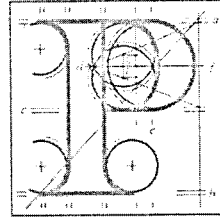


Our Case Number: ABP-318802-24



An  
Coimisiún  
Pleanála

Mamie Bowen (CHASE)  
Glenville  
Monkstown  
Cork  
Co. Cork

**Date:** 11 December 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.

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*

Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

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An Coimisiun Pleanála

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Case reference PA04 318802

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
14 NOV 2025	
Fee: €	✓ _____ Type: _____
Time: 9.15	By: <i>Dat</i>

Proposed development of a resource recovery centre [including waste to energy facility] by Indaver NV t/s Indaver Ireland.

My name is Mamie Bowen , I represent Monkstown, Glenbrook and Passage Branch of CHASE .I am a founder member of the Monkstown sailing Club and Sec. of Monkstown Heritage Group. Our branch of CHASE has been involved with Indaver's planning applications for the past 24 years. My submission is a continuation of one sent by me and the late Chris Ramsden, my co/chairperson.

### SITE SELECTION

There was no proper site selection 2001, or in 2009, or again for this application. If there had been, this site would have failed in the beginning because of the structure of the soil 's geology, hydrogeology, hydrology and coastal recession. The site is over a vulnerable aquifer and could be contaminated by human activity. All 3 senior inspectors were aware of this when they gave their judgements that the site was unsuitable.

### TRAFFIC

Indaver's traffic will be sharing the L2545 with traffic going to the **Island Crematorium** 365 days of the year. {there can be 10 +funerals a day}. Photo 1

In addition, the location of the proposed development is at the end of a cul de sac with a single road access ending at **Gobby beach**. Indaver's waste will be coming in HGVs that have to pass each other to exit, not only that, but buses and cars bringing pupils to the NMCI will have to navigate and share that portion of the L2545 together with families with cars visiting **Haulbowline Recreation Park** In addition 800 people work in the Naval Base . Add to this the **Hammond Lane's** HGVs.loaded with cars and metal for scrapping. A cul de sac means one way in, one way out.To

access the Indaver site they will be travelling with Port of Cork traffic and the cars of all employees in the area. A large percentage will have to use the Jack Lynch tunnel to get to the site. **It would be prejudicial to public safety and amenity.**

**The proposed development would therefore be contrary to the proper planning and development of the area.**

## **HISTORY .**

Before this planning application was lodged in 2016, Indaver had 3 years of consultations with the then ABP. It followed the refusal of their 2008 application by an Bord Pleanála's Senior Planning Inspector, who recommended **refusal**, a judgement to which the Board agreed.

Indaver sought a **Judicial review** of the Board's decision but retreated from the High Court a year later announcing their intention to lodge a **third application**. This is the application we are dealing with now.

After a 3 week oral hearing digging out information from a reluctant Indaver the hearing ended with "misinformed" figures being offered. Again the ABP Senior Planning Inspector **advised refusal** to Indaver's application. The Board overruled his advice, and having postponed their decision 7 times over a period of 2 years eventually gave their decision to the objectors.

CHASE, who represent all the communities around the harbour sought and were granted a **Judicial Review**. In 2021 the High Court ruled **in favour of CHASE** that the decision was affected by objective bias. The planning was **quashed** and the application was sent back to the Board for reconsideration. This is the application we are dealing with now.

In June 2024, Indaver was asked by the Board for additional information to update the documentation for that planning application . They have submitted extensive new documentation to the Board. Public consultation was reopened for 6 weeks, until the 17th of Nov. 2025.

## **CHANGES**

The size of the overall site has decreased considerably. On the coastal East side the Indaver's boundary cliff has had flooding mudslides and erosion . This occurred in **2004 2009, 2010**; very invasive flooding and erosion took place again in **2016, 2018,2021,2023 and 2024.**

**See photos. 2 by 12**

On page 18, Ringaskiddy Resource Recovery Centre Issue 2

"the principal design objective for raising the ground levels of the Indaver site is to raise them above the levels of 1 in 200 year tidal event with an allowance for climate

change. **This site is classified as Flood zone C** " I raised this point at the last oral hearing as the site had flooded 8 times since 2004 and must be classified as **A**.

In raising the level of the Indaver site by 4 meters it would exacerbate the visual intrusiveness and impact of the vast scale and bulk of their facility with its 75 meter chimney. While raising the road 0.9 m this will impact all other users particularly Hammond Lane who were compelled to move back their entrance to allow sight view for safety of traffic on exiting their site.

