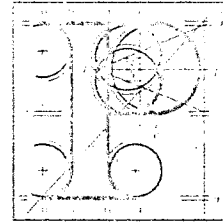


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Usna Keating
69 Helms Point
Churchbay Road
Crosshaven
Cork

Date: 20 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

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64 Sráid Maoilbhríde	64 Marlborough Street
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Usna Keating
69 Helms Point,
Churchbay Road,
Crosshaven,
Cork.

An Comisiun Pleanala
64 Marlborough St.
Dublin 1
D01V902
Nov 16 2025

Re: Case No PA04.318802

Proposed development of a resource recovery centre (including waste to energy facility) in Ringaskiddy Co. Cork.

To whom it may concern,

I am writing an objection to the proposed incinerator in Ringaskiddy, Co. Cork. I believe that it is unfair that a community has had to endure and object for so long (over 20 years), on so many valid grounds, and concerns validated by three inspectors, and yet still the proposal has not been fully halted on a permanent basis.

The concerns that I have in relation to the proposed development include a concern for national environmental sustainability and development of a circular economy, tourism and economic impact, visual and landscape impact, health impacts, and potential biodiversity and ecological impacts.

1. Sustainability and Circular Economy

By their very nature, incinerators incinerate waste and therefore need waste to operate. I feel that the new development of such infrastructure incentivises waste production, opposed to a strategic and focussed move to embrace a circular economy. If we are to truly embrace a circular economy, then we need to stop producing the current waste that we produce, and move towards circular and sustainable systems, and circular and sustainable materials (i.e. waste that does not need incineration). If we are to move towards a circular economy, the demand for such infrastructure (such as an incinerator) should not exist.

The [Circular Economy and Miscellaneous Provisions Act 2022](#) became law in July 2022. This legislation defines the Circular Economy in Irish domestic law and provides a legal basis for many of the actions that the government will take to support the circular transition.

Key measures in the Act include among other items: incentivising the use of reusable and recyclable alternatives to a range of wasteful single-use disposable packaging & improving our national regulatory processes, to encourage the safe and sustainable re-use of materials instead of treating them as wastes.

The Circular Economy and Miscellaneous Provisions Act (2022) does not include incineration as a method to support Circular economy. It is noted: ‘ “recovery activities” does not include incineration, whether with or without energy recovery, or export for incineration, whether with or without energy recovery (<https://www.irishstatutebook.ie/eli/2022/act/26/enacted/en/html>) ’. Therefore, the proposal for incineration is at odds with our Circular Economy Strategy.

2. Impacts on Tourism, Landscape and the Local Economy

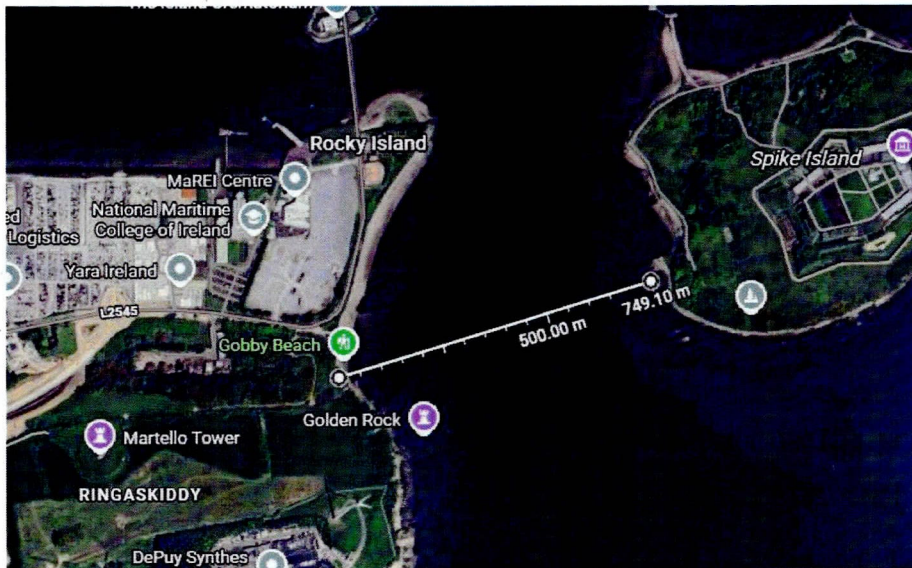
Cork Harbour is claimed to be the second largest deepwater port, and one of the largest natural harbours in the world (<https://web.archive.org/web/20160303214047/http://infomar.ie/surveying/Bays/Corkv1.php>). This means that Cork Harbour has distinct and unique topography, and is exceptionally special in a global context.

