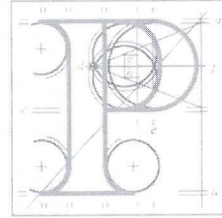


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Rodney Daunt
Shee Gwee
North Boreen
Fountainstown
Co. Cork

Date: 12 January 2026

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. As you have previously made a submission, a cheque in the amount of €50 will be refunded to you shortly. 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

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

Teil
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Ríomhphost

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64 Marlborough Street
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AN COIMISIÚN PLEANÁLA
LDG- 084045-25
ACP- _____
12 NOV 2025
Fee: € 50 Type: Cheque
Time: 9.15 By: post

Page 1 of 5

Rodney Daunt
Shee Gwee
North Boreen
Fountainstown
Co. Cork
10/November/2025

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

APPEAL

Reference: Application for incinerator at Ringaskiddy Co Cork.
Planning application No.: Case no: PA04.318802 (ABP-318802-24)
Original ref: PL04. PA0045
Applicant: Indaver Ireland
Planning Authority: Cork County Council
Development: Proposed waste incinerator with energy recovery.
Location: Ringaskiddy, County Cork

Dear Sir/Madam,

I would ask you to refuse the planning application based on the following new observations.

My expertise

I am an Industrial Controls and Instrumentation Engineer with over 40 years' experience installing, designing, commissioning, servicing and calibrating industrial measurement instrumentation. This includes experience on solid waste incinerator (SWI) and liquid waste incinerator (LWI) stack emission analysers.

I am also a founding member of Tracton Biodiversity Group, who won the national Pride Of Place award for Biodiversity and Climate Action 2025. The award was based in part on the comprehensive expertise within Tracton Biodiversity Group that includes meteorology, physics, chemistry, bioscience, computer data analysis and botany.

I have many years' experience, as a volunteer, identifying and logging local rare plant and butterfly sites for the National Biodiversity Data Centre monitoring schemes. Three species of the rare plant sites which I monitor are adjacent to the Indaver site, namely, Gobby Beach, Paddy's Point, and Ballyheimken.

I have concerns and observations relating to the following points on the accompanying pages.

Stack emissions control and temperature inversions.

The bowl-like topography of Cork Harbour makes it particularly susceptible to temperature inversion, a weather phenomenon where a layer of warm air traps cooler air and water vapour underneath it, reversing the normal condition where temperature decreases with altitude. This acts like a lid, preventing pollutants from rising and dispersing, leading to their accumulation near the ground, which can cause poor air quality. In the case of the Indaver site, the trapped air can also potentially combine with other local industrial emissions, including dioxins and water vapour, further complicating and concentrating emission fallout. Photo 1 below shows an incident of temperature inversion at Cork Harbour in 2016, where cool air and water vapour were trapped at low level in the vicinity of the Indaver site. This example of temperature inversion is a frequent occurrence in Spring within Cork Harbour

In addition there is a relatively new large electricity wind turbine erected within a few hundred meters SW of the Indaver site. Wind turbines by their very nature take energy out of the wind and convert it to electricity. This loss of wind energy being so close to the Indaver site, will only encourage even more temperature inversion at a critical stage especially being at a similar altitude to the stack emissions, (wind energy will also be reduced at the top of the stack by the turbine). There appears to be insufficient or indeed no consideration given to this in the EIS
Please refer to Photo 1 example below.



Photo 1. Cork harbour view from upper Fountainstown demonstrating temperature inversion with nearby falling emissions in the vicinity of the Indaver site dated 7-3-2016

Filter emissions control and management.

The proposed filters in the Process Flow Diagram (Fig. 4.11 Vol. 3 EIS) give cause for concern.

The filters will need to be periodically removed and replaced depending on the volume of incineration and frequency of process start/stops. To replace blocked or leaking filters containing toxic residue, the process will need to be isolated and a procedure put in place to remove and dispose of the filters safely. Such a procedure will typically involve handling of hazardous material, which requires special precautions to be taken, including the use of personal protective equipment.

This level of hazard is concerning, given the small size of the site and its proximity to public lands. The fact that there would be factory employees necessarily gowned up only meters from a public footpath where unsuspecting pedestrians are walking, must surely make this proposal untenable.

Indaver have not stated how often the filters will be changed and have failed to indicate a reliable method of identifying substandard, i.e. leaking, filters. From my own professional experience, it is very difficult to differentiate between a clean filter and a leaking filter, based on a low differential pressure across the filters. Leaking filters would allow toxic particles through to the stack.

EIS, Biodiversity and Recreation concerns

Misleading environmental information.

I have serious concerns regarding some of the inaccuracies and misleading environmental information within the EIS.

For example even without entering the proposed Indaver site one can plainly see that there is a line of mature hornbeam trees forming part of a hedgerow. I would estimate based on the girth of the hornbeam trunks some are at least a minimum 50 years old. Please refer to attached photos



Photos 2 showing mature line of hornbeam and hornbeam leaves dated October 2025

There is no mention of these important mature hornbeam trees in the EIS from what I can see. I had wondered was the hornbeam mistaken for another species of tree, but even a basic EIS should be able to distinguish a hornbeam from other even similar looking species of tree. The site is also an important site for fungi of which there is little or no mention made. These and other omissions would suggest the EIS is therefore misleading, inaccurate, incomplete or probably all three.

The site is an oasis of biodiversity in an otherwise landscape of industrial development, and intense farming as can be seen from Indavers own aerial photo of the site. Given the location of the site near both educational facilities and special protected areas within Cork harbour, the proposed development would have a major impact locally on both the wildlife and recreational use as there is no other land-based wildlife oasis in this area of the harbour.



Fig 4.4 of the EIS showing the land oasis for wildlife

As part of my voluntary survey work and enjoyment, I require access along the shoreline to view and monitor nature, geology, and archaeology. Currently there is enough room to walk along the shoreline except at high tide. It is very concerning that any interference of the shoreline including the placement of rock armour will not only impact the wildlife including rare plants but also restrict access along the shoreline to carry out such work. In fact it could be disastrous from an educational point of view due to certain important geological features being hidden by rock armour.

In view of the above concerns and observations, together with the more recent tourism and recreation plans and aspirations of the greater Cork harbour I would strong urge you to reject this application

Please find attached appropriate fee of €50.00.

Yours Sincerely,

A handwritten signature in blue ink that reads "Rodney Daunt." The signature is written in a cursive style with a large initial 'R' and a trailing flourish.

Rodney Daunt.