

Port of Cork Company (POCC)

Comments on the Draft National Planning Framework (NPF)

Introduction

The Port Of Cork Company (POCC) welcome the opportunity to provide comments for consideration to the Draft National Planning Framework (NPF).

The POCC is very supportive of the NPF initiative. POCC acknowledge that the Draft NPF is supportive of Port requirements and has considered many aspects of the POCC original submission. Nonetheless, minor amendments and / or additions to the Draft NPF would provide further clarity on policies and initiatives required to facilitate sustainable growth of critical strategic port related development and the potential of maritime economic and leisure activities.

The Port of Cork is a key asset in facilitating national and regional growth and can positively contribute to the objectives identified in Cork 2050 and the NPF. POCC Strategic Plan has identified future port locations in Cork's lower harbour, as follows:

- Ringaskiddy
- Marino Point
- Cobh
- Aghada / Whitegate

Consent is in place for the redevelopment of Ringaskiddy to accommodate container activities, and in the longer-term Roll-on Roll-off freight trade. However, further investment in port facilities in the Cork Harbour and associated infrastructure is required to support the objectives of the Draft NPF for the sustainable growth of Cork and its region. There is also a need for further policy support to facilitate port related development; realise Ireland's full maritime potential; and streamline maritime and port related development consent procedures.

Submission Request - Overview

POCC request that the draft NPF is amended to facilitate the full potential of Port Infrastructure and activities; support the upper harbour redevelopment lands in Cork; and facilitate Maritime Resources as key growth enablers for the Southern Region. In overview, the amendments sought by POCC relate to planning policy objectives; infrastructure priorities; enabling renewable & sustainable development; implementation; and maritime potential, as follows:

Planning Policy Objectives

- The Port of Cork Strategic Development Plan should be a key consideration of the RSES review for the Southern Region.
- Port Companies should be recognised as prescribed bodies within the planning approval system.
- Cork Docks (including Cork's City Quays) and Tivoli are key Tier 1 Zoned lands of strategic significance to the city's growth targets. Stronger and clearer policies should be put in place to enable their regeneration and sustainable development, including:
 - Relocation of Seveso sites from the Corks City Quays and Tivoli;
 - Supporting enhanced public transport system including BRT to Tivoli and river ferries.
- Suitably zoned lands should be made available adjacent to port facilities to meet the landside requirements of Ports; and Port & Maritime related industries. The strategic importance of these zoned lands should be recognised and protected at regional and local planning policy level.

Infrastructure Priorities

- Suitable road / rail connectivity is required to support the relocation of current upper harbour & City Quays operations to the lower harbour.
- Enhanced regional connectivity to 'Core' Ports (under European Commission's TEN-T Guidelines) and National Tier 1 Ports, including road networks such as:
 - o M28
 - o Dunkettle Interchange
 - o M20 & Northern Ring road
 - o R624 Cobh Road
 - o Rail connectivity to Marino Point

Enabling Renewable & Sustainable Development

- Provision of port infrastructure and facilities is a key enabler for the renewable energy sector, such as wind, wave and tidal.
- Identification and provision of port infrastructure to support potential LPG regasification installation will enhance Ireland's energy security.

Implementation

- Requirement for an Integrated land and maritime planning & foreshore consenting process with streamlined approval mechanisms & timeframes particularly for Strategic Infrastructural Developments, thus removing duplication.
- The POCC supports Objective 69 which related to a centrally managed approach to developing state owned / influenced lands and considered that the same powers and strategies should be explicitly put forward for the delivery of required national infrastructure.

Economic & Maritime Potential

- The ports importance in areas of tourism, marine leisure and cruise is not fully identified in the draft NPF document, exemplars include Cobh Cruise Terminal and Bantry Inner Harbour Inner Harbour Development.
- Ports have a vital role to play in rural regeneration as local economic drivers e.g. marine aquaculture, fishing, marine tourism, health and wellbeing, exemplars include Bantry Inner Harbour Inner Harbour Development.

In the context of the above bullet points, POCC request that the following specific amendments and additions are made to the Draft NPF.

