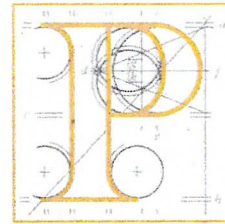


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Kathryn Foskin
High Oaks
Hilltown
Carrigaline
Co. Cork

Date: 21 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.

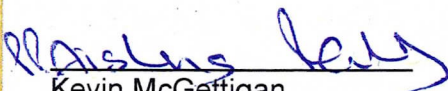
The Commission will revert to you in due course with regard to the matter.

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
Executive Officer
Direct Line: 01-8737263

PA04

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel
LoCall
Fax
Website
Email

(01) 858 8100
1890 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Re: Planning Application PA04.318802 - Indaver Ringaskiddy “Resource Recovery Centre”

Dear Sir / Madam,

I wish to object to the above application for a waste-to-energy incinerator at Ringaskiddy, Cork Harbour.

I live approximately 6 km west of the proposed site at an elevation of about 80 metres above sea level. I am writing as a local resident, a parent of children with allergic rhinitis and asthmatic-type symptoms, and as someone whose family uses Cork Harbour frequently for sailing and other recreational activities. Our home is directly exposed to prevailing winds that frequently blow from the harbour inland. At this elevation, I am concerned that we are at a level where the plume may travel horizontally rather than disperse upwards, placing my family in a particularly sensitive position.

My main grounds of objection are:

1. The risk of **increased exposure to air pollutants** for my family and neighbours due to plume behaviour in the bowl-shaped topography of Cork Harbour and our higher elevation;
2. The **cumulative air-quality impact** of this facility when added to the existing industrial and shipping emissions in Cork Harbour;
3. The **inadequate consideration of sensitive receptors**, including children with respiratory vulnerabilities and people engaged in outdoor recreation on the water;
4. Concerns about **coastal erosion, flooding, and the long-term climate resilience** of this particular shoreline site;
5. The **negative impact on the natural beauty, landscape character and amenity value** of Cork Harbour; and
6. **Contravention of the Cork County Development Plan** zoning objectives for the site.

Air quality, health & harbour topography

The applicant’s 2025 Non-Technical Summary states that, based on air dispersion modelling, “no significant adverse effect on public health or the environment... is envisaged to occur at or beyond the facility boundary.”

I am very concerned that this conclusion does not adequately reflect:

- The **complex topography of Cork Harbour**, which is often described as a “bowl” where air can become trapped over water and low-lying communities;
- The effect of **higher-elevation residential areas**, such as my home at approximately 80 m A.S.L., which may experience the plume at or near ground level as it cools and descends; and
- **Wind directions** that can carry the plume directly towards residential areas.

Tools such as the Ringaskiddy Plume Plotter, based on Indaver's own specifications and meteorological data, visually demonstrate that the plume does not simply disperse vertically, but frequently travels horizontally across the harbour and inland, reaching areas several kilometres away from the stack.

As a parent of children with allergic rhinitis and asthmatic symptoms, the addition of another combustion source emitting nitrogen oxides (NOx), fine particulates (PM2.5/PM10), and other pollutants directly upwind of our home is deeply concerning. According to allergy-ireland.ie, approximately 21% of Irish children have asthma and it is estimated that around 26% of Irish people have allergic rhinitis. The Irish Thoracic Society in its Respiratory Health of the Nation report (2018) states that Ireland's death rate from respiratory diseases is "the fourth highest in the EU-28" and that many respiratory conditions are under-recognised. It is clear that many families will be affected by this and we need to protect our vulnerable population. Even if average emissions meet legal limits, there is no known safe level of exposure to fine particulates for children or vulnerable groups.

EPA/UCC research also shows that air in the Cork Harbour area already contains fine particles from multiple sources - including traffic, solid-fuel burning and shipping - meaning local air quality is already under pressure. I also note that during winter, the harbour frequently experiences calm, still days with low fog or cloud. These are classic thermal inversion conditions, where air does not move. These are precisely the days when plume behaviour poses the highest risk to health and wildlife.

I request that An Bord Pleanála:

- *Scrutinise the **meteorological assumptions and terrain treatment** in the air-dispersion modelling;*
- *Consider **worst-case scenarios**, including temperature inversions, calm conditions and on-shore winds which may trap pollutants in the harbour; and*
- *Recognise children with respiratory conditions as a **highly sensitive receptor group** in this context.*

Cumulative impact with existing industrial emissions

Cork Harbour is already subject to significant environmental pressure from shipping, industrial facilities, wastewater treatment and historic contamination, as acknowledged in environmental reports on the harbour and by local NGOs.

The proposed facility is in an area where there are existing incinerators/combustion sources and industrial stacks. The Environmental Impact Assessment Report appears to focus mainly on whether the new facility on its own meets limit values, rather than fully exploring the cumulative impact of:

- Existing industrial emissions;
- Shipping and port activities;
- Road traffic associated with the facility; and
- Background emissions in Cork city and the wider harbour.

As a resident already living with the consequences of this industrial mix, I am concerned that the addition of a 240,000-tonne-per-year incinerator will further erode local air quality and quality of life, especially for vulnerable groups. Under the EIA Directive, cumulative impacts must be assessed fully, not in isolation. I do not believe the applicant has demonstrated this.

