Department of Housing, Planning, and Local Government
Custom House
Dublin 1

7th December 2018
by email: msp@housing.gov.ie

RE: National Marine Planning Framework SUBMISSION

To whom it may concern:

This Submission has been prepared by Brady Shipman Martin on behalf of our client, Drogheda Port Company, Harbourville, Mornington Road, Drogheda Co. Meath, in response to the request for submissions issued by the Department of Housing, Planning and Local Government, on the release of the National Marine Planning Framework (NMPF) Baseline Report.

1. INTRODUCTION

Drogheda Port Company (DPC) welcome the advent of a national plan for Ireland’s seas. DPC support the intent of the Baseline Report issued for public consultation, and welcome the role the NMPF will have “..at the top of the hierarchy of plans and sectoral policies for the marine area”. DPC supports the stated objective that the NMPF will “provide a coherent framework in which these sectoral policies and objectives can be realised”.

DPC notes the EU MSP Directive 2014/89/EU which obliges all Member States to establish maritime plans by 2021, “which consider economic, social and environmental aspects to support sustainable development and growth in the maritime sector”.

The purpose of this submission is to ensure the National Marine Planning Framework takes account of the importance of Drogheda Port at both the national and regional level and as such incorporates the strategic policies and objectives necessary to support Drogheda Port. While Drogheda Port is currently designated as a Port of Regional Significance, it has the significant additional designation of being part of Ireland’s core port network and identified under the European designation TEN-T. It is the only commercial regional port in Ireland to have this designation. This designation is of national significance.

Drogheda Port plays an important role in the national and regional economy by facilitating the movement of goods in an efficient and cost-effective manner. The Port will experience new challenges in the coming years such as adapting to new market conditions and increasingly larger vessels. The National Marine Planning Framework should recognise the significance and importance of Drogheda
Port as strategic infrastructure which underpins the economic functioning of the economy. It is the fifth largest bulk port in Ireland and the largest regional commercial port.

We submit that the National Marine Planning Framework should provide the necessary supporting objectives and policies to facilitate the ongoing operations and future development of Drogheda Port and associated activities. The Port has a number of existing strengths which should be preserved and further opportunities which should be exploited.

2. ALIGNMENT OF THE NMPF WITH POLICY

NATIONAL POLICY

The National Ports Policy (NPP) was published in 2013 by the Department of Transport, Tourism and Sport. It aims to ‘facilitate a competitive and effective market for maritime transport services’.

It recognises the long term international trend in port and shipping is toward increased consolidation of resources in order to achieve optimum efficiencies of scale which has implications for vessel size, water depth and the type and scale of port transport connections.

The NPP categorises Irish ports into Ports of National Significance (Tier 1), Ports of National Significance (Tier 2) and Ports of Regional Significance (Drogheda Port).

The NMPF Baseline Report focuses heavily on the role of Tier 1 Ports (as identified in National Ports Policy). We believe the NMPF needs to recognise the role of all ports in servicing the Irish economy, and particularly the role which regional ports play in accommodating displacement of tonnages that the Tier 1 ports cannot, or do not want to, accommodate. The layering of this port infrastructure hierarchy must be recognised and supported in the NMPF, otherwise Tier 1 Ports would cease to function effectively by reaching capacity at an earlier stage. This is particularly noteworthy given recent indications by Dublin Port that they are now looking at capping capacity at the end of their current master plan developments. While the ports of national significance are currently our key international gateways, the focus must be on the potential for other ports to act as such gateways, to ensure continued sustainable development and growth of our economy, at a national and at a regional level.

The increased demand for goods and services in the region coupled with continued strong economic growth, justify greater investment and support for Ports beyond Dublin within the region. Capacity, infrastructure and channel constraints in Dublin Port could result in a bottleneck and impact the entire region’s competitiveness. Drogheda Port is an underutilised resource in this regard.

The port serves the needs of regional industry which rely on Drogheda Port as a distribution centre and to transport their products which are often bulk goods.
As a key piece of transport infrastructure and as source of indigenous employment, Drogheda Port is making a significant contribution to the regional economy and there are excellent opportunities to further develop this role. It is put forward that this needs to be captured in the NMPF to fully represent the role of the non-Tier 1 ports in areas of national significance.

