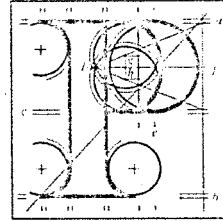


**Our Case Number:** ABP-318802-24

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Gary Jordan  
Dun Áras  
Barnahely  
Ringaskiddy  
Co. 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](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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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1.
D01 V902	D01 V902

**To:**

An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1, D01 V902

**Date:** 15 November 2025**Observation on SID Application - Case Reference: PA04.318802**

Proposed Development of a Resource Recovery Centre (including Waste-to-Energy Facility)  
at Ringaskiddy, Co. Cork by Indaver NV t/a Indaver Ireland

**Observer Name:** Gary Jordan**Observer Address:** Dun Aras, Barnahely, Ringaskiddy, Co. Cork.**Observation Details:**

1. Proper planning generally comprises of three main elements - Consistency, in that a proposal must align with the overall planning framework for the area; Material Considerations, which includes adherence to policies on land use, zoning, and other factors defined by law, and Balancing Interests; in that bodies, such as An Coimisiun Pleanala, should aim to balance environmental and economic considerations in it's decisions.
2. Consistency weighs heavily on this application in that despite the general industrial zoning of the wider Ringaskiddy area, marine leisure, maritime education, and tourism have become focal and strategic objectives for Cork Harbour as a whole. In particular, the increase in Cruise Ship visits (approx. 100 per annum), a continuation in significant investment in Spike Island (approx. 80,000 visitors per annum), and an expansion in both maritime education and R&D attracting international students and delegates annually, are all key indicators that the overall strategic characteristics of Cork Harbour, including Ringaskiddy, are shifting away from pharma/industrial, and steering more towards the leisure, tourism, and education sectors.
3. Ringaskiddy Village Residents have endured decades of industrial onslaught, and although this has provided much needed employment for Cork as a whole, and significant corporate taxation to the economy, the village has become surrounded by industry, and this has been exacerbated by the relocation of Port of Cork operations from Tivoli Docks downriver to the north of Ringaskiddy.
4. Such a relocation occurred primarily for the betterment of Cork City to develop housing, businesses, and riverside recreational facilities, yet adds to the physical boundary congestion of Ringaskiddy, with the only 'relief' now to the East towards Gobby Beach, Paddy's Point, and Haulbowline Park. This application would result in the final occlusion of those residing in Ringaskiddy, and would be detrimental to both the physical and mental health of the residents.

5. Furthermore, despite the hinterlands of Ringaskiddy being zoned as industrial, the site (RY-1-09) directly related to this Application has now been zoned as 'suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development'; from source; RY-1-09, Table 4.1.17 Specific Development Objectives for Ringaskiddy; Cork County Development Plan 2022-2028.
6. In relation to the current maritime educational and enterprise developments in Ringaskiddy, which are in extremely close proximity to the proposed development, which is effectively on a peninsula and access is only from the west, in the event of a hazardous occurrence, emergency services could be hindered in accessing the area safely just by wind direction and heat radiation alone. With this in mind, there are a number of other facilities and amenities located beyond the site of the proposed development which lend to serious health and safety concerns.
7. In addition to NMCI, MaREI Campus and Beaufort, facilities include the only national Naval Base and Dockyard. Amenities by road include Gobby Beach, Paddy's Point, Haulbowline Bridge, and Haulbowline Park, and by sea include Spike Island. Should a hazardous incident occur, as which have occurred at other international incinerators, there are grave concerns for those approx. 1000 personnel and civilian employees at Haulbowline Naval Base, visitors and hobbyists at Gobby Beach, Paddy's Point, and Haulbowline Park as they would require to be evacuated safely. Should visitors to Spike Island (estimated at 80,000 annually) be exposed to downwind combustion particles and smoke from a potential hazardous incident, the only means of evacuation would be by ferry, which can also be constrained by tidal movements.
8. In terms of Material Considerations, the site identified in this application has now been zoned for Educational expansion, in-line with current land uses in the immediate vicinity of the site. Due consideration should be taken by An Coimisiun Pleanala when deciding on this Application in terms of the current zoning of the site by Cork County Council, and this being part of the County Development Plan. An Coimisiun Pleanala are required to ensure that all planning decisions adhere to principles of proper planning and sustainable development. It is understood that should they feel that a Local Authority has not taken these principles into consideration, then they can progress the development, however, is noted that this would only generally occur where the proposed development is of local or national importance, and currently I feel that this is not the case.
9. Notwithstanding the information submitted in August 2025 by Indaver, there are a number of concerns in relation to this Application that I feel are imperative to highlight in the interest of proper planning as mentioned, but also health and safety, and the waste streams proposed to be burned in the facility mentioned within this Application.