*I request that An Bord Pleanála require an **independent assessment** of cumulative air-quality and health impacts, separate from the applicant's consultants, and that a **precautionary approach** be taken given the existing pollution burden in Cork Harbour.*

Coastal erosion, flooding & climate resilience

I am concerned about the **physical location** of the site in relation to coastal erosion, sea-level rise and storm surges. Public sources, including CHASE's documentation and previous oral hearing evidence, have highlighted issues such as high tide now occurring within the site boundary and questions over long-term safety in the context of climate change.

Locating a major hazardous and non-hazardous waste incinerator on a low-lying coastal site raises serious questions:

- How will **coastal erosion and sea-level rise** affect site stability and containment over a 30+ year lifetime?
- What are the **risks of flooding or storm damage** to waste storage areas and to the plant itself?
- How would an **extreme weather event** affecting this site be managed, and what would be the consequences for surrounding communities and the harbour ecosystem?

I ask the Board to consider whether, in light of current climate science and national adaptation objectives, this is a fundamentally unsuitable and unsafe location for such a facility.

Site suitability, zoning & planning conflict

The site is **too small** for the scale of development proposed. Its usable area has diminished over time due to coastal erosion on one side and constraints from the M28 on the other. As planning expert Derek Daly concluded in 2017, the available space is inadequate.

The land (RY-I-09) is zoned for **third-level education expansion** and **marine-related enterprise development**, forming part of the planned growth of NMCI and MaREI. This is central to the Cork County Development Plan 2022-2028.

Indaver's 2025 documents attempt to dismiss the relevance of this zoning, but zoning is a statutory planning requirement and should be upheld. The proposed development directly contradicts the County Development Plan.

Landscape, visual impact & recreational amenity (including sailing)

Cork Harbour is widely recognised as a place of **exceptional natural and cultural value** and is a key amenity for local communities and for tourism. Our family regularly sails in the harbour, meaning we are physically present on the water - directly downwind or crosswind of the proposed stack on many days.

The proposed development, with its substantial buildings and tall stack, will significantly alter the **skyline and visual character** of this part of the harbour. Even the developer's own photomontages, as highlighted by CHASE, show a large visibility zone where the top of the building and the stack will be visible from surrounding communities.

In addition to visual impact, there is the **experiential impact**: knowing that my children will be sailing and playing in waters directly exposed to the incinerator plume and any accidental releases undermines our confidence in the harbour as a safe place for recreation.

The 2024 Cork City, Harbour and East Cork tourism plan aims to **make Cork Harbour a "world-class visitor experience."** Placing a 75-metre incinerator stack and large industrial buildings only about 700 metres from Spike Island completely contradicts that goal. Spike Island alone draws over 70,000 visitors a year, and in 2025 more than 170,000 cruise passengers arrived into Cork, generating around €17 million for the local economy.

Cork Harbour has transformed hugely since Indaver first bought this site, with tourism, recreation and heritage now central to the area's identity. Approving an incinerator at this stage would seriously damage these hard-won opportunities, as well as the health and recreational benefits the harbour provides to local communities. As the world's second-largest natural harbour, Cork Harbour should be shaped around sustainable tourism, outdoor enjoyment and nature — not new heavy industry.

I ask that greater weight be given to:

- *The amenity value of Cork Harbour for families and children;*
- *The role of the harbour in sailing and water sports; and*
- *The long-term impact on Cork Harbour's image as a clean, attractive destination.*

Policy, alternatives & the precautionary principle

European and national waste policy places **waste prevention, reuse and recycling** above incineration. While incineration can have a role, it must be balanced against **location-specific risks** and the availability of **alternative waste management options**. A 2023 Zero Waste Europe report showed that Europe already has more incineration capacity than it requires. Instead of building a huge, long-term industrial structure on our coastline - one that could be outdated long before its planned lifespan ends - Ireland could work with existing capacity in neighbouring countries and focus on better waste reduction and recycling at home.

Given the already stressed environment of Cork Harbour, with industrial history, existing air-quality pressures and sensitive coastal ecosystems, the **precautionary principle** should apply.

If there is reasonable scientific doubt about long-term health and environmental effects, particularly on **children and vulnerable groups**, it is not acceptable to press ahead simply because legal limit values might be met on paper.

Conclusion & specific request

For the reasons set out above - relating to air quality and health, cumulative pollution, coastal vulnerability, and the protection of Cork Harbour's landscape and amenity - I respectfully request that An Bord Pleanála **refuse** planning permission for this development.

At a minimum, if the Board is minded to consider granting permission, I request that it:

- Commission an **independent health and air-quality risk assessment**;
- Require a robust **baseline health study** of Cork Harbour communities, as previously called for in oral hearing evidence;
- Re-examine the **suitability of this particular site**, given coastal erosion and climate-change risks; and
- Impose the strictest possible **monitoring and transparency conditions**, including real-time public access to emissions data.

I thank you for considering this submission.

Yours faithfully,

Kathryn Foskin
High Oaks
Hilltown
Carrigaline
Co. Cork.
16th November 2025