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**14 June 2024**

## **RE: Consultation on the Draft South Coast Designated Maritime Area Plan for ORE (SC-DMAP)**

Dear Sir/ Madam,

Cork County Council welcomes the publication of the Draft South Coast Designated Maritime Area Plan and the opportunity to make a submission. Having reviewed the documentation, the Council in particular welcomes the following:

- the plan led approach, and particularly the emphasis on an ecosystems-based approach taken to establish the SC-DMAP;
- the proposed governance structure and emphasis on having expert ecological advice to inform decision making. The Council would however like to see confirmation that expert ecologists will be included on SC-DMAP Implementation Board, and not just on the Marine Ecosystems and Ornithology Working Group;
- proposals to establish a shared GIS data repository where data will be stored and through which it can be shared;

- the commitment to carry out regional level surveys to contribute to knowledge on the ecological baseline for areas B (Lí Ban), C (Manannán) and D (Danu) as well as the commitment to fund independent long-term monitoring of SC-DMAPS areas by the Marine Institute. We recommend that consideration be given to replicating these proposals for onshore renewable industries.
- provisions included for monitoring and review of the implementation of SC-DMAP itself. The Council would recommend that a timeline commitment be provided for same.

#### *Available Data*

While we note that the identification of the four areas where ORE projects will be directed was informed by available scientific data consideration needs to be given to how best to ensure that the process is fully informed by completion of regional surveys including ecological surveys.

We recommend that priority be given to the scoping of regional surveys and, in so far as they will apply within the zone of influence of Area A, that these be commenced as soon as possible and within a committed timeline. In the absence of the availability of the results of regional surveys to inform the design, assessment, consenting and development of proposed projects, we strongly recommend that applications for consent for ORE and associated grid connection projects pertaining to Area A, be required to include all relevant ecological baseline data necessary to complete robust environmental, ecological and appropriate assessment processes and that such data be collected, analysed, presented and assessed in accordance with relevant accepted best practices. We further recommend that the Policy Objectives for Mitigation (MI) be revised to include the above mitigatory requirements for Area A. Policies as currently drafted in MI1 (a) do not address Area A.

#### *Marine Protected Areas*

In the context of the climate crisis, the need for urgency to develop offshore renewables is fully supported. We are concerned however, that the Marine Protected Areas Act has not as yet been passed and that the process of designating Marine Protected Areas (MPAs) has not commenced. Considering the extent of development, which is now proposed in the marine environment, we recommend that priority be given to the passing into law of the Marine Protected Areas Act and to the designation of Marine Protected Areas. We recommend that particular priority be given to the designation of candidate MPAs which occur within the zone of influence of the four areas identified for the development of ORE in the SC-DMAP. We also recommend that the NPWS and Marine Institute be fully resourced in terms of staff and expertise to not just fulfil its obligations to support the implementation of this and other DMAPs, and to contribute to the assessment of individual ORE project applications, but to

also complete the process of designation of MPAs. We recommend that the SC-DMAP would include a time bound commitment reflecting same.

#### *Guidelines for Nature Enhancement and Rehabilitation Plans*

We welcome the requirement for all ORE projects to contribute to nature restoration by being required to develop Nature Enhancement and Rehabilitation Plans. While recognising that there is a lot to do, we recommend that priority be given by the SC-DMAP Implementation Board and the Marine Ecosystems and Ornithology Working Group to the preparation of guidelines to assist with the development of such plans. We recommend that any such guideline would include guidance on quantifying net gain for biodiversity as well as methods to achieve same.

#### *Electricity Transmission*

In order to minimise the development footprint and impacts on both the marine and terrestrial environment, we recommend that the SC DMAP include a commitment that the development of electricity transmission systems for ORE projects be co-ordinated.

#### *Appendix B: Pre-consent Surveys.*

We recommend that references for accepted and recommended best practice survey techniques be cited in Appendix B.

