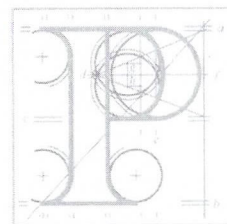


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Sinéad Reen
Ardnahinch
Shanagarry North
Midleton
Co. Cork
P25XE03

Date: 24 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

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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

TO:

An Coimisiún Pleanála

64 Marlborough Street

Dublin 1, D01 V902

Observation on a strategic infrastructure development application

Case Reference: PA04.318802 (Ringaskiddy, Co. Cork)

Proposed Development: Resource Recovery Centre (including “Waste-to-Energy” Facility)

Applicant: Indaver NV t/a Indaver Ireland

Observer Name: Sinéad Reen

Observer Address: Ardnahinch, Shanagarry North, Midleton, Co.Cork P25XE03

Contact Email: sineadreen@gmail.com

Date: 17th November 2025

Introduction:

I submit this observation under the Planning and Development Act 2000 regarding Indaver NV t/a Indaver Ireland’s proposal for a Resource Recovery Centre (waste-to-energy incinerator) in Ringaskiddy. The proposed development lies immediately adjacent to protected habitats within the Cork Harbour Special Protection Area (SPA) (Site Code 004030) and within proximity to educational, residential, recreational, strategic maritime infrastructure and strategic tourism area.

Location:

The proposed development is adjacent to the National Maritime College of Ireland (NMCI), a constituent campus of Munster Technological University (MTU) and not Cork Institute of Technology (CIT) as repeatedly referred to in the final proposal submitted. This change occurred on the 1st of January 2021. This oversight would indicate that the impacts on NMCI staff & students have not been reconsidered or reviewed. The college has grown in student numbers in recent years with a throughput of +5000 delegates.

The application, reference 6.2.1. it is unclear and not apparent that the applicant has taken the increased population into account in hazard identification and risk assessment.

Considering health and safety:

Incinerators produce emissions regulated under the Industrial Emissions Directive 2010/75/EU and the European Best Available Techniques Reference Document (Waste Incineration BREF). Even emissions characterised as “within limits” include Persistent Organic Pollutants (POPs) and heavy metals. Long term chronic exposure to persons has not been ruled out by the applicant.

Whilst the flue gases will contain fine particulates, acid gases, metals and dioxins reportedly within licensed limits, these particles still add to air pollution. Considering the predominant wind direction and the harbour’s predispose to meteorological inversions within the atmosphere, there is a strong opportunity for the POPs and heavy metals to linger within the breathable air for adjacent occupants such as those within the NMCI, UCC’s Beaufort building, Hammond Lane Metal Recycling Company Ltd. and the wider area.

The proposed building lies within Flood Zones A/B- OPW Flood-Risk Management Guidelines (2009 & 2022), and County Development Plan (including recommendations on amendments to the Plan), and Updated Strategic Flood Risk Assessment review (2021), in which is stated that a sequential approach to be applied and development to be avoided in Flood Zones A and B. Understanding that the applicant proposes to raise ground levels, this merely deflects water, it doesn’t remove the risk. The area across the road to the North of the proposed site comprises of reclaimed land which has significant sand deposits. Groundwater beneath the site rises and falls with the tide, so flooding can occur from below.

Considering the map used in Appendix 6.1, Figure 2-4: OPW Flood Map. Online up to date flood maps www.floodinfo.ie provide predictive flood mapping and clearly has the area to the north of the site as flood zones which contravenes the applicant’s claim that “there is no inland encroachment of flood zones to the Indaver site or to the vicinity of the Indaver site.”

Substantial Hazard Identified in Hazard Identification and Risk Assessment- The applicant’s own HIRA identifies a waste bunker fire as a substantial risk within the risk matrix. It is unclear from Appendix 6 of Appendix 6.1 whether the Consequence Modelling for Fires in Bunker Area consider predominant winds or varying wind directions which may affect the atmospheric dispersion rates.

Conclusion:

Inspectors Jones (2004), Yücel-Finn (2009) and Daly (2017) each found the site unsuitable. Nothing in the significant new information submitted suggests any remedy to these prior findings.

Signed:



Sinéad Reen