On the Western side of their site, **Cork Co. Council** under CPO acquired a huge chunk of Indaver's usable site. The western side which is zoned as industrial has always had Hammond Lane **occupy the centre of Indaver's site**, and Hammond Lane have their own road frontage. **It limits the development or expansion of the site, which is now much smaller since the last oral hearing.**

The **western side** is zoned as **RY-1-09**, however the whole site is predominantly **RY-1-15** zoned for educational purposes. Arup's map on page 15 4.7 does not mark the eastern coastal site as zoned RY-1-15. educational purposes, nor the western site -industrial. Where Indaver proposes to site their hazardous facility with its chimney is **zoned RY-1-15 educational. Photo 3**

Three senior inspectors heard our arguments and they judged this site to be unsuitable. Why did Indaver not consider another site, which would not have this problem? Rather than persist in applying for permission to build their hazardous facility on such an unsafe site with flooding and erosion leading to mudslides. A proper site selection would have ruled this site as unacceptable.

The boundary at the eastern side has the soil structure of a glacial till and is located over a vulnerable aquifer; it is subject to erosion, flooding and mudslides. It has already degraded the proposed public path and viewing platform, leading from **Gobby to the Martello Tower** as mud slides have encroached on it already. For health and safety reasons this access path at this location is unsustainable.

Their EIS was inadequate, and is still inadequate. Climate change has added to the risk of erosion, and flooding now takes place at an ever increasing rate {see photos.}

## **Location**

**WHO** guidelines advise NOT to build a toxic incinerator near a stationary population; **NMCI** is such. Their fire assembly point is nearer to Indaver's hazardous facility than it is to the main entrance of **NMCI. This is unsafe and is not good planning.** The bus bringing the pupils to the entry gate of **NMCI** has a covered bus shelter less than **2 meters** from the **Indaver site photo 4**

**Next door to the NMCI is the Beaufort Building and Imerc.** This is a **UCC** campus researching marine wave and green energy. They are seeking to further develop their facility. The proximity of the site to the **Marine College NMCI**, and to

the **UCC campus** is such that it imposes real risk of fire and explosion. This is not taken into account by Indaver.

The L2545 road width divides these two educational facilities from the proposed **toxic incinerator**; all traffic leads you past the Port of Cork, passing Ringaskiddy itself to **Gobby Beach**. **Gobby** is a much used site to view **Spike Island**, Cork harbour and sailing from **RCYC**. As a result of industrial incremental creep there is **no view** of the water travelling from **Carrigaline to Ringaskiddy** until you get to **Gobby**. This is a very important place in its own right, because of its geology. 70,000 years the ice age ended here leaving **Golden Rock**, and other erratics. .

Fireworks from **Spike** on the 25<sup>th</sup> of August are viewed from **Gobby**, when bus loads of spectators come from Cork City. The whole of **Gobby** and **Haulbowline** are packed as it is a point with the best viewing advantage.

To the South of Indaver's site behind the windmill is **Lough Beg**, the nearest sandy beach to Cork City. It was always used locally, known as **LUC** but during Covit it was discovered by Cork people, so now it is packed in the Summer, and is used year round for swimming. **Photo 5**

The proposed development is beyond inappropriate because as you pass the proposed site in a funeral cortege to go to the **Island Crematorium**, the very last thing you see would be an incinerator with a plume of smoke burning toxic material. When exiting and heading home that is the first thing you see coming from **Haulbowline**, a **very offensive hazardous facility** burning toxins.

Close by is the **Haulbowline Naval Base**, a facility of national **strategic importance** where military **helicopter aircraft** carry out a wide range of operations. **The Defence Forces** objected to their safety being put at risk by the smoke plume from the proposed chimney at the last oral hearing, as it would present an unacceptable risk to aircraft navigation and would impair the operations of the Base itself. The Dept of Defence is tasked to operate their training and aviation operations on **Haulbowline** without compromising their **health and safety** for a commercial development of a toxic incinerator. **It would be contrary to the proper planning and sustainable development of the area.**

Beside the Naval Base is **Haulbowline Recreation Park**, used by walkers, and families. There has been heavy investment in this park, which has a 360 degree view of the whole harbour. **Haulbowline** is rich in cultural heritage and history. This amenity's recreational value is constantly in use 365 days of the year. It is flat and very appealing to the disabled.

## **NEED**

In May 23 **The European Investment Bank** stated they did not consider waste to energy a part of the circular economy.

*“activities energy from waste and residues are excluded from the circular economy categorization system. This is because the resource efficiency gains from waste to energy and waste to fuel activities are limited in comparison with those from activities in the above circular economy, particularly when considering the loss of value of potentially recyclable materials.”s aimed at recovery.*

At the last oral hearing **Mr John Ahearn** explained the size of the chimney was to withstand **explosions** from batteries which could find their way into the incinerator.

Our **national policy** is to follow a circular economy and reduce reuse and recycle, it is not to convert **non renewable natural resources into toxic ash and carbon dioxide**.

