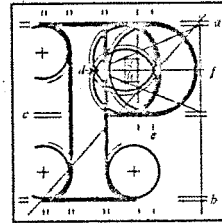


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Eimer Kelly  
5 Strandville  
Rushbrooke  
Cobh  
Cork

**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*

Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

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D01 V902 D01 V902

Eimer Kelly  
5 Strandville,  
Rushbrooke,  
Cobh,  
Co. Cork  
17<sup>th</sup> Nov 2025

TO: An Coimisiun Pleanala  
64 Marlborough Street  
Dublin 1, D01 V902

**OBSERVATION ON SID APPLICATION** - Case reference: PA04.318802, Ringaskiddy  
Co Cork  
Proposed development of a resource recovery centre (including waste-to-energy  
facility) by Indaver NV t/a Indaver Ireland

Dear Sir/Madam

I am a concerned resident of the harbor town of Cobh, Co Cork and wish to register my concern at the proposed development of the development by INDAVER NV trading as INDAVER Ireland. The following are a list of my concerns regarding the development proposed by INDAVER IRELAND.

## Submission Objecting to the Proposed Indaver Waste Incinerator, Cork Harbour, Ireland

To: The Technical Board of Person (Planning Authority)

From: Senior Environmental Consultant (Person)

Date: Date 17<sup>TH</sup> November, 2025

**Subject:** Objection to the Proposed Municipal and Hazardous Waste Incinerator (240,000 tonnes capacity) by Indaver, Located within Cork Harbour, Ireland

### 1. Health and Safety Risks: Gaseous and Particulate Discharges, and Hazardous Ash Management

The proposed 240,000 tonne capacity municipal and hazardous waste incinerator, to be operated by Indaver, poses significant, unacceptable risks to public health and safety within the Cork

Harbour region. While incineration technology has evolved since the initial application 24 years ago, recent studies continue to highlight serious concerns, particularly regarding ultra-fine particulate matter, gaseous emissions, and the management of hazardous bottom and fly ash.

## Gaseous and Particulate Discharges

Incinerators, even those utilizing 'Best Available Techniques' (BAT), are known sources of numerous air pollutants. The location within Cork Harbour, a densely populated and environmentally sensitive area, significantly increases the risk profile.

Pollutant Category	Health Risk/Concern	Supporting Reference
Ultra-fine Particulates (PM <sub>2.5</sub> /PM <sub>0.1</sub> )	Penetration deep into lungs, cardiovascular and respiratory diseases, increased mortality. The impact is exacerbated in coastal, estuarine locations where atmospheric inversions can trap pollutants.	[Study on Particulate Matter and Health Impacts Near Incinerators] File
Dioxins and Furans	Known carcinogens, endocrine disruptors. Despite low measured releases, lifetime exposure and bioaccumulation are major concerns.	[Toxicology Report on Dioxins and Furans from Waste Incineration] File
NO <sub>x</sub> and SO <sub>x</sub>	Respiratory issues, contribution to acid rain and smog formation.	[Air Quality Modelling Report for Incinerator Emissions in Coastal Areas] File

## Hazardous Ash and Odour Concerns

The facility will generate substantial volumes of hazardous ash (fly ash) that must be managed. The risks associated with the transportation, storage, and final disposal of this toxic material are considerable and create a pollution pathway that extends beyond the operational site at Place. Furthermore, odour emissions, particularly from the waste reception and storage bunkers, pose an acute nuisance and health risk to nearby residential areas.

- The proposal lacks sufficient detail on the long-term, high-volume management of hazardous fly ash, which is typically classified as a hazardous waste. The potential for leaks, spills, and soil/groundwater contamination during transit and at the disposal site remains a major concern.
- The proximity of the site to residential and recreational areas makes the risk of odour pollution from incoming waste unacceptable. Effective odour control measures are difficult to guarantee 24/7.

## 2. Environmental Risks and Compliance Concerns

The proposed site is situated within an ecologically sensitive area, with numerous protected sites and water bodies in close proximity. The operational lifespan of the incinerator will lead to chronic, low-level pollution that could undermine the integrity of the Cork Harbour ecosystem.

## Ecological Impact

The chronic discharge of gaseous and particulate matter presents a risk to the surrounding terrestrial and marine environment, particularly Natura 2000 sites located near the proposed facility.

