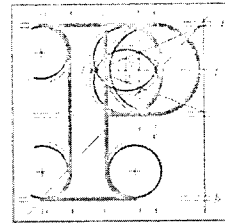


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An  
Coimisiún  
Pleanála

Micahel Higgins  
Avoca  
Lake Road  
Cobh  
Co. Cork

Date: 17 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

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

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

OK

**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

**OBSERVER NAME** MICHAEL HIGGINS **DATE** 14/11/2025  
**OBSERVER ADDRESS** AVOCA, LAKE ROAD, CABH,  
CO. CORK

**OBSERVATION DETAILS**

Notwithstanding the information submitted in August 2025, the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by M28 on the other. *It is considered that the actual usable area of the site is inadequate in relation to the scale of development proposed. (Derek Daly, 2017).*

By all 3 Bord Pleanala Inspectors, the **Environmental Impact Statement (EIS)** was found to be deficient in substance even where found legally adequate in form. *The information as submitted to the Board is therefore insufficient to enable the Board to carry out an 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 still continues to be inadequate.

'No site selection assessment has been done since 2001 despite the enormous change that has taken place in the area. It failed the W.H.O. site selection process then and certainly fails it now after 20 years. There is **no renewed site selection assessment** in the material submitted in 2025, but instead a justification based on site ownership by Indaver, with inadequate consideration given to major public and private investment initiatives that have transformed the character of the immediate area in the intervening period since 2000. (Daly 2017). The only qualification it has is that they own the site.

The site is in a flood risk area. Indaver plans to overcome this problem was to raise the entire area by 4m, which will be an eyesore for all who use this area for recreation. Mitigation measures to locate the facility at levels significantly above 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 the location of a use that processes and generates hazardous compounds. (Oznur Yukel Finn, 2009)

Indavers submission ignores the fact that part of their site (RY-I-09) is now zoned for marine education and related enterprise and activities. That part of their site is no longer zoned for industry. The proposal is therefore in contravention of the County Development Plan.

Please refuse this planning application on the basis that the site is inherently unsuitable, as concluded by all 3 Bord Pleanala Inspectors (Jones 2004, Yukel Finn 2009, Daly 2017), and the proposal contravenes the zoning of the Cork County Development Plan 2022 - 2028 for this site.

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

I enclose fee of €50

I have already submitted in 2016 so have paid prior fee

4 Additional pages attached (no of)

This is the first time that I have ever objected to anything to An Coimisiún Pleanála/An Bord Pleanála. I am against the Belgium company Indaver's re-application for planning permission for a 240,000-tonne waste incinerator in the middle of lower Cork Harbour. To me, this is quite a ridiculous location: it is beside the Irish Navy's main base (will it interfere with helicopters landing on Haulbowline and on its ships?), across the road from two college buildings (the National Maritime College of Ireland and the Beaufort Research Laboratory), the Port of Cork is literally just down the road, it is 500m meters from a highly visited tourist spot (Spike Island) with large populations (Cobh, Carrigaline, Crosshaven etc.) living close by. There is also a flood risk involved, as well as coastal erosion. The site is also in direct contravention of the County Development Plan. And its location is in a natural bowl i.e. the harbour basin - you cannot say that the proposed chimney stack plumes will be safely dispersed at this location, at all times. Finally, it is in a Cul de Sac – what happens if there is an accident there? Unfortunately, I have to note here that Indaver has already had a serious recent explosion at their incinerator at Stabroek, near Antwerp in 2018.

I do believe that we should, as a country, manage our own waste. I believe that there should be a government led solution to this problem, and I also believe that probably a Public Private Partnership (PPP) would be the most ideal solution. Currently it's looking like Indaver is driving this and our government bodies are under pressure to accept their proposal. This feels very wrong. For instance, Indaver have carried out alternative site evaluations and have come back with the conclusion that the site, that they own in Ringaskiddy, was the best site! Quite a coincidence. Isn't this an example how Indaver are putting their own interests above public ones? I don't know this company, but we have seen companies with great track records for safety, fall foul of commercial pressures with disastrous results – the best recent example of this is Boeing with their 737 Max airplane.

As I have said, I would prefer a PPP running an incinerator rather than it be fully own by a private company. Yes, it is the location of the incinerator that I mostly have a problem with, but I also have some reservations about incinerators in general. Incinerator smoke contains harmful pollutants, which include particulate matter, heavy metals, dioxins, furans, and various volatile organic compounds (VOCs). What is in the incinerators smoke plumes, and how much of it, is directly dependent on what is burned, as well as the efficiency and pollution controls of the incinerator. It is dioxins that I am most worried about.

