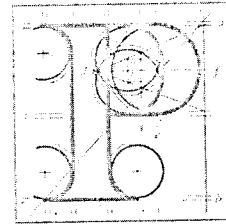


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An  
Coimisiún  
Pleanála

Liam Quaide TD  
21 Blossom Hill  
Broomfield East  
Midleton  
Co. Cork  
P25A326

Date: 24 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](http://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
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An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902

Home address:  
21 Blossom Hill,  
Broomfield East,  
Midleton,  
Co. Cork  
P25A326

17th November 2025

**Re: Observation on case reference: PA04.318802, Ringaskiddy, Co. Cork**

A Chara,

I wish to make an observation on the proposed development of a resource recovery centre (including waste-to-energy facility) in Ringaskiddy, County Cork, case reference **PA04.318802**.

This proposal, in various iterations, has been under consideration for the past 24 years. Previous applications (2001, 2009, 2016) have all encountered serious difficulties, leading to refusals, appeals, oral hearings and ultimately High Court actions. At each of the three Oral Hearings, **each Planning Inspector recommended refusal** on grounds including site unsuitability, visual impact, coastal erosion, emergency evacuation concerns, and conflicts with surrounding land uses. I do not believe that anything in the current application materially addresses the issues already highlighted repeatedly by inspectors, Cork County Council, and local communities.

I continue to object to the proposal on the following grounds:

- (1) Inappropriate location and inadequate site
- (2) Contravention of the Cork County Development Plan 2022–2028
- (3) Flood risk and coastal erosion
- (4) Public health and air quality concerns
- (5) Adverse impacts on wildlife and the Cork Harbour Special Protection Area
- (6) Conflict with tourism, amenity and public investment
- (7) Risks to Naval Base, National Maritime College of Ireland And Emergency Evacuation:
- (8) Policy conflicts with the Circular Economy and national waste strategy
- (9) Perverse incentives for long-term waste management

Further detail is set out below.

## 1. Inappropriate location and inadequate site:

The proposed site selection dates back to 1999/2000, before the transformation of Cork Harbour into a nationally significant hub of education, research, heritage, recreation and tourism.

Multiple An Bord Pleanála Inspectors have previously concluded that the site is:

- Fundamentally too small
- Visually inappropriate
- At risk of coastal erosion
- Unsuitable for emergency evacuation, especially regarding the Naval Base and National Maritime College of Ireland (NMCI)

These concerns remain entirely valid.

The site lies at the heart of a heavily invested public coastal corridor that includes:

- National Maritime College of Ireland (€60m investment)
- MaREI Energy & Marine Research Centre (€29m investment)
- Haulbowline Naval Base upgrades (€12m + ongoing masterplan projects)
- Haulbowline East Tip Park (€25m remediation)
- Spike Island redevelopment (€6.5m investment)
- Expanded cruise tourism through Cobh (estimated €17m annual economic value)
- Camden Fort Meagher tourism and cultural development

Cork Harbour has evolved dramatically since 2001. What was once largely industrial land is now a centre for marine training, research, national defence, heritage tourism, and public recreation. A large incinerator—requiring a 100m-class emission stack—would be **entirely inconsistent** with the modern development trajectory of the harbour.

## 2. Contravention of the Cork County Development Plan 2022–2028:

Under the Cork County Development Plan, Ringaskiddy is identified as a Strategic Employment Area, supported by policies intended to protect land for appropriate industrial, research, and educational expansion.

Crucially, the proposed incinerator site is specifically zoned for:

- Third-level campus expansion
- Marine-related education
- Enterprise, research and development

Allowing an incinerator would undermine these objectives by:

- Negatively transforming an important site needed for campus and research growth
- Creating land-use conflict with sensitive educational and naval institutions
- Undermining long-term strategic planning for maritime training and research

The proposal is directly contrary to the zoning and strategic objectives of the Development Plan

### 3. Flood Risk and Coastal Erosion:

Cork County Council and the Office of Public Works acknowledge that the site is a known flood-risk area, and studies predict **significant future erosion**. Even the developer has previously conceded that the site requires extensive raising and flood defences.

Building major hazardous infrastructure on an eroding, low-lying coastal site is inappropriate—especially in an era of accelerating sea level rise and climate-related storm surges.

Furthermore, the proposed raising of the land height would intensify the already unacceptable **visual impact** of a large industrial facility in a sensitive harbour landscape.

