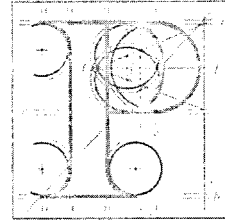


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Steven & Terezia Foott
10 The Orchard
Crosshaven
Co. Cork
P43 H996

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
Executive Officer
Direct Line: 01-8737263

PA04

Tel	Tel	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

OBJECTION LETTER — ABP-318802-24 (Indaver Ringaskiddy Incinerator)

Steven & Terezia Foott
10 The Orchard,
Crosshaven,
Co Cork
P43 H996

16:11:25

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

**Re: Observation / Objection — Strategic Infrastructure Development
Application PA04.318802**

Proposed "Resource Recovery Centre" (Incinerator) at Ringaskiddy, Co. Cork
Applicant: **Indaver NV t/a Indaver Ireland**

Dear Commissioners,

I wish to lodge a **formal objection** to the above application. I enclose the required fee of €50.

My objection is grounded primarily on **public health**, as well as **environmental suitability, appropriateness of location, planning policy, and harbour amenity considerations**. The site at Ringaskiddy is **inherently unsuitable**, a conclusion reached by **three separate Bord Pleanála Inspectors** (Jones 2004, Yukel Finn 2009, Daly 2017), and nothing in the 2025 re-submission alters that reality.

1. Public Health Risk — Uncontrollable Plume Direction in a Harbour Basin

My principal concern is the **unavoidable and uncontrollable dispersal of emissions**. Once fumes exit the stack, **they are carried by the wind** — that is a physical reality that cannot be mitigated by modelling.

I have reviewed reports for similar proposals before, and they consistently rely on **over-confident dispersion modelling** suggesting that emissions will travel in predictable directions or predominantly "out to sea." This is **deeply unrealistic**.

Cork Harbour is a **bowl-shaped estuary**, and the proposed site lies:

- **2km inside the mouth of the harbour,**

- at the **geographical centre** of the harbour basin,
- surrounded by dense residential communities on **all sides**.

The potential exposure zone includes, within **5–10 km**:

Cobh, Rushbrook, Glenbrook, Passage West, Monkstown, Raffeen, Carrigaline, Crosshaven, Currabinny, Aghada, Whitegate, and slightly farther: **Midleton, Ballinacurra, Glounthaune, Fota, Little Island, Rochestown, Douglas, Mahon, Blackrock and Cork City**.

No dispersion model — however complex — can reliably protect **all of these communities simultaneously**. **Environmental legislation cannot override physics**.

This is an unacceptable risk to the health of the people of Cork.

2. The Ringskiddy Industrial Fire Demonstrated Real Plume Behaviour

During the **industrial fire in Ringaskiddy** (generally referred to as the Hall animal-feed facility fire), a **large smoke plume was captured on video and CCTV** over several hours.

That plume:

- **shifted directions multiple times,**
- **travelled across the harbour,**
- **drifted inland,**
- **and demonstrated conclusively that air movement in the harbour is unpredictable.**

This real-world event shows that **any claim that future emissions will be “harmlessly blown out to sea” is unfounded**.

Cork Harbour’s meteorology makes long-term human exposure unavoidable.

3. Cork Harbour: Recreational, Residential, Cultural, and Tourism Asset

Cork Harbour is one of Ireland’s greatest natural amenities. It supports:

- Sailing, rowing, kayaking, open-water swimming
- Walking routes, coastal recreation, maritime tourism
- Historic sites and scenic viewpoints used by thousands
- Vibrant communities living on both shores

Placing a **24-hour incinerator**, with continuous emissions, in the **heart of this shared public space** is wholly incompatible with the harbour's purpose, identity, and value.

4. Planning Policy Conflict — Zoning Violated (RY-I-09)

The specific site (RY-I-09) is **not zoned for heavy industrial incineration**. It is zoned for:

“Extension of the Third Level Educational campus and enterprise related development, including marine-related education, research and innovation.”

– Cork County Development Plan 2022–28, Table 4.1.17

This zoning reflects the **major public investment** in NMCI, MaREI and associated maritime research facilities.

The proposed incinerator is **directly contrary** to this zoning objective.

5. Site Size, Coastal Erosion, Flood Risk & Inadequate Safety Margin

The site is:

- **too small** for the scale of development,
- **eroding at the coastline**,
- **constrained by the M28** on its other boundary.

Official maps (OPW Floodinfo.ie) record the area as subject to **documented flooding**. Raising the site to avoid flooding would worsen **visual impact** and does not eliminate the safety risk of storing or processing hazardous materials in an **area known for storm surges**.

As expert Inspector Daly stated (2017):

“The site is inherently unsuitable for use involving hazardous compounds.”

This remains true in 2025.

6. Repeated Applications on an Unsuitable Site — a Failure of the Planning System

Indaver has repeatedly applied for planning on this site over two decades:

- 2001–2004
- 2008–2011
- 2016–2018
- 2024–2025

Every time, the core reasons for refusal **remain unchanged**. Yet the system allows a well-resourced applicant to **keep trying again and again**, hoping that eventually something will slip through.

A site deemed unsuitable **by multiple inspectors** should not be subject to endless re-litigation.

“No” should mean **no**.

7. Environmental Impact Assessment Deficiencies

Three inspectors found the EIS/EIA **deficient**. The updated 2025 submission **repeats older assertions**, offers **justification based on site ownership**, and does not provide a **de novo site selection process** or a **credible alternatives assessment**.

This is legally inadequate for Strategic Infrastructure.

8. Request for Oral Hearing

Given the **scale, sensitivity, and public interest**, I formally request an **Oral Hearing** so that these issues may be assessed transparently with full public participation.

Conclusion

For the reasons above — particularly the **public health risks**, unpredictable plume dispersal, unsuitable zoning, flood vulnerability, recreational importance of Cork Harbour, and the historical record of planning inspector conclusions — I respectfully request that **An Coimisiún Pleanála refuse this application in full**.

The site is inherently unsuitable and should be definitively ruled out for this type of development.

Yours faithfully,
Steven Foott

Terezia Foott