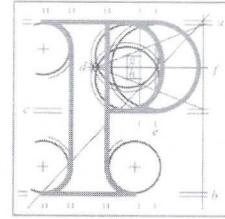


Our Case Number: ABP-318802-24



An
Coimisiún
Pleanála

Shanbally National School
c/o David Nolan
Shanbally
Ringaskiddy
Co. Cork
P43 W990

Date: 30 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.

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
Ríomhphost

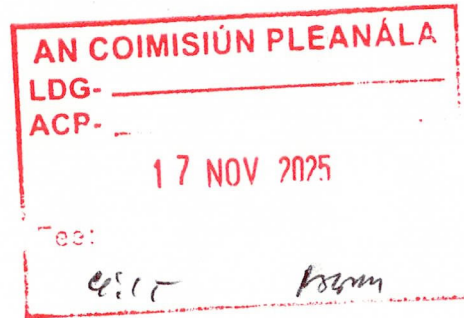
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Scoil Náisiúnta Seanbhaile Shanbally N.S.

Shanbally, Ringaskiddy, Co. Cork.
Phone: (021) 4378178 Email: office@shanballyns.ie
www.shanballyns.ie
Roll No. 13889C



14th November 2025

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

Re: Case Reference No. PA04.318802 – Ringaskiddy, Co. Cork.
Observer Name – Shanbally National School
Observer Address – Shanbally National School, Shanbally, Ringaskiddy, Co. Cork. P43W990
Fee – I have already submitted a fee in 2016 so have paid prior fee

Dear Sir/Madam,

I again write to you in relation to the proposed Incinerator for Cork Harbour. On 8th March 2016, I wrote a letter of objection in my capacity as Principal of Shanbally National School, a position I still hold. Back then I was concerned in particular regarding the health implications on behalf of our (school) community. Having earnestly studied and investigated the potential health implications since, I remain steadfastly convinced that the proposal of an Incinerator for Cork Harbour is fundamentally flawed for a number of reasons which I will outline below. Therefore I am officially objecting to the proposed Incinerator and request that a Public Oral Hearing be held (again) to allow the local community to voice their concerns in a respectful and considered setting against this application.

My first concern is in relation to the site which appears completely inappropriate for a number of reasons. In particular, that Indaver's proposal to place 1100 cubic metres of shingle above the fore shore along the eastern boundary of the site to offset coastal erosion will not be adequate.

My understanding is that by potentially building an incinerator in Cork Harbour that the resulting particles from a stack won't dissipate and will in fact be spread sideways and down onto the local environment. Furthermore, I believe that the natural bowl shape of Cork Harbour would result in Thermal Inversion where a layer(s) of warm air sit above a layer of cool air, thus trapping cooler air near the ground leading to the potential build-up of pollutants, leading to significant air pollution. A number of Senior Inspectors (Jones 2004, Yukel Finn 2009 and Daly 2017) from An Bord Pleanála have previously recommended refusal as this site is not suitable due to site overdevelopment, site unsuitability and incompatibility with stated plans for the area. That hasn't changed, and I would hope that An Coimisiún Pleanála would remain impartial and consistent in this regard.

The Incinerator proposal also contravenes the zoning of the Cork County Development Plan 2022–2028 for this site. Instead this site was zoned for the extension of the Third Level Educational Campus for marine related education and enterprise, research and development given the presence of the National Maritime College and the Beaufort Institute. Therefore, the proposed incinerator is in direct contravention of the County Development Plan and the specified objections for the immediate area.

As outlined in their Brief Formulation Report of 6th January 2025 the Planning and Building Unit in the Department of Education have signed off on the construction of a new 16 classroom school plus four Special Educational Needs rooms on a new green field site in Barnahely, Ringaskiddy, to cater for the amalgamation of our school, Shanbally NS and Ringaskiddy Lower Harbour NS. It would be most inappropriate to construct an incinerator a few fields away given the ongoing concerns regarding pollution that I will address next.

In previous communications from Indaver to me in 2016, they sought to outline that essentially “only steam” would be released from their stack. Following extensive research and communication with Scientists since then who are qualified to speak on such matters, I now know this to be untrue. Incineration doesn’t completely eliminate waste nor reduce it down to steam – instead it transforms it into gases, fine dust and ash, all containing harmful pollutants. These pollutants potentially carry a variety of toxic chemicals including dioxins and mercury. I have learned that often compounds used in society are engineered to resist oxidation so therefore they don’t burn off in an incinerator. Very often, to reduce the running costs, the required temperature of 1100-1200 degrees celsius is not reached. Therefore fly ash and bottom ash are highly contaminated with dioxins and other chemicals such as Perfluoroalkyl and Polyfluoroalkyl substances (PFAs) which, once released are a direct cause of many cancers. Emissions to air from waste incinerators are not properly controlled, nor monitored or measured adequately or regularly and therefore will invariably pose a huge risk to all within a 40 mile radius approximately. As per the WHO and IARC, potential health effects would include cancer, heart defects, respiratory illness, immune system disruption, potential birth defects and learning difficulties.

How could anyone, especially a School Principal, turn a blind eye to such threats?

Dioxins from emissions can also contaminate soil and water and thus enter the food chain. I have read with great interest and concern the persistent organic pollutants in the environment surrounding the REC Waste Incinerator in Harlingen, the Netherlands, in particular high levels of dioxins and aluminium in the food chain.

Apart from the risk of contamination, there are other serious risks to public safety including fire/explosions at Indavers Plants in Antwerp (February 2016) and at Stabroek (September 2018) and a fire on 29th May 2025 at Indaver Willebroek (Belgium) which completely discredits Indavers safety claims and assurances and their potential ability to counteract any such incident at the Ringaskiddy site.

Over the past decade, considerable energy and investment of €64 million into the clean-up from the days of Irish Steel have transformed Cork Harbour. From the beauty of Haulbowline Island Park (Opened in 2021 at a cost of €25 million) locals can view the arrival of over 100 cruise liners annually into Cobh and the subsequent economic spin off for destinations such as Spike Island, Fort Camden and the wider Munster region. It is mind boggling that one would now again consider to build an eight storey (height of 45.7 metres above the ground) not to mention the stack up to 70m above ground that would irrevocably impact on the skyline of Cork Harbour.

We have a very unique and precious local community here that has survived and thrived in partnership with large pharma development over the decades. We are most determined to fight for its protection for current and future generations. However this proposal of an Incinerator is completely inappropriate and will sound the death knell for the local community if it is allowed to proceed.

I look forward to outlining my concerns on behalf of all in Shanbally National School if necessary at a Public Oral Hearing.

I would implore all concerned to consider and reach the only sensible, honest and logical conclusion that the proposed Incinerator should not proceed.

Yours sincerely,

David Nolan.

David Nolan,
School Principal
On behalf of the Board of Management and all in Shanbally NS.