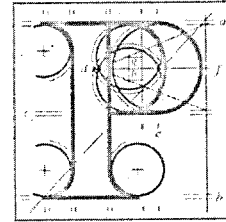


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Paul Kelly
Strandville
Rushbrooke
Cobh
Co. Cork

Date: 18 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

PA04

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 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

Paul Kelly
Strandville,
Rushbrooke,
Cobh,
Co. Cork
14th Nov 2025

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

Overview

It is somewhat disconcerting, if not unlawful, that EU and Irish planning regulations facilitate the submission and resubmissions of planning applications, until what appears as in this case, a satisfactory outcome is received for the applicant. Is one entities desire to make more money surpass the greater need and good of any community? Minor changes, additional information, larger scale do not alter the fundamental issue that a municipal and hazardous waste incinerator is unsuitable within the landscape and environment of Cork Harbour, a view held by thousands of people. And where does the local community sit in the authorities' deliberations? How objective and independent are the arbiters in the processes, who benefits and who loses as a result of the proposed incinerator? What of the harbour's environmental designations, will they be extinguished if the proposed development proceeds? How is a local community supposed to reasonably fund objections, observations and submissions against an international group with a turnover in excess of \$871m (2024) in seeking an un-biased determination.

Beneficiaries

Obviously, the behemoth that is Indaver is a winner if the development proceeds, providing municipal and hazardous waste management services to the waste producing sectors, some with considerably deep financial resources. And Indaver will benefit further from the sale of energy and the recycling of materials. The waste producing sectors may initially save on export and haulage costs. But what have these sectors done in the last 24 years to minimise their waste production? Where are the efficiencies and technological advances that should have been self-implemented or imposed on the sectors, that would reduce the volume of waste produced? Have stricter hazardous waste standards and volumes not been set and targets entered into? Does the principle 'minimize waste at source' no longer apply or does it only apply to households as there is insufficient authority or the will to penalize the large organisations hazardous waste

producers? Does Indaver expect the same volumes of waste material in the future as it did 24 years ago or will the local reductions in municipal and hazardous waste be supplemented by imported municipal and hazardous waste? Recognising increasing population, is the percentage of waste per household decreasing? Independent of population growth, why is hazardous waste volume not decreasing? If the development is sanctioned, what additional services will Indaver seek to provide at any time in the future?

Losers

The losers, if the proposed development is sanctioned, is the community, the environment and the potential of Cork Harbour. It is well documented that there are elevated cancer rates in Cork Harbour due to local industry, attributable to undefined sources. Bringing a hazardous waste facility into the harbour community will do absolutely nothing to reduce those health risks

a) through altering the chemical composition of the waste to different forms but not removing those chemical elements and compounds -ashes, gases, particulates and other pollutants and

b) by facilitating, if not encouraging, existing and new local industry to produce a greater quantity of hazardous waste to be inadequately managed at a local level.

Environmental losses are as described above, but also odours as well as visual intrusion from Poolbeg waste to energy facility – a comparable blight on the landscape. Since the original application 24 years ago, the potential of the Cork Harbour has been enhanced significantly through collaborations with Cork Co, Port of Cork and the local community. Cruise liner visits have grown, with passengers no longer being bused out of town in such large numbers when they visit, along with general tourists, local amenities – Spike Island; Fota Wildlife, House and Arboretum; the historic Cobh town centre and its attractions. The water quality in the harbour has improved significantly making it more attractive to wildlife – porpoises, seals, otters; sea swimming, angling and boating of many forms, though this potential is yet to be fully realized. The harbour is on an upward trajectory and what is needed is more sustainability, tourism, attractions and reasons to visit and indulge. A local municipal and hazardous waste facility will do nothing to fulfil those ambitions

Technology Fails

A common thread with any technology whether old but more particularly new, is that it fails. Annually the EPA produces reports of failing waste water treatment facilities around our coast. These facilities use tried and tested simple technology. How can we then pivot and expect to rely upon scrubbers, thermal oxidisers, precipitators, digestors etc to reduce harmful ash, gases, particulates, vapours etc. Reduce, not eliminate, as the by-products, now concentrated, remain with the risk of accidental release, spillages etc. as a result of set and not improving standards and regulations, inadequate oversight, substandard and unsuitable location (flooding) and insignificant non-compliance penalties.

How can the arbiters of such a technical development become reliant on submissions from an Applicant without a reciprocally funded response? Where is the funding for balanced expert opinion? How many non-compliances or exceedance will be tolerated by governing agencies, how many will not be even be detected or measured – again technology failures. Will real penalties be conditional and be imposed on loss of life, loss of potential, loss of wellbeing and sustainability and the community compensated accordingly

Given the progress in local amenities, sustainable outlook, increasing populations and the number of unanswered questions I see little to support the resurrection of this referral/application

This planning application should be refused 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 request an Oral Hearing to continue full public participation in this application

Encl. €50 fee.