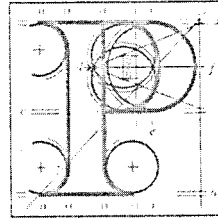


**Our Case Number:** ABP-318802-24



**An  
Coimisiún  
Pleanála**

Gerard O'Mahony & Others  
3 Castle Close  
Ringmahon  
Blackrock  
Cork  
Co. Cork

**Date:** 01 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*

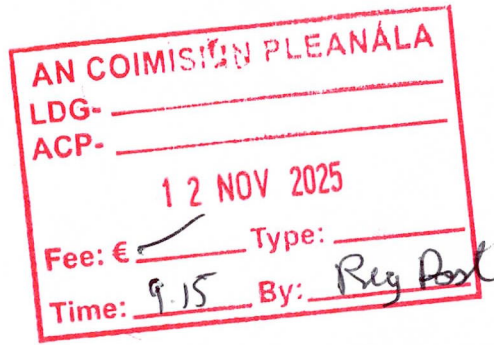
Kevin McGettigan  
Executive Officer  
Direct Line: 01-8737263

PA04

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

3 Castle Close,  
Ringmahon,  
Blackrock, Cork City



To: An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin DO1 V902

10<sup>th</sup> November 2025

Your Ref ABP-318802-24.

**Proposed development of a resource recovery centre (including waste-to-energy facility) in Ringaskiddy, County Cork.**

Fee not required.

Sent by email to [laps@pleanala.ie](mailto:laps@pleanala.ie)

FAO: K McGettigan ACP

**And by Post**

Sir/Madam,

Further to our earlier appeal going back to 2016 and previously to 2001, I wish to offer a few comments and observations on the recent submission by Indaver Ireland Ltd in which you considered that the additional information contained therein "contains additional data in relation to the effects on the environment of the proposed development."

This examination by An Coimisiún Pleanála (ACP) of the application follows an order of the High Court, into of planning application PL04.PA0045 which followed a lengthy oral hearing in 2016.

I assume this is not a new Planning application even if the extent of documentation provided by Indaver gives the impression that it is. Yet it weird given the passage time and of the huge physical changes in the local area, both natural, manmade and infrastructural in the decade since 2016 and the upgrading of technology, computerisation, changes in best technology, growing and accelerating climate change etc, this documentation seems to be trapped in time capsule using the previous decade's language and context which no longer exists..

One of the findings of the High Court that the 2018 An Bord Pleanála's (ABP) decision was voided due objective bias over the participation of Mr Boland a member of the Board. Is the current Board of ACP absolutely sure that no other members of the previous Board of ABP had a potential conflict of interest.....This should be confirmed as soon as possible.

I am also asking for a for a renewal or reconvening of the Oral Hearing which was held in 2016 in view of the additional information provided and the passage of a almost a decade .

Can I make the following initial observation?

By way of context into the history of the Ringaskiddy Industrial area.

I wish to place on record an observation on why this inappropriate site was chosen for this incinerator by Indaver and place it in the wider context of the selection of Ringaskiddy itself for heavy industrialisation.

Ringaskiddy itself is located on the South Western side of Cork Harbour. The village was selected as being suitable for the Port of Cork back in the 70s for apparent reasons other than good planning.

There were literally no development of infrastructure at the site. There was only a basic road connection from Cork to Ring at that time, the next road to Cork constructed eventually became a moving carpark for many years. A €250 million euro motorway is now being finally constructed after 50 years which impacts in the existing site for this incinerator.

This road will lead directly to and from the crowded Jack Lynch tunnel before the traffic breaks into the National Road network on the north of the River Lee and the upper harbour where the infrastructure of roads, railways and port facilities were far more developed on this section of the Harbour and were in place already. There is no railway from this incinerator site until one gets to Cork City.

The very water port created over the past 50 years at Ringaskiddy had had to be dug out of the harbour and requires constant dredging. The sole site proposed by Indaver lies alongside the waters of Cork Harbour to the east of Ringaskiddy itself which is largely a dead-end except for the bridge to Haulbowline. The reason for the decades old conflict with the residents of Cork Harbour is based on the fact that the site selected by Indaver is the wrong site, based as it is on the selection of the original Ringaskiddy Port and the site itself is based mainly on a fortuitous purchase of waste and residual ground at Ringaskiddy back in 2000.

I propose to offer a few comments on various aspects of the new information supplied by Indaver.

1. I believe this site is completely inappropriate for the construction and operation of a waste incinerator. I have said this in submissions on several occasions since this saga commenced in 2001. I do not intend to repeat the many reasons for this opinion again.

