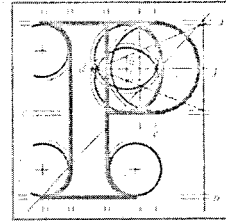


Our Case Number: ABP-318802-24

Planning Authority Reference Number:



An
Coimisiún
Pleanála

Aoife & Roy Sexton
102 Drakes Point
Crosshaven
Co. Cork

Date: 11 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 Marlborough Street
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Submission to Coimisiún Pleanála

Case Reference: **PA04.318802 – Proposed Waste-to-Energy Incinerator, Ringaskiddy, Co. Cork**

To:

The Secretary,
An Coimisiún Pleanála,
Marlborough Street,
Dublin 1.

From:

Aoife & Roy Sexton
102 Drakes Point,
Crosshaven, Co. Cork
Email: 102drakespoint@gmail.com

Date: 31st October 2025

Subject: Formal Observation and Objection to Proposed Incinerator at Ringaskiddy, Co. Cork

We wish to lodge a formal objection to the above-referenced application for the construction of a waste-to-energy incineration facility at Ringaskiddy, Co. Cork. This submission is made pursuant to the provisions of the Planning and Development Acts, and we respectfully request that Coimisiún Pleanála refuse permission for this proposal on the grounds set out below.

1. Inherent Unsuitability of the Site

Notwithstanding the additional material submitted in August 2025, the site remains fundamentally inadequate and unsuitable in scale, stability, and context for a project of this magnitude. As previously concluded by Inspector Derek Daly (2017), “the site is fundamentally too small for the project proposed and continues to reduce in size, with coastal erosion on one side and boundary reduced by the M28 on the other.” The usable area has further diminished due to ongoing coastal erosion and infrastructure encroachment. The site poses unacceptable constraints on operational safety, flood resilience, and environmental protection.

2. Deficiencies in Environmental Impact Assessment (EIS/EIAR)

All three Bord Pleanála Inspectors in previous iterations—Jones (2004), Yukel Finn (2009), and Daly (2017)—found substantial deficiencies in the Environmental Impact

Statement. Inspector Daly (2017) concluded it was legally adequate in form but deficient in substance. Despite subsequent revisions, the 2025 material continues to recycle earlier conclusions and assert outcomes without evidence. The submission fails to meet statutory standards for environmental impact evaluation under the EIA Directive.

3. Absence of De Novo Site Selection and Changed Local Context

No genuine de novo site selection has been undertaken. The applicant's justification rests solely on site ownership, which is irrelevant to sustainable development. Major public and private investments—particularly NMCI and MaREI—have transformed Ringaskiddy into a centre of maritime education and renewable research, wholly incompatible with a hazardous waste incinerator.

4. Flood Risk and Coastal Vulnerability

The site lies within a known flood risk area, confirmed by the Cork County Development Plan (Table 4.1.17) and OPW Flood Maps (IDs 1364, 13082, 12085). Raising the facility above flood levels would worsen the already severe visual impact. The low-lying coastal position makes the site inherently unsafe for hazardous processing. This represents an unacceptable and foreseeable risk.

5. Contravention of the Cork County Development Plan 2022–2028

The applicant's site, zoned RY-I-09, is designated for expansion of the Third Level Educational campus and marine-related enterprise. The proposed incinerator is incompatible with this zoning and contradicts the statutory Development Plan. Granting permission would materially contravene the Plan and undermine strategic local objectives.

6. Cumulative and Visual Impacts

The proposed large-scale industrial structure on a prominent coastal headland would irreparably harm the visual character of Cork Harbour, degrading tourism and amenity value and contradicting national objectives for sustainable coastal development.

7. Public Health and Environmental Safety

The combustion of municipal and hazardous waste generates toxic emissions including dioxins, furans, and particulate matter, posing risks to respiratory and cardiovascular health. No cumulative health assessment addresses nearby populations or institutions such as NMCI, schools, and residences. The proposal fails to comply with EU Directive 2010/75/EU (Industrial Emissions Directive) and Article 3(1) of the EIA Directive regarding human health.

8. Contravention of National Climate and Circular Economy Policy

The proposal conflicts with Ireland's Climate Action and Low Carbon Development (Amendment) Act 2021 and Circular Economy Act 2022. It undermines national goals to

reduce incineration capacity and move toward waste prevention and recycling, contrary to the EPA's 2023 Circular Economy Programme and the National Waste Management Plan for a Circular Economy (2024).

9. Cumulative Industrial Risk within Cork Harbour

Cork Harbour already hosts multiple Seveso-class and high-risk facilities. Adding an incinerator would increase hazard exposure and complicate emergency response. No integrated risk analysis or evacuation modelling has been provided, contrary to Schedule 6 of the Planning and Development Regulations.

10. Socio-Economic and Reputational Impacts

Ringaskiddy has developed as a hub for maritime education, research, and renewable innovation. A hazardous waste incinerator would undermine this progress, deter investment, and damage Cork Harbour's reputation as a sustainable marine cluster.

11. Consistency with Previous Bord Pleanála Decisions

Three independent Bord Pleanála Inspectors—Jones (2004), Yukel Finn (2009), and Daly (2017)—all concluded that this site is inherently unsuitable. To approve the same proposal now, despite increased urbanisation and stricter climate obligations, would represent a regressive and unjustifiable reversal of planning precedent.

12. Conclusion

For the reasons outlined above, the proposed incinerator at Ringaskiddy occupies a physically unsuitable and environmentally vulnerable site, relies on a deficient environmental assessment, fails to consider alternatives, contravenes the County Development Plan, and conflicts with Ireland's national climate and health obligations. It poses serious risks to public health, environmental integrity, and regional development. We therefore respectfully request that Coimisiún Pleanála refuse permission for this application.

We also formally request an **Oral Hearing** to ensure full public participation and procedural fairness in the consideration of this application.

Yours sincerely,

Aoife & Roy Sexton

102 Drakes Point, Crosshaven, Co. Cork

Email: 102drakespoint@gmail.com

References:

Daly, D. (2017) Inspector's Report, An Bord Pleanála Ref. PL04.PA0045

Yukel Finn, O. (2009) Inspector's Report, An Bord Pleanála Ref. PL04.GA0004

Jones, S. (2004) Inspector's Report, An Bord Pleanála Ref. PL04.GA0001

Cork County Development Plan 2022–2028, Table 4.1.17

OPW Floodinfo.ie (Flood Summary IDs: 1364, 13082, 12085)

<https://ringaskiddyrrc.ie/significant-further-information-to-acp-august-29th-2025/>

<https://chasecorkharbour.com>