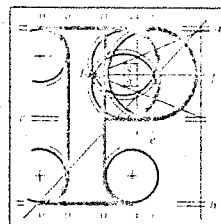


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Sally and Paul Hudson
27 Diamond Hill
Monkstown
Co. Cork
T12 KRN4

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
Ríomhphost	Email	communications@pleanala.ie

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

November 13 2025

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Observation on SID Application
Case Reference PA04.318802
Proposed development of a Resource Recovery Centre (including Waste-to-Energy Facility) by Indaver NV t/a Indaver Ireland

Dear Sir/Madam

We wish to lodge Observations in respect of the above. This submission is accompanied by the requisite fee (€50) remitted in accordance with the procedures prescribed on the Coimisiún's web-site.

We expect that a large number of objections are likely to be submitted in respect of this controversial scheme. Many of these will be of a much more expert and informed nature than this and we would be confident that the Coimisiún will be comprehensively appraised of the various detailed concerns about the proposed development.

We simply wish to append our own following observations and queries to support this body of objections for consideration and inclusion in the Coimisiún's deliberations and decision.

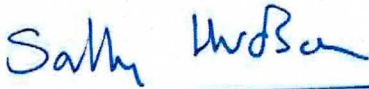
- 1 Whilst we acknowledge that there are procedural reasons that could account for the long duration between the submission of the original application (2016) and this reactivation, it seems indulgent of the applicant that deliberations should now be resuming. Significant developments during the intervening period - including extensive investment and adoption of a wide range of educational, amenity and educational resources in the harbour area - reflect a more significant evolution in the use and character of the outer harbour than can be fully reflected in a Further Information re-working of a proposal conceived and initiated nearly 10 years ago. Not least, the County Development Plan has been significantly revised since the original application. We rely on the Coimisiún to dutifully reconcile the proposed development with the prevailing Development Plan and with all current iterations of the extensive governing European and National legislation relating to the Further Information, its EIS and NIS.
- 2 The extremely large building housing the proposed incinerator (euphemistically called a Resource and Recovery Centre including Waste-to-Energy facility) occupies the eastern part of the Indaver site between the Hammond Lane site and Gobby beach. Most significantly, in the Cork County Council Development Plan 2022-28, this area is specifically and exclusively zoned RY-1-09 'suitable for the extension of the third level educational campus and enterprise-related development, including marine-related education, enterprise, research and development.....' And, further, 'areas within this zone may be used by special conservation interest bird species for which Cork harbour is designated. Account will be taken of this when considering new development proposals in the area'. Any permission granted by the Coimisiún at this time would be unambiguously contrary to the Development Plan zoning.