This is highlighted through the high abundance and extent of estuaries, tidal mudflats, and coastal habitats, distributed over a concentrated geographical area (<https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY004030.pdf>). The harbour is famous for its natural beauty and man-made military fortifications, as well as its surrounding villages and towns and associated history with the Titanic and Lusitania.

Given the unique geographical context, Cork Harbour has a rich cultural and maritime heritage. The harbour is a major tourist attraction in Ireland and the harbour supports the local tourism economy. It is essential that the harbour retains natural habitats and features, to support landscape aesthetics to support tourism growth and the development of a world class tourism destination.

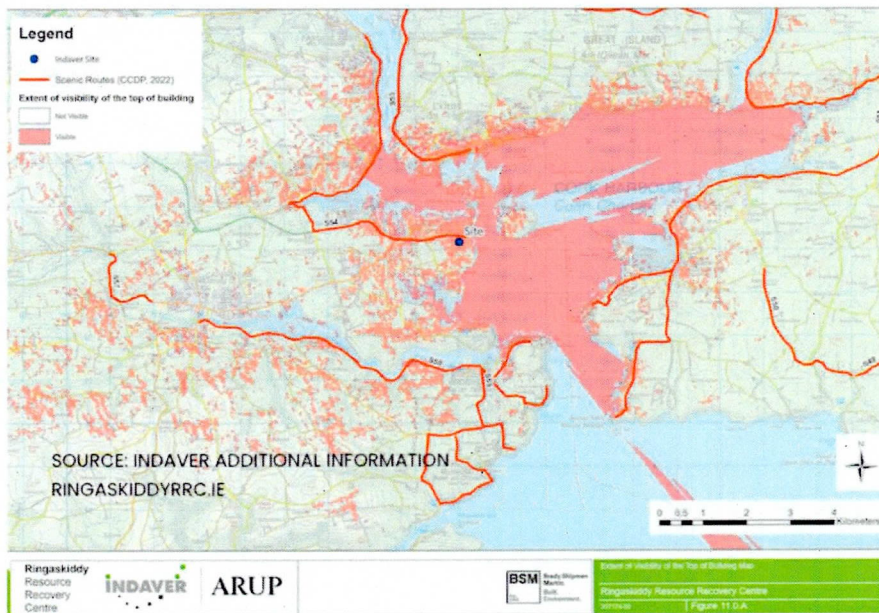
This statement is supported by tourism interests in Cobh, which is a heritage town and cruise ship destination, and Spike Island, a tourist attraction of international acclaim. In 2024, Spike Island was listed as one of Irelands top 10 tourist destinations (<https://www.independent.ie/life/travel/awards/top-10-irish-visitor-attractions-named-for-2024-its-touristy-but-very-well-done/a1973416554.html>).

Spike Island was named top European tourist attraction at the 2017 World Travel Awards. On Spike Islands’ website it is noted that “Spike Island boasts breathtaking natural scenery, providing a stunning backdrop to your visit – embark on our scenic walking trails around the island taking in unparalleled view of Cork Harbour” (<https://www.spikeislandcork.ie/>). This highlights the importance of landscape aesthetics for the visitor experience. Spike Island is a key Cork Harbour attraction, which is in very close proximity (750m approx.) to the proposed development.



Proximity of proposed development to Spike Island.

In 2019, visitor numbers for Spike Island alone was 81,000 (<https://www.irishexaminer.com/business/arid-30978480.html>). During the year 2024 (As per the Port of Cork 2024 Annual Report), 104 Cruise liners (2023: 95) called to Cork, carrying 197,107 (2023: 186,426) visitors (Port of Cork Annual Report 2024 - <https://www.portofcork.ie/reports/>). These figures highlight the massive importance of Cork Harbour as a tourist destination to the local economy.



Pink area illustrates the areas from which the top of the building will be visible. The stack is visible from even further.

Area of visibility of top of proposed development.



View of proposed development from Spike Island.

