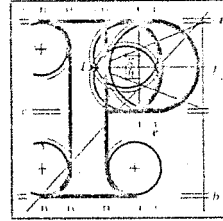


**Our Case Number: ABP-318802-24**

**Planning Authority Reference Number:**



**An  
Coimisiún  
Pleanála**

Ronan Jordan  
Avoca  
Ringaskiddy  
Co. Cork

**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](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

**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** ROUAN JORDAN **DATE** 12 NOV 25  
**OBSERVER ADDRESS** 'AVOCA' RINGASKIDDY, 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

Additional pages attached (no of)

'Avoca'

Ringaskiddy,

Co. Cork

**Case Reference PA04.318802**

Proposed resource recovery centre, Ringaskiddy.

Dear sir/ madam,

In addition to my submission, please consider the following observations I have listed below.

Indaver currently operate a facility in Carranstown, Duleek, Meath.

Looking at the layout of the Carranstown facility, there is a vast difference in site layouts. There looks to be excessive congestion at the proposed facility at Ringaskiddy due to site constraints and topography.

The proposed Ringaskiddy facility plan is to operate at 20% more waste than the Carranstown facility, which results in more vehicle movements in and out of site.

The congested nature of the site could give rise to potential for accidents on site with machinery movement during delivery or collection from site. The congestion could result in issues in the event of emergency response on site.

The suggestion of raising the site levels and also raising the road L2545 level with installation of 2 X 660m<sup>3</sup> water storage tanks under the road L2545 suggests that the company have serious concerns relating to Water on the site. This increase in road elevation could result in issues elsewhere in the vicinity including the National Maritime College of Ireland, Hammond Lane or Yara Fertilizers.

The use of 1150 cubic metres of shingle as coastal protection measures acknowledges the "net coastal sediment transport will go from south to north in the medium and long term" will affect the remaining parts of Gobby beach south towards Haulbowline which would change the characteristics of the beach which patrons have enjoyed for many years as a method of recreation.

Referring to 3.3 in the Environmental Impact Statement: Alternative Site Locations.

This argument is weak and biased toward a site that is currently owned by Indaver, Hence the reason it is their preferred site, while they may wish for the geographical location, the characteristics of the site itself is unsuitable for this facility.

The proposed site is on a peninsula and access is only from the west, in the event of an emergency, emergency services could be hindered accessing the area safely just by the direction of the wind.

An incident could also leave the Naval base, Haulbowline park and staff and patrons of Island Crematorium, and the MaREI Centre cut off / stranded for an unknown period.

The NMCI is across the road from this proposed site also which is a World Class facility that caters to national and International students and customers.

Should an incident occur with the wind from the south, then the Island of Cobh would be affected. Should people need to be evacuated, this would be extremely difficult as the Island is served by a car ferry and 1 narrow bridge.

The Naval base, NMCI and MaREI, Haulbowline Park are all North of the proposed Incinerator site so would all be effected but stranded with no real means of evacuation apart from by water, which may or may not be feasible.

The World renowned tourist attraction of Spike Island which attracts Thousands of tourists monthly would also be affected and could be a logistical nightmare as this is only served by ferry.

The topography of Cork harbour results in the harbour being of a basin type and this is subject to thermal Inversion. This Inversion could result in trapping pollutants at ground level resulting in degraded air quality, smog and ultimately health risks.

A municipal & hazardous waste incinerator will have vast amount of inputs to maintain combustion, so the output will not be predictable and therefore difficult if at all possible to monitor due to the unknown composition of waste. Indavers own EIS section 4.7.3.5 refers to a possibility for explosion due to a large gas cylinder making it to the furnace, so can they really be sure exactly what is going into it, as per their licence ( as yet unapproved).

Pharmaceutical sites in the area have incinerators, however their fuel source is known so reliable and accurate combustion and monitoring is achievable.

Incineration will not help Ireland to achieve emission targets and will result in more carbon taxes on the public, and it isn't reflected in the EPA strategic Plan 2022-2026.

Zerowasteurope.eu suggest that 1 tonne of municipal waste incinerated is associated with 0.7 to 1.7 tonnes of carbon dioxide.

This is not in line with Irelands plan to reduce CO2 emissions.

The Climate Action Plan 2025 shows the Irish Government are looking to reduce waste going to landfill & Incineration, so this proposed facility also contravenes this.

(Ireland Climate Action Plan 2025 section 19.3.6)

There are a number of different types of incinerator, examples being grate, rotating Kiln, Fluidised bed, with each having advantages and disadvantages, or preferred applications.

