# Strategic Environmental Assessment (SEA) Statement



Brady Shipman Martin Built.

Strategic Assessment Built Environment Est. 1968

Environment.

Client:

Fáilte Ireland 24 September 2024

Date:

#### DOCUMENT CONTROL SHEET

# 7052\_RP01\_Strategic Environmental Assessment (SEA) Statement

Project No.	7052
Client:	Fáilte Ireland
Project Name:	Cork City, Harbour and East Cork Destination & Experience Development Plan
Report Name:	SEA Environmental Report
Document No.	RP01
lssue No.	01
Date:	24/09/2024

This document has been issued and amended as follows:

lssue	Status	Date	Prepared	Checked
01	Final	24 Sep 2024	NK	ТВ

Strategic Environmental Assessment (SEA) Statement

# Contents

Glos	ssary	i
1	Introd	uction 1
	1.1 1.2	Overview
	1.2	Appropriate Assessment
	1.5	Content of the Strategic Environmental Assessment Statement
	1.5	SEA Stages and Process
2	Integr	ation of Environmental Considerations into the Plan5
	2.1	Introduction5
	2.2	SEA Consultation
	2.2.1	SEA Scoping Consultation
	2.2.2	Draft Plan Consultation
3	SEA Er	nvironmental Report
	3.1	Strategic Environmental Objectives
	3.2	Assessment of Effects of the Cork City, Harbour and East Cork Destination Experience Development Plan
	3.3	Mitigation Measures
4		
4	Assess	ment of Alternatives
	4.1	Introduction
	4.2	Alternative 1: Do-nothing / Do-Minimum
	4.3	Do-something (Alternatives 2A and 2B: Prepare a Plan)56
	4.4	Assessment of Alternatives
	4.5	Reasoning for Selection of the Preferred Alternative
5	Monit	oring
6	Refere	ences

# Glossary

#### Appropriate Assessment

The obligation to undertake Appropriate Assessment derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC. AA is a focused and detailed impact assessment of the implications of a strategic action or project, alone and in combination with other strategic actions and projects, on the integrity of a Natura 2000 site in view of its conservation objectives.

#### Biodiversity and Flora and Fauna

Biodiversity is the variability among living organisms from all sources including inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems' (United Nations Convention on Biological Diversity 1992).

Flora is all of the plants found in a given area.

Fauna is all of the animals found in a given area.

#### **Environmental Problems**

Annex I of Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the assessment of the effects of certain Plans and programmes on the environment (the Strategic Environmental Assessment Directive) requires that information is provided on 'any existing environmental problems which are relevant to the plan or programme', thus, helping to ensure that the proposed strategic action does not make existing environmental problems worse.

Environmental problems arise where there is a conflict between current environmental conditions and ideal targets. If environmental problems are identified at the outset they can help focus attention on important issues and geographical areas where environmental effects of the plan or programme may be likely.

#### **Environmental Vectors**

Environmental vectors are environmental components, such as air, water or soil, through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings.

#### **Mitigation Measures**

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing a human action, be it a plan, programme or project. Mitigation involves ameliorating significant negative effects. Where there are significant negative effects, consideration should be given in the first instance to preventing such effects or, where this is not possible, to lessening or offsetting those effects.

#### **Protected Structure**

Protected Structure is the term used in the Planning and Development Act and Regulations (as amended) to define a structure included by a planning authority in its Record of Protected Structures. Such a structure shall not be altered or demolished in whole or part without obtaining planning permission or confirmation from the planning authority that the part of the structure to be altered is not protected.

Strategic Environmental Assessment (SEA) Statement

#### **Recorded Monument**

A monument included in the list and marked on the map which comprises the Record of Monuments and Places that is set out County by County under Section 12 of the National Monuments (Amendment) Act, 1994 by the Archaeological Survey of Ireland. The definition includes Zones of Archaeological Potential in towns and all other monuments of archaeological interest which have so far been identified. Any works at or in relation to a recorded monument requires two months' notice to the former Department of the Environment, Heritage and Local Government (now Department of Arts, Heritage and the Gaeltacht) under Section 12 of the National Monuments (Amendment) Act, 1994.

#### SEA (Strategic Environmental Assessment)

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt it.

#### **SEA Scoping**

Scoping is the process of determining what issues are to be addressed, and setting out a methodology in which to address them in a structured manner appropriate to the plan or programme. SEA coping is carried out in consultation with appropriate environmental authorities.

