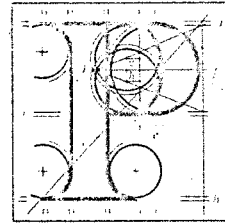


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Noel O'Riordan  
Woodhaven  
Strawhall  
Monkstown  
Co. Cork

**Date:** 19 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  
Executive Officer  
Direct Line: 01-8737263

PA04

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Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
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Ríomhphost	Email	<a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a>

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

TO: An Coimisiun Pleanala  
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 Noel O'Riordan

DATE 13 Nov 2025

OBSERVER ADDRESS Woodhaven, Strawhall, Monkstown Co Cork

### **OBSERVATION DETAILS**

Notwithstanding the information submitted in August 2025, the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by M28 on the other. It is considered that the actual usable area of the site is inadequate in relation to the scale of development proposed. (Derek Daly, 2017).

By all 3 Bord Pleanala Inspectors, the EIS was found to be deficient in substance even where found legally adequate in form. The information as submitted to the Board is therefore insufficient to enable the Board to carry out an environmental impact assessment in an appropriate manner, and to form a basis for an informed decision on the application. (Daly, 2017). Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence.

There is no de novo site selection in the material submitted in 2025, but instead a justification based on site ownership by Indaver, with inadequate consideration given to major public and private investment initiatives which have transformed the character of the immediate area in the intervening period since 2000. (Daly 2017)

The site is located on a known flood risk area, marked as same in Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW floodinfo.ie , (Flood Summary ID-1364, 13082, 12085). Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure. It is my considered opinion that the site is inherently unsuitable for location of a use which processes, and generates hazardous compounds. (Oznur Yukel Finn, 2009).

Road access is inadequate — an extra 150 truck movements per day would strain infrastructure.

Notwithstanding the zoning of the greater Ringaskiddy area as industrial, the Indaver site area where the incinerator build is proposed (RY-I-09) is zoned as suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. (RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28) This is dismissed in the August 2025 information but it is of critical importance that this zoning be upheld as it is directly linked to the investment in the NMCI and MaREI 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.

The site is also located in an area of natural beauty and the Irish tourism body, Fáilte Ireland (formerly Bord Fáilte) has explicitly recognised Cork Harbour as a destination for tourism and natural-beauty-spot experiences. For example:

- Their document for the “Cork City, Harbour and East Cork Destination & Experience Development Plan (DEDP)” states a vision of Cork Harbour as “a world class Cork Harbour experience” and talks about harnessing its “natural heritage” and scenery.
- A news release from February 2024 notes that Fáilte Ireland is developing a “Cork Harbour Tourism Plan ... to position Cork Harbour as a world-class tourism destination ... the world’s second largest natural harbour ...”

None of this will be possible with a giant incinerator stack polluting the air. This is both a physical and visual deterrent for the tourist economy.

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.

Meaningful public consultation was not carried out, in breach of international guidelines.

Incineration doesn’t eliminate waste — it transforms it into gases, fine dust and ash, all containing harmful pollutants. Cork harbour’s suffers from temperature inversions where a layer of warm air sits above cooler air near the ground. This prevents air from rising normally, so smoke, fog and pollutants get trapped and cannot disperse. Therefore frequently the emissions will not disperse at a higher altitude and cause harm to locals. Haulbowline Island Park at a cost of 25 million euro opened in 2021 so people will be walking, cycling and breathing right next to and all around this incinerator. Emissions can spread within a 40-mile radius, affecting Crosshaven, Carrigaline, and Cork City – a considerable population of 200,000+ citizens. 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. Incineration creates toxic ash (about one-third the original waste volume).

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, especially in this case where Indaver know that their commercial plan cannot rely on waster produced in Ireland, it will lead to importing foreign waste.

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.

Please refuse this planning application on the basis that the site is inherently unsuitable, concluded by all 3 Bord Pleanala 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. I wish to request an Oral Hearing to continue full public participation in this application.

I enclose fee of €50