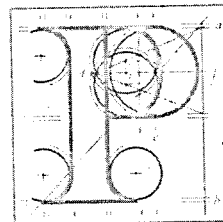


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Ian Heffernan
100 Brightwater
Crosshaven
Co. Cork
P43 TD30

Date: 25 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

Kevin McGettigan
Executive Officer
Direct Line: 01-8737263

PA04

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Riomhphost

Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Objection to SID Application – PA04.318802
Proposed Ringaskiddy Resource Recovery Centre (Waste-to-Energy Facility) by Indaver NV t/a Indaver Ireland

To:

An Coimisiún Pleanála
64 Marlborough Street, Dublin 1, D01 V902

Observer Name: Capt. Ian Heffernan
Observer Address: 100 Brightwater, Crosshaven, Co. Cork. P43 TD30.
Date: 17/11/25

OBSERVATION ON SID APPLICATION

The proposed development threatens the unique environment of Cork Harbour as well as the health, safety and wellbeing of residents, wildlife, and strategic infrastructure. As a professional seafarer and lecturer in Irelands only dedicated third level maritime college, the National Maritime College of Ireland (NMCI), which is based in Cork Harbour — I wish to express my strongest objection to the proposed Ringaskiddy Resource Recovery Centre, on the following grounds:

1. Direct Contravention of the Cork County Development Plan 2022–2028

The designated site (RY-I-09) is zoned specifically for the expansion of third-level educational campus facilities and marine-related research and enterprise development. This zoning supports the NMCI and MaREI campuses and aligns with Cork Harbour's strategic development vision.

The proposed incinerator directly conflicts with this zoning and undermines planned investment in education, research, innovation, recreation, and waterfront development. Its approval would represent inappropriate industrial intensification in an area legally designated for public and educational benefit.

Ireland is an island nation and relies on shipping for import and export. The proposed site is in close proximity to Irelands only dedicated third level maritime college. As a lecturer in the college I have concerns about the long-term health impact of the proposed development on both staff and students in the college. Furthermore, the proposed development may negatively impact the ability of the NMCI to attract students in sufficient number to answer Irelands need for suitably qualified mariners to work in the marine industry. This would result in Ireland having to bring seafarers in from abroad to fulfill the country's needs for suitably qualified individuals.

2. Risk of PFAS, Dioxins, and Toxic Emissions – A Serious Public Health Threat

Independent European research shows that waste-to-energy plants emit persistent pollutants including PFAS, dioxins, heavy metals and ultrafine particles—even when operating within permitted limits. The application omits PFAS analysis, ultrafine-particle assessment and critical pollutant monitoring, making its safety claims scientifically unreliable.

3. Adverse Impacts on Cork Harbour Special Protection Area (SPA)

The site lies only 405 metres from the SPA boundary. Under the Habitats Directive and Birds Directive, permission may not be granted unless it is proven beyond scientific doubt that no adverse effects on the integrity of the SPA will occur. This legal threshold is not met.

4. Inherently Unsuitable and Flood-Prone Coastal Site

The site is too small, erosion-prone and located in an OPW-mapped flood zone. The waste bunker floor lies at 0 mOD (sea level), meaning any flooding event could cause catastrophic marine contamination. The location breaches the Floods Directive and national planning guidance requiring avoidance of long-term flood-risk areas.

5. Major Accident Hazard: Applicant Admits “Substantial Risk”

The developer's own Hazard Identification and Risk Assessment identifies a 'Substantial' risk of a waste bunker fire involving municipal, industrial and hazardous waste. Such an event would produce uncontrolled toxic emissions, contaminated firewater runoff into Cork Harbour and significant emergency-access impacts.

6. Deficient Environmental Impact Assessment

The EIAR and NIS remain deficient in substance, lacking credible alternatives analysis, PFAS monitoring, ultrafine particle data and updated assessments reflecting changes since 2000. This falls short of the legal standard required under EIA and Habitats legislation.

7. Visual, Tourism and Economic Impacts

A 75-metre stack would permanently damage the visual identity of Cork Harbour, undermining tourism, recreation and significant public investment in heritage and waterfront amenities. The harbour has developed a thriving cruise vessel industry, these vessels would be berthed in sight of the stack and directly in the 'fall out zone'. These cruise vessels will very quickly replace Cork on their itinerary for another European destination leaving the economy to lose out on valuable tourist dollars.

8. Waste Policy Non-Compliance

Existing and approved national incineration capacity already exceeds Ireland's 2030 residual waste targets. The proposal also depends on indefinite export of hazardous residues, contrary to the Proximity and Self-Sufficiency Principles in the Waste Framework Directive.

9. Climate Law Non-Compliance

The project would add approximately 190,000 tonnes of CO₂ annually, yet provides no carbon-budget analysis, ETS modelling or lifecycle emissions accounting. Compliance with the Climate Action and Low Carbon Development Acts cannot be demonstrated.

10. Risks to National Security Infrastructure

The site borders the Irish Naval Base on Haulbowline. A fire, explosion or major incident could impede naval operations, compromise evacuation routes and endanger Defence Forces personnel.

Conclusion

For reasons of public health, furthering maritime education, environmental protection, climate compliance, flood risk, SPA conservation law, national security, planning policy and legal obligations under EU Directives, the proposed development is fundamentally unsuitable and cannot legally be approved. It is respectfully requested that this application be refused.

On a personal level I am asking that this planning application once and for all be refused, on the basis that the site is inherently unsuitable, additional incinerator capacity is in direct conflict with targets to cut waste and emissions and that the applicant has failed to reassure on all environmental, safety and ethical grounds.

For the future health and life-expectancy of those of us that will be living and working under its shadow, in particular my colleagues and all the students at the National Maritime College of Ireland, I ask that this planning be refused.

Your sincerely,

Capt. Ian Heffernan