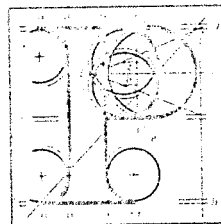


Our Case Number: ABP-318802-24



An  
Coimisiún  
Pleanála

Kevin & Lynda Forde  
13 The Estuary  
Church Road  
Carrigaline  
Cork

P43 WK74

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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|--------------------|---------|--|
| Teil               | Tel     | (01) 858 8100  |
| Glaó Áitiúil       | LoCall  | 1890 275 175   |
| Facs               | Fax     | (01) 872 2684  |
| Láithreán Gréasáin | Website | <a href="http://www.pleanala.ie">www.pleanala.ie</a>                       |
| Ríomhphost         | Email   | <a href="mailto:communications@pleanala.ie">communications@pleanala.ie</a> |

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

Kevin And Lynda Forde  
13 The Estuary  
Church Road  
Carrigaline  
County Cork,  
P43 WK74  
Ireland.

16 November 2025

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

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

**OBSERVATION DETAILS**

We enclose the fee of €50.

We are residents in Carrigaline and regular users of the harbour for waterborne recreation and of the many public amenity spaces in Ringaskiddy and the surrounding areas (Currabinny Woods, Loughbeg Beach, Gobby Beach, Paddy's Point Slipway, Haulbowline Park and Spike Island).

We consider the Proposed Development will have a number of significant, adverse and detrimental impacts on the local area in terms of:

- initial site selection,
- site suitability,
- zoning issues,
- environmental contamination and public health impacts,
- visual impact and
- impact on the burgeoning local harbour tourist industry

that greatly outweigh the alleged benefits of burning our waste for profit.

**Site Selection Process**

The site for any development should be assessed in terms of its unique suitability for the proposed development in an Environmental Impact Assessment Report (EIAR).

In this repeat application by Indaver there has been no meaningful 'de novo' site selection process in the additional material submitted in 2025, but instead an attempt to continue to justify the use of the site based on its existing ownership by Indaver, rather than any particular site characteristics that make it particularly suitable for an incineration operation.

Only cursory consideration has been given by Indaver to a number of major public and private investment initiatives since 2000 which have:

- significantly altered the surrounding land uses from predominantly industrial to a mix of educational, residential and amenity use,
- altered the county Council zoning of the site of the Proposed Development from industrial to educational use, and
- transformed the character of the immediate Ringaskiddy area, and of the wider Lower Harbour area, in terms of tourism and amenity facilities in the intervening period since the original Indaver application in 2000 (as acknowledged by ABP inspector Daly in his 2017 assessment).

## **Site Suitability**

### **- Site Size**

Notwithstanding contrary statements in the additional information submitted by Indaver to An Coimisiun Pleanala (ACP) in August 2025, the Proposed Development site is fundamentally too small for the scale of project proposed and has been further reduced in size since the 2016 application, by a combination of active marine coastal erosion of the glacial till cliff on the eastern side side and by a boundary change due to the construction of the new section of the M28 road in Ringaskiddy Village on the northwest side.

It is considered that the actual usable area of the site remains inadequate in relation to the scale of development proposed (as had been concluded by An Bord Pleanala inspector Derek Daly for the then-larger site in 2017).

In previous assessments by all 3 Bord Pleanala Inspectors, the Environmental Impact Statements (EIS, now termed EIAR) submitted by Indaver were found to be deficient in substance, even where found legally adequate in form. The technical EIS/EIAR information as submitted to the Board is therefore insufficient to enable the Board to carry out an appropriate Environmental Impact Assessment in an appropriate manner, and to form a basis for an informed decision on the application. (Daly, 2017).

Despite revisions, the updated EIS material continues to repeat earlier conclusions and provide assertions without evidence. It is our opinion that the site is inherently unsuitable for location of a use which processes, and generates hazardous compounds. (this was also stated by ABP Inspector Ozgur Yukel Finn in 2009).

### **- Flood Risk**

The site is located on a 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). Mitigation measures to locate the facility at levels significantly above projected flooding levels would exacerbate the negative visual impact of the proposed large structure (see below).

### **- Geology – Coastal Erosion**

Active marine coastal erosion of the glacial till cliff on the eastern side side is occurring, as is acknowledged in the 2025 EIAR Chapter 13 Section 13.3.8.2.

This EIAR section refers to cliff retreat rate studies done by Arup however this section makes no mention of the potential for an increase in cliff retreat rates over time due to climate change and sea level change causing increased erosion rates in the future.

Given the grant of a 10 year planning period and initial 30 year operational period, this opens the possibility of steadily-increasing coastal erosion rates over this 40 year period, which the applicant has not accounted for in the EIAR, and the prospect of a further 30 year extension to the operational phase could extend this time-frame (and the likely increase in sea levels and storm activity, to a 70 year period).

