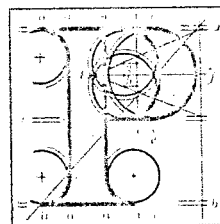


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



**An
Coimisiún
Pleanála**

Paul Reid and Rhona Reid & Others
2 Martello Park
Ringaskiddy
Co. Cork
P43 AY64

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.

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	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Riomhphost	Email	communications@pleanala.ie

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

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1

13th November, 2025

OBSERVATION ON SID APPLICATION

Case Reference: PA04.318802

Proposed Development of Resource Recovery Centre by Indaver NV t/a Indaver Ireland at Ringaskiddy, Co Cork.

Observer Names and Addresses:

Paul Reid & Rhona Reid
2 Martello Park
Ringaskiddy
Co Cork, P43AY64.

Anthony McDermott & Aileen McDermott
8 Martello Park
Ringaskiddy
Co Cork, P43RX67.

The €50 fee has been paid online with this submission.

OBSERVATION DETAILS:

In 2017, a decision was made by the Elected Members of Cork County Council to rezone part of the applicant's site for educational and marine research purposes and related activities, which is in tandem with the facilities that exist in that vicinity. The rezoning was a sensible response to reflect the substantial changes in the character and purpose of the area since the applicant initially applied to build an incinerator back in 2001.

Best practice in planning would not advocate overriding the current zoning of a site in favour of its past zoning. The applicant may be entitled on paper to pursue planning permission based on the past zoning of the site, but in view of the rezoning decision, to grant such a permission would be utterly cynical, would contravene the County Development Plan, completely undermine the role of the Elected Members and the Plan itself, and render useless local democracy.

It should be noted that, contrary to what the applicant states in their application, residential development in Ringaskiddy is continuing, with dozens of private and local authority housing units currently under construction.

The European Commission has recommended a moratorium on new incinerators in favour of waste reduction, reuse and recycling.

The proposed incinerator represents the epitome of a linear economy – material is produced, utilised, discarded, and disposed of. Ireland's National Waste Policy emphasises a circular economy – reduction, reuse and recycling. The proposed incinerator, to be commercially-viable, will require a steady stream of waste that is not reused or recycled. The project will lock-in the burning of waste as opposed to alternative methods – for at least 30 years. If we can't produce enough waste to burn to keep the incinerator in profit, we might need to import

more waste. It's extraordinary that someone could think this is a good idea, or that it is in keeping with National and European Waste Policy.

The suggestion that incineration could form part of a circular economy is a blatant falsehood and has been exposed as such numerous times.

The applicant suggests that incineration will reduce our reliance on landfills. The truth, however, is that incineration creates residues and ash (around 30% of the original waste volume), and much of this will end up in landfills.

The applicant admits, in their further information, that they are unable to produce a Health Impact Assessment, due to a lack of obtainable information. They instead attempt to address the health implications of their project in their Environmental Impact Statement. Their EIS was determined by all previous An Bord Pleanála Inspectors to be deficient. If we are being told that the applicant's EIS adequately addresses matters of health, this will require quite a leap of faith, particularly given that no state body monitors health impacts near incinerators.

The incinerator will be unable to burn or break down many modern, emerging compounds, even under high temperatures, as these compounds have been engineered to be resistant to oxidation. Even material that is burned is not eliminated in a true sense – it is transformed into harmful by-products such as gases, fine dust and ash.

The applicant suggests that the proposed incinerator may have positive psychological and health benefits for the local community. This is an odd suggestion, already undermined by the stresses placed upon the local community by twenty-five years of campaigning against the incinerator. There were babies born at the time of the original application who are now well into adulthood and actively campaigning against it, and there are older people since passed away who will never know the outcome of their battle against the applicant. It is sad and rather dreadful that one company could have been allowed to hold so many ordinary people hostage with its muscle for so long.

The applicant has made no attempt to undergo a Site Selection process since their initial application back in 2001, ignoring the evolution of the area since then. Their rationale for this merely appears to be that they own the site, and so they won't countenance looking at alternative sites. This gives poor consideration to nearby developments which are completely incongruent with the application, such as the National Maritime College of Ireland and Beaufort Institute, the Port of Cork's Paddy's Point, and Cork County Council's Haulbowline Recreational Park, all of which required significant effort and investment.

All three previous An Bord Pleanála Inspectors recommended refusal of the application, citing, amongst other factors, its incompatibility with educational, amenity and heritage investment and development in the area.

Inspectors also advised that the site was too small for the development. Since then, the site has shrunk even further on the western side due to a CPO for the M28 Road Project, and has shrunk on the eastern side due to natural erosion of the soft glacial till, which is worsening

each year. The site is far too small for a 30-40 year project. Certain scientific models show sea level rises in this area in the next 30-40 years which should ring quite a few alarm bells for a hazardous waste facility that might be built next to a beach. Even on the matter of site suitability alone, the application should be refused.

The applicant claims that "Ringaskiddy is not currently a popular tourist destination". The applicant would seem to be wilfully ignorant of the number of year-round visitors to Haulbowline Recreational Park, Paddy's Point, Gobby Beach, the Napoleonic-era Martello Tower, and the hugely popular Loughbeg Beach, as well as cruise liners that dock at Ringaskiddy in addition to Cobh.

It is universally accepted that Cork Harbour is one of the largest and most scenic natural harbours on the planet. Countless visitors come to Cobh, Spike Island, and Camden Fort Meagher, amongst various other spots, while passengers from all over the world visit on cruise ships. The proposed project, given its building size, stack, and stack plume, will be visible from every stretch of Cork Harbour. It will be the first note of attention for cruise passengers entering the harbour for the first time, and the last thing they see when leaving.

Enabling such a monster to be built on the shoreline, to be detested by generations of residents, tourists and harbour users to come, would be unforgiveable. The visual amenity of Cork Harbour is an extraordinary asset, much of it yet untapped. It is incumbent on state authorities to cherish and encourage it – not to do the opposite.

Whether An Coimisiún Pleanála accepts this point or not, there is a considered feeling amongst the public that the applicant has been afforded much patience and hand-holding over the years, in contrast to how much the applicant's opponents have been afforded. It is certainly hoped that An Coimisiún Pleanála will correct this perception, and honour the principles of the very important *Aarhus Convention* which is an international treaty stating that environmental issues are best handled with the participation of all concerned citizens.

With that in mind, we request an **Oral Hearing** in relation to this application. This is important given the technical and complex nature of the information at hand, and also given the substantial volume of further information submitted by the applicant with limited notice given to the public to analyse it.

It should also be noted that, at the previous Oral Hearing, much of the information submitted by the applicant did not stand up well to scrutiny, and included irregularities that were exposed at the Hearing (such as the applicant's dioxin figures and soil samples). It would be impossible for An Coimisiún Pleanála to make a fair and informed decision on this application without an Oral Hearing first taking place, so that the applicant's further information can have much-needed light shone upon it.

Kindly acknowledge receipt of this submission - contact details provided above.