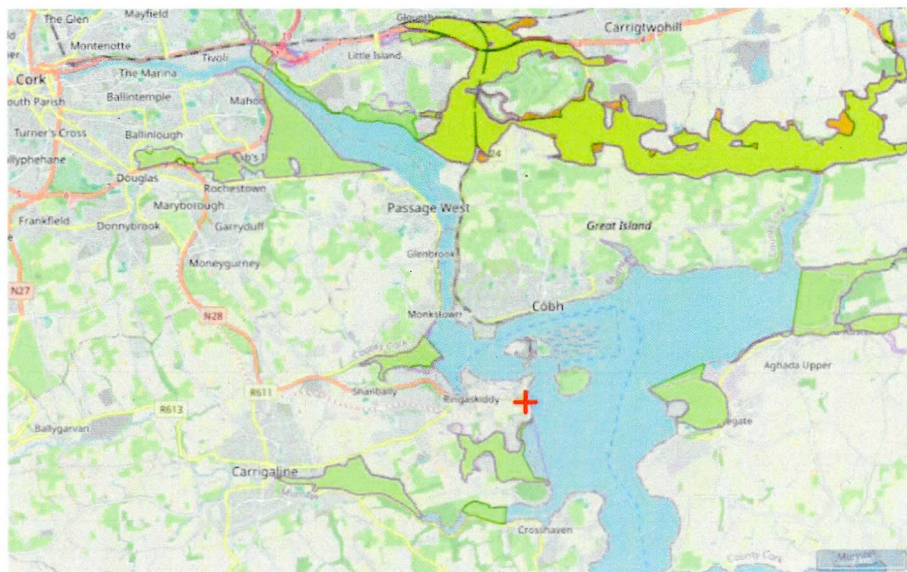
It is noted that Cork Harbour is home to the world's oldest Yacht Club, Royal Cork Yacht Club, Crosshaven, which hosts international sailing competitions. Spike Island is a key feature that can be seen as one leaves Crosshaven towards Roches Point. The proposed incinerator would be clearly visible from yachts and maritime traffic entering and using this internationally unique harbour and would adversely affect the character and natural beauty of the area.

The proposed development extends over the horizon line when viewed from numerous areas including Cobh (practically all vantage points – Whitepoint Rd, Russell Heights, St Coleman's Cathedral), Monkstown, Crosshaven etc. The otherwise, largely natural rolling horizon line of Cork Harbour, is intruded by the sharp lines of the proposed development. The impact of the harbour line is unnatural and industrial, and has a significant visual impact.

Given the location, size and visibility (from Spike Island, Cobh, Monkstown, Crosshaven, Ringaskiddy) of the incinerator, and other parts of the harbour, the development detracts from the harbour's natural beauty, and detracts from this world class tourist destination. This proposed development, in turn, could adversely impact on the tourist industry, local economy and local employment that depends on or is supported by tourism. In addition to potential impacts on tourism, the proposed development would have a permanent adverse impact on landscape visibility for residents, visitors and maritime enthusiasts.

3. Impacts on Biodiversity

Cork Harbour is of international importance for wildlife. Cork Harbour comprises numerous proposed Natural Heritage Areas, the Cork Harbour Special Protection Area (a Natura 2000 site) (<https://www.npws.ie/protected-sites/spa/004030>) and the Great Island Channel Special Area of Conservation (a Natura 2000 site) (<https://www.npws.ie/protected-sites/sac/001058>) . These are all within close proximity to the proposed incinerator (approx.. 500m – Cork Harbour SPA, approx.. 5.5km Cork Harbour SAC). These sites have hydrological connectivity to the site.



Cork Harbour SPA (green) and Cork Harbour SAC (yellow) (Proposed incinerator – red cross).

According to the National Parks and Wildlife Service, Cork Harbour is of “international importance” for migratory bird species (<https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY004030.pdf>), that feed in open water, estuarine and tidal areas and coastal habitats. Populations of international and national importance occur in the harbour. Should there be any accidents in the site, such as fires, release of poisonous gases, poisonous ash or hydrocarbons etc, there is scope for adverse impacts on the species and habitats in this internationally important site, where pathways (air and water) and receptors exist.

Given the tidal and estuarine nature of Cork Harbour, and topographical diversity, currents exist that can spread pollution incidents across the harbour area. This could therefore adversely affect habitats and species in different areas, and impact on Species of Conservation interest in Cork Harbour SPA, that are important internationally.

By their nature, incinerators burn waste and there are multiple reports across Europe of these facilities going on fire. This poses a potentially significant threat to Qualifying Interests and Species of Conservation Interest of the Great Island Channel SAC, and the Cork Harbour SPA respectively.