Submission Request – Specific Amendments / Additions

Port of Cork Company requests for amendments and additions are detailed below in *Blue Bold Italic Type*;

Section 3.5 Ireland’s Cities Page 48

Cork City and suburbs are identified for strong population and employment growth, with circa. 50% of development to be delivered on Brownfield or Infill development sites. Cork City Docks and Tivoli are identified as key development opportunity sites and have the most potential to deliver urban development within the city’s boundary. The importance of both the City Docks and Tivoli should be further emphasised within the NPF.

Suggested addition to paragraph 2:

Two specific areas for higher rate growth have been identified in Cork City: - City Docks and Tivoli Docks which can cater for significant population growth within the city boundary. Local Area Plans are currently being prepared for these locations. These sites already are well serviced with key infrastructure and should be facilitated as Tier 1 zoned lands.

Section 3.9 Cork Page 55

In the section on ‘Cork’, P.55 of the NPF Draft Document the ‘Key future growth enablers for Cork’ are identified. The following amendments are proposed to recognise existing and future potential of the Port as a growth enabler, and explicitly reference necessary infrastructure.

Suggested Amendments to Section 3.9:

- ...Large scale regeneration projects in Cork Docklands (City Docks and Tivoli), including the relocation of two ‘Seveso’ sites from the City Docks...

Correction; ...the relocation of two Seveso sites from Tivoli (Flogas LPG and Calor Gas LPG) and one Seveso site from City Docklands area (Gouldings Fertilizer).

- Progressing sustainable development on greenfield sites on public transport corridors, such as Monard.
- *Progressing sustainable development on brownfield regeneration sites such as North and South City Docks and Tivoli Docks.*
- Identifying infill and regeneration opportunities.
- Enabling enhanced opportunities for existing communities (through employment, learning and education support).
- Development of the new Science Park at Curraheen.
- Expansion of the 3rd level education institutions.
- Development of much enhanced Citywide public transport system for an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link to the Airport *including a BRT link to the Tivoli site and river ferries.*
- M8 / N25 / N40 Dunkettle Junction upgrade (approved) and improved Ringaskiddy port access *i.e. delivery of the M28 motorway to Ringaskiddy Port as part of the Core TEN-T network. Upgrade of the R624 to Cobh Port facilities to National Road status.*

- Enhanced regional connectivity through improved average journey times by road. *Delivery of the M28 to Ringaskiddy, the M20 Cork to Limerick Motorway, Northern Ring Road in Cork and re-designation and upgrade of the R624 Cobh road.*
- Improved traffic flow around the city, which could include the upgrade of the N40, and / or alternatives *such as the Northern Ring Road* which may include enhanced public transport.
- Improved rail journey times to Dublin and consideration of improved onward direct network connections.
- *Upgrade of the rail network to cater for freight from the Cork area, particularly from Cobh (Marino Point).*
- Ensuring water supply and waste-water needs are met by new national projects to enhance Cork's water supply and increase waste water treatment capacity.
- Improving sustainability in terms of energy, waste & water.
- *Ensuring the Port facilities have the expansion capabilities and access to support the renewable energy industry such as deep-water berth facilities, adjacent laydown & assembly lands and suitable road access for oversize loads such as wind turbine blades, transformers, etc.*
- *Enabling the expansion of Port facilities at Ringaskiddy, Marino Point, Cobh and Whitegate / Aghada and relocation of shipping and port activities to lower harbour locations as a key growth enabler. Providing adjacent lands zoned for port-related activities and suitable road/ rail connectivity to these facilities will allow relocation of cargo and port related industries from the upper harbour and City Docks.*

Section 3.9 Limerick Page 57

In the section on 'Limerick', (P.57) 'Key future growth enablers for Limerick'. It is submitted that bullet point 11 should be amended to specifically reference the need to deliver the M20.

Suggested Addition to Section 3.9

- Enhanced regional connectivity through improved average journey times by road to Cork *by delivery of the M20* and to Waterford.