As three learned planning inspectors of An Bord Pleanála over 15 years have basically concurred with the assessment of Ringaskiddy being a bad site it is highly unusual that An Coimisiún

Pleanála (ACP) has not sought an entirely new independent assessment of the site after 25 years of appeals, oral hearings, courts, judicial reviews and the views of everyone in Cork except the Indaver consultants and spokespeople.

Is this planning application for an incinerator on this unsuitable site the longest running planning saga in Ireland and possibly in Europe?

Indaver agreed to purchase the unused site from Irish Ispat or its Receivers at a good price in the late 1990s and have been attempting to shoehorn an incinerator into it for more than a generation in defiance of the local community, most politicians, the Dept of Defence, the Irish Navy, and just about every other civil and community body in Cork (with the usual exception of the Cork Chamber of Commerce!).

There is little more to be added to what the Board's own inspectors have clearly stated after listening to submissions and oral hearings over 25 years and now the present submissions.

Any decision by An Coimisiún Pleanála to allow planning permission will simple constitute a bad planning decision which will have detrimental implications both for the health of people in the Cork Harbour basin for several generations and for the positive development of the entire area over a longer period.

**I note that Indaver Ireland Ltd intend to operate the Incinerator for an INITIAL period of 30 years. Obviously further planning applications can be expected if the site survives climate change.**

**(a) The story of Indaver at Rivenhall.**

In this context I invite ACP to examine the planning approval for the Rivenhall Incinerator at Witham in Essex, where Indaver were allowed bring 400 trucks through a local village and reduced the height of the stack from the original 58 metres to 35 metres. In a recent report of the BBC news site of 30<sup>th</sup> July 2025, James Abbott a local Green Party Councillor was quoted as saying "We have been right royally played by the developers.....for decades about this site" He was referring to Indaver's failure to include recycling facilities at the incinerator site"

Mr John Ahern the business development director at Indaver stated that "We're not allowed to "royally play" anybody,"

Unfortunately now the Indaver company wants to change emissions from its stack plume from invisible which was placed in the planning licence to visible and highly so according to the reports from the ground. The locals in Rivenhall are not too happy about being "right royally played" at this stage after 15 years of hassle.

Many people in Cork have concluded that Indaver have been playing the Planning authorities, here as well along with the local communities for the past two decades.

The BBC report of 30<sup>th</sup> July goes on to say "Essex County Council Is currently investigating whether permissions had been breached by Indaver"

(b) Extract from Chapter 7 Indaver EIS summary in relation to alternative sites surveyed in 1999/2000.

*"This section provides a description of the reasonable alternatives studied by Indaver, which are relevant to the Ringaskiddy Resource Recovery Centre proposal and its specific characteristics, and an indication of the main reasons for the option chosen, including a comparison of environmental effects. As part of this, the site selection process and the main alternative waste management options and technologies considered with particular reference to best available techniques are described. A site selection study was carried out during 1999-2000. The site selection criteria at the time also included an analysis of environmental factors and was carried out in three phases, considering potential sites across Cork Harbour, Cork County and Ringaskiddy. A number of technical and social criteria were used to compare each site which included consideration of environmental factors such as landscape and visual, sensitive receptors, ecology etc. These criteria informed the decision-making process. Following on from this study, Indaver purchased a site in November 2000. This is the site for the current proposed development and remains the preferred site, following subsequent assessment in 2015. It is located at the eastern end of the Ringaskiddy Peninsula, surrounding the Hammond Lane Metal Co premises. As part of the site selection process, at a national level, the Eastern and Midland region was considered, however a key consideration in that regard was the relevant regional waste management plan at the time, which noted that site selection should consider the spatial distribution of thermal recovery capacity in the State when authorising future developments."*

**Comment:**

While I accept from Indaver that it conducted some sort of an examination of alternative locations for the Incinerator in 1999/2000, it is difficult to accept that this examination was a serious one. The actual purchase of the present Ringaskiddy site from Ispat for an undisclosed sum was made in November 2000.

So was it just coincidence that the site selection study carried out by Indaver between 1999 and 2000 for its planning application of 2001 was in progress during the exact same time period as Indaver was discussing the purchase of the Ispat land which became amazingly enough the same site that was selected for the incinerator? Ispat was offloading assets as it was about to go into Receivership and Liquidation. The site selection by Indaver may have been obviously influenced by Indaver acquiring this "asset" so the site for the incinerator was then a fait accompli.

Earlier this unused site and the steel works factory and toxic dump, part of the Irish Steel owned lands were originally purchased for 1 Punt by the Indian company Ispat in 1995 from the Irish Government which owned Irish Steel.

