



SUBMISSION TO THE NATIONAL PLANNING FRAMEWORK

31-3-2017

INTRODUCTION

Port of Cork Company [PoCC] makes this submission to the Department of Housing, Planning, Community and Local Government in respect of the proposed National Planning Framework [NPF].

The purpose of this document is to provide more specific details and to emphasise the critical role of the Port in influencing the spatial pattern of the development of the Cork region its critical role in supporting the future economic and employment growth locally and nationally.

PoCC wishes to acknowledge and express its support for the Cork 2050 submission to the NPF, jointly prepared by Cork City Council and Cork County Council. In particular PCCC acknowledges the objectives and proposals in relation to the current and future role of the Port and of Cork Harbour in a local regional and national context as set out in the Cork 2050 submission.

Accordingly this document may be viewed as complimenting the Cork 2050 submission,

The Port of Cork is categorised as a Port of National Significance [Tier 1] under EU Policy. Tier 1 Ports are Ports which:

- are individually responsible for 20% of overall tonnage through Irish ports
- have clear potential to lead the development of future port capacity

¹Government expects the Ports of National Significance [Tier 1] to lead the response of the State need for efficient connectivity to the market place, for access to raw materials and distribution of finished product

Government and EU policy emphasises the importance of a strong and functioning port to the Cork and Munster region.

KEY NATIONAL STRATEGIC OBJECTIVES

Cork 2050 sets out that Cork is today the best location capable of delivering two key national strategic objectives:

- creating up to 120,000 jobs over the next 33 years
- achieving a critical mass within the metropolitan area, of 500,000+ people by 2050

The unique role of PoCC to directly and indirectly contribute to the delivery of these objectives is distinguished by:

- designation as one of three Ports of National Significance [Tier 1] under National Ports Policy and [Core Port] under the European Commission's TEN-T Guidelines, in

¹ National Ports Policy 2013



recognition of its strategic importance to the island of Ireland, and its location on the North Sea Mediterranean Corridor

- ²relocation of port operations from City Quays and Tivoli, which will facilitate the opportunity for renewal and regeneration of circa 160 acres of serviced lands for employment, mixed housing [3,000+ units] and amenity development within 2km of Cork City
- efficient connectivity to market facilities increase in trade throughput and employment growth
- infrastructural capacity to relieve pressure on Dublin and the eastern part of the country whilst strengthening the role of Cork and the other regional centres.
- resilience and first mover advantage both regionally and nationally to market changes, resultant from investment in port related infrastructure [€100 million by 2020]

For Example:

- responding to expanding markets in the Marine and Agri-Food sectors
- responding to BREXIT

Direct Contributions to National Objectives

A committed investment to the relocation of PoCC container terminal business from Tivoli to Ringaskiddy will significantly increase the capacity of this international freight, logistics and trade infrastructure gateway, thereby building resilience to challenges such as Brexit and ensuring efficiency of the export-import process for industry based in Ireland to the wider markets. In a recent ³assessment of its economic importance and impact, Indecon International Economic Consultants estimated that the planned PoCC investment in port related infrastructure would:

- play a key strategic role in the development of Cork, the Munster Region, the wider Irish economy and the EU's internal markets
- facilitate capacity for increase in the overall value of throughput at the port by €14.8 billion, which in turn would translate into an extra 182,000 full-time equivalent jobs across the regional and national economies

Direct Contribution to Industry and Employment

The Port of Cork, consistent with all infrastructural development, performs a contributive and facilitative role in the case of inward investment, indigenous industry clustering and growth across the entire Munster region. PoCC interacts with and plays a positive role in the facilitation and movement of goods and people to wider markets across a broad spectrum of industry sectors, to include:

- **Agri-Food:** Import of animal feed, fertilizer and export of meat products, dairy products, milk powder, whey protein, cheeses, etc. (e.g. Kerry Group, Dairygold)
- **Food + Beverage:** Import of grain for distilling and export of bottled Irish whiskey. Raw material in and finished product out for beer and stout breweries.
- **Pharmaceutical:** Import of raw materials and export finished product
- **Energy:** Oil and gas importation, wind turbine importation, location for oil exploration off south and west coasts