Section 6 Realising our Island and Marine Potential Page 91-93

6.1 Integrated Land and Maritime Planning / Foreshore Licensing

The need for integrated land and Maritime Planning is identified in the NPF and there is an objective to ensure that Regional and local development plans integrate relevant maritime spatial planning issues. There is also reference to the need for 'Co-ordination of Departments and Sectoral Issues in a plan-led manner'; and 'Consistency between maritime and terrestrial planning in areas of common interest.' However, the NPF stops short of stating that there will be any change in the arrangements for approving planning on the foreshore.

The current foreshore consenting process does not have pre-set timelines or clear terms of engagement for applicants. This leads to risk and uncertainty for funders of infrastructural projects which have a foreshore requirement. This is a key risk area for Strategic Development projects which have a foreshore element.

In tables on Page 92 and 93, POCC welcomes the objective to promote integration between land and maritime planning but it is not clarified how the foreshore licenses / permitting system will be changed or improved in the future.

The current foreshore consenting process is not aligned with the planning process and conditions imposed under the two processes may not be mutually compatible nor complementary.

POCC submit that the statutory approval process must be streamlined if projects are to be progressed in an efficient manner, therefore POCC seek an objective in the NPF for foreshore planning responsibility to be transferred to relevant Planning Authority or ABP.

POCC also request additional text in section 6.1 to recognise the significance of landside requirements in realising Ireland's maritime potential.

Suggested Additions to Section 6.1 and National Policy Objective 40

- *An Integrated process for Foreshore permitting, in parallel with the land based planning process, would be beneficial for risk mitigation and project timeline certainty. This is particularly the case for Strategic Infrastructure Development projects which have a Foreshore element.*
- National Objective 40:
Regional and local development plans will take account of and integrate relevant maritime spatial planning issues *and an integrated planning and foreshore consent process will be developed.*
- *As the key link between land and sea, suitable Port facilities with available capacity, road network connectivity and adjacent suitably zoned land banks, are required for the delivery of projects to make our maritime economy a reality.*

6.2 Maritime Economy Page 93.

Marine leisure, marine sports, and cruise tourism are key elements of our marine potential but are not captured explicitly in this section. POCC submit that text should be added to page 90 of the document to recognise these elements of the maritime economy.

POCC would like to put forward Bantry Inner Harbour Port Re-development project, undertaken by Bantry Bay Port Company and Port of Cork Company, as a good example of best practice of marine aquaculture, marine leisure and cruise tourism enhancement in a rural town, all delivered in the context of a large commercial port operation. (See best practice of Bantry Inner Harbour Development below)



Photo 1.

Construction stage photo showing town fishing pier extension, quayside marina and breakwater / amenity area developed from environmentally re-engineered contaminated dredge material.



Photo 2.

Marina Opening day of Bantry Marina, August 11th 2017.



Photo 3.

Photo shows the Holland America Line's Cruise Vessel 'Prinsendam' moored in Bantry Inner Harbour, Jun 2017, with Bantry House in the foreground and Whiddy Island Oil Storage Terminal in the background.

Suggested Additions to Section 6.2

- *Marine leisure, maritime sports and cruise tourism are key areas of potential market growth which can grow sustainably in conjunction with maritime aquaculture, fishing, and commercial port activities.*

The National Ports Policy 2013 identifies Dublin, Cork, and Shannon / Foynes as Tier 1 Ports of National Significance. It is important that the NPF also recognises that Dublin and Cork Ports are designated as European Core ports and are part of the Core TEN-T Network. Connections to the TEN-T network will become more significant in the light of Brexit and national policy should seek to strengthen direct connections to Europe.

In the context of Cork, the EU Port designation means that, as well as the delivery of the M28 to Ringaskiddy, the R624 to Cobh should be re-designated as a National Road, as this road currently serves three main port sites in the Port of Cork as follows;

- Cobh Cruise Terminal (100 cruise vessels expected in 2018)
- Marino Point (ex IFI) site (newly acquired by a JV which includes the Port of Cork Company with plans for future Port activity)
- Cork Dockyard (ship repair & import and export of goods)

The suggested amendments to Section 3.9 address this issue, but there is also a need to amend section 6.3 to highlight the need for development of the Core TEN-T Network. Accordingly, it is submitted that paragraph 5 should be amended and that additional text is provided.