I see from Indaver's reapplication that they have provided additional data to their 2016 planning application. They list a quite detailed summary of the incinerator process, but they specify the following in relation to the monitoring of dioxins dispersed into the atmosphere (which are highly toxic and carcinogenic):

#### *4.11.2 Continuous Sampling of Dioxin Emissions*

*Although it is not a requirement of EU or Irish legislation, the monitoring equipment will include a state-of-the-art continuous dioxin sampler. Due to the very low levels of dioxins in*

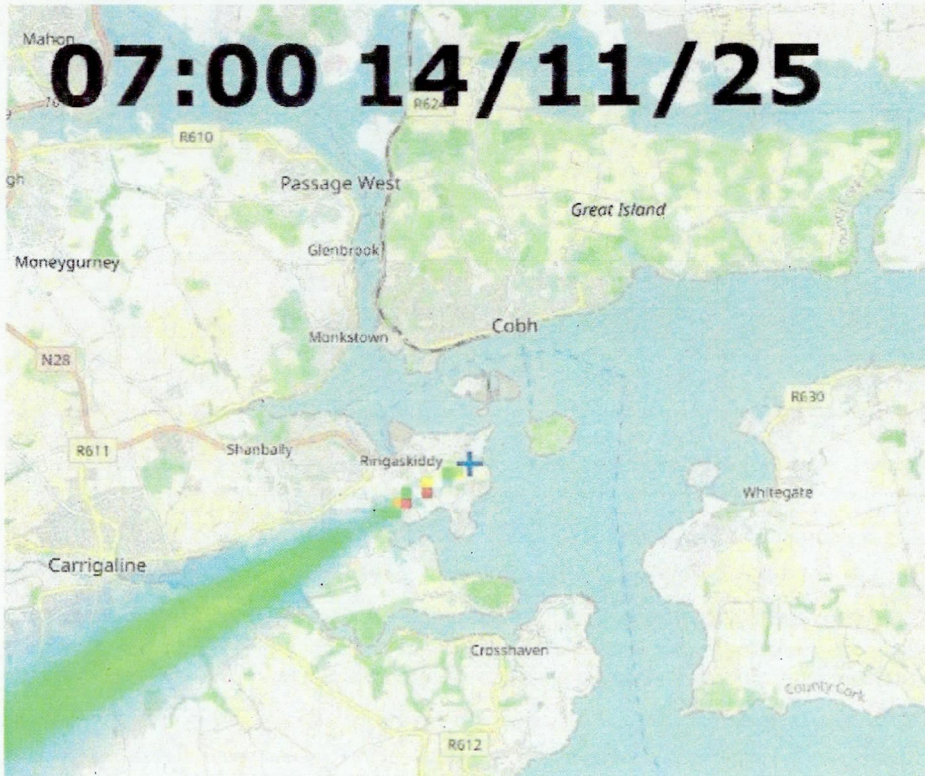
*the flue gases leaving the stack, no proven technology is currently available, which is capable of providing continuous monitoring. The continuous dioxin sampler will allow the dioxin emissions to be sampled continuously. A dioxin filter cartridge will be placed in the sampler to collect dioxin emissions on a fortnightly basis. This will then be removed and analysed in an independent laboratory. Laboratory testing of the samples will give dioxin emission concentrations and mass emission rates over a two-week period. This equipment is in use in existing Indaver facilities such as the Waste-to-Energy facility in Meath. The monitoring and sampling systems proposed are considered BAT for compliance with emission limit values set down in EU Directive 2010/75/EC.*

This statement gives me very little confidence that we know enough. The directive specifies that dioxin emission levels are to be measured twice a year, by external independent agencies. Only twice a year! Do these agencies have to provide prior notice of their visits? If that is the case, it is almost certain that the facility's operation will be at optimal conditions for each visit and not showing a true representation of its overall performance, with respect to what is released into the atmosphere. This type of thing happens in private companies.