The proposed Grate type for Ringaskiddy will be expected to work for solid and liquid type waste and hazardous waste.

From my research , Rotary Kiln Incinerators are suggested to be better for hazardous waste.

Indaver suggest use of a moving grate furnace to be Best available Techniques.

However research in the USA has revealed the high temperatures required for the decomposition of hazardous compounds can destroy the grates.

Similarly

The European Commission document.

Integrated Pollution Prevention and Control

Reference Document on the Best Available Techniques for Waste Incineration

(August 2006)

Suggests that Rotary Kiln incinerators would be more suitable for Hazardous Waste.

Indavers E.I.S 3.5.2.2 state the rotary Kiln would be unsuitable.

"due to relatively high capital and operating cost of rotary Kiln incinerator and the kiln limit of about 60,000tonnes/ annum means that a larger capacity unit is required to be economically viable. They are also not suitable for the treatment of sludge-like wastes or municipal solid wastes if no other types of waste are added.

GEMCO Energy on their website state that Rotary Kiln Incinerators can handle industrial waste, municipal solid, hazardous waste and sludge.

Is the Indaver statement about suitability misleading as the confines of the site would not suit a rotary Kiln Incinerator which appears to be more suitable for Waste incineration, especially Hazardous waste as it can operate at higher temperatures needed.

Note from my research online; The rotary Kiln Incinerator would be more expensive and complex than a moving grate incinerator. Indaver do use a rotary kiln elsewhere which leads me to the below statement.

The EPA Strategic Plan 2022-2026 states that:

"Ireland continues to play catch up with regard to the quality of our environment. For too long, we have merely aimed to 'get by' aspiring to only minimum standards, and then in many instances, not even meeting those.

If Indaver is such type company to aim to get by, then choosing the site & technology they propose to use, then it appears they may be of the mindset to 'get by' with minimum standard.

Lax monitoring is evident at another Indaver facility ref EPA notification INCI028944 where emissions exceeded agreed trigger levels, but it went unnoticed for 20 days.

If this is to be the culture within the organisation, then it is understandable that there are concerns from people in the Cork harbour areas.

Some incidents attributable to Indaver facilities,

Feb 2106 explosion at Antwerp facility.

Sep 2018 explosion at Antwerp Plant 1 dead, 4 hospitalised

May 2025 Fire at Molenweg site in Doel Belgium.

May 2025 Willebroek, Belgium

#### E.I.S Section 4.17.4 Potential operating hazards and proposed Safety Measures.

"Smoke vents, in the roof over the bunker will be opened automatically or manually on activation of the sprinkler systems." which would allow uncontrolled and unmonitored release of burning contents to atmosphere

#### E.I.S.4.13.7 Energy Efficiency

The electrical generation efficiency of this design will be about 26%.

For a facility to have such environmental risks and negative impact on the surroundings to have such a low efficiency is surely not worth the risk.

Even the Moneypoint Powerstation has been closed as this was coal fired, which operate with efficiency of approx 37% (E.I.S. 4.13.7).

This helps in Irelands move toward clean pollution-free energy generation.

#### E.I.S. 8.1.1 Monitoring under maximum and Abnormal operating Conditions.

A section here gives figures of potential emissions of harmful and toxic chemicals that would be emitted under abnormal operating conditions.

These are given in a rate of mg /m<sup>3</sup> and the estimated days per annum.

1 example of Mercury (Hg) release to atmosphere during abnormal conditions, (which I would presume to the machine with some form of malfunction) with the plant at 75% 158250 cubic metres per hour.

$1\text{mg/m}^3 \times 158250 = 158.25\text{g per hour} = 3798\text{g per day for 11 days} = 41778\text{g of mercury.}$

Figures taken from section E.I.S 8.1.1 with flowrate of 75% taken from Table 8.4.

As is widely known, mercury carries many health risks. They list other chemicals in this table also as potential emissions.

E.I.S. Section 4.19 Regulatory Control

Indaver do not currently hold a licence for operating an incinerator in Ringaskiddy, an application is with the EPA since 2019 for consideration.

The Environmental & Natura Impact statements are written with bias to "soften" the impact this proposed facility would have on the Environment and Nature.

Cork harbour has transformed into a place of beauty and economic value, Tourism has been promoted, up to 100 cruise ships annually visiting Cork harbour, and this would be an eyesore in the middle of the harbour which would give a negative first impression to tourists.

Please refuse this proposed project.

Thank you,



Ronan Jordan