- Drogheda port specifically should be recognised as being included in the **EU list of core ports under the GDA port cluster**, making it eligible for Connecting Europe Facility (CEF) and TEN-T funding. The Connecting Europe Facility (CEF) is a funding framework to support key EU investments in transport (Trans-European Transport Networks, TEN-T), energy (Trans-European Energy Networks, TEN-E) and Broadband and Information and Communication Technologies (ICT).

- **The GDA Port Cluster** should be identified and referenced in the plan as offering unique development opportunities in the future.

- **EU Motorways of the Sea** designation includes the GDA port cluster as far as Drogheda Port on the East coast. (See Fig. 1 below).

**Motorways of the Sea (MoS)**

Motorways of the Sea (MoS) is the maritime pillar of the TEN-T (Trans European Transport Networks). It consists of short-sea routes, ports, associated maritime infrastructures, equipment, facilities and relevant administrative formalities. MoS contributes towards the achievement of a European Maritime Transport Space without barriers, connecting Core Network Corridors by integrating maritime links with hinterland. In doing so, it aims at providing more efficient, commercially viable and sustainable alternatives to road-only transport. MoS taps into the huge potential of maritime transport as the backbone of international trade. MoS removes bottlenecks in the EU transport system, thus supporting more efficient and high-quality maritime links and services between Member States.

**Figure 1** EU Motorways of the Sea
It is essential that Drogheda Port be represented in the NMPF as a key port in the GDA Port Cluster, recognising its shipping routes, and its key role and potential within the MoS European Transport Networks.

Figure 2 Drogheda Port Limits, Pilotage Limits and Shipping Navigation Corridors
• **Drogheda Port as a strategic waste export facility**

Under national waste policy notwithstanding existing and planned incineration capacity, it is recognised that Ireland is likely to continue to rely significantly on the export of residual waste. Drogheda Port Company, given its strategic location proximal to the largest population centres and waste markets in Ireland, is a key part of Ireland's waste export infrastructure. It is also the Department’s view that export remains an important option for purposes of ensuring a proper functioning and competitive waste market.

Currently, Drogheda has the largest IED licenced facility in Ireland for waste export at 500,000 tonnes p.a.

Drogheda Port Company plays a strategic role at a national level in waste management. This reinforces the national role which the Port plays in national issues, for which the Tier 1 Ports do not have capacity.

**REGIONAL & LOCAL POLICY**

**Draft Regional Spatial Economic Strategy (2018)**

The recent publication of the draft Regional Spatial Economic Strategy for the Eastern and Midland Region sets out that the regional ports are important centres of economic activity, and seeks to protect and support the role of regional ports as economic drivers for the Region, including Drogheda.

With specific regard to Drogheda Port, RPO 4.9 aims to support the role of Drogheda Docklands and Port by:

- Supporting and protecting the role of Drogheda Port as a port of regional significance.
- Facilitate relocation of Drogheda Port subject to a feasibility study and appropriate coastal zone management.
- Supporting the future development of the Port Access Northern Cross Route (PANCR).

It is submitted that this regional significance of Drogheda Port be strengthened in the NMPF to recognise its important role within the GDA Cluster, on the east coast of Ireland.

This is further supported by regional and local policy as set out below.

The Regional Planning Guidelines for the Greater Dublin Area point to the need, at Strategic Policy PIR8:  

“**To make provisions in future Plans that examine the growth of Dublin Port and the possibility of a new Port and associated facilities and infrastructure on the coast of the GDA to facilitate future long term growth needs of the State, in accordance with the planning and environmental processes. Authorities should liaise with Port and Harbour Authorities in their area to identify key issues and support the role of smaller ports and harbours in the GDA in an integrated manner.”**
This policy echoes the content and intention of this submission. Drogheda Port can contribute to long term growth needs of the State and should be integrated into the policies and objectives for the Region, and recognised at national marine planning level.

