

## **STATEMENT OF CONSISTENCY WITH THE NATIONAL MARINE PLANNING FRAMEWORK**

### **Introduction**

This statement has been prepared in support of an application for a foreshore licence for the deployment of up to nine (9) Acoustic Doppler Current Profilers (ADCPs) at various locations within Cork Harbour and surrounding environs to provide the data required to conduct a numerical model that will be used to inform future design and installation of waste water treatment. The statement addresses how the activity is consistent with the objectives and policies of the National Marine Planning Framework.

### **Background**

Irish Water wish to conduct a strategic modelling study of water currents within Cork Harbour and surrounding environs. The study requires the deployment of up to nine (9) Acoustic Doppler Current Profilers (ADCPs) at various locations within the area to provide the data required to conduct the modelling. Ancillary instruments, to collect salinity and temperature data, may also be contained within the trawl resistant frame in which the ADCPs will be deployed. Indicative ADCP locations are presented in the table in **Section 2.3** with indicative locations and Licence Area shown in **Appendix A - Drawing No 20860-FL-105**. While it is intended that the ADCPs will be deployed at these locations, the wider Foreshore Licence area (also shown in **Appendix A - Drawing No 20860-FL-105**) has been selected to provide alternative deployment positions should the preferred locations be deemed unsuitable due to the presence of, for example, reef habitat.

ADCP deployment is required for modelling purposes to inform the future design and installation of wastewater treatment.

### **Objectives of the NMPF**

As the data from this monitoring will be used in a numerical model to inform future design and installation of wastewater treatment, this statement piece focuses on how the project is consistent with the objectives of Chapter 24 - Wastewater Treatment & Disposal. The objectives outlined in the chapter are as follows:

- To bring and maintain public water and wastewater services to acceptable international benchmarks, verified by independent monitoring and reporting, through increased wastewater treatment based on best available techniques, with a focus on, inter alia, ensuring full compliance with the Urban Waste Water Treatment Directive and wastewater licensing requirements.
- To support communities and sustainable development in coastal areas through the provision of resilient water services, now and into the future.

In relation to wastewater, the NMPF outlines the following as a key issue for Marine Planning:

*"The European Union's Urban Waste Water Treatment Directive sets the basic standards for the collection, treatment and discharge of urban wastewater from large urban areas. Meeting the standards in the Directive is a key step in protecting our environment from the adverse effects of wastewater discharges.*

*The EPA is responsible for authorising and regulating urban wastewater discharges. Licences are required where the population equivalent of the urban area is greater than 500, and certificates of authorisation are required for urban populations below this threshold. Authorisations include a requirement to address compliance with the Urban*

*Waste Water Treatment Directive and, where necessary, provide for higher levels of treatment in order to achieve a water quality objective identified in a River Basin Management Plan or to address a requirement of EU legislation.*

*In 2019, the Court of Justice of the European Union declared that Ireland has failed to fulfil its obligations under the Urban Waste Water Treatment Directive. Also in 2019, the EPA identified that treatment at 19 large urban areas failed the mandatory treatment standards set out in the Directive. These 19 areas generate more than half of Ireland's urban wastewater. In mid-2020, the EPA identified 35 areas around Ireland where wastewater was collected and released back into the environment without treatment. As shown on map 2 below, the vast majority of these areas are in coastal locations" (p . 185 & 186).*

The proposed works are consistent with the objectives of the NMPF as the results of proposed monitoring works are required to inform the future design and installation of wastewater treatment which will ensure compliance with relevant national legislation and European directives.

### **NMPF Policies relevant to the proposed development**

The table below presents a response to the policy statements applicable to the proposed activity subject of the Foreshore Licence application, as contained in Chapter 24 of the NMPF.

Policy Statement	Response
<p><b>Wastewater Treatment and Disposal Policy 1:</b> <i>Proposals by Irish Water related to the treatment and disposal of wastewater that:</i></p> <ul style="list-style-type: none"> <li><i>i. service the social and economic development of the country under the National Planning Framework;</i></li> <li><i>ii. resolve environmental issues at priority areas identified by the EPA;</i></li> <li><i>iii. contribute to the realisation of the objectives of:</i> <ul style="list-style-type: none"> <li><i>• Ireland's River Basin Management Plan 2018 – 2021</i></li> <li><i>• The Water Services Policy Statement 2018 – 2025</i></li> <li><i>• Marine Strategy Framework Directive 2012 - 2020</i></li> </ul> </li> </ul> <p><i>should be supported, provided they fully meet the environmental safeguards contained within relevant authorisation processes.</i></p>	<p>The results of the ADCP monitoring are required to inform a numerical model that will be used by Irish Water to:</p> <ul style="list-style-type: none"> <li>• Inform future design and installation of waste water treatment which will in time provide positive benefits to the human health of the general public residing in this area.</li> <li>• Examine the impact of wastewater on coastal water quality</li> <li>• Examine the impact of wastewater on designated shellfish waters.</li> </ul> <p>Furthermore, the modelling will be used to develop wastewater infrastructure which will ensure that effluent emissions meet the objectives of the WFD; which achieve the objectives of the Water Services Policy Statement and are in line with the Marine Strategy Framework Directive. All wastewater infrastructure will be subjected to an authorisation process and will fully meet environmental safeguards under the relevant EU Directives.</p>
<p><b>Wastewater Treatment and Disposal Policy 2:</b> <i>Proposals that have the potential to significantly adversely affect existing and planned wastewater management and treatment infrastructure where a consent or authorisation or lease has been granted or formally applied for by Irish Water should not be authorised unless:</i></p> <ul style="list-style-type: none"> <li><i>• compatibility with the existing, authorised, proposed or otherwise identified in consultations with Irish Water activity, can be satisfactorily demonstrated;</i></li> <li><i>• the proposal is clearly of strategic or national importance.</i></li> </ul> <p><i>Where possible, proposals that may affect Irish Water activities or plans should engage with Irish Water at the earliest available opportunity.</i></p> <p><i>Compatibility should be achieved, in order of preference, through:</i></p> <ul style="list-style-type: none"> <li><i>a. avoiding adverse impacts on those activities; and / or</i></li> <li><i>b. minimising impacts where they cannot be avoided; and / or</i></li> <li><i>c. mitigating impacts where they cannot be minimised.</i></li> </ul>	<p>Not applicable. The deployment of the ADCPs will not have any adverse effects on existing or planned wastewater management or treatment infrastructure.</p>