#### Strategic Actions

Strategic actions include: Policies / Strategies, which may be considered as inspiration and guidance for action and which set the framework for Plans and programmes; Plans, sets of coordinated and timed objectives for the implementation of the policy; and Programmes, sets of projects in a particular area.

#### Strategic Environmental Objective (SEO)

Strategic Environmental Objectives (SEOs) are methodological measures developed from policies which generally govern environmental protection objectives established at international, Community or Member State level and are used as standards against which the provisions of the Masterplan and the alternatives can be evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects – unmitigated

# 1 Introduction

# 1.1 Overview

This is the Strategic Environmental Assessment (SEA) Statement for the Cork City, Harbour and East Cork Destination Experience Development Plan (hereafter referred to the 'Plan' or the 'CDEDP').

This SEA Statement, which should be read in conjunction with the CDEDP, has been prepared by Brady Shipman Martin, environmental, planning and landscape consultants, on behalf of Fáilte Ireland, the National Tourism Development Authority.

The following report has been prepared to comply with the provisions of Article 16(2)(b) of S.I. 435 of 2004 – European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations – as amended by S.I. 200 of 2011 – European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011.

Directive 2001/42/EC<sup>1</sup> on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') requires EU Member States to assess the 'likely significant environmental effects' of plans and programmes prior to their adoption. This provides for the assessment of strategic environmental considerations at an early stage in the decision-making process. SEA is a process for evaluating, at the earliest appropriate stage, the environmental quality and consequences of Plans or Programmes (P/Ps). The purpose is to ensure that the environmental consequences of P/Ps are assessed both during their preparation and prior to their adoption. The SEA process also gives specified environmental authorities, interested parties and the general public, an opportunity to comment on the environmental impacts of the proposed P/P and to be kept informed during the decision-making process.

Article 1 of the SEA Directive states that:

"The objective of this directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment."

The SEA Directive was transposed into Irish law through:

- Statutory Instrument (S.I.) No. 435 of 2004 (the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004), as amended by S.I. No. 200 of 2011 (the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011); and
- S.I. No. 436 of 2004 (the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2004), as amended by S.I. No. 201 of 2011 (the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011).

The former regulations, (S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011), relate to SEA as it applies to plans or programmes prepared for *"agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism and town and country planning or land use"*, and these provisions are applicable to the CDEDP as a tourism sector plan.

<sup>&</sup>lt;sup>1</sup>SEA Directive: <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN</u>

Strategic Environmental Assessment (SEA) Statement

The latter regulations (S.I. No. 436 of 2004 as amended by S.I. No. 201 of 2011) relate to SEA as it applies to plans or programmes where the context requires, "a development plan, a variation of a development plan, a local area plan (or an amendment thereto), regional planning guidelines or a planning scheme", and are not applicable to the CDEDP.

This SEA Statement is a reflective document that looks back on the SEA process, what has been achieved and it also sets out what monitoring will be done in the future.

# **1.2 Destination & Experience Development Plans**

A Destination Experience Development Plan (DEDP) is a five year commercial destination and experience development plan prepared for an area.

The Cork City, Harbour and East Cork DEDP focuses on increasing the value of tourism in Cork City, Cork Harbour and East Cork by growing the appeal of the destination, reducing seasonality and increasing visitor spend. The CDEDP has been prepared through a consultative process involving tourism industry representatives, members of the local community and Cork County Council.

#### **1.3** Appropriate Assessment

The EU Habitats Directive (92/43/EEC) requires an Appropriate Assessment (AA) to be carried out where a plan or project is *likely to have a significant impact* on a Natura 2000 site. Natura 2000 sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

Stage 1 is to establish whether AA is required for the particular plan or project. This stage is referred to as 'screening for the requirement for AA', and its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project, alone or in combination with other plans or projects, could have significant effects on a Natura 2000 site, in view of the site's conservation objectives.

As set out in Department Circular Letter SEA 1/08 & NPWS 1/08<sup>2</sup> (15 February 2008), Screening for AA is of relevance to SEA screening in that *"where following screening, it is found that the draft plan or amendment may have an impact on the conservation status of a Natura 2000 site or that such an impact cannot be ruled out, adopting the precautionary approach:* 

- An AA of the plan must be carried out, and
- In any case where SEA would not otherwise be required, it must also be carried out."

Hence, where a plan requires AA, it shall also require SEA.

A Stage 2 Appropriate Assessment (AA) and the preparation of a Natura Impact Statement (NIS) has been undertaken alongside the preparation of the CDEDP and the SEA Environmental Report.

The AA has concluded that the CDEDP will not affect the integrity of the Natura 2000 network.