- **Water Quality:** Runoff and cooling water discharges into Cork Harbour pose a risk to marine habitats. The risk of accidental spills from hazardous waste entering the process stream is a critical concern for water quality compliance under the Water Framework Directive.
- **Air Quality Compliance:** While the operator may propose compliance with current emission limits, the cumulative impact of an additional major industrial polluter in the Cork Harbour airshed is unacceptable. The long history of the application (24 years) and the constantly evolving environmental legislation (e.g., Industrial Emissions Directive) necessitates a fresh, rigorous review of long-term compliance feasibility.

## Compliance Concerns and Licensing

The length of time since the initial application raises fundamental concerns about the current environmental impact assessment (EIA) and its compliance with modern legislative standards.

- The current proposal should be benchmarked against the most stringent **BAT** standards applicable today, not those relevant two decades ago.
- The cumulative impact assessment must fully incorporate all existing and planned industrial activity within Cork Harbour, especially given the history of the site.

## 3. Best Waste Management Practices and Sustainability

The fundamental objection to the incinerator stems from its conflict with established European and national waste management hierarchies, which prioritize prevention, reuse, and recycling over thermal treatment (incineration).

### Conflict with the Waste Hierarchy

The proposed 240,000-tonne capacity facility creates a **lock-in effect**, committing Cork and the region to generating a specific volume of waste for the facility's lifespan (typically 25-30 years). This fundamentally undermines efforts to reduce waste stream volumes and achieve circular economy targets.

Waste Hierarchy Pillar	Incinerator Impact	Recommended Alternative
Prevention/Reduction	Creates a market dependency on high waste volumes to ensure profitability.	Increased investment in producer responsibility schemes, and domestic waste reduction campaigns.
Reuse/Recycling	Diverts recoverable materials from higher-value recycling streams to be used as fuel.	Investment in advanced material recovery facilities and increased separation at source.
Incineration (Recovery)	Low-level recovery at the expense of higher-tier options; produces hazardous outputs.	Development of comprehensive separate collection and treatment of biowaste (e.g., Anaerobic Digestion).

### Financial Sustainability and Policy Alignment

- The capital and operational costs of incineration are significant, diverting resources that could be better spent on genuine circular economy infrastructure.
- The proposal is incompatible with Ireland's climate targets and the transition to a low-carbon economy, as it represents a significant, long-term source of fossil CO2 emissions from the non-biogenic fraction of the waste stream.

## 4. Socio-Economic Impact and Visual Intrusion

The incinerator will generate negative socio-economic impacts that outweigh any claimed economic benefits, specifically related to the visual amenity and the perception of the Cork Harbour area.

### Visual Intrusion

The scale and industrial nature of the proposed development, including the main stack and ancillary buildings, will constitute a significant, negative visual intrusion upon the landscape of Cork Harbour, which is increasingly utilized for tourism and recreation.



- The industrial scale will conflict directly with local planning objectives to enhance the scenic amenity of the harbour.
- The presence of a major waste facility depresses property values and deters foreign direct investment in non-industrial sectors (e.g., high-tech, tourism) that rely on a clean, green image.

## Community and Economic Detriment

The negative branding associated with a major hazardous waste incinerator undermines efforts to promote Cork Harbour as a clean, healthy place to live, work, and invest. The perceived health risks, regardless of technical compliance, will negatively impact the quality of life for residents in surrounding communities such as Place.

## 5. Conclusion and Call for Refusal

Given the substantial and documented risks related to public health, environmental damage, non-compliance with the waste hierarchy, and unacceptable socio-economic and visual intrusion, the proposed Indaver municipal and hazardous waste incinerator at Cork Harbour must be refused. The long delay since the initial application 24 years ago only serves to highlight the incompatibility of this outdated technology with modern, sustainable waste management policy.

The Technical Board is urged to refuse permission and instead direct resources toward infrastructure that supports the European Union's circular economy goals and Ireland's commitment to reducing waste streams, as detailed in this submission.

## References (For Technical Board Review)

1. **Air Quality/Health Study:** File (Detailed analysis of ultra-fine particulate matter and health outcomes near similar facilities.)
  2. **Waste Management Policy:** File (EU and National Circular Economy Package compliance requirements and the Waste Hierarchy.)
  3. **Ecological Impact Assessment:** File (Report detailing the potential chronic impacts on Natura 2000 sites within Cork Harbour.)
  4. **Hazardous Ash Management Protocol:** File (Assessment of risks associated with high-volume, long-term fly ash disposal.)
- 

This planning application should be refused on the basis that the site is inherently unsuitable, concluded by all 3 Bord Pleanála Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017) and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 28 for this site.

I request an Oral Hearing to continue full public participation in this application

Eimer Kelly  
5 Strandville  
Rushbrooke  
Cobh  
Co Cork  
P 24 E165

Encl. €50 fee.