² Cork City Development Plan 2015 to 2021

³ Cork to the World –Indecon 2014

- **Marine + Green Energy:** NMCI College, IMERC, Halpin, Beaufort, research centers, strong grid and network connections, marine base for wave research etc.
- **Fishing + Seafood:** Landing of catch for Irish fishing fleet and export of seafood
- **Construction:** Importation of cement, timber, steel, and other construction materials
- **FDI:** Importation of raw materials and export of finished product for FDIs such as Liebherr Cranes, EMC, Apple, BASF, Depuy, Flextronics, KOSTAL, etc
- **Tourism and Leisure:** Dedicated cruise ship berth at Cobh (100,000+ passengers annually) and ferry link to France (85,000+ passengers annually). The Port is also a centre for sailing, angling, rowing, diving, historical tourism, etc.
- **Key location for:** heavy engineering, ship repair, power generation and manufacturing

Indirect Role in Delivering National Objectives

⁴The relocation of port operations and Seveso activities to Ringaskiddy and Marino Point in the Lower Cork Harbour from ⁵Tivoli, the Cork City Quays, and South Docklands, will offer the opportunity for redevelopment of these brownfield sites for new housing and employment opportunities within Cork City boundaries.

For example such relocations include:

- Container operations from Tivoli to Ringaskiddy (planned for 2020)
- Fertiliser Operations (Seveso) from City Quays to Marino Point (subject to purchase and planning requirements)
- Bulk feed, coal, other cargos from City Quays to Ringaskiddy (post M28 delivery)

DELIVERY OF CORK 2050 OBJECTIVES: KEY INTERVENTIONS

Key interventions required within the NPF to support the Port's role in the viable development of port infrastructure, state owned lands, and the economic development of Cork and the surrounding Munster Region include:

- Port Related Planning Policy Priorities
- Integrated Consenting Process and Delivery Mechanisms
- Infrastructure and Connectivity Upgrades
- Seveso Policy

Port Related Planning Policy Priorities

Delivery of port infrastructure is unique in that, it involves development both on land and the foreshore, and connectivity to heavy service utilities, national road and rail infrastructure.

Ports by their very nature are key locations for other heavy industries but are also located in estuaries or costal zones, which are recognised as highly dynamic ecosystems and tend to be in or adjacent to protected natural habitats.

The current consenting system leads to much uncertainty with regard to the interpretation and implementation of planning, environmental and legislative directives together with foreshore, dumping at sea licensing, and administration in respect of port development.

⁴ PoCC Strategic Development Plan [SDP]

⁵ Appendix 1. New Perspective for Tivoli

PoCC suggest that the role of National Planning Framework could:

- ensure the goals of the National Ports Policy play a front and centre role in the national planning hierarchy
- establish a framework for setting out the strategic development and priority connectivity requirements for the top tier ports, to include efficient hinterland and inter-urban connections via a reliable national primary road network

⁶For Example:

- recognition that most freight will continue to be carried within Ireland by road and sea
- rail has a role to play for specific niche cargo, such as export of product from mining areas or import of bulk fuels to power generation stations

Integrated Consenting Process and Delivery Mechanisms

PoCC suggest that the role of National Planning Framework could streamline the planning consenting process by:

- seeking to initiate a national port sector-specific task delivery agency to build an integrated and periodically reviewed plan for the development of top tier Ports in Ireland. This plan would identify the level of required development and environmental responsibilities at each top tier port zone up to 2050.

For Example: Structure of agency

The agency may consist of key government and industry stakeholders such as the Department of Transport Tourism and Sport, Department Housing Planning and Natural Resources, Irish Marine Development Organisation, Irish Ports Association, and the relevant regulatory planning and infrastructure authorities

- identifying the requirement for baseline supporting documentation, for example technical, environmental, ecological and archaeological reporting that would avoid duplication of reporting and support principles of new planning applications
- stepping towards a more integrated approach and greater interplay between planning, environmental and foreshore consenting and administrative processes to allow for clarity in procedure and certainty in timing, thereby removing the need for dual consenting process

For Example: Alignment of processes

PoCC experienced some practical difficulties in the recent Ringaskiddy Redevelopment Plan in the context of aligning the different consenting processes and dealing with the large number of agencies involved with different timelines.