This is further endorsed by local policy at Meath County Council level, where the Meath County Development Plan 2013-2019 acknowledges the proposal by Drogheda Port “to develop a world class deepwater port, logistics centre and business park at Gormanston, County Meath. The development of the deepwater port would transform the economic and employment prospects of the East Meath – North Fingal area and establish a new economic hub on the Dublin – Belfast M1 Corridor. The current status of the project is that prefeasibility and environmental / habitat assessment has been carried out.” Adding: “Meath County Council is committed to the development of a deep water port and associated landside activities in East Meath.”

| ED POL 10: To facilitate the sustainable development of a new deep water port in East Meath. |
| ED POL 11: To facilitate associated landside activities to support a proposed deep water port, in order to maximise the economic benefits to nearby communities and minimizing any negative impacts of landside activities on such communities or the environment and heritage of the area. |

This important County Development Plan objective and initiative needs to be recognised and included in the NMPF in order to ensure recognition of the need for continued resilience of Irish ports in contributing to Irish economic growth. It is critical in recognising the future potential of Irish ports beyond the existing port infrastructure, and the current and future potential of the GDA Port Cluster.

This inclusion would reflect the intent and strategy of the National Planning Framework, finalised in February 2018. (See Figure 3 below).
Figure 3 Proposed Bremore Port Limits, Pilotage Limits and Shipping Navigation Corridors
3. MARINE AGGREGATES
Drogheda Port Company wishes to correct the reference in Section 14.2 of the NMPF Baseline Report to the use of marine aggregates. DPC have already established a programme for beneficial reuse of marine aggregates into the construction industry with a private partner (see further detail below). This programme was established in 2010. DPC intends to grow this sector as the market leader. There are currently no port reception facilities, other than Drogheda Port, for increasing volumes of aggregates into the future. Tier 1 Ports do not plan to provide any such facilities on the east coast. DPC would agree that the NMPF should highlight the importance of this future requirement.

It is further asserted here that the IMAGIN study should be revisited and its geographic scope expanded, and consequent recommendations implemented. Its initial limited geographic remit was a result of the initial partnership being with Wales under an Interreg funding programme.

Drogheda Port & Kilsaran Concrete
Consideration of Marine Aggregates within the Marine Special Planning Regime
With the current high demand for construction aggregates in the Greater Dublin and Cork regions it is essential that provision is made for the continuity of supply of construction aggregates. Land based aggregate sources, particularly sand deposits are becoming scarce, with potential negative cost implications of supply of materials to the building sector. Rising construction costs are impacting the delivery of affordable housing, offices and major infrastructure projects, all of which will contribute to financial instability and further budgetary inflation moving forwards. Marine aggregate can also be used for beach replenishment, supporting coastal defence projects.

Kilsaran Concrete has been engaged with Drogheda Port Company for some time now providing a beneficial re-use for dredged sand from the approach channel of the River Boyne. Extraction of marine aggregates is a long established practice in European waters and elsewhere throughout the world where sustainable working practices have been developed over many decades. Preliminary studies have identified that substantial aggregates resources exist in Ireland’s coastal waters (IMAGIN Project). It is essential that marine aggregates are acknowledged and provision for extraction and landing is made within the evolving National Marine Planning Framework process. Additional easy coast deepwater bulk port facilities will be required in the near future to facilitate this resource opportunity.
4. SUSTAINABILITY

The NMPF sets out at 17.29 that “unnecessary diversion of sea traffic increases environmental impacts and constriction of routes and sea space can increase risk of maritime incidents”. In this regard, this submission asserts that the denotation of the maritime corridors to each port should be carefully identified in conjunction with each individual port. It should take cognisance of all the approach corridors from the north, east and south, the Ports jurisdictional limits, its pilotage limits, existing and planned Navigational aid locations, Port dredge material disposal site current and non-active, EU maritime corridors (MOS and Ten-T). This would ensure Port operations are protected and that sustainable shipping practices are optimised.

5. CONCLUSION

In order for Ports to deliver on the objectives of the NMPF, it is essential that the Framework recognises the role which each port currently plays, and can play in to the future.

Drogheda Port Company is a strong regional port delivering on economic, social and environmental goals in the eastern region. Equally, it is a port which plays a strong role in the delivery of national objectives given its inclusion in the EU list of core ports under the GDA port cluster, part of the Motorways of the Sea designation, with eligibility for CEF and TEN-T funding to achieve EU objectives. We have included, for ease of reference, mapping of the current critical operational jurisdiction and navigational corridors for the functioning of Drogheda Port and these should be maintained in any overall spatial mapping proposed.

Yours sincerely,

Pauline Byrne
Partner
Brady Shipman Martin

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