Paragraph 6 deals with Port strategic planning in the context of city regions. In the case of Port of Cork and Shannon-Foynes, the new port areas are in their respective Counties and fall under the County Council planning policy context. This needs to be reflected in the text by referencing County plans as well as City plans in paragraph 6.

In the case of the Port of Cork, the sustainable development of the city region is inextricably linked with the orderly and planned relocation of port activities to locations in the lower harbour area, located in the County region. Additional text is suggested to ensure that Regional, City and County planning objectives facilitate the relocation of port activities from upper harbour city areas as appropriate.

The requirements for Ports to relocate to lower harbour locations are being driven by international shipping trends, as well as the demand for the centrally located development of lands to support urban development. Additional text is suggested on page 94 to identify the trends in international shipping and the consequent policy implications.

Objective 42 provides strong policy steer that RSES should consider the strategic development requirements of Tier 1 and Tier 2 ports. Additional text is suggested to specifically reference the need to have consideration to the strategic development plans of Port Companies.

Ports have a key role to play in the strategic and economic development of Ireland and its regions, as recognised by the National Ports Policy and the draft NPF. Port Companies have a unique insight on connectivity to international markets; national / regional economies and infrastructure requirements. This insight should be harnessed during the planning appraisal of strategic development proposals. Accordingly, POCC submit that Port Companies should be recognised within the planning system as a prescribed body for relevant development projects. An additional objective is suggested within section 6.3.

Suggested Amendments to Section 6.3

- **Paragraph 5:** Tier 1 ports are located within close proximity to Dublin, Cork and Limerick respectively and the role of these ports will be considered and addressed in tandem with long-term infrastructural requirements as part of the relevant Regional Spatial and Economic Strategy (RSES) and any concurrent or subsequent metropolitan area or city / county development plan process. *Dublin and Cork Ports are also designated as European Core ports as part of the Core TEN-T Network and the importance of strengthening direct connections to Europe will be addressed by the relevant RSES.*

- **Insertion of additional text after paragraph 5:** *The EU ‘Core Port’ designation opens up the opportunity for EU grant aid and funding for qualifying Port development, as well as funding development of the access and connectivity such as road and rail connections to the Core Ports.*

All roads connecting EU Designated Core Ports and National Tier 1 ports to the national road network should be designated as National Roads.

- **Additional text to paragraph 6:** Strategic plans for Tier 1 ports City *and County* growth strategies should align and be consistent with the broader aims and policies of the City *and County* plans for the effective and sustainable development of the region.
- **Additional text after paragraph 6:** *The City and County strategies should recognise the role that ports play as a key economic driver for the region. The relocation of port facilities from city areas should be jointly facilitated by City and County Council planning policy. Development Plans should reflect the key economic role that ports play as outlined in the National Ports Policy.*
- **Additional text on page 94:** *The long-term international trend in ports and shipping is toward increased consolidation of resources to achieve optimum efficiencies of scale. This has knock-on effects in terms of vessel size, the depths of water required at ports, the type and scale of port hinterland transport connections, and landside requirements to accommodate port and port related activities.*

Port facilities require suitably zoned lands adjacent to Port facilities and a comprehensive connection to the road network.

All roads connecting EU Designated Core Ports and National Tier 1 ports to the national road network should be designated as National Roads and be upgraded accordingly.

- **Additional Text to National Policy Objective 42:**
Ensure that the strategic development requirements *and Strategic Development Plans* of Tier 1 and 2 Ports are considered and addressed as part of the Regional Spatial and Economic Strategy (RSES) and that any concurrent or subsequent metropolitan area of city/ county development plans and strategic plans for the Tier 1 and Tier 2 ports are aligned to ensure the effective growth and sustainable development of the city regions.
- **Additional National Policy Objective 42(a):**
Given their unique insight to international, national and regional markets and infrastructure requirements, Port Companies will be identified as a prescribed body in the planning consultation process, for relevant development projects.

Section 6.5 of the draft NPF recognises the potential of off-shore renewable energy, but does not reference the importance of Port infrastructure and landside requirements in unlocking this potential. Irish Ports have a key role to play in facilitating the infrastructural requirement for the off-shore industry, as demonstrated by Ports such as Hull Greenport, and the Dong facility in Belfast Harbour.