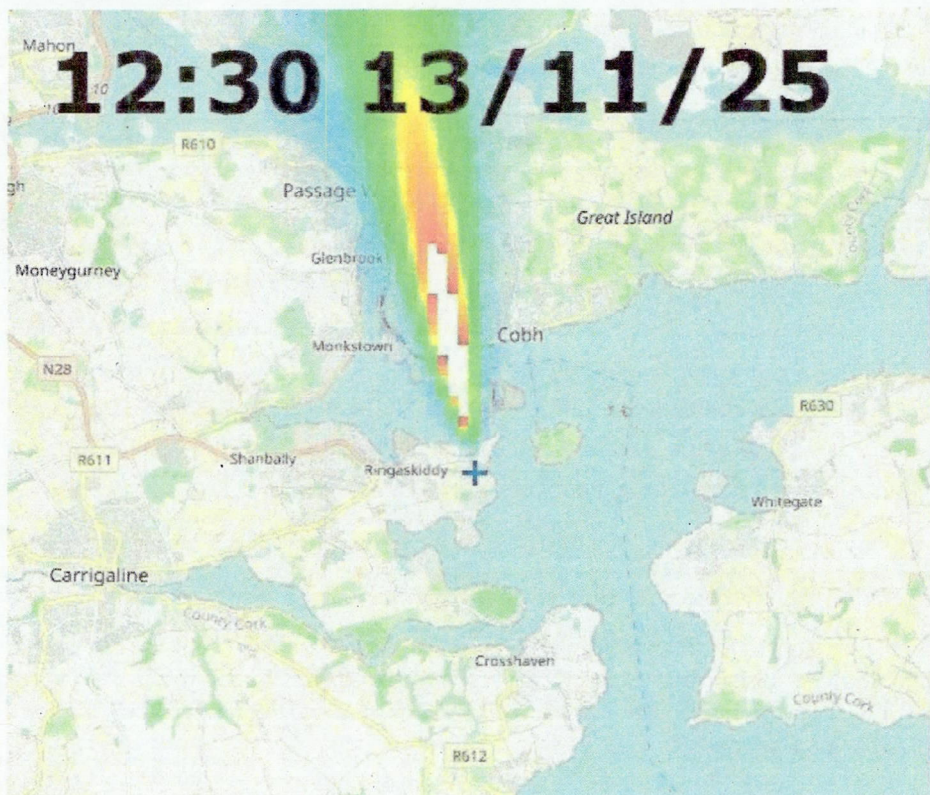
In fairness to Indaver, they do say that they will include a dioxin sampler, whose results will go to an independent lab. Will all dioxin sampling information be available publicly? And what happens if the results are not good, will the incinerator be shut down? Can they give more information on this sampler i.e. what does it measure? How many dioxins can it recognise (there are 75 of these polychlorinated dibenzo-*p*-dioxins in existence)? And by the way, Indaver is not legally required to have this sampler in operation in the first place, so they can stop using this at any time, legally, currently.

The EU Directive 2010/75/EC (on industrial emissions (integrated pollution prevention and control)) says that: as soon as appropriate measurement techniques are available within the Union, the Commission shall, by means of delegated acts in accordance with Article 76 (of the Directive) and subject to the conditions laid down in Articles 77 and 78, set the date from which continuous measurements of emissions into the air of heavy metals and dioxins and furans are to be carried out. What this tells us that technology, as yet, does not provide the means to continuously monitor dioxin emissions – so this means that, until then, we need to be extra vigilant in minimising contaminants like dioxins from getting into the atmosphere. That also means we need to be very careful in all aspects of the incinerator process – which includes the selection of an incinerator site itself.

Currently, the lower Cork harbour area is a wonderful place to live in, and we can see more and more tourists visiting there (Cruise Liners, Spike, Fota and the towns and villages located here). We have a long history of having industry here, so we are not against industrial facilities. But this incinerator proposal is different, it has brought fear to the area. Just look at this morning's simulation map of where the predicted state of pollution from the proposed incinerator at Ringaskiddy would be:



And yesterdays:



This morning it would be going over in the Carrigaline direction and yesterday in the Cobh direction (and also note yesterday the plume would have been going over part of Haulbowline). Carrigaline and Cobh are the largest towns in County Cork. And a more suitable location couldn't be found!

So, I don't think that the fear, that I mentioned, is not misplaced. I, for one, believe that it poses a serious threat to our future.

Mick Higgins

PS: If Indaver cannot get enough waste to run its incinerator, will it import waste to fill the void and what will that waste be?

PSS See the arrow in the picture below, that I took this summer of the lower harbour. The arrow indicates the incinerator site. A picture tells the story, doesn't it?