- 3 The proposed incinerator, by nature of its function and as witnessed by a series of accidents, explosions and/or fires in at least 9 installations in Europe within the last ten years (including 1 in Poolbeg, Dublin and 3 in European Indaver Plants) may reasonably be deemed an inherently high-risk use. The proposal to locate this facility immediately adjoining the only road and emergency access serving the NMCI, UCC IMERC/Beaufort Building Centre, the National Headquarters of the Irish Naval Service, the Rocky Island crematorium and Haulbowline Island Park, (both intermittently heavily populated) and otherwise close to these facilities and the immediately adjoining major ESB Networks Loughbeg sub-station and compound and related high voltage distribution power lines which run directly alongside the southern boundary of the Indaver site are, in our opinion and arguably, sufficiently sub-optimal as to render the site totally unsuitable.
- 4 We are unconvinced that the provision of additional incineration provision in the State is necessary. Incineration does not eliminate waste but transforms it into potentially harmful pollutants in gases, fine dust and ashes. We note that a moratorium has been advised in recognition of serious environmental concerns on the construction of new incinerators in the EU (2017); imposed in Wales, Scotland and New Zealand, and is currently being phased out in Denmark, once a leader in incineration. The British Society for Ecological Medicine has concluded that no new incinerators should be built given the associated health risks associated with the fine and ultra-fine particulates emitted (4th Report of 2005/2008). Recent research has revealed that incineration is practically as dirty a way to generate energy as coal (average gCO₂e/kWh Coal 730, Incineration 720, Gas 400, Solar 40, Nuclear 12, Wind 11, source IPCC/BBC 2024). Furthermore, potential for carbon capture from incineration emissions is negligible; the only such pilot project to capture carbon in the UK (Ferrybridge WEF) collects 365 tonnes of CO₂ pa from a facility which produces 500,000 tonnes of CO₂ annually (source BBC 2024). Burning plastics - a significant and increasing component of the waste material (given widely adopted and separated organic waste provision) - which will be treated in the incinerator, produces 175 times more CO₂ than burying it in landfill (UK Government). Commercial incineration is likely to rely on lock-in contracts with waste operators that may discourage the reduce, re-use and recycling imperative and/or prompt the importation of waste material. None of these considerations suggest that incineration is environmentally beneficial.
- 5 Enormous quantities of a wide-ranging content of residual household, commercial and industrial waste material will be required to be delivered in the continuing stream necessary to maintain the incinerator operation (up to 240,000 tonnes pa), 10% of which is likely to be hazardous. Substantial quantities of post-treatment material will be generated (over 53,000 tonnes of bottom ash, over 2,000 tonnes of boiler ash and over 9,000 tonnes of flue gas-cleaning residues, significant amounts of which are likely to be exported for treatment (to Northern Ireland, Germany or elsewhere in the EU). Waste materials, drawn and delivered from around Munster and beyond and the post-treatment material for disposal will presumably be transported over significant distances. It seems less than ideal that the facility should be located geographically in a remote southern location within the most southern county in the country.
- 6 In addition to the appreciable visual impact that the large bulk of the building will impose on the greater Harbour area, the case is made in the FI submission that this large industrial volume is comparable to the several other very large buildings on the Ringaskiddy industrial campus. This is an erroneous comparison since all these other buildings are located within a large parkland setting generally remote from the public road. The proposed incinerator is a very substantial building horn-shoed into a small proportion of the overall site and its impact on the adjoining Scenic Route L2545-0, the many Harbour amenities and facilities accessed along it and on the Ringaskiddy Martello Tower, a Protected Structure, which closely adjoins the site, will be overbearing and intrusive.

- 7 Given 1) the inherent difficulties associated with effective monitoring of emissions from an incinerator chimney, 2) the very divided and inconclusive technical opinions relating to their harmfulness, 3) the acknowledged and extensive inadequacies of independent environmental monitoring in the Harbour area and 4) the dysfunctional and wholly ineffectual enforcement procedures exhibited by Cork County Council, we are not convinced that hazardous and harmful emission levels from the incinerator will be sufficiently measured, maintained and/or controlled.
- 8 Adjoining areas of Cork Harbour are designated in EC law, as reflected in the Development Plan, as both SPA and NHA Special Protection Areas for migratory birds, a designation of European significance. We are not convinced that the emissions and environmental degradation generated by the proposed incinerator will not have a measurable impact on this important status.
- 9 In February 2024 Cork Harbour was designated by Cork County Council, Cork City Council and Bord Failte as a World Class Tourism Destination in a shared venture to enhance visitor experience, unlock tourism potential and to position Cork Harbour as a world-class tourism destination and to support the sustainable development of the area into a must-visit destination. Considerable State investment has been committed in many immediately local facilities and amenities over recent years (NMCI, IMERC, extensive remediation works and subsequent creation of Haulbowline Island Park, Spike Island, Fort Camden, Haulbowline Naval Base historic buildings). It would, we believe, be perverse to now significantly compromise, undermine and jeopardise these investments, which have measurably enhanced the resources, quality, amenity, status and attractiveness available to locals and visitors and which the Harbour area now enjoys.
- 10 In each of the three related previous applications by Indaver (2001, 2008 and 2016), the Board's Senior Inspectors strongly recommended against the granting of a permission. It is difficult to see what has fundamentally changed in the present proposal that is likely to change these expert opinions. We trust that in this instance, the Coimisiún will now be able to re-adjudicate on this application free of any 'objective bias'.

We believe that the proposed incinerator is neither necessary nor acceptable. We would consider that its concept and scale, its potential and various deleterious impacts are sufficient to warrant an oral hearing to enable all considerations to be openly deliberated within a single forum.

Yours faithfully,





Sally and Paul Hudson
27 Diamond Hill
Monkstown
Co Cork T12 KRN4
e-mail: paulsallyhudson@gmail.com
Mob: 086 8250205 (Sally Hudson)
086 805 4738 (Paul Hudson)