<file:///C:/Users/hkingston/Downloads/37833%20BHC%20off%20shore%20wind%20report%20Web.pdf>

<http://www.belfasttelegraph.co.uk/business/news/dong-wind-turbines-built-in-belfast-start-to-turn-as-irish-sea-project-begins-29959555.html>

<http://greenporthull.co.uk/>

<https://www.macegroup.com/projects/green-port-hull>

Additional text is suggested to recognise the importance of port infrastructure and landside requirements in enabling offshore renewable energy.

Suggested Amendments to Section 6.5

- **Additional text after paragraph three:** *Irish Ports have a key role to play in facilitating the infrastructural requirements for the offshore energy industry. The renewable offshore energy sector requires, deep-water serviced ports to deploy wind, tide and wave energy generating installations into suitable open sea locations.*

These renewable energy generators (wind turbines, tidal turbines, & wave generators) require suitably zoned land adjacent to port facilities for manufacture, assembly, testing, and mobilisation of these large machines.

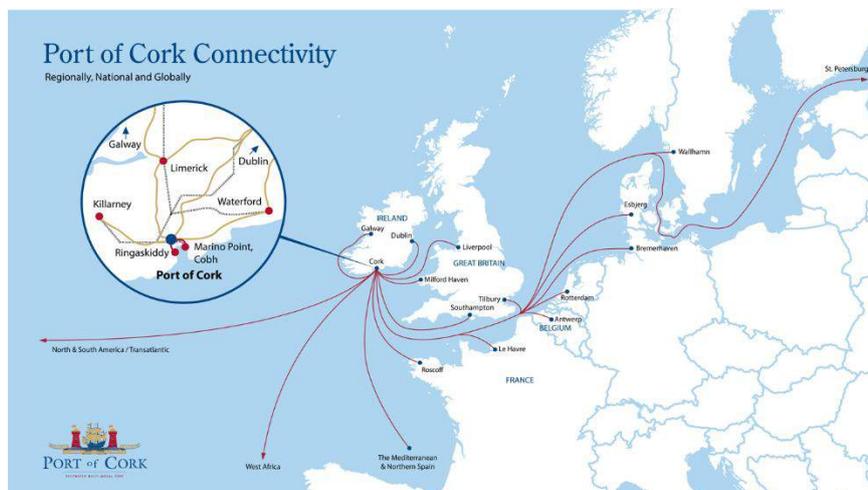
Ireland’s current over reliance on landbridge across the UK and the Dover – Calais link to European markets is a key risk for Brexit. The existing landbridge connection is illustrated in Figure 1.

Figure 1: UK Landbridge



The Port of Cork is well located to further develop direct sea links with other EU countries, as illustrated by Figure 2.

Figure 2: Port of Cork Connectivity



The recognition of the importance of the connectedness of Ports to the EU countries outlined in paragraph 3 of page 99 is acknowledged, and further text is suggested to reinforce this issue.

Suggested Amendments to Section 7.1, page 99

- **Additional text after paragraph 3 of page 99:** *The increased peripherally of the Irish economy in a post-Brexit scenario places an increased reliance on independent transport links to the European market which do not rely on transit through the UK.*

Building capacity into our existing ferry ports and container ports will allow the shipping and logistics chain to react to changing external conditions and maintain Irish competitiveness.

7.4 Energy Page 104

The importance of energy infrastructure connections is paramount in a Post-Brexit scenario. There is emerging potential for importing Liquid Natural Gas (LNG) through Irish ports and its regassification to existing shoreside infrastructure. This has the potential to extend the utilisation of the national gas network as the Kinsale natural gas field is depleted. Opportunities in this field are currently being explored by Shannon-Foynes and POCC and the potential of this energy source should be reflected within the NPF, as highlighted in the links below:

<http://www.portofcork.ie/index.cfm/page/currentnews/id/196>

<http://www.energycork.ie/index.php/2017/08/02/energy-cork-welcomes-proposed-cork-lng-facility/>

<http://www.irishexaminer.com/ireland/massive-gas-supply-project-could-be-running-in-cork-harbour-by-2019-455405.html>

<http://www.shannonlng.ie/>

Additional text is suggested on page 104 to recognise the potential for LNG.

