



Statement of Consistency - National Marine Planning Framework

**Foreshore Licence Application for Marine Site
Investigation Surveys at Dognose, Corkbeg,
Whitegate, Co. Cork**

June 2023



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1. Introduction

The Port of Cork Company (PoCC) ('the Applicant') is submitting a Foreshore Licence Application (FLA) for Marine Site Investigation (SI) surveys (hereafter referred to as the 'proposed works') at Dognose Bank, Corkbeg, Whitegate, Co. Cork (hereafter referred to as 'proposed works site') to the Foreshore Section of the Department of Housing, Local Government and Heritage (DoHLG&H).

The FLA is being sought solely to facilitate SI works associated with the future port infrastructure identified in the recently launched Port of Cork Masterplan 2050, and in particular, Offshore Renewable Energy (ORE).

The application is supported by a Supporting Information for Screening for Appropriate Assessment (SISAA) report, Annex IV Risk Assessment and Non Statutory Environmental Report (NSER).

This Statement of Consistency with the National Marine Planning Framework (NMPF) has been prepared in support of the application.

2. National Marine Planning Framework

As part of the Government's comprehensive approach to marine planning across three main areas of forward planning, development management, and marine planning enforcement, the NMPF sets the framework for the forward-planning component of the country's marine-planning system.

The NMPF is at the highest level of a hierarchy of plans and strategies and is the marine equivalent of the National Planning Framework which provides a similar approach for land-based planning. The NMPF does not determine the precise location of any development project or designate or allocate specific land uses.

The NMFP was published on 30th June 2021 and brings together all marine-based human activities for the first time, outlining the government's vision, objectives and marine planning policies for each marine activity. All applications for activity or development in Ireland's maritime area are considered in terms of their consistency with the objectives of the plan.

The NMPF details how these marine activities will interact with each other in an ocean space that is under increasing spatial pressure, ensuring the sustainable use of our marine resources to 2040.

The NMPF enables the Government to:

- Set a clear direction for managing our seas;
- Clarify objectives and priorities; and
- Direct decision makers, users and stakeholders towards strategic, plan-led, and efficient use of our marine resources.

The NMPF has been prepared with an ecosystem-based approach and informed by best available knowledge.

It sets out “Overarching Marine Planning Policies (OMPPs) that will apply to all marine activities or development”, including policies in relation to matters such as “co-existence, biodiversity, coastal and island communities, and infrastructure.

Each of these is separately numbered, contextualised and cross referenced to other relevant OMPPs and Activity-specific or Sectoral Marine Planning Policies (SMPPs).” The NMPF also includes “Activity-specific or Sectoral Marine Planning Policies (SMPPs) to guide decision makers in assessing or dealing with specific proposals (for example, aquaculture, ORE, ports development, etc.).

This document sets out how the proposed Site Investigation works are compliant with the overall objectives of the NMPF and its relevant planning policies.

3. Compliance with NMPF Overall Objectives

The PoCC is a State-owned commercial company responsible for operating and developing the Port of Cork (PoC) and its associated activities. The PoC is the key seaport in the south of Ireland. Due to its favourable location on the south coast of Ireland and its modern deepwater facilities, the Port of Cork is ideally positioned for European trading.

The PoCC is designated a Tier 1 Port of National Significance by the Irish National Ports Policy. The PoCC is one of only two ports, the other being Dublin Port, capable of handling traffic across all five principal traffic modes (LoLo, RoRo, Break Bulk, Dry Bulk and Liquid Bulk). It handles approx. 19% of all seaborne trade in the State and has clear potential to lead the development of future port capacity in the medium and long term, when and as required. The criteria used by the European Commission are broadly similar to those used in identifying the Ports of National Significance (Tier 1). The continued maintenance and development of Tier 1 ports is a key objective of the National Ports Policy. The PoC continues to be a critical part of the supply chain infrastructure to industries and the public in the south of Ireland.

