

Cobh Tidy Towns
Ruth Ring
29 Whitepoint Avenue
Rushbrooke
Cobh
Co. Cork

Date: 12 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,

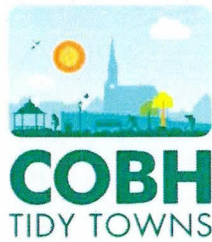
Kevin McGettigan

Kevin McGettigan
Executive Officer
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PA04

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Making Cobh a nicer place to live in, work in and to visit

29 Whitepoint Ave
Rushbrooke
Cobh
Co. Cork

4th November 2025

Submission re. proposed Indaver Incinerator in Cork Harbour

Re: Case Number ABP-318802-24

Cobh Tidy Towns is a voluntary organisation that through years of voluntary hard work, in conjunction with Cork County Council, the community and businesses has brought Cobh to the very top of the Tidy Towns competition.

A huge focus of the Tidy Towns competition is now on Sustainability.

When we made a submission to this application and attended the Oral Hearing in 2016, we outlined why this is the wrong site for this incinerator. This is still the wrong site – it will be an eyesore in the centre of Cork Harbour, it's too far away from where the waste in the southern region is generated, it's too far away from where the ash could be landfilled and the prevailing winds will blow the emissions right at the people of the Irish Naval Base, Cobh and Midleton.

In terms of waste to energy the proposal is a lazy attempt at turning waste into usable energy. In November 2019 (Eighteen years after Indaver's first application) Fichtner Consulting Engineers published a report **Indaver Heat Network Feasibility Study and Cost Benefit Analysis** on behalf of Indaver to assess the potential for a heat network supplied by the proposed Incinerator.

Indaver was obliged to satisfy the following pre-commencement planning requirement contained in Condition 20 of Planning Permission reference 04.PA0045 granted by An Bord Pleanála. *"The developer shall commission an independent Feasibility Study in relation to the possibilities for the recovery of excess heat energy from the proposed facility. The terms of reference of the study shall be agreed with the planning authority, and the report shall be completed and submitted to the planning authority within 18 months of the date of this order and made publicly available. Reason: In the interest of sustainable energy management, and to inform future land-use and development planning in the area."*

Indaver are clutching at straws to make this incinerator look like an environmentally sound proposal. Because of the site chosen by Indaver, and their dogged persistence in pushing this proposal for this site, there are no real prospects of using all of the "waste" heat from the plant in the locality. According to the report, the proposed heat network would result in Primary Energy Savings (PES) of 11.6%, which they say is in excess of the technical feasibility threshold established within the Energy Efficiency Directive (2012/27/EU). If the Energy Efficiency Directive became effective in 2012 why wasn't Indaver's Planning Application deemed to be deficient before the Oral Hearing by not recovering heat? **Heat Recovery should be an integral part of the overall planning application for the Incinerator – not as a convenient "add on" that can never be achieved at this site.**

Five years after publishing the report, Indaver haven't applied for Planning permission for the heat network. The report states:

The results of the CBA indicate that the nominal project internal rate of return and net present value (before financing and tax) are negative and therefore currently the proposed heat network does not yield an economically viable scheme. However, the CBA calculation does not include any potential capital grants or subsidies which may offset some of the capital/operational costs of the scheme. Support, from a scheme such as the Climate Action Fund, could make the project economically viable. The economic feasibility of the scheme will be reassessed in the future when there is more certainty regarding heat loads and considering any subsidies that may be available to support heat network delivery.

This report is a feeble attempt at box ticking and greenwashing. Is there any evidence of Indaver substantially progressing this concept with the companies mentioned? How can the Port of Cork use any of this energy as cited? The report isn't worth the paper that it's written on. More pertinently the figures in the **Indaver Heat Network Feasibility Study and Cost Benefit Analysis** are completely at odds with what heat recovery is being achieved at fully operational incinerators in the UK.

Four of the permitted MSW facilities (in the UK) are recovering heat and power under the Combined Heat and Power Quality Assurance Programme, as well as Slough Heat and Power (co-incineration process):

- Sheffield Energy Recovery Facility – 225,000tpa MSW throughput recovering 21MWe (electrical) and 45MWth (thermal) distributed to 140 buildings in a District Heating System. That's a total of 66MW of energy recovered.
- Eastcroft Energy from Waste in Nottingham – 180,000tpa MSW throughput recovering 14.4MWe and 44.2MWth(thermal) – supplying heat to almost 5000 residential premises, a Shopping Centre and Municipal buildings in Nottingham.

By comparison the proposed Ringaskiddy Resource Recovery Centre is cited by Indaver to generate 21MW of electricity annually by burning 240,000 tonnes of waste.

Indaver's Meath facility processes 280,000 tonnes of waste annually and produces 21MW of electricity with all of the remaining energy going into the atmosphere.

Using Sheffield as a **real-life** example, the proposed Ringaskiddy facility could recover 66MW of useable energy. It is designed to recover just 21MW – that's just 32% of what could be recovered. Sheffield was built in 2006!!

Using Nottingham as a **real-life** example, the proposed Ringaskiddy facility could recover 87.9MW of energy. It is designed to recover just 21MW – that's just 23.8% of what is possible.

We have seen from the outset of this application that Consultants will write reports that support the outcomes wished for by those who commission the reports. The single biggest failing in the Irish Planning System is to allow Developers to pay Consultants to write reports on their behalf. Reports should be commissioned by the Competent Planning Authority. At least then, there would be no bias in their commentary.

We refer, as an example to the report presented by Dave Coakley at the Oral Hearing on behalf of Indaver. https://ringaskiddyrrc.ie/wp-content/uploads/Witness_statement_Dave_Coakley.pdf. It seems to have more holes in it than a Swiss Cheese as outlined by our now chairperson at the Oral hearing. (please see his personal submission to this further information for this)

The Cork Harbour Indaver Incinerator is a lazy attempt at Resource Recovery in a poorly conceived proposal. It will waste energy AND will emit between 170,000 and 280,000 tonnes of Carbon dioxide every year. In a Climate Emergency!!

The communities of Cork Harbour have been saying to build this incinerator somewhere else for decades. We agree. It's time, once and for all, to reject this proposal outright.

Ruth Ring
Vice Chairperson

Hendrick Verwey
Chairperson