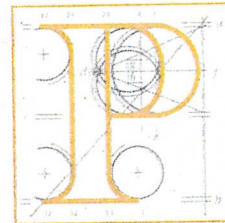


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



An  
Coimisiún  
Pleanála

The Environmental Forum  
C/o Bernadette Connolly  
Mount Carmel  
Kilcolman  
Enniskeane  
Co. Cork  
P47 C578

**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  
Executive Officer  
Direct Line: 01-8737263

PA04

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An Coimisiun Pleanála  
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16<sup>th</sup> November 2025

**Case reference: PA04.318802**

**Proposed development of a resource recovery centre (including waste-to-energy facility)**

The Environmental Forum has a broad remit of environmental protection and restoration informed by the needs of current and future generations. We therefore welcome the opportunity to make our observations in respect of the aforementioned planning for a resource recovery centre (including waste-to-energy facility) at Ringaskiddy, Co. Cork.

**Site Location Unsuitable and Inappropriate**

Three of your Inspectors who presided over Oral Hearings have all concluded in 2004, 2009 and again in 2017 that this site is unsuited to such a development. Repeat applications for this incinerator are located on the same site despite having also failed the World Health Organisation's site selection process. The intervening years, even since 2017, have only reinforced how unsuited this location is for such a facility.

In this period changes have been made by Cork County Council to the **Zoning** of the area in their Development Plan. It is no longer zoned as Industrial but rather as "marine education and related enterprise and activities" in keeping with the involvement of the area as a key location for marine educational infrastructure with both NCMI and MaREI located in very close proximity to the site. The scale and size of such an industrial structure, as well as a towering chimney stack, required to treat up to 240,000 tonnes per annum of residual household, commercial and industrial nonhazardous and 24,000 hazardous waste is completely in contradiction with how this area of the harbour has developed, it's current uses and the plans of the local authority and others for it's future use.

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**Directors:** Isabelle Sutton, Ellie Donovan, Dylan Krug, Dave Ludgate, Irene Ní Shúilleabháin, Dúigí Mercer  
**Company No:** 340723 **CHY:** 16288 **RCN:** 20058357

Ringaskiddy port has welcomed visitors for many years and will continue but on an increasing scale, recreational use of the shore grew as a result of Covid with local residents rediscovering the amenity of the beaches beside the site. With all the industrial activities of the Port of Cork moving out from the City Centre the entire Harbour is opened up more for recreational boating and will also be important in the servicing of Offshore Renewable Energy sites.

The site is extremely vulnerable to **coastal erosion and sea level rise**. This is emphasised in the Cork County Council Climate Action Plan 2024 -2029 *“Sea levels in the Cork Harbour area have also risen by approximately 40cm since 1942. The climate risk assessment predicts that the risk of existing hazards such as river and coastal flooding and coastal erosion is likely to increase in the future because of changes in both hazard frequency as a result of climate change and impact due to changes in exposure and vulnerability.”* The site is on the more exposed outward side of the harbour, by the edge of Gobby Beach and with soft banks, the amount of hard engineered coastal defences suggested in the application are not in keeping with prioritising eco-system based approaches supported by the CARO Local Authority Climate Action Plans -Marine and Coastal Sectoral Report *“to address coastal erosion and implement coastal flooding prioritising ecosystem-based adaptation actions”*. Hard erosion control is a problematic solution as it can cause negative consequences further along the coast.

The EIS does not give adequate comfort from any of these issues and in fact states *“The findings confirm that cliff retreat at Gobby Beach is an active and ongoing process, influenced by a combination of cliff toe erosion, softening of the weaker till in the upper cliff section due to water seepages and overland surface water flow, and weathering of the cliff due to rain, wind and freeze thaw action. Local exceedances, such as the collapse between Sections F and G, underscore the episodic and unpredictable nature of cliff failure, reinforcing the importance of ongoing monitoring and future risk management.”*

The size of the site is not only threatened from erosion and slumping on the seaward side but encroachment from the landward side by the M28 which is currently under construction. The operation of such a hazardous facility on such a vulnerable site would in our view be highly irresponsible.

### **Public and Community Rights to a Healthy Environment**

The public and all of the communities that live along the Harbour and in the City have a right to a Healthy Environment enshrined in the **Aarhus Convention** which Ireland ratified in 2012.

Despite any technological improvements in the operation of incinerators they still pose a health risk with emission of harmful dioxins and substances. The prevailing winds will dictate the direction of smoke plumes at any given time and they pose a threat to the air quality of a wide area of the most inhabited part of the harbour extending right into the City. Cork and the general harbour areas are very prone to **weather inversions** which trap pollutants near the ground, acting like a lid, they rapidly increase concentrations of smog, particulate matter, and gases, causing poor air quality and health issues for the population. The added pollutants from burning hazardous waste would exacerbate the health risk to communities and the natural environment.