### **Zoning Issues**

While the zoning of the greater Ringaskiddy area was industrial for many years and many long-established pharmaceutical and logistics facilities exist in the area, the particular Indaver site area where the incinerator build is proposed (RY-I-09) is now zoned as of 2018 as suitable for the extension of the Third Level Educational campus and enterprise-related development, including marine related education, enterprise, research and development<sup>1</sup>. (RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 – 28). This zoning change is dismissed in the August 2025 Indaver information but it is of critical importance that this zoning be upheld, as it is directly linked to the future investment in the NMCI and MaREI Campus areas and the potential for future growth of this sector.

The proposed incinerator development is therefore in direct contravention of the County Development Plan and contrary to the specified objectives for the immediate area.

### **Environmental Contamination and Public Health Impact**

Incineration of mixed municipal wastes releases pollutants like dioxins, furans, PFAS, heavy metals, nitrogen oxides (Nox) and fine/ultrafine particulate matter (PM10 PM2.5 and PM0.1 particulates) into the atmosphere.

#### **- Dioxins and Furans**

Dioxins and furans are produced during incineration through high-temperature processes where chlorine is present, particularly from the incomplete combustion of organic matter and chlorine-containing wastes, are of concern as human carcinogens and are often incompletely removed in incinerator flue gas treatment, posing a public health risk to local communities.

#### **- PFAS**

In recent years public and regulatory awareness of the potential health and environmental hazards of PFAS (Pre and Poly fluorinated alkyl substances), also popularly termed the 'Forever Chemicals', with human exposure to PFAS in the environment potentially linked to increased risks of certain cancers, high cholesterol, reproductive and developmental problems, liver damage, and immune system effects, and suggested links to thyroid disease, pregnancy complications like pre-eclampsia, and reduced vaccine response. Most of these risks are not yet fully understood and remain subject of intense research.

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<sup>1</sup> RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 – 28

PFAS are present in many consumer products, albeit in the process of being phased out of use in new products in the EU. These consumer products may be present in municipal wastes for years to come and, if the waste is combusted in the incinerator, the PFAS are emitted to the atmosphere in the flue gases and will travel downwind of the incinerator stack and fall to ground if conditions allow.

Many current incineration processes, especially those not specifically designed for PFAS, do not reach the necessary extremely high temperatures or conditions (of the order of 1,000 to 1,100°C, compared to the proposed 850-1,000°C proposed temperature range the Proposed Development (EIAR Chapter 8 Section 8.4.2<sup>2</sup>) to fully break down the stable carbon-fluorine bonds in PFAS. The incineration process can therefore be ineffective or harmful for PFAS because they are often not completely destroyed, leading to the spread of PFAS contamination through airborne emissions, ash, and residues.

Given the stated operating temperature range of the Proposed Development is below 1,000°C, it can be concluded from Indaver's EIAR that there will be incomplete combustion of PFAS in this facility and consequently uncontrolled, unquantified air emissions of PFAS to the local area.

There is no risk assessment of PFAS loading or estimation the potential mass of PFAS that may be dispersed to air from this facility in Chapter 8 Air Quality of the 2025 EIAR<sup>1</sup> or of the potential impact on human and environmental health locally, which is a major deficiency given the rapidly increasing regulation of PFAS emissions from industry and the application of increasingly stringent regulatory limits on PFAS across many environmental media in EU law (soil, drinking water and surface water) in the past 5-10 years.

The incineration process creates hazardous ash (fly ash and bottom ash), which can contain more concentrated dioxins, furans, PFAS and other toxins and therefore requires special handling and disposal, potentially requiring surface transport through our towns and cities or overseas land filling, both of which are environmental concerns in themselves and are incompatible with Ireland's stated Waste Management policies and targets.

#### **- Ultra-fine particulates**

Regulations do not yet exist for Ultra-Fine Particulate (UFPs) which are particles less than 0.1 µm in diameter (termed PM<sub>0.1</sub>) in ambient air. Hot volcanic lava, ocean spray, and smoke are the common natural UFPs sources, as is the nucleation of gases in the air, and therefore incineration of waste may be a potential producer of UFPs.

This size class of particles are far smaller than the regulated PM<sub>10</sub> and PM<sub>2.5</sub> particle classes and is believed to have several more aggressive health implications than those classes of larger particulates per unit mass<sup>3</sup>. Owing to their large quantity and ability to penetrate deep within the lung, UFPs are a major concern for respiratory exposure and health<sup>4</sup>.