#### *Natura Impact Statement*

We note that the Natura Impact Statement includes an assessment of each of the **policy statements** included in the draft SC-DMAP. However, it does not appear to include any assessment of the **four areas** selected, as to whether these **areas** are the right locations for ORE, having regard to the potential for adverse effects on EU sites, and their related qualifying interest habitats and species, particularly mobile and/or migratory species such as cetaceans and seabirds. We are concerned that this approach may not be in accordance with the requirements of the Directive and may result in overreliance on project level assessment to determine likely effects on individual EU sites. This approach may therefore need to be reconsidered.

#### *Built Heritage*

In order to avoid any possible unforeseen impacts on built heritage, it is recommended that consideration be given to including an objective to 'support and facilitate coexistence between ORE development and built cultural heritage sites, subject to carrying out

assessment at plan and project level for these activities as required, and the outcome of planning and/or conservation guidance as relevant.

### *Land and Sea interactions*

The Council acknowledges the importance of the development of the offshore renewable energy sector and further recognises the opportunities the sector presents for the blue economy. The Cork County Development Plan 2022 contains policy and objectives to support the development of the offshore renewable energy sector, and the investment needed in landside and other supporting infrastructure, to ensure alignment between terrestrial and marine planning policy.

In addition, in March 2024 Cork County Council published its vision statement for establishing Cork as Ireland's leading offshore wind energy and green energy location (See attached appendix). The vision statement outlines how Cork's unique collection of strategic energy infrastructure, ports and natural energy storage assets, located within Cork Harbour and along the Cork coastline, provide a strong platform to establish Cork as a leading offshore renewable energy location, with early mover advantage for green industrial parks/ a green energy valley and associated maritime services. The vision is that, by 2030, renewable offshore power will be coming ashore in Cork; that Cork Harbour will have established offshore wind assembly, marshalling and servicing capability; the Celtic interconnector will be operational, and the Kestrel gas storage facility will be under development. This will support Cork based industry in decarbonising their energy demand and enable new industries to locate in Cork to take advantage of the availability of green energy. In the longer term, the statement outlines the potential to export energy and produce fuels such as green hydrogen in Cork.

In this context, the Council welcomes the support, within the SC DMAP, for the sustainable development of strategically positioned ports and harbours along or within proximity to the South Coast of Ireland, to facilitate the accelerated deployment of offshore wind.

The Council particularly welcomes policy objectives LS1 and LS2 on Land and Sea Interactions, and policy objective PH1 on Ports and Harbours, which support the coordination of land and sea interactions and the alignment of terrestrial plans and policies that deliver sustainable investment in enhancing the capacity of onshore infrastructure, including port infrastructure, to support and enable the development of offshore renewable energy projects off the South Coast. Both Cork Harbour and Youghal are well positioned, for example, to support developments in Area A 'Tonn Nua'.

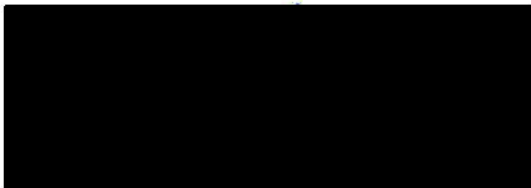
The Council further welcomes Policy Objective EC1 for Employment and Employment Growth Potential, supporting actions in relation to research, innovation, skill development in the sector etc., to ensure communities of the south coast are equipped to capture the economic and investment opportunities associated with the development of ORE.

The Draft Offshore Renewable Energy Future Framework Policy Statement (2024) identifies essential components that need to be in place for ORE systems, including strengthened electricity grids, energy storage, supply to centres of high energy demand close to the ORE resource, interconnectors and port facilities that enable marshalling and assembly (M&A) and operations and maintenance (O&M) of offshore wind development. The Council would like to see a co-ordinated strategic approach to addressing these issues and ensuring that the necessary infrastructural capacity is delivered in a timely manner so the investment and employment opportunities can be captured on shore within County Cork, and across the South Coast.

The Council looks forward to the finalisation of the SC DMAP and the progression to the next stage of Maritime Area Consent, assessment, and permission for development.

If we can offer any further assistance, please let us know.

Yours sincerely,



CHIEF EXECUTIVE

CORK COUNTY COUNCIL

**Designated Public Official under the Regulation of Lobbying Act 2015**