.
8. The EIS is deficient and not in compliance with legislation. The updated EIS is not a substitute for the required EIAR which would provide a comprehensive analysis of the potential environmental effects of the project which the 2016 EIS or any updates has failed to do. The applicant does not have the legislative right to deem that an updated EIS is sufficient and in compliance with the EU and Irish legislation of 2020 that requires an EIAR.
9. The application seems to attempt to avoid transparency on the above points and issues and many parties in the applicant’s organisation seem to be biased and have conflicts of interest in the development whether from related industries or services. It is highly likely that this application will not address the source issue of waste generation and frustrate the public truly assessing the risks of this development.

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

10. The proposed development contravenes the Cork County Development Plan 2022-2028.

Please refuse this planning application for the above reasons.
In addition to this observation, I wish to request an Oral Hearing to continue full public participation in this application but when the applications submissions are in compliance with the current legislation most notably in Item 8 above.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

Fee

7. You **must** make sure that the correct [fee](#) is included with your observation. You can find out the correct fee to include in our [Fees and Charges Guide](#) on our website.

This document has been awarded a Plain English mark by NALA.

Last updated: April 2019.