#### **1.4 Content of the Strategic Environmental Assessment Statement**

In accordance with Article 16(2)(b) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, (as amended by S.I. 200 of 2011), the SEA Statement will summarise the following:

(i) how environmental considerations have been integrated into the Plan or programme, or modification to a plan or programme;

<sup>&</sup>lt;sup>2</sup> NPWS SEA letter: <u>https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf</u>

Strategic Environmental Assessment (SEA) Statement

- (ii) how:
  - (I) the environmental report prepared pursuant to article 12,
  - (II) submissions and observations made to the competent authority in response to a notice under article 13, and

(III) any consultations under article 14.

have been taken into account during the preparation of the plan or programme, or modification to a plan or programme,

- (iii) the reasons for choosing the plan or programme, or modification to a plan or programme, in the light of the other reasonable alternatives dealt with, and
- (iv) the measures decided upon to monitor, in accordance with article 17, the significant environmental effects of implementation of the plan or programme or modification to a plan or programme.

#### **1.5 SEA Stages and Process**

The key focus of SEA is to take environmental issues, and in particular '*likely significant environmental effects*' of a P / P, into consideration during the plan or programme making process. The key stages in the SEA process as they relate to the CDEDP are outlined in **Table 1.1** below.

Stage Description		Status
1. Screening	The requirement to undertake a SEA is mandatory for certain Plan / Programme (P / P). Where SEA is not a mandatory requirement, the P / Ps is subject to a 'Screening process', to consider if it is <i>likely to</i> <i>have significant effects</i> on the environment, and therefore, if SEA is required. The preparation of the <i>Draft CDEDP</i> has been screened for Appropriate Assessment (AA) and it has been concluded that potential for effects on the integrity of European sites cannot be excluded beyond all reasonable scientific doubt and is required to undergo Appropriate Assessment. Therefore, in accordance with <i>Circular Letter SEA 1/08 &amp; NPWS</i> <i>1/08</i> the <i>Draft CDEDP</i> was also required to undergo a Strategic Environmental Assessment (SEA) in accordance with <i>Directive</i> <i>2001/42/EC on the assessment of the effects of certain plans and</i> <i>programmes on the environment</i> (known as the SEA Directive).	Completed
2. Scoping	<ul> <li>Preparation of a SEA Scoping Report highlighting that the Environmental Report is required to include:</li> <li>methods of assessment;</li> <li>contents and level of detail in the Plan / Programme;</li> <li>the stage in the Plan or Programme-making process; and</li> <li>the extent to which certain matters are more appropriately assessed at different levels in the decision-making process in order to avoid duplication of environmental assessment.</li> <li>Scoping provides for consultation with the Environmental Authorities specified in Article 13 of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011, and the process allows for incorporation of the views of the environmental authorities within the P / P and the SEA Environmental Report.</li> </ul>	Completed

#### Table 1.1 Outline of the SEA Process

Stage	Description	Status
3. Environmental Report	Stages in the 1 / 1 making (e.g. Diart, Amended Diart etc.), are	
4. SEA Statement	<ul> <li>Completion / adoption of the Final CDEDP, taking account of <i>likely</i> significant environmental effects, any submissions or observations received from consultations and integration of mitigation and monitoring measures within the Plan.</li> <li>The Environmental Report is concluded and an SEA Statement is prepared in accordance with Article 16(2)(b) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011, summarising:</li> <li>how environmental considerations have been integrated into the Plan / Programme;</li> <li>how the environmental report, and any submissions /observations or consultations have been taken into account in the preparation of the Plan / Programme;</li> <li>the reasons for choosing the Plan / Programme in light of the other reasonable alternatives dealt with; and</li> <li>the measures decided for monitoring the significant environmental effects of implementation of the Plan / Programme.</li> </ul>	Completed
5. SEA Monitoring	The Plan is adopted and implemented, and the environmental effectiveness of the implementation of the Plan is monitored and reported on through the life of the Plan.	On-going

# 2 Integration of Environmental Considerations into the Plan

# 2.1 Introduction

This section details how both the SEA Environmental Report and submissions and observations made to the planning authority on the Environmental Report and SEA process have been taken into account during the preparation of the CDEDP.

The SEA and AA team worked with the Plan-preparation team at Fáilte Ireland in order to integrate requirements for environmental protection and management into the Plan. Consideration has been given to the requirement to undertake environmental assessment of this Plan in order to ensure full legal compliance and to further integrate protection, enhancement and promotion of the environment in developing and implementing the Plan. The key findings of the SEA and AA Process for the Plan and key requirements for Environmental Protection and Management are included in Appendix 1 of the CDEDP.