For Example: Natura sites

Currently all development proposals in the Cork Harbour area have to individually address Special Protection Areas [SPA] and (or) Special Areas of Conservation [SAC] issues and carry out detailed and site-specific ecology and habitat surveys etc.

For strategic locations such as Ringaskiddy there is a need for a long-term management strategy that identifies what is the baseline requirement to protect the SPA and SAC, to include which lands may need to be set-aside to facilitate and protect the ecology and wildlife habitats of the area.

For Example: Imperative Reasons for Overriding Public Interest (IROPI)

⁶ Booz & Co. Port of Cork Rail Connection Report

There is also a need to pre-determine the IROPI parameters for port or strategic infrastructure expansion. At present, the planning risks and associated costs and delays are far too great to consider development proposals that might trigger IROPI.

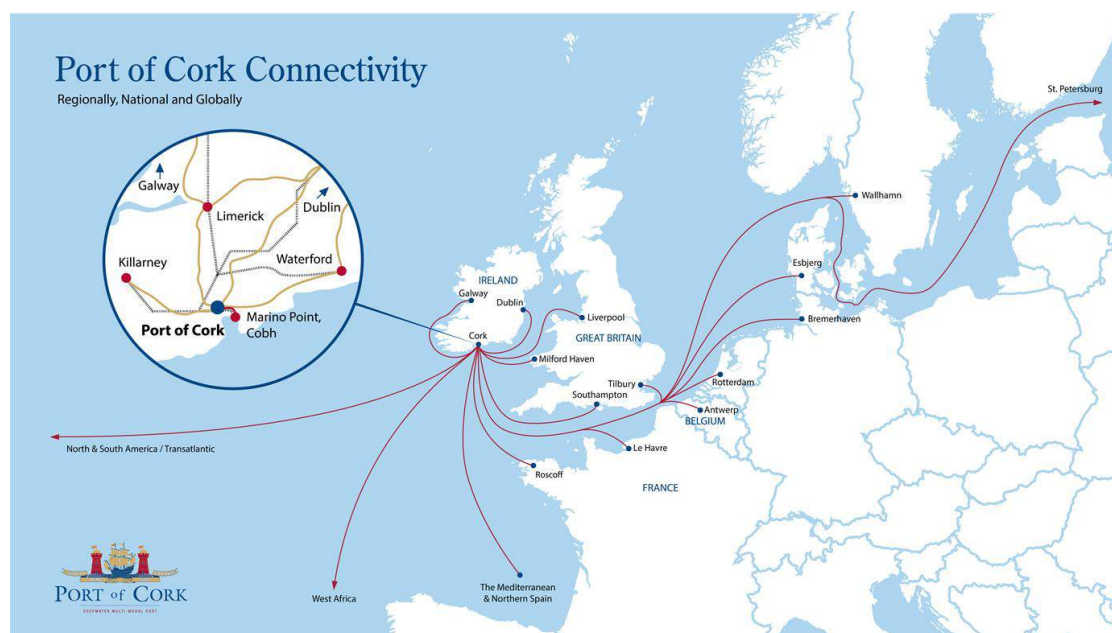
The lengthy timeframes involved with a Strategic Infrastructure Development [SID] process without any IROPI considerations, is an example of the challenge.

The overall objective of these suggestions is to provide definition around project consenting and timelines to enable financial institutions, investors and project promoters to make timely and informed funding decisions. Thereby de-risking major infrastructural projects and reducing the cost of financing.

Infrastructure and Connectivity Upgrades

The Port benefits from proximity to the main shipping channels which connect European and transatlantic routes.

Bulk cargos are re-distributed from the Port of Cork by road to its hinterland but also by sea to other Irish Ports such as Dublin, Galway, Bantry, and Greenore.



A capital investment plan for road and rail connectivity to the Tier 1 Port sites, aligned to the Ports Policy and National Planning Framework, is necessary.

PoCC has identified key road and rail access routes to improve transport connectivity from the wider regional hinterland to the Port of Cork.