The need for a toxic incinerator in this area because of the pharmaceutical companies does not make sense as most companies have their own **in house incinerators** catering for their specific waste, while there are **5 windmills** supplying them with **wind energy**.

## **VISUAL IMPACT**

The fact that Cork Harbour is like a bowl and the Indaver site is in the middle of it but acting like a light house means that the visual effect is acutely negative from all directions. **All cruise liners**, over a hundred in any one year, will have a clear view of a **toxic plume** and a **gigantic building** directly in front of them as they enter the **very scenic corridor entrance to the inner harbour**. There has been millions of euros spent in promoting the amenities of this area **Photo 6**

**Indaver's** industrial creep to this scenic area with its proposal for a Toxic Incinerator puts the **amenity value of this whole area at risk**.

## **AMENITIES**

The **historic cultural heritage amenities** of Cork Harbour all happen to be adjacent to Indaver's proposed site.

Spike Island with its **Fort Mitchell** tourist attraction. Millions have already been spent on upscaling it as a top tourist destination.

**The Martello Tower in Ringaskiddy**, built in 1815 as a defensive system for Cork Harbour overlooking the fortifications in the outer harbour. This was the last Martello Tower of 5 built in the harbour. The sight line to all the fortification within the harbour will be obstructed by the bulk of the proposed building as it will be higher than the Martello Tower.

**Fort Camden** in Crosshaven, - a 16th century original fort reconstructed in the 19th century. It is now a tourist attraction, with millions to be invested.

**Fort Carlisle** in Whitegate- a 17th original castle, with 19th century reconstruction.

**The RCYC** who hold yacht races in the waters beside the proposed hazardous facility and host **Cork week**, a major international event.

**Haulbowline Recreational Park** an island in the center of Cork Harbour where you have a 360 degree view of all the communities who will be affected by this Incinerator. **Ringaskiddy, Shanbally, Carrigaline, Rafeen, Monkstown, Glenbrook, Passage West, Rushbrook, Whitepoint, Cobh, Eastferry, Whitegate, Aghada.** through the National Maritime College and the Beaufort Institute.

**I ask the planning commission to look at this site in relation to ZONING**

**There is overdevelopment, erosion and flooding.**

**The size of the site has decreased since the oral hearing.**

**There is a very negative visual effect for everyone in Cork Harbour{ Photo 7}**

**We have had huge investment in the area for tourism which will be ongoing.**

**The proximity to stationary populations makes this hazardous facility; a health and safety concern.**

**To take into account why three Senior Planners advised the refusal of**

**Indaver'Hazardous Facility I Glenville, Monkstown, Co. Cork**

**For all the above reasons I request the Planning Board to refuse this application, and request an oral hearing.**

**Mamie Bowen,**

**Chairperson Monkstown, Glenbrook, and Passage Branch of Chase.**

*Mary T. Bowen*

*Encl 21*

Inis Sionnach  
HAULBOWLINE  
L2545

Páirc Taitneamhachta  
AMENITY PARK



Créamatóiriam  
CREMATORIUM

Coláiste Náisiúnta  
Mara na hÉireann  
NATIONAL MARITIME  
COLLEGE OF IRELAND

THIS IS A  
BUS ROUTE

I



TRAFFIC NAVAL BASE, NMCI - BEAU FORD, HAMMOND LANE  
FUNERALS GOING TO ISLAND CREMATORIUM +  
HAULBOWLINE RECREATION PARK "I WAY IN, I WAY OUT"

