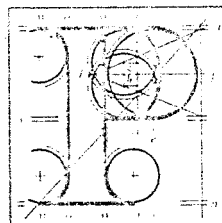


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Miriam O'Shea
Ballybrassil
Ballymore
Cobh
County Cork

P24 XH33

Date: 19 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.

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
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 Coimisiun Pleanála
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.

OBSERVER NAME: Miriam O'Shea

Signed: 

DATE: 11/11/2015

OBSERVER ADDRESS: Ballybrassil, Ballymore, Cobh, County Cork, P24 XH33

OBSERVATION DETAILS:

My name is Miriam O'Shea and I am a registered and practicing Nurse in Cork. I wish to submit an objection to the proposed waste to energy incinerator at Ringaskiddy based on the following opinions. I propose that this incinerator is not allowed to proceed and if not outright rejected then I wish to request an Oral Hearing to continue full public participation in this application. The reason for requesting an oral hearing is on the fact that as this proposal has been in the sphere of consideration for so long, the basis of proposing the rejection has evolved and has become more compelling which I will outline below.

My approach for proposing rejection is based on my understanding that An Coimisiún Pleanála role is to promote and safeguard Strategic Infrastructure. I assume that this proposed incinerator is before An Coimisiún Pleanála due to the nature of electricity generation and waste disposal from a National Strategic Infrastructure position. As such, I will focus my points solely on these elements although I do harbour reservations based on the health implications too which I've also included.

1. Electricity Generation.

The proposed waste to energy (electricity) incinerator will provide 18.5MW of electricity to the grid [1]. Compared to other electricity generation facilities in the Cork harbour area, this is a very small amount of electricity. The Whitegate power station generates approximately 444MW while Aghada power station in total generates approximately 700MW. The quantity of electricity that this proposed facility will provide is very small and of little significance in terms of the base load. As such it would not be a wise strategic decision to utilise such an ideal industrial area that could be used for better use to meet strategic goals. If Electricity Generation was the strategic goal, then it is better served by building a traditional electricity generation station at this location. Indaver are proposing spending E200 million to provide 18.5MW to the grid, this is their money to propose but for comparison, E250 million would provide 300MW based on a recent proposal in North Dublin [7].

It might be stated that 18.5MW generation, although small, would be at least a positive addition to the national grid that would add to the base load. This should be viewed in context that this proposal is nearly 24 years old, literally a generation. In the meantime, there has been a generational leap in electricity generation options.

In 2001, wind generated electricity accounted for approx. 500MW, in 2023 it accounts for in excess of 4700MW [2]. While Solar PV generation in 2023 accounts for in excess of 752MW per year [2], it was practically non-existent in 2001. In-fact, roughly 3000 Solar PV installations on typical domestic homes, on a sunny day, could surpass the electricity generation from the proposed incinerator. The argument of course could be made that wind and solar electricity generation are intermittent sources of electricity, this is true, but in the same 24 year period, three electricity interconnections to the UK have been made with two more planned to the UK and one planned to France. These interconnections allow for import of electricity from the UK and soon from France where each interconnection has the capacity to import in excess of 500MW of electricity each at a time, some are 750MW. I want to emphasise that this is 500MW each and serve our strategic interest very well. Another source of electricity that did not exist in 2001 was battery storage where Aghada now has a 150MW storage which was put into use in 2024 [4]. More such battery storage instances obviously exist through out the country and seem to be increasing considerably. Wind, Solar, Interconnection and Battery Storage are not wishful proposals, these are already developed, proven profitable business models that are cost effectively in place in the immediate area.

The intermittent nature of solar, wind was mentioned. I'd question the stability of waste to electricity too though. Granted it may well be more consistent than wind or solar, I honestly don't know. But the nature of waste to energy must surely require the grading of waste for incineration. I would imagine that timber, dry paper, cardboard and plastics would readily burn and could be considered the best grade for burning, lets say grade 1. A mid-grade, lets say grade 2, might consist of rubbish such as soiled packaging, which will burn if managed carefully with grade 1. While the least likely rubbish to burn, lets say grade 3, such as rotting food waste and extensively soiled items such as nappies / clothes and similar would likely be difficult to burn and would need to be added to the furnace sparingly. I assume this would need to be managed carefully and if it does actually fall below 850°C [5], then electricity generation must cease as stated by Indaver. Also consider that that I assume that the incinerator process requires filter maintenance and I hope that particle monitoring of some sort that would also result in routes to stopping electricity generation unless satisfied. My point is that waste to energy is likely not the most stable source of electricity that could be located at this strategic location.

I'd also like to make the point that I would assume that the national strategic plan would not consider any new coal fired electricity generation facilities on the basis that this source is considered too polluting. If so, I'd like to reference a BBC article that highlights that waste to energy electricity emits practically the same CO2 emissions as that of coal [5] as so too should negate it from the national strategy.

If we consider the impressive increased electricity generation from wind, solar, battery storage and interconnection to the UK / Europe and the pace at which it seems to be increasing, could we consider what other use this land could be used for in the interest of national strategy? Hydrogen generation / storage or perhaps a LNG terminal would far better serve the national strategy to safeguard energy / electricity generation.

It might be stated that Ireland is growing and needs more electricity. 2001, the year that this waste to energy proposal was first made, was the year that Ireland generated its peak electricity generation [9]. The population has grown, industry has expanded, new proven methods to generate electricity have entered the forum but this peak has not been surpassed since. My point again, is that there is no strategic basis for this proposed waste to electricity generation.