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2 Indaver (2025) Ringaskiddy Resource Recovery Centre Environmental Impact Assessment Report  
Ringaskiddy Resource Recovery Centre - <https://ringaskiddyrrc.ie/wp-content/uploads/EIAR-2019-Ch-8-Air-Quality.pdf>

3 V. Howard (2009). "Statement of Evidence: Particulate Emissions and Health (An Bord Pleanála, on Proposed Ringaskiddy Waste-to-Energy Facility)" (PDF). Durham Environment Watch  
<http://www.durhamenvironmentwatch.org/Incinerator%20Health/CVHRingaskiddyEvidenceFinal1.pdf>

4 B. Collins (3 August 2007). "HP Hits Back in Printer Health Scare Row". PC Pro.  
<http://www.pcpro.co.uk/news/121641/hp-hits-back-in-printer-health-scare-row.html>

Although UFPs remain largely unregulated, the World Health Organization has published good practice statements regarding measuring UFPs in 2021<sup>5</sup>, however Chapter 8 Air Quality of the Indaver EIAR makes no reference to this emerging contaminant of concern.

### Visual Impact and Visual Amenity

The construction of a building 50 m high and with a stack to 75m OD will dwarf surrounding features such as the hill and historic Martello Tower to the south and will be visible from all around the harbour, overpowering the natural and historic features of the harbour area and is counter-productive to the new tourism strategy for the harbour area.

The EIAR Chapter 11 Landscape and Visual Assessment itself states in Table 11 that:

- the “ top half of the main process building and stack with an occasional plume will be visible above the trees in the mid to background” from Ringaskiddy village .
- “The main process building and the stack with occasional visual plume also break the skyline” from certain locations,
- “The proposed stack with an occasional plume will be visible as a prominent additional vertical feature in the foreground rising above the ridgeline and seen against the sky resulting in significant, permanent and negative effect.” from the Ringaskiddy Martello Tower,
- For the NMCI the “ the proximity of the development it will become the prominent visual feature at this location, resulting in a significant, permanent and neutral visual effect”,
- From Gobby Beach “The eastern end of the process building will be prominent in views from this location leading to significant, permanent and neutralvisual effect.

### Tourism Impact

We consider that the Indaver facility will have a negative impact on potential tourism initiatives in Cork Harbour due to concerns about the visual and landscape impacts on the area's cultural heritage features, such as Spike Island, Camden Fort, Cobh, Haulbowline Park, Paddy's Point and Gobby Beach and the Ringaskiddy Martello Tower, on water-based tourism in the harbour (leisure craft and the increased cruise liner activity in recent years) and its effect on the residential and recreational amenity of the area.

The Bord Failte Ireland 2024 “Cork City, Harbour and East Cork Destination and Experience Development Plan”<sup>6</sup> ‘includes extensive blue tourism’ (maritime-based tourism) goals and includes the following relevant points:

- under **RTDS STRATEGIC OBJECTIVE 3** includes under strategic goals integrating on land and on water exploration of the destination from the river, harbour to greenways, realising the opportunities provided by outdoor, adventure and rural tourism experience clusters
- **Section 3.2** shows Ringaskiddy as a node on the proposed **BLUE: Water and Blueway Line** to “introduce visitors to a necklace of water based experiences and locations celebrating Cork’s maritime heritage”.

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5 WHO (2021) Global Air Quality Guidelines <https://iris.who.int/server/api/core/bitstreams/b729bbc4-7032-4799-898e-d112faa16f22/content>

6 Failte Ireland (2024) Cork City, Harbour and East Cork Destination and Experience Development Plan <https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Irelands%20Ancient%20East/cork-city-harbour-east-cork-dedp.pdf>

- **Section 4.1** Aims to "embrace sustainability as a point of experience differentiation to tell the Cork maritime and harbour story".
- **Section 4.2** emphasises a "coherent or easily accessible overview of the destination's maritime story ", refers to maximising "the opportunity through Cork harbour as the world's second largest natural harbour and East Cork's local attractions as a platform for tourism development" and aims to develop "an international visitor destination recognised for a best in class approach to sustainability" and concludes that future tourism development must "Ensure carbon emissions are being minimised or eliminated."
- **Catalyst Project 2** envisages a long-term goal creating a national maritime visitor experience located at Haulbowline Island and opening elements of the naval base for visitor experiences comparable to other international maritime and military site experiences.

We strongly argue that a large incinerator building in a key visual location on the harbour and burning 240,000 tonnes of waste a year is at odds with these Failte Ireland sustainable and maritime heritage tourism development goals for the Cork Harbour area.

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Please refuse this planning application on the basis that the site is inherently unsuitable, as concluded by all 3 An Bord Pleanála Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017), that site selections and some key air emission factors have been omitted from the EIAR and the proposal also contravenes the educational zoning of the Cork County Development Plan 2022 - 28 for this site.

We wish to request another full Oral Hearing to give the local community a real voice in this continuing planning debacle, ensure full and democratic public participation and allow us to better consider and debate the validity of this significant volume of new "11<sup>th</sup> Hour" information entered by Indaver in an attempt to keep this doomed application alive.

DATE 16/11/2025

SIGNED *Kevin Forde* and *Sevula Forde*

END