So Ispat lasted about 5 years in all before closing, abandoning the nearby toxic dump and selling of segments of land and assets to realise some cash for which it was accused of asset stripping by local interests such as trade unions in the national media at the time.

Ispat closed down in early 2001 but managed to sell off this separate patch of land to Indaver just prior to the permanent closure of Ispat leaving large liabilities to creditor and 300 to 400 employees redundant. Its liquidation followed a few months later.

This was at the very same time that Indaver say it was supposed to be considering alternative sites. The prompt announcement of the Indaver Incinerator plans just a few months later in April 2001 suggests that the timescale for the serious consideration of alternative and more appropriate sites nationally for an Incinerator was to say the least quite short and cursory. Was it a desk review of possible alternatives or was anything done to seriously look at alternatives which was required under EIS/EIA legislation?

When the site was examined again in 2015 as part of its Site Suitability Review (Taking in Kilbarry, Bottlehill and Gortadroma) but once again Ringaskiddy was selected. This report was presented to the Planning Spector at the 2016 Oral Hearing.

It is now 10 years since any site suitability was examined despite all the local changes and public monies spent.

**Although the answer is obvious to most reasonable people it remains up to ACP to determine if these consideration of alternatives in 2000 and 2015 was in anyway genuine or not in accordance with Irish environmental and European law dealing with Environmental Impact statements. If these attempts are considered to be incomplete, preordained to give a certain outcome due to the purchase of a particular site then this planning application fails and should be rejected by ACP..**

(c) So the relevant question for ACP to determine is whether the fortunate availability of a cheap but difficult tight site alongside the Harbour yet near the Ringaskiddy Port in the late 90s, which was then acquired by Indaver was selected solely on the basis of its ownership by Indaver and ready availability rather than assessed independently and with regard to the sensible and constructive planning of the area.

Was it ever the correct site for a large Incinerator located as it is at the eastern end of Ringaskiddy village through which all the related traffic and services have to travel?

In the event of a serious accident how are Irish Navy personnel expected to get off Haulbowline Island? They will have to pass the site of the incinerator! In the event of war or security issue, an attack on the incinerator could ensure the non- availability of the Irish Navy due to being trapped on the naval base if attacked or by naval officers attempting to get to the Naval base to launch naval boats. The bridge/causeway is basically a narrow road, which gets crowded for local funerals.

How will people visiting the new Recreation Park get to safety if there is a serious accident at this site?

How will grieving families attending nearby funerals at Rocky Island get evacuated?

**The past 25 years of conflict with everyone in the Cork area has clearly shown that this site is not a suitable location for the proposed Indaver Incinerator. It never was suitable.....it never will be!**

2. I believe granting permission will set back any ongoing attempts by Government and the community to eliminate waste through prevention, reduction, reuse and recycle. Indeed the very concept of burning waste is contrary to achieving the above aims. The whole ideal of a closed circular waste economy will become irrelevant as indeed is the hierarchy of waste. Nowhere in the documentation provided by Indaver Ireland Ltd does the company provide practical solutions in relation to eliminating waste. What we get in the latest Indaver reports is a textbook "greenwashing" of the issue offering the burn solution while ignoring its impact on the local community or its ability to solve the waste problem and there is no incentive to do so. Result: there will simply be more waste created and more to be burned.

3. The site at the eastern end of Ringaskiddy Village is close to the entrance to the beautiful Cork Harbour. The building structures and bunkers and stack of this development will be obtrusive and highly visible to many residents in the Lower Harbour and to all visitors entering and leaving the Harbour waters. The papers submitted by Indaver just gloss over this issue with a serious of AI/Fake news style montages which are not in any way representative of the structures to be constructed and the backgrounds from which they will be viewed..

Is this the Gateway image to Ireland which will be enjoyed by those travelling by passenger boats which we as a country wish to leave as a further everlasting monument to bad planning in Cork Harbour?

4. Anyone who visits the eastern end of the site and walks on Gobby beach cannot help but notice the huge erosion which has taken place there in the past decade as large chunks of the fields and trees tumble regularly into the harbour waters. The remedial actions proposed by Indaver will destroy what remains of Gobby Beach by adding stones and infill.

The remaining access to the nearby once beautiful Loch Beach, south of Gobby (once the "pearl of Cork Harbour") will be eliminated except to those of robust nature.