The order of priority for transportation upgrades are listed as follows:

Type of Transportation Upgrade	Benefits to a Port-Related Area + State Lands
M8 Dunkettle Interchange	Ringaskiddy+ Tivoli
N28 Cork to Ringaskiddy [M28]	
N20 Cork to Limerick [M20]	
Mallow By-Pass [N72 / N73] – Interim to M20	
Cork Northern Ring Road	
N22 Cork to Killarney	
N25 Cork to Waterford	Marino Point
*R624 Cork to Cobh	
Cork to Cobh [Marino Point Link] Rail Line	

*Cork 2050 notes that:

“Ringaskiddy and Marino Point are identified for employment growth through the facilitation of the planned redevelopment of the Docklands with relocation of industrial uses and major port facilities.”

The upgrade of the R624 Regional road to Cobh is required to facilitate this objective.

Seveso Policy

PCCC notes the Cork 2050 reference to Seveso: ***“There will be a need for specific national policy provision and financial support for relocating incompatible uses, including Seveso establishments, from the Docklands”*** [including South Docklands and Tivoli].

Seveso developments are critical to the region’s ambition to become an industrial, energy, and agricultural hub. However, the requirement to consider the domino effects of a major accident at a Seveso establishment is a key issue that will influence development potential of City Quays and Tivoli.

⁷A consultation zone of 650m surrounds the liquefied petroleum gas [LPG] above ground storage facilities at Tivoli. High density population development is restricted within this zone. For example in the case of the 61 Ha Tivoli site. In excess of 85 % of the site is effectively restricted from being developed as proposed.

A similar inhibiting scenario also exists in relation to a fertilizer facility in close proximity to City Quays and within South Docklands.

Maintaining this status quo means that more densely populated residential or employment development shall not be permitted within the Seveso consultation zone. Seveso establishments by their nature shall continue to pose significant challenges and additional cost when it comes to relocation, should the need arise.

Inadequate arrangements for the provision of planning policy and legislation that would support the timely relocation of such industry could lessen the potential for the growth of the business zone and (or) provision of housing types which in turn could lead to the Region being less attractive to foreign direct investment and indigenous industry.

PoCC suggests that:

- Seveso facilities relocation and development requirements in the Cork Region need to be considered at the top level and explicitly planned for under a strategic national policy
- a regional Seveso and zoning plan needs to be prepared to identify the appropriate location for such projects in the Cork region
- planning policy and legislation would integrate with chemical acts and legislation for the orderly relocation of Seveso establishments [suitable sites, infrastructure provision and streamlined consenting process for relocation], so that Seveso activities would not impact on regional or national economic performance and ambition of Cork.
- state functions and mechanisms are introduced to include incentives and or penalties to encourage relocation of Seveso facilities.
- without a clear Seveso planning policy, local authorities will lack clarity regarding extent and scope of their role with respect to land use planning in this critical context

⁷ Appendix 1. New Perspective for Tivoli, page 6

SUMMARY

The Port of Cork is a key asset in facilitating national and regional economic growth. Cork and other regional cities can benefit from this asset in terms of developing as a countermagnet to Dublin.

The Port of Cork can positively contribute to the objectives identified in the plans for Ireland 2040 and Cork 2050.

The NPF should consider some key interventions which would support the role of the Port of Cork:

- Port Related Planning Policy Priorities
- Integrated Consenting Process and Delivery Mechanisms
- Infrastructure and Connectivity Upgrades
- Seveso Policy

PoCC suggest that these are necessary interventions to provide definition around project consenting and timelines, thereby de-risking major infrastructure and employment projects and reducing the cost of financing.

The NPF should consider the establishment of an interagency approach for key infrastructural projects which would proactively reduce planning risks before strategic and high employment projects enter the planning application process.

PoCC suggest that streamlining the planning processes, and having a strong policy framework would provide definition for funders. This will allow industry to react swiftly to future challenges and opportunities making the national economy more resilient.

The Port of Cork Company endorses the objectives for Cork Harbour as set out in Cork 2050 with regard to Tourism, Leisure, the Blue Economy, and Sustainable Energy. We actively participate in promoting all of these initiatives as part of our remit as a Port Authority and recognize that Ireland's unique environment and the health and wellbeing of our population is also a key competitive advantage of our region.

On behalf of the Port of Cork Company.

Regards,

[Redacted signature]

[Redacted name]