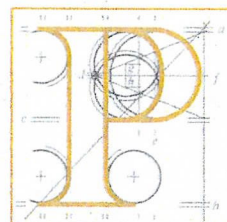


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Orla Berkley
21 Ard Cross Court
Camden Road
Crosshaven

P43 X514

Date: 02 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. 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

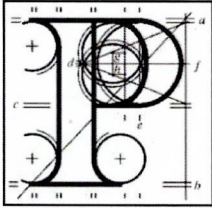
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An
Bord
Pleanála

Observation on a Planning Appeal: Form.

Your details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

Your full details:

(a) Name

(b) Address

Agent's details

2. Agent's details

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

(b) Agent's address

Postal address for letters

3. During the appeal process we will post information and items to you or to your agent. For this observation, who should we write to? (Please tick ✓ one box only.)

You (the observer) at the address in Part 1

The agent at the address in Part 2

Details about the proposed development

4. Please provide details about the appeal you wish to make an observation on. If you want, you can include a copy of the planning authority's decision as the observation details.

(a) Planning authority

(for example: Ballytown City Council)

Cork County Council

(b) An Bord Pleanála appeal case number (if available)

(for example: ABP-300000-19)

PA04.318802

(c) Planning authority register reference number

(for example: 18/0123)

PA04.318802, Ringaskiddy, Co Cork

(d) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Ringaskiddy, Co. Cork

Observation details

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

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 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 material continues to repeat earlier conclusions and provide assertions without evidence. There is no de novo site selection 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 which have transformed the character of the immediate area in the intervening period since 2000. (Daly 2017) 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. It is my considered opinion that the site is inherently unsuitable for location of a use which processes, and generates hazardous compounds. (Oznur Yukel Finn, 2009) Notwithstanding the zoning of the greater Ringaskiddy area as

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

industrial, the Indaver site area where the incinerator build is proposed (RY-I-09) is zoned as suitable for the extension of the Third Level Educational campus and enterprise related development including marine related education, enterprise, research and development. (RY-I-09, Table 4.1.17: Specific Development Objectives for Ringaskiddy, Cork County Development Plan 2022 - 28) This is dismissed in the August 2025 information but it is of critical importance that this zoning be upheld as it is directly linked to the investment in the NMCI and MaREI Campus areas and the potential for future growth of this sector. The proposed incinerator is therefore in direct contravention of the County Development Plan and contrary to the specified objectives for the immediate area. Please refuse this planning application on the basis that the site is inherently unsuitable, 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 - 28 for this site. I wish to request an Oral Hearing to continue full public participation in this application.

As a resident of the lower Cork Harbour, we have first hand experience of a serious fire event at the R&H Hall grain on January 9th, 2021, whereby due to the prevailing climate patterns in the harbour, the immense pollution and smoke remained stuck in air and harbour for a number of days. As residents we were unable to open our windows, however in spite of this the smoke penetrated our homes and caused serious breathing problems for two of my family members with asthma.

I would like to draw attention to the **notification system** — as residents we first learned about the fire via media rather than from the Port or council. If a fire were to break out at the proposed incinerator site, there would be

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

significant impact on the towns of the lower harbour. This was **not the first fire** at the Ringaskiddy facility: this was **at least the third fire** at the grain store within a four-month period.

The Ringaskiddy area has many heavy pharmaceutical factories, along with the grain store – which makes the location wholly unsuitable for the incinerator. There is a disproportionate risk to residents when compared with the general population.

The Ringaskiddy area is currently undergoing significant transport investment and is the proposed original site therefore has been reduced in size, making this an unsuitable sized site with reduced capacity for incineration of rubbish.

Bord Failte has designated the entire harbour area an area of investment and development and the proposed incinerator contravenes this plan.

Indavers safety record is sub optimal and if approved in Ringaskiddy, will pose life long unacceptable risks to residents.

Notable Incidents & Criticisms

Despite their stated safety systems, Indaver has had several notable serious incidents:

1. 2018 Explosion in Belgium

- In September 2018, there was a **fatal explosion** at an Indaver plant in Stabroek (near Antwerp). One worker died and four were injured. [greennews.ie+1](https://www.greennews.ie/2018/09/20/indaver-explosion-belgium/)
- The cause was linked to the transfer of liquid waste into a storage tank. hazardexonthenet.net

5. Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

- This explosion raised serious questions for communities, especially in places where Indaver proposed new incinerators (e.g. in Cork / Ringaskiddy).

2. Dioxin Release (2002 / Earlier Incident)

- During an earlier period (cited in a Cork hearing in 2005), Indaver admitted to an “accidental release of dioxins” from a static kiln at its Antwerp site. [The Irish Times](#)
- According to their general manager at the time, the burner did not achieve the necessary high “flame-tip” temperature to fully break down heavily-chlorinated compounds, which overwhelmed the gas-cleaning system, leading to dioxin release. [The Irish Times](#)
- Indaver said that error was a “serious mistake” which to me as a resident of Ringaskiddy, is one serious mistake too many and unacceptable

3. Recent Fire at Willebroek (2025)

- In May 2025, a fire broke out at the Indaver facility in **Willebroek (Belgium)** at outdoor storage of compressed PMD (plastic-metal drink) bales. [ChemXplore](#)

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

Fee

7. You **must** make sure that the correct **fee** is included with your observation. You can find out the correct fee to include in our [Fees and Charges Guide](#) on our website.

This document has been awarded a Plain English mark by NALA.

Last updated: April 2019.