02 x 12 2023 02



02 9023





9093  
105



Oct 2023



② x 12

5th  
April  
2021



5A  
april  
2021



5th  
April

2021



Cyprid 2018  
② x 12



April 2018



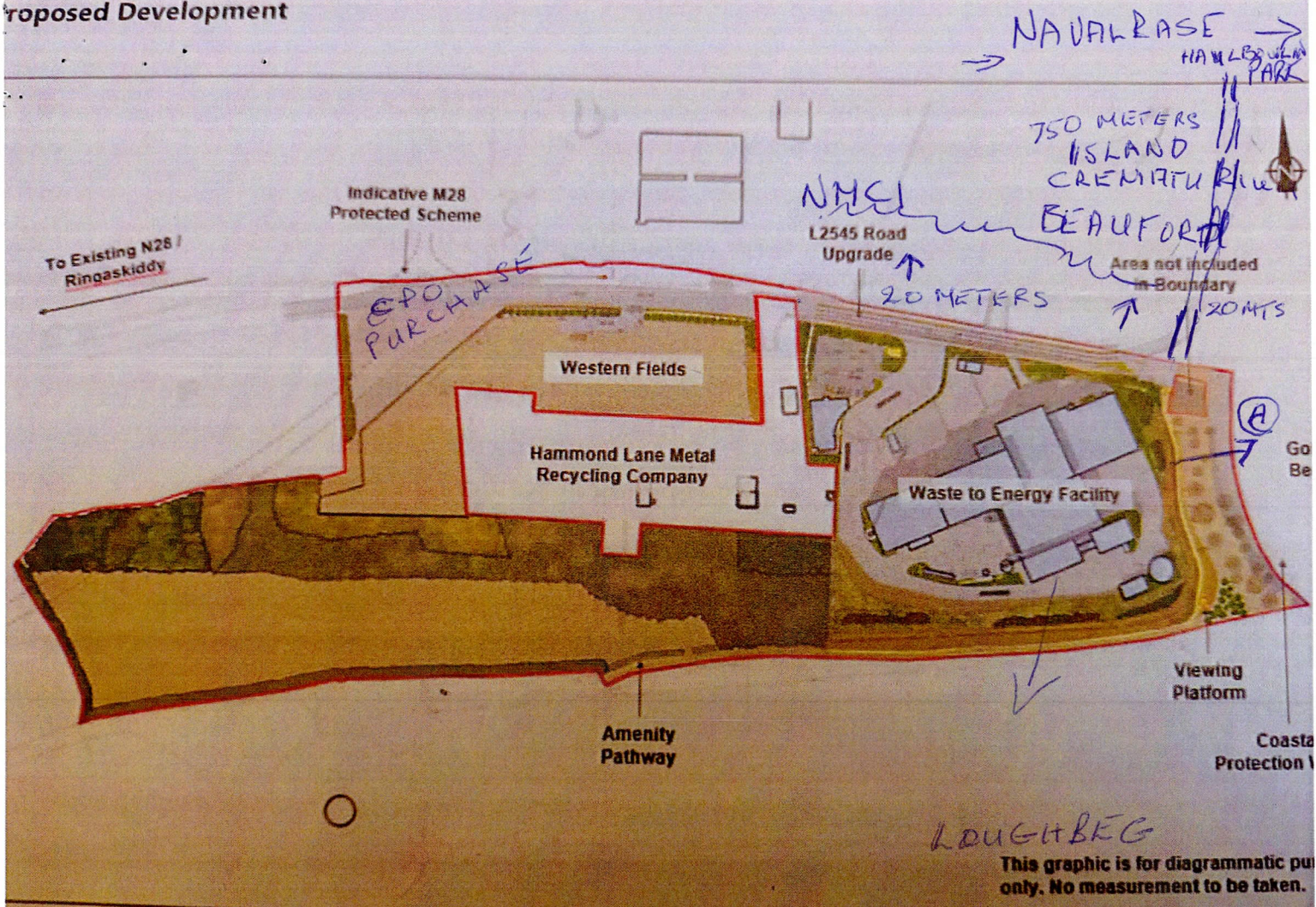
April 2018



2 - 1-2016 (2) x 12



2 - 12016



This graphic is for diagrammatic purposes only. No measurement to be taken.

**B** THE AMENITY PATHWAY IS ALREADY AFFECTED BY MUDSLIDES A MATTER FOR HEALTH & SAFETY

EASTERN RY-1-15  
WESTERN RY-1-09

ENTRY TO NMCI & ACROSS THE ROAD IS THE  
INDAVER SITE - ENTRY A FEW METERS FROM BUS  
STOP. THE FIRE ASSEMBLY POINT IS  
NEARER THE INDAVER SITE THAN IT IS TO  
THE EXIT DOOR OF THE COLLEGE.

(4)





HAMMOND LANE IS SURROUNDED BY INDAVERO. INDAVER SITE IS PARTIAL THE INDUSTRIAL SECTION OF THEIR WESTERN FIELD FROM THE BUS STOP IS WHERE THE EASTERN SECTION IS ZONED FOR EDUCATIONAL PURPOSES.



"Luc" LOUGH BEGSITE IS BEHIND THIS WINDMILL. (5)  
"NEAREST SANDY BEACH TO CORV CITY



LOUGH BEG. BEING SO CLOSE TO THE INDAVER  
SITE WILL SEE CLEARLY THE CHIMNEY STACK  
& PLUME. THEY SHOULD HAVE TO SUFFER THIS  
AMENITY BEING DEGRADED BY HEALTH + SAFETY  
ISSUES



Figure 17 Proposed view from L2545 road close to the NMCI entrance

BULK + SCALE OF BUILDING  
OPPOSITE NMCI + IMERC. + WHAT ALL  
FUNERALS HAVE TO PASS BY COMING  
AND GOING (⚡)



THE SITE AS SEEN FROM ENTRY & EXIT  
FROM THE ISLAND CREMATORIUM (7)



VIEW FROM MONKSTOWN

6