# 2.2 SEA Consultation

A number of opportunities are integrated into the plan-making process to allow for consultation with the environmental authorities and the general public on the plan and SEA. Submissions and observations were made at each of these stages, and these informed the preparation and finalisation of the Plan and the SEA process.

#### 2.2.1 SEA Scoping Consultation

SEA Scoping (Stage 2) consultation with the Environmental Authorities specified in Article 9(5) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011 and for incorporation of the views of the Environmental Authorities within the Plan or Programme and the SEA Environmental Report.

The consultation was undertaken with the following Environmental Authorities specified in Article 9(5) of S.I. No. 435 of 2004, as amended, on 08 May 2023:

- Environmental Protection Agency (EPA);
- The Minister for Housing, Local Government and Heritage;
- The Minister for the Environment, Climate and Communications;
- The Minister for Agriculture, Food and the Marine;
- Department of Tourim, Culture, Arts, Gaeltacht, Sport and Media.

Submissions / observations on the scoping of the Environmental Report were received from the environmental authorities and comments have been incorporated into the Plan and Environmental Report as set out in **Table 2.1**.

Strategic Environmental Assessment (SEA) Statement

#### Table 2.1 SEA Scoping Submissions / Observation from Environmental Authorities

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
Department of Environment, Climate & Communications	The submission noted that the Planning Advisory Division acts on behalf of the Department as a statutory consultee within the planning system. The Department provides observations in relation to County Development Plans, Local Area Plans and Strategic Environmental Assessments. The Department does not provide observations for individual planning applications, EIA or individual developments.	The response has been noted.
Geological Survey of Ireland (GSI)	GSI encourage use of and reference to their datasets attached to their submission. These include geoheritage (county geological sites), geotourism, dimension stone/stone built Ireland, groundwater, geological mapping, geotechnical database resources, geohazards, marine and coastal unit, national coastal change assessment, physiographic units.	The information and datasets provided have informed the preparation of the Environmental Report.
	GSI also includes a list of publicly available datasets relevant to planning, EIA & SEA processes.	
	It is noted that County Geological Site audit for Co. Cork commenced in 2021 and will be completed in 2023. The audit for Cork City was complete in 2022 and eight County Geological Sites were recognised in Cork City.	
Department of Agriculture, Food & Marine (DAFM)	The submission from DAFM highlights the following information: Fishery Harbour - There are no impacts or requirements on fishery harbours.	The response has been noted and the information provided has informed the preparation of the Environmental Report.
	Aquaculture – DAFM advise that scoping should be mindful of Aquaculture licensed sites and their role. This includes their locations, required landside infrastructure such as piers & landing place, navigational requirements of licensed sites.	
	Sea fishing - no significant impacts.	-
	Cumulative impact - DAFM state that they are not aware of any other development, plans or projects that may in conjunction with this application, require further scoping.	
	Conclusion- DAFM advise that consideration be given to Aquaculture and potential for future aquaculture and its effects.	

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
Environmental Protection Agency (EPA)	The submission from EPA includes the following comments and recommendations: EPA highlights several key environmental issues to consider in preparing the Plan and SEA. The Plan should set out the implementation arrangement and governance structures, document synergy between the Plan and key national plan and programmes, reflect objective of the SEA Directive. The SEA shall address climate & biodiversity issues.	The information provided has informed the preparation of the Plan and the Environmental Report.
	Recommendations from the SEA & AA including mitigation measures and monitoring proposals should be integrated into the Plan. SEA Environmental Report and the Plan should include a chapter on how the recommendations and mitigation measures have been incorporated into the Plan.	
	EPA recommend that the Plan includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and Plan policies/measures.	
	EPA recommend that the SEA Environmental Report should include summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Plan policies/measures.	
	The submission describes the key findings and chapters of the 'State of the Environment Report- Ireland's Environment An Integrated Assessment 2020'. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.	
	EPA highlights the requirement under the SEA Regulations to consult with Environmental Authorities (EPA, Minister of Housing, Local Government & Heritage, Department of Environment, Climate & Communications, Minister of Agriculture, Food and the Marine)	
	Appendix I to the EPA submission includes comments on the SEA Scoping Report - scope of the SEA, data and knowledge gaps, range of effects, monitoring, implementation & reporting, SEA statement, integration with other key Plans and Programmes, available guidance & resources, webtools.	

Environmental Authority	Outline of Nature of the