Suggested Amendments to Section 7, page 104

- **Additional text after paragraph 3:** *The potential for a Liquid Natural Gas (LNG) importation facility at one of Ireland's major ports is recognised as a method of extending the utilisation of the national gas network as the Kinsale natural gas field is depleted.*

The availability and transportation of natural gas by ship and its re-gasification to shoreside facilities is proven technology and would provide another source for energy security and resilience for the island whilst extending the life of the existing natural gas transmission network assets in a sustainable manner.

Section 7 addresses all Island tourism, but does not emphasise the potential of marine tourism. For example, the South coast and examples such as Bantry Bay port offer excellent marine tourism opportunities, which could be bundled and marketed on an All-Ireland coastal basis.

Examples of existing activities in Bantry Bay are provided in the following links:

http://www.bantrybayport.com/bantry_blue_way_trails

<http://www.bantrybayport.com/contentfiles/Blueways%20Bantry%20Map%20booklet%20Vs.3.pdf>



Suggested Amendments to Section 7, page 105

- **Additional text after paragraph 2:** *Marine tourism initiatives which offer an alternative to land based activities such as coastal kayaking (Bantry Blueway), cruising sailing, yacht racing events, boating, adventure races, rowing, and surfing, etc. can be bundled and marketed on an All-Ireland, coastal basis.*

As the cruise industry is grows and expands further into northern European destinations, remote destinations such as the coast of Ireland are an attractive proposition for cruise passengers.

These ‘marine tourism’ activities can be integrated into our marine cultural and natural heritage.

- **Enhanced regional Accessibility**

POCC support the NPF's emphasise on the importance of connectivity between Cork and Limerick and the Atlantic Economic Corridor. Improving the connectivity of the two cities and particularly the link between the agricultural heartland of mid Cork and the port will add to the efficiency and to the ability to improve the density of the urban areas.

- **High Quality International Connectivity**

The need for investment in our Ports to overcome the difficulties of Brexit is agreed and POCC note the examples given of signature projects such as the second runway for Dublin Airport and the Dublin Port Masterplan. In the context of the Southern Region, the redevelopment of Ringaskiddy terminal is a signature project. The Port of Cork is embarking on a €80 Million development of a new container port in Ringaskiddy. This project has full planning and funding in place with construction commencing in 2018 and opening in 2020. It is supported by the EU with Tens-T grant aid and a European Investment Bank loan, and is the biggest single investment project in port infrastructure in Ireland.

See project website here: <http://www.ringaskiddyportredevelopment.ie/> . Additional text is suggested for the first bullet point to highlight a signature project in the Southern Region.

To prepare for Brexit, the need for investment in connecting roads and rail to our ports and zoning of adjacent land banks is equally as important to enable signature projects. Additional text is suggested to emphasise this point.

Suggested Amendments to Section 9, page 124, first bullet point

- ...and signature projects such as the second runway for Dublin Airport, the Dublin Port Masterplan, *and the Port of Cork Company Strategic Development Plan.*
- **Additional Text on Page 124:** *The ability to accommodate modal shift of cargos from road transport / ferries to containers and establishing new direct links to Northern Spain and Western France Europe as an alternative to land-bridge across the UK is a priority in preparing for Brexit.*

Investment in Ports needs to be accompanied with suitable investment in the connecting roads and rails networks to provide sufficient advance infrastructural capacity which will serve to overcome external disruptions such as Brexit or other unforeseen events.

Resilient and alternative routes to the EU and worldwide market for raw materials and for finished product is important for an island nation.

9.2 Governance / Prioritising Development Lands Page 129

POCC welcomes the National Policy Objectives 68 & 69 to prioritise development lands and promote state-led strategic land development. However, these objectives appear to be drafted towards satisfying housing needs.