**Polychlorinated dibenzo-p-dioxins (PCDDs)**, the primary dioxins amongst others released from incinerators, cause a risk to human health, both direct but mainly from secondary contamination of the food supply including through fish and shellfish. Life in the ocean and the water quality are at risk as in such close proximity to the site - *“In the marine environment PCDD/F are quickly adsorbed onto suspended matter, due to their high hydrophobicity, and then deposited onto the sediment where they accumulate over time, due to their persistence. As a consequence, sediment may act both as a secondary source of PCDD/F pollution for the water column (Khairy et al., 2016) and as a primary source of contamination for the benthic species living and/or feeding on sediment-bound contaminants (Pruell et al., 1993, 2000).”*

The **water quality** in our estuaries is at an all time low with only 30% reaching Good Environmental Status according to the most recent EPA report, meaning we continue to fail our obligations under the Water Framework Directive. We need to reduce pressure on our water and the marine species including marine birds for which a large portion of Cork Harbour is designated as Special Protected Areas.

The R&H Hall Grain Store fire in Ringaskiddy in 2021 brought into stark clarity the **accident risk** that industrial operations can have. The fire meant the suspension of shipping from the Port for a day and it was 4 days after the fire started before fire crews were able to handover the site. An accident from a hazardous waste facility poses a much greater threat to the community and environment.

### **Contradiction of EU and National Policy**

Whatever rationale might have existed in the early 2000's for incineration, which we never agreed there was one, 24 years later the justification for incineration of waste has completely diminished.

The notion of toxic waste facilities is contradictory to resilient strategies for future generations and our commitments to the Paris Agreement and the **Sustainable Development Goals** in particular related to responsible consumption.

EU and National Policy support a move to a **Circular Economy** that values resources and keeps them in use as long as possible with the role of eco-design of products encouraged. Ireland's Presidency of the EU in 2026 is likely to coincide with the publication of the EU "Circular Economy Act 2026" which reinforces this approach. Incinerators require being constantly fed by large volumes of waste, whereas, the approach now is to reduce "waste" through reuse, reprocessing, repurposing and a move away from problematic plastics and toxic materials.

Ireland's **Energy Policy** is guided by the **Climate Action Policy** with a focus on renewable energy, primarily wind and solar with ambition of 80% renewable electricity from these sources by 2030. The 21 megawatts of electricity projected to be produced from the burning of waste at the facility is not a priority in either policy. The focus has shifted with Cork Harbour's role being an important one in terms of support services, including transport and supplies required by the offshore sites. Energy being produced by burning waste is now very definitely an outdated model.

Cork Harbour is a very valuable asset not only as a deep harbour for shipping but has a rich **natural and built heritage**. The harbour supports a diverse range of habitats and species with much of the inner

harbour a Natura designated area primarily as **Special Protected Areas for Birds** but also some **Special Areas of Conservation**. Given its strategic position it has a built heritage of EU and Global significance with gems such as Fort Mitchel on Spike Island – directly opposite the proposed site of the waste facility *“24-acre star-shaped Fort Mitchel that was started in 1804 is one of the largest of its type in the world”*.

Cork County Council, Fáilte Ireland and the Heritage Council have made very substantial investments to both the natural and built heritage assets of the harbour area since 2016. Both Spike Island and Camden Fort have been reopened, investment has also gone into wetland areas such as Harpers Island with a strong emphasis on the conservation and protection of heritage and our biodiversity which in turn are recognized as important tourist attractions. The **Nature Restoration Regulation** places additional responsibilities on all countries to do even more in terms of protecting and restoring habitats and species.

### **Conclusion**

This is the 3<sup>rd</sup> Application by Indaver to develop such a facility on the same site over a period in excess of 24 years. After a lapse of 9 years it has lodged additional information reopening the daunting prospect of such a facility being built in Ringaskiddy, in total disregard to the relentless and vehement opposition of the community. There is substantial political opposition locally and at national level.

Three of your own Inspectors have concluded at different times, 2004, 2009 and again in 2017 that this is an inherently unsuitable site for such a development. In the intervening years the site is now more than ever unsuited for the reasons outlined above.

We appeal to you, An Coimisiun Pleanála, to refuse permission for this waste facility which is contradictory to the current policy direction of dealing with waste in Ireland and Europe and in how Cork harbour and the wider area have developed in the intervening years supported by a vision that values the natural and built assets as a means of further supporting communities with a healthier environment.

We wish to request an Oral Hearing to continue full public participation in this application.