In relation to Ports, Shipping, and Harbours, Chapter 18 of the NMPF sets out four key objectives to:

- Safeguard the operation of ports as key actors in the economic wellbeing of the State through the provision of safe and sustainable maritime transport.
- Facilitate a competitive and effective market for maritime transport services.
- Sustainable development of the ports sector and full realisation of the National Ports Policy with a view to providing adequate capacity to meet present and future demand, and to adapt to the consequences of climate change.
- Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, and smaller harbours are appropriately addressed in regional and local marine planning policy”.

A total of 10 planning policies are set out to achieve these objectives, and they cover issues including the protection of current port activity (e.g. dredging). They also commit to supporting future opportunities for expansion of port and harbour activities.

Chapter 13 of the NMPF has several key objectives and policies supporting Offshore Renewable Energy (ORE). The key objectives are:

- Support the development of ORE in Ireland as a driver to significantly reduce greenhouse gas emissions and accelerate the move to cleaner energy in line with National and EU policy.
- Increase the sustainable ORE use of our extensive marine resource in an efficient and coordinated manner identifying, where possible, potential for synergies and opportunities for multi-use of our shared maritime area.
- Support Ireland's decarbonisation journey through increased use of ORE while delivering significant and sustained benefits, import substitution, fiscal return, national and local economic development and technology learning.
- Support the strategic growth of the ORE industry recognising the potential to derive benefits particularly for Ireland's coastal communities.
- Provide enhanced security of energy supply for Ireland in the short and medium term, in accordance with the Climate Action Plan.
- Develop a robust, effective transparent consenting process to ensure appropriate environmental protections are built-in, while enabling sustainable ORE developments to progress.
- Ensure good regulatory practices in ORE installation and generation, including decommissioning of existing facilities, at end of life, according to international best practice.

The proposed site investigation works may help facilitate the development of the ORE industry in Ireland and thus are consistent with the overall policies and objectives relating to ORE.

In relation to the environment Chapter 2 Introduction of the NMPF states that:

Any project that may give rise to likely significant effects on the environment will need to be accompanied by one or more of the following, as relevant:

- *An Ecological Impact Assessment Report*
- *Environmental Report*
- *An Environmental Impact Assessment Report (EIAR) if deemed necessary under the relevant legislation (statutory document)*
- *Natura Impact Statement if deemed necessary if deemed necessary under the relevant legislation (statutory document)*
- *Article 12 (Habitats Directive) Assessment on Annex IV species.*

Following pre-application consultation with the Foreshore Unit, the Licence Application for the Site Investigation works has been accompanied by a Non-Statutory Environmental Report (NSER) and Supporting Information for Screening for Appropriate Assessment (SSIA) and an Article 12 Assessment on Annex IV species. This is consistent with the requirements of the NMPF.

The SSIA concluded that it could be objectively concluded that the Natura 2000 sites (Cork Harbour SPA and Great Island SAC) within the zone of influence of the proposed works would not be significantly impacted by the proposed site investigation works at Dognose Bank.

The NSER submitted with the FLA considers the potential environmental impacts on a wide range of receptors, based on a multitude of reports, and concludes that there will be no significant effects. Mitigation measures are proposed throughout the NSER to reduce potential impacts.

The Applicant considers the proposed works fully comply with the NMPF Overall Objectives based on the following facts:

The FLA is being sought solely to facilitate SI works associated with the future port infrastructure identified in the recently launched Port of Cork Masterplan 2050, and in particular ORE. Dognose Bay is seen as a site that, after land reclamation (12ha), could support the ORE sector by facilitating offshore wind industry requirements for Marshalling and Assembly (M&A) as identified in the Masterplan.

4. Conclusion

The proposed works have been designed to avoid, minimise, or mitigate adverse impacts on both the natural environment and other marine uses within the harbour. The works are not in contravention with any policies or objectives as outlined in the NMPF.