10. In my opinion, and from visual inspection and other local knowledge, the site is fundamentally unsuitable for the proposal in terms of size, and the site in question continues to reduce in size due to continued coastal erosion on the eastern boundary, in addition to the Compulsory Purchase Order (CPO) which resulted in the loss of further area on the western boundary as part of the M28 TII Project. This was previously alluded to by Inspector Daly in 2017 in that "it is considered that the actual usable area of the site is inadequate in relation to the scale of the development proposed".
11. Furthermore, the site is located on a well-known flood risk area, marked as same in Table 4.1.17: Specific Development Objectives for Ringaskiddy, and on OPW floodinfo.ie, (Flood Summary ID-1364, 13082, 12085). The suggestion of raising the site levels and also raising the level of Road L2545, and installation of 660m<sup>3</sup> water storage tanks under Road L2545 suggests that the applicant have serious concerns relating to flood waters occurring on the site. This increase in road elevation could result in issues elsewhere in the vicinity, in particular northwards into the grounds of the National Maritime College of Ireland (NMCI).
12. Such concerns were highlighted by Inspector Oznur Yukel Finn in 2009 in that "Mitigation measures to locate the facility at a level significantly above the projected flooding levels would exacerbate the negative visual impact of the proposed large structure....It is my considered opinion that the site is inherently unsuitable for location of a use which processes, and generates hazardous compounds".
13. In addition to this, the proposed use of 1150 cubic metres of shingle as coastal protection measures acknowledges the "net coastal sediment transport will go from south to north in the medium and long term" and will affect the remaining parts of Gobby Beach south towards Haulbowline, which would change the characteristics of the beach, which locals and visitors have enjoyed for many years as a method of recreation, mindfulness, and exercise.
14. The Commission on the Defence Forces (February 2022) has recommended an implementation plan to achieve Level of Ambition (LOA) 2 by 2028, and a long-term-goal of LOA 3 which will require significant monetary investment, but also the attraction of a safe place to work for those with a desire to join the Irish Naval Service. This is a national security issue as LOA 2 recommends an increase in Naval Personnel from 1,094 to 1,794 by 2028, and if Cork Harbour, and in particular Haulbowline [Naval Base] Island, is envisioned as an unsafe or unhealthy place to live and/or work as a result of such a proposed development, then the Irish Defence Forces are at risk of not achieving the recommended Level of Ambition.

15. Referencing the aforementioned amenities within close proximity to the proposed development, Cork Harbour has excelled in terms of tourism. Over 100 Cruise Ships visit Cork Harbour on an annual basis, and as alluded to, approx. 80,000 visitors experience Spike Island, and even more encounter the heritage and Titanic experience at Cobh. From both a visual aspect and reputational aspect, it is reasonable to accept that the insertion of such a development within the second largest natural harbour in the world, would result in those visitor numbers diminishing.
16. In terms of Balancing Interests, I further feel that this Application is flawed and incomplete, as it does not address the environmental and human health impacts of incomplete degradation of toxic PFAS compounds, which is emerging as an internationally recognised concern regarding municipal incineration. Per- and polyfluoroalkyl substances (PFAS) are a class of over 10,000 widely used chemicals. So significant are the environmental and human health concerns regarding PFAS (eea.europe.eu), that authorities from Denmark, Germany, the Netherlands, Norway, and Sweden have formally initiated a process to restrict the entire class of chemicals under EU REACH legislation (echa.europe.eu).
17. The combustion temperature of the proposed development is stated as 850°C to 1000°C; EIA 4.7.3.1 (ringaskiddyrrc.ie), lower than typical hazardous waste incinerators which have combustion temperatures of between 1100°C and 1450°C (www.eurits.org). At 850°C-1000°C the combustion temperature of the facility is too low to fully break down PFAS. According to Indaver's own website temperatures of 1150°C should be used to ensure that PFAS are safely treated (indaver.com).
18. The UK Environment Agency recently published a review of the evidence on incineration of PFAS and concluded that temperatures of at least 1100°C should be used. Incomplete breakdown of PFAS results in emissions to air of non-combusted PFAS and Products of Incomplete Combustion (PICs) - many of which are also known of suspected to be toxic and some of which are known to have global warming potentials tens of thousands of times higher than CO<sub>2</sub> ("Rapid evidence assessment of PFAS incineration and alternative remediation methods", Chief Scientist Group report, September 2025).
19. The proposed development would also be considered a COMAH (Control of Major Accidents Hazards) Site and would pose a societal risk in terms of safe evacuation of the nearby facilities and amenities as mentioned previously. It can also be considered that drivers of dangerous goods vehicles (those that would be delivering to the proposed development) are exposed to hazards similar to those present within the proposed development and would be required to have a greater awareness of such hazards, but more importantly be cognisant of how to respond and react to a potential emergency. For example, a waste-energy facility can be considered as an Upper Tier COMAH establishment, typically containing COMAH substances such as flammables and toxics, and therefore increases the societal risk should a major accident of a hazardous nature occur.

20. Effectively, my concerns are summarised in that the site in question for this proposed development is inherently unsuitable, due to inadequate access, safety constraints, risk of flooding, and continuous erosion of the eastern boundary, and was similarly concluded by all 3 previous [An Bord Pleanála] Inspectors (Jones, 2004, Yukel Finn 2009, Daly 2017). Further concerns allude to the safe evacuation of nearby facilities and recreational amenities, and likely harm to the tourism of Cork Harbour.
21. Based on the afore-mentioned reasons, I request that An Coimisiún Pleanála refuse outright permission for this proposed development to progress, and if not, then I request that an Oral Hearing is convened to allow full public participation and independent expert scrutiny of the many health and safety concerns.

**Submitted by:**

Signed:

A handwritten signature in black ink, appearing to read 'G. Jordan', is written over a horizontal line.

Gary Jordan