Any consideration to this proposed waste to energy facility providing district heating should also get a short mention. There are no homes in the area that require such district heating, nor would anyone likely choose to live near a waste storage facility. Providing district heating to adjacent industry is also unlikely as it would require disruption to their production operations and roads / similar. A lot of these facilities have their own incinerators to support operations and could do so themselves, but all are transitioning to industrial heat pump solutions.

Indaver has stated that this proposed facility would provide enough electricity to supply 30,000 homes via its 18.5MW supply[10]. A large dairy farm in Killeagh in East Cork is proposing selling off his 1100 cows and leasing his land to allow a 250MW export capacity Solar Farm to be installed which would supply 52,000 homes [11]. I'd like to make some points on this. The first, have Indaver over estimated their potential electricity contribution? 18.5MW from Indaver will supply 30,000 homes while the 250MW proposed solar farm would supply 52,000 homes appears strange. This might be on account of the intermittent nature of solar PV. The second point, I have read that some similar proposed solar farms have received rejections, which people are free to do and one of the cases is the concern that a potential risk of battery storage that accompanies solar farms could contaminate the ground water. I personally do not share this concern but if such a concern would be found to be valid, then should similar concern be given to the fuel source of the proposed incinerator, i.e. untreated rubbish which could contaminate both the ground water and the harbour? My third point on this, should the authorities (An Coimisiún Pleanála and relevant County Councils), in the interest of Strategic Infrastructure and ensuring electricity capacity, really support the creation of a 18.5MW waste to incinerator electricity generation but not equally support the use of agricultural land for solar farms in the interest of strategic infrastructure? The land that this incinerator is proposed to use could also be returned for grazing cattle.

To conclude, an 18.5MW waste to electricity generation located at Ringaskiddy is an incredibly bad strategic use of prime industrial land if it in-fact is industrial land at all. It would be an ill-advised strategic decision on the basis that there are far easier, reliable and far higher electricity generation methods available which were highlighted, most did not even exist in Ireland at the time of the first proposal of this project. It would be counterproductive to serving the national interest as it would deny the use of finite land in this area for a superior option. This area of land is literally at the edge of Ringaskiddy where it meets the harbour. Alternatively, this proposed incinerator, at a trivial capacity of 18.5MW could perhaps be considered of such low importance that it is not anymore relevant for consideration with An Coimisiún Pleanála and should be left for Cork County Council to decide.

2. Waste Management.

If waste management is a national strategic policy, which I would imagine it is, then I'd like to make the following point. Is the proposed location best placed to serve the requirement of waste management / disposal strategy from a national perspective? If this was a proposed landfill, would this location be selected, over utilizing the location as a pharmaceutical manufacturing facility, an electricity production facility or a third level institute? I think it would not be of national strategic importance to use this location for a land fill or a recycling centre for ensuring the goals of national strategic policy.

I also think credit is not given to the changes that have occurred in the 24 years since this proposed incinerator was initially raised in terms of waste management. Recycling rates have surely increased and continue to do so. Take the recent rollout of the bottle recycling endeavour. I think Irish people are willing to get behind more similar efforts, we just need such efforts to be pushed out and it will generally be accepted / complied with.

3. Health implications.

As a practicing nurse I have encountered developed complications from exposure to industrial pollution which were deemed safe at the time. This is a time and again story that I've heard from many generations of patients. When you practice in such a work environment and come accustomed to such stories you achieve an awareness of obvious impending health risks that are only just waiting to be exposed next. I have never objected to any proposed development before, but can not leave this one pass-by without submitting an objection rather than remain silent. I feel that the emissions that we would be exposed to as a result of this infrastructure would propagate further risk of developing cancers.

The Cobh area has historically been known for elevated cancer rates [12]. The reason for this is unfortunately debated and not established which lets be frank, is not acceptable but is outside the realm of this objection. The point of this objection is that if the residence of the Cobh area have documented concerns about elevated rates of cancer which have not been established then is there not a moral obligation to heed their specific health concerns with this proposed incinerator? If such an industry is deemed required for strategic purposes then at least make the decision on the basis that some areas, such as Cobh, may have had more than their fair share of burden from the negative aspects of adjacent industry.

If the above is not sufficient to conclude that the proposed incinerator should be rejected, then I wish to request an Oral Hearing to continue full public participation in this application.

Signed: 

Date: 

References listed above in square brackets are listed below.

References:

- [1] <https://www.independent.ie/business/irish/indavers-projected-spend-on-incinerator-in-co-cork-has-risen-by-millions-of-euro-plans-reveal/a33931744.html>
- [2] <https://www.seai.ie/sites/default/files/publications/energy-in-ireland-2024.pdf>
- [3] <https://www.smartgriddashboard.com/roi/interconnection/>
- [4] <https://www.powercomm.ie/blog/esb-opens-latest-battery-storage-project-co-cork>
- [5] <https://indaver.com/expertise/waste-to-energy/grate-incinerator-ireland>
- [6] <https://www.bbc.com/news/articles/cp3wxqje5pwo>
- [7] <https://www.coaklevoneill.ie/infrastructure-energy/>
- [8] <https://fingalchamber.ie/news/maior-energy-investment-north-dublin-welcomed-fingal-chamber#:~:text=Fingal%20Chamber%20has%20welcomed%20Kilshane, support%20Fingal%27s%20rapidly%20growing%20economy.>
- [9] <https://www.seai.ie/sites/default/files/publications/Energy-in-Ireland-1990-2016-Full-report.pdf>
- [10] <https://indaver.com/locations/ireland/cork>
- [11] <https://www.irishexaminer.com/business/technology/arid-41595754.html>
- [12] <https://www.independent.ie/irish-news/revealed-the-town-with-the-highest-cancer-rates-in-ireland/34736634.html>