Of course Indaver state that they will raise the height of the low lying levels of the site by 4.55 metres OD and 5.00 metres to protect the Incinerator without giving a basis for these figures given the uncertainties of climate change. However when combined with the main process buildings rising to between 23.7 and 50.7 metres AOD and the Stack at 75 metres AOD the newly elevated lower site with a tall plume emitting stack at the rear will represent a highly visible bunker type industrial structure at a strategic position in the Harbour.

5. The new Amenity pathway being included on the eastern and southern perimeter is another case of what is referred these days as “greenwashing”. Why does Indaver suppose that people would wish to take exercise alongside a large security fence with keep out signs an elevated industrial complex operating for 8000 hours per annum and emitting chemical compounds of dangerous and toxic natures into the very air they are breathing? Instead
6. I would have thought it prudent for the Irish Health Authorities if this incinerator ever operates to immediately erect health warning signs for individuals with respiratory issues, especially for those climbing the hilly section on the eastern side of the incinerator.
7. The proximity of the site of the proposed incinerator to local growing populations such as Ringaskiddy, Cobh, Crosshaven, Monkstown etc should be a cause of concern. Added pollutants from this incinerator to the local atmosphere especially in periods of temperature inversion will come with additional health costs for the local populations. The proximity of an incinerator to the HQ of the Irish Navy in a time of recent threats to Ireland’s security needs to be reconsidered. Indeed the 2016 Oral Hearing took place at a time in which the existing external threats to our security as a country were not treated as a major issue in the opposition to this Incinerator development. Although the opposition to certain elements of the Indaver plans was made clear at the oral hearing in a detailed submission from a senior representative of the Irish Navy. I can only conclude that the current views of the Irish Navy and Defence Forces should be sought again and seriously examined in view of the urgency of the growing military threat to Ireland and Europe.
8. The work of the nearby National Maritime College (across the road from the incinerator site) is vital to Ireland as an island nation. The ongoing development of the Ringaskiddy terminal itself is now vital for economic security. Recent Irish State investments in Spike Island and Haulbowline Recreational Park and the berthing facilities in Cobh for the Cruise Liner industry since the original planning application by Indaver in 2016 call into question the future prospects and viability of these investments in the event that this incinerator is allowed planning. Imagine elderly tourists for example sitting on the upper decks of the cruise ships looking at plumes of pollutants rising 24 hours per day from this clearly visible nearby facility. The economic cost/benefit to Cork of these considerations needs to be examined objectively as part of the ACP assessment and not just dependant on studies which some people might suggest are primarily geared to preordained outcomes.
9. Comment on Section 19. ***Cumulative Impacts, Other Impacts and Interactions.*** EIS summary.

***“The jobs created during construction and operation, and the contribution which Indaver and its employees will make to the local economy, will have a slight positive economic effect on the Ringaskiddy and Cork City and County areas.”***

Can I remind the Coimisiun that just 63 people will be employed at Indaver, even the applicant accepts that the contribution Indaver and its employees will make to the local economy will have “***a slight positive economic effect***” yet nowhere are the potential negative economic costs of this incinerator, both actual and in people’s perception of the area and the economic costs to the wider community detailed in the Indaver reports.

Is there not a case where the potential lost employment in retail and local services and potential future investment in tourism in the Ringaskiddy, Cobh and Lower Harbour should be examined independently, considered relevant to the planning application and verified by the ACP?

#### 10. Some further comments

Indaver Natura Impact Statement NIC 5.8.1

##### **Conclusion of bio-monitoring review**

"A notable method for examining the impact of pollutants in the wild is bio-monitoring. While studies on heavy metals, in particular mercury, are well established, non-invasive biomonitoring for dioxins is still relatively new. Bird feathers and eggs have been successfully used to monitor mercury levels in birds for many years. In the case of dioxins, bird livers and muscle are commonly used, although a number of studies have successfully used eggs to monitor contamination levels. However, other factors, including age, sex, time of year, migratory status and, in the case of eggs, laying sequence, will affect the levels of mercury or dioxins detected. **Therefore, using such techniques to monitor mercury patterns in a single area, or from a single source (in this case the proposed development) appears very difficult if not impossible.** Indaver contacted representatives of the waste-to-energy industry in the UK, Ireland, Germany, Belgium and The Netherlands but found no evidence for a biomonitoring programme instigated by a specific incinerator. **The general consensus was that such programmes are not required due to the low emission levels and the low potential for impacts. The predicted levels of dioxins and mercury generated by the facility will be low and no significant impact on piscivorous bird species is predicted.** Given the difficulties inherent in determining the source of dioxins and mercury in piscivorous birds and the difficulties in ascribing levels to any particular source, the use of cows' milk is considered an adequate means of determining if problematic levels of dioxins are entering the food chain via atmospheric deposition. The EPA conducts such monitoring of dioxin in cow's milk in Ireland, including in the Ringaskiddy area"