POCC suggests that the same powers and strategies be explicitly put forward for use in the delivery of required national infrastructure such as Ports, waste management facilities, roads, energy installations, Seveso zoned sites, etc

Suggested Amendments to Objective 69, page 129

- **Additional text to Objective 69:** A more effective strategic and centrally managed approach will be taken to realise the development potential of the overall portfolio of state owned and / or influenced lands in the five main cities and potentially other major urban areas as a priority, *to deliver strategic housing and infrastructure projects.*

National Strategic Outcome, High-Quality International Connectivity Page 134

POCC strategic plan has identified future port locations & infrastructure required in Cork's lower harbour to cater for expansion as follows:

- Ringaskiddy
- Marino Point
- Cobh
- Aghada / Whitegate

The delivery of the M28 is required before the permitted development at Ringaskiddy can be fully implemented. Further, the R624 road to Cobh requires upgrading before the full potential of future port locations at Marino and Cobh can be achieved. In recognition of these requirements, POCC submit that two further bullet points be added under the 'Ports' heading on Page 134.

Suggested Amendments to 'Ports' heading, page 134

- **Additional Bullet Points:**
 - *Delivery of the M28 road to Ringaskiddy Port*
 - *Redesignation of the R624 road to Cobh to National Road status and upgrade to a standard capable of accommodating three major Tier 1 port installations: Cobh Cruise Terminal; Marino Point Port Terminal; and Cork Dockyard.*

National Strategic Outcome, Empowered Rural Communities Page 136

Ports and harbours can be significant economic drivers for rural communities. In promoting rural development it is submitted that the NPF should acknowledge this potential and provide a policy commitment to future investment. An additional bullet point to the Rural Development Outcomes detailed on p. 136 is suggested.

Suggested additional bullet point, Page 136:

- **Additional Bullet Point, Rural Development:** *Investment in smaller coastal ports as key economic drivers for rural communities and sources of jobs to facilitate fishing, aquaculture, active marine sports, and marine tourism.*

Ports have a key role to play in the transition to sustainable energy and to providing energy security for Ireland. It is submitted that the section on Transition to Sustainable Energy should make reference to the potential for a Liquid Natural Gas (LNG) importation facility at one of Ireland's major ports (see link <http://www.portofcork.ie/index.cfm/page/currentnews/id/196> for details); and that the role of ports in facilitating the offshore energy sector is highlighted. Ports such as Hull Greenport and the Dong Port facility in Belfast harbour are best practice examples in this field: <http://greenporthull.co.uk/>

Additional text is suggested to the section.

Suggested Amendments, Transition to Sustainable Energy

- **Additional text, after Paragraph 3:** *The renewable offshore energy sector requires, deep-water serviced ports to deploy wind, tide and wave energy generating installations into suitable open sea locations. Irish Ports have a key role to play in facilitating the infrastructural requirements for the offshore energy industry.*

These renewable energy generators (wind turbines, tidal turbines, & wave generators) require suitably zoned land adjacent to port facilities for manufacture, assembly, testing, and mobilisation of these large machines.

- **Additional text, after Paragraph 5:** *The potential for a Liquid Natural Gas (LNG) importation facility at one of Ireland's major ports is recognised as a method of extending the utilisation of the national gas network as the Kinsale natural gas field is depleted.*

The availability and transportation of natural gas by ship and its re-gasification to shoreside facilities is proven technology and would provide another source for energy security and resilience for the island whilst extending the life of the existing natural gas transmission network assets in a sustainable manner.

- **Additional Bullet Points, Green Energy:**

- *Facilitate the capacity of Irish Ports to service the renewable offshore energy sector.*
- *Support the development of a LNG importation facility at one of Ireland's major ports.*

Summary

POCC welcomes the draft NPF and its recognition of the strategic importance of Ports to Ireland's economic vitality and growth potential. POCC's Strategic Development Plan has identified locations for future port expansion and relocation of trades from the upper harbour. Successful implementation of the Strategic Plan will support the NPF growth objectives for the Region.

POCC has suggested amendments and additions to the draft NPF with a view to maximising the full potential of Port Infrastructure and activities; facilitating the redevelopment of lands located in the upper harbour of Cork City; and supporting Maritime Resources as key growth enablers for the Southern Region.

Thank you for your consideration of this submission.

Regards,

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