Furthermore, in relation to the site specific context of the current site, the site currently comprises a mosaic of habitats including mature treelines and hedgerows, and semi-mature woodland and scrub. These habitats are of importance locally and in an entire harbour context for a variety of different species of breeding birds and bats (see NIS and Appendix 10), both groups being protected under EU Law. Given recent developments to the direct north of the site, and the development of a large road to the west of the site, there are cumulative impacts of habitat removal locally, that have adverse impacts on this local wildlife.

In addition, coastal habitats are essential habitats for migratory species, as they are the first landing point for some species following long migration. The loss of such habitats over a relatively large site context represents a loss of important coastal wildlife habitat in a Harbour context, which has, over time, been subjected to significant cumulative removal through development and agricultural impacts in the surrounding local area.

4. Human Health

I have concern in relation to the impact of emissions from the incineration process on public health. It was noted previously at the 2016 oral hearing that “Under specific weather conditions, stack emissions will tend to drop to a lower level sooner than expected and will cause the airborne particles to settle locally”, “Even without the consideration of temperature inversion, under high humidity/light wind conditions, a build-up of stack emissions can form over the harbour and then precipitate out locally in the form of a rain shower.”

Given the proximity of coastal and adjacent villages to this incinerator, and thermal inversion potential or potential of local precipitation of stack emissions, it is my opinion that the current proposed location of the incinerator is unsafe. Towns such as Cobh, Crosshaven, Monkstown, Shanbally, Glanmire, Carrigaline, Middleton, and Cork City are all located in and around Cork Harbour. Given the proximity to and characteristics of the harbour (given its unique topography as discussed earlier), this proposal potentially poses a health risk to all these areas.

Numerous scientific studies support higher rates of public health problems near incinerators (e.g. <https://www.sciencedirect.com/science/article/pii/S132602002300732X>) (Tait et al. (2020) – ‘The health impacts of waste incineration: a systematic review’) which states that in close proximity to incinerators, “A range of adverse health effects were identified, including significant associations with some neoplasia, congenital anomalies, infant deaths and miscarriage, but not for other diseases. “. The study concluded that “Older incinerator technology and infrequent maintenance schedules have been strongly linked with adverse health effects. More recent incinerators have fewer reported ill effects, perhaps because of inadequate time for adverse effects to emerge. A precautionary approach is required. Waste minimisation is essential.”

Similarly, the following study (Sharma et al. 2012 – ‘The impact of incinerators on human health and environment’) also identified health impacts in close proximity to incinerators (<https://pubmed.ncbi.nlm.nih.gov/23612530/>) and noted “This process of waste incineration poses a significant threat to public health and the environment. The major impact on health is the higher incidence of cancer and respiratory symptoms; other potential effects are congenital abnormalities, hormonal defects, and increase in sex ratio.”

Furthermore, in a recent study comparing impacts of incinerators on public health between two different time periods, the following study (Barjaan et al. (2020) – ‘Cancer incidence in the vicinity of a waste incineration plant in the Nice area between 2005 and 2014’) (<https://www.sciencedirect.com/science/article/pii/S0013935120305740>) concluded “We recorded 80,865 new cancers in the A-M population. Between 2005 and 2009, we observed a higher incidence among exposed women of acute myeloid leukaemia, myelodysplastic syndromes and myeloma and, among exposed men, of soft tissue sarcomas, myeloma and lung cancer. Between 2010 and 2014, there was no excess incidence among women, while among men incidence of myeloma and lung cancer remained higher.”

The EIA report for the project proposal quotes a report from the Health research Board commissioned in 2003 which states “A number of well-designed studies have reported associations between developing certain cancers and living close to incinerator sites. Specific cancers identified include primary liver cancer, laryngeal cancer, soft tissue sarcoma and lung cancer. It is hard to separate the influences of other sources of pollutants, and other causes of cancer and, as a result, the evidence for a link between cancer and proximity to an incinerator is not conclusive. Further research, using reliable estimates of exposure, over long periods of time, is required to determine whether living near landfill sites or incinerators increases the risk of

developing cancer. Studies of specific environmental agents and specific cancers may prove more definitive in the future.”