### 4. Public Health and Air Quality Concerns:

Incinerators emit a range of pollutants, including:

- Ultra-fine particles (PM0.1), which pass through filters
- Dioxins and post-combustion chemicals
- Acid gases and heavy metals

At the 2016 Oral Hearing, toxicologist Prof. Vyvyan Howard highlighted that chronic exposure to ultra-fine particulates can reduce life expectancy and that existing filtration does not reliably capture them.

Cork Harbour's basin-like topography creates a phenomenon known as thermal inversion, where air becomes trapped at low level and cannot disperse. This significantly heightens the risk associated with fine particulate emissions settling over populated areas. The developer's own plume modelling shows that, depending on wind conditions, emissions could affect towns across the entire harbour, not just Ringaskiddy.

There has been **no independent health impact assessment** of long-term exposure for residents, students, staff, or naval personnel. This is unacceptable.

### 5 Adverse impacts on wildlife and the Cork Harbour Special Protection Area:

The site currently consists of grassland and scrub habitat used by a wide range of foraging bird species. It lies within 500 metres of the **Cork Harbour Special Protection Area**, a site of international conservation importance.

Key issues include:

- Loss of foraging and resting habitats during construction,
- Disturbance from noise, traffic and lighting,
- Eco-toxicological risks from airborne pollutants to otters, seals, and other marine fauna,

- Long-term contamination of sensitive tidal and mudflat ecosystems.

These concerns have never been adequately addressed.

#### 6. Conflict with Tourism, Amenity and Public Investment interests:

Cork Harbour is now a major national tourism destination, enhanced by significant public funding and the development of World Class Harbour Experiences envisioned by Fáilte Ireland.

A 240,000-tonne waste burner with a tall stack would:

- Damage the visual amenity of a heritage landscape
- Conflict with the character of Spike Island, Camden Fort Meagher, Haulbowline Park and recreational sailing routes
- Undermine cruise tourism and the harbour's "clean, green" reputation
- Negatively effect the economic value of Cobh's cruise industry (estimated €17m per year)

An industrial incinerator is entirely incompatible with a harbour now globally recognised for sailing, marine recreation, heritage tourism and wildlife.

#### 7. Risks to Naval Base, NMCI and Emergency Evacuation:

All previous planning inspectors identified **serious concerns** regarding evacuation and emergency response relating to:

- Haulbowline Naval Base
- National Maritime College of Ireland
- MaREI research facilities
- Maritime apprentices, students, and residential workers

The proposed site sits at the narrowest point of the peninsula, creating choke-points in any emergency scenario. These concerns remain unresolved.

#### 8. Waste Policy and Circular Economy Conflicts:

A new Waste Action Plan for a Circular Economy is due in 2026, aligned with a national Circular Economy Strategy and EU guidance, which explicitly discourages increases in incineration capacity because it:

- Locks Ireland into long-term burning of recoverable materials
- Undermines recycling and reuse targets
- Creates dependency on a continuous waste stream

Ireland already has two large commercial incinerators (Meath and Poolbeg). Adding another major long-lived burner is inconsistent with national and EU circular economy ambitions.

Approving this project now—before updated policy is published—would be premature and strategically unsound.

## 9. Perverse Incentives:

Large-scale waste-to-energy plants require constant high volumes of waste for 30+ years to remain economically viable. This creates:

- A disincentive to reduce or reuse waste
- Pressure to secure waste feedstock
- Potential future reliance on importing waste to sustain operations

This is the opposite of what Ireland's waste hierarchy and circular economy strategy require.

### **Conclusion:**

For the reasons outlined above—relating to location, site suitability, environmental and health risks, policy conflicts, and the fundamentally transformed nature of Cork Harbour—I submit that planning permission for this proposed incinerator should be **refused**.

The development is contrary to the Cork County Development Plan, undermines decades of public investment, poses serious environmental and health risks, and conflicts with Ireland's transition toward a circular economy.

Repeated applications by Indaver, despite the mass of evidence and argument against this incinerator, also impose unacceptable stress on communities around Cork Harbour who have been forced on each occasion to launch a major campaign, involving immense time and effort and funding.

I respectfully request that An Coimisiún Pleanála refuse permission for this proposal. In the event that there is another Oral Hearing on this application I wish to participate.

Yours sincerely,



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Liam Quaide TD  
Cork East