**Comment: How can the authors predict levels and impacts on wildlife of toxic emissions emitted from this incinerator in view of no tests on birds being attempted? Tests on cows are not a substitute for tests on wild birds whose immune systems could be compromised and make them susceptible to disease.**

**And "the general consensus" of the European incineration industry including Indaver in relation to biomonitoring programmes for a specific incinerator not being required are not a solid basis for decision making on which to base any conclusions, predictions or impacts on anything to do with dangerous substances such as dioxins emitted from this industry.**

**Surely the "precautionary principle" should be applied by regulatory authorities in the case of sources which emit such substances into nearby communities and local environments. Those authorities should not just accept the cosy "general consensus" of the multinational incineration industry whose aim is maximise income and minimise its costs by socialising its waste costs to the very air which the nearby community breathes,**

**See Table 12 of Natura Report NIS**

I have read the work in relation to the conservation status of Cork Harbour SPA's SCI birds.

I note Table 12 gives details for 22 species and grades the site conservation conditions.

The details for the Cork harbour list 9 species were highly unfavourable, 6 species were unfavourable, 3 species at intermediate and just 4 as favourable. The Information used was based on a NPWS report of 2014. The information provided shows approx. 80% of the species are negative. The comparison with Current international trends and Current All-Ireland trends are mostly positive by comparison for these species at either increasing or positive.

**I cannot see how the construction over 31 months and 8000 hours of operation per annum of this incinerator will improve this situation for those SCI birds and common sense would suggest that it will be very detrimental. Although I suppose a mitigating factor there will be that less people will be walking in the general vicinity or bringing their dogs during daylight hours to disrupt the birds as referred to in the Natura report supplied as "impacting on bird usage of Gobby beach."**

**The poor state of the bird habitat should be a signal to ACP that all is not right in Cork Harbour bird habitats even before the negative impacts of this incinerator is considered.**

**Page 12 EIS Non-technical Summary**

"Emission Reduction The facility will be designed to minimise the formation of dioxins and furans (the term 'dioxin' is taken to include dioxins and furans) in the furnace by maintaining the flue gases at a high temperature of over 850°C for over 2 seconds. In order to minimise the reformation of dioxins in the boiler, it has been designed to include automatic controlled cleaning and rapid cooling. Oxides of nitrogen will be controlled through combustion and through the injection of ammonia solution or urea. The flue gas cleaning equipment, described below, will further reduce dioxin concentrations in the flue gas to well below the EU emission limits."

**Comment: There are no safe levels for the emissions of dioxins.**

See summary by Indaver.

Note: "The facility is designed to MINIMISE the formation of dioxins and furans"

Note: "In order to MINIMISE the reformation of dioxins in the boiler etc."

Note: "The flue gas cleaning equipment, described below, with further REDUCE dioxin concentrations" etc.

**Conclusion: There will be unknown and indeterminate quantities of emissions of residual dioxins and furans to the air and atmosphere of the Cork Harbour area which will be to the detriment of everyone living here. We find this unacceptable.**

**Conclusion:**

Despite the passage of almost 25 years there appears to be little new information contained in the various pieces of documentation being submitted by Indaver to ACP. The information, language and mind set seems to be quite similar to every planning application of Indaver since 2001.

For example was climate change an issue of real importance in 2001? Today it is as we have now breached all targets as we race into the massive impacts due to our failure to reduce emissions. The Indaver site was bad in 2001, it's now a potential disaster for an incinerator.

Again based on the emergence of climate change as a serious emergency for the world, a fact mentioned by Local constituency TD and Taoiseach Mr. Micheal Martin at Cop 30 just last week, one would consider that the increasing evidence of this unfolding disaster would be all that is required to refuse planning permission for this particular site.

However as an observation of these planning applications over the years, I find it quite extraordinary that three ABP Planning Inspectors have refused to support the granting of the Planning permission for this site after oral hearings involving the community and visits to the actual site for this development. Yet the Boards of ABP ignored their own inspectors and proposed giving permission. Now An Coimisiun Pleanala once again has an opportunity to refuse planning permission for this stupid proposal by Indaver. It should do so if only to retain some credibility in it by local people.

I again call for a refusal of the Planning permission or at the minimum a reopening of the Oral Hearing to examine the results of this "additional" information. We have had to defend our communities when the Boards of the Planning authorities do not. ACM has been given a makeover recently but its credibility is on the line here along with future community trust

**Yours faithfully,**

**Gerard O'Mahony**

gerard o'mahony..