The applicant highlights that they ' found no studies indicating that modern-technology waste incineration plants, which comply with the legislation on emissions, are a cancer risk factor or have adverse effects on reproduction or development. There are several factors in favor of this affirmation: (a) the emission levels of the plants currently built in the developed countries are several orders of magnitude lower than those of the plants in whose environments epidemiological studies have been carried out and which have found some kind of negative association in terms of health; (b) risk assessment studies indicate that most of the exposure is produced through the diet and not by a direct route; and (c) monitoring dioxin level studies in the population resident in the environment of incineration plants did not reveal increases of these levels when compared with a population living in reference areas.’

In response to this statement, I believe a precautionary principle should need to be applied when it comes to matters of human health. The National Cancer Registry of Ireland note that many cancers take 15-20 years to develop. Therefore, insufficient time may have passed to adequately and accurately determine the impact of modern incinerators on public health (in response to point (a) above). In addition, given the potential for thermal inversion in Cork Harbour, and the bowl like topography of the harbour, there is scope for increased direct contact with dioxins, and other discharges in the plume from the incinerator (in response to point (b)). In response to point (c), it is my understanding that nanoparticles would not be measured and PM10 and PM2.5 particles are measured 4 times per year (information taken from (<https://chasecorkharbour.com/no-measuring-of-nanoparticles-not-practical-indaver-tell-hearing/>)).

According to the following study (Forastiere et al. (2011) (<https://pmc.ncbi.nlm.nih.gov/articles/PMC3129292/>)), that investigated the potential impact of incinerators and landfill sites on the health of the nearby population, they “have a high level of confidence in the estimates of YoLL (Years of Life Lost), mainly due to the rather stable and well-established coefficients for NO₂ and PM₁₀.”

The results of their study estimated that “In Italy, the impact is higher for NO₂ (total YoLL 3,621, 341.4 per 100,000 inhabitants) than for PM₁₀ (total YoLL 181, 17.16 per 100,000 inhabitants). In Slovakia, the total number of YoLL is also higher for NO₂ (37, 226 per 100,000) than for PM₁₀ (2, 12.2 per 100,000). Comparable results were available for England with a total impact similar to Italy (for NO₂: total YoLL 3,966, 330 per 100,000 inhabitants; for PM₁₀: total YoLL 199, 16.5 per 100,000 inhabitants). Overall, the maximum impact of incinerators is 1.25 days per each person in Italy, 0.82 days per person in Slovakia, and 1.20 days per person in England.”

In relation to nanoparticles, which I believe will not be monitored, I refer to the information from Toxicopathologist and nano-particulate expert, Professor Vyvyan Howard, speaking at the Oral Hearing who stated that “Chronic low dose exposure to ultra fine particles reduces life expectancy” and cited several published studies which show that “filters are not capable of arresting these particles” which “pass through any filtration system undetected” and also warned that statutory limits are not protective. (<https://chasecorkharbour.com/no-safe-level-of-exposure-to-tiny-particulates-says-toxicopathologist/>).

Further to this, a recent study in 2025 ‘Origin and Health Impacts of Emissions of Toxic By-Products and Fine Particles from Combustion and Thermal Treatment of Hazardous Wastes and Materials’ (Cormier et al. 2025) (<https://pmc.ncbi.nlm.nih.gov/articles/PMC1480527/#:~:text=Ultrafine%20PM%2C%20or%2>

[Onanoparticles%2C%20is.\(zones%203%E2%80%935\).\) published in Environmental Health Perspectives](#) stated that “Ultrafine PM, or nanoparticles, is formed largely by combustion sources as primary PM emissions or as secondary particles formed by atmospheric chemical reactions of combustion emissions of sulfur and nitrogen oxides ([Donaldson et al. 1998](#)). Nanoparticles are not efficiently captured by air pollution control devices, are transported over long distances, and penetrate deep into the respiratory system, all of which enhance the potential negative health impacts ([D’Alesio et al. 1999](#); [Kauppinen and Pakkanen 1990](#)).”

Therefore with evidence of adverse health impacts of incineration, the harbours geography and thermal conditions, and high population density of surrounding residential areas, in close proximity to the site, I believe the proposed development poses a public health risk to people living within Cork Harbour.

5. Other Concerns

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).

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, subject to appropriate ecological consideration and planning. (RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28) It is of 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 therefore appears to be contrary to the specified objectives for the immediate area as per the County Development Plan.

6. Conclusion

Please refuse this planning application on the basis that the proposed development at this site is inherently unsuitable. The proposed development is not appropriate for the reasons concluded by all three Bord Pleanala Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017), and for other reasons outlined above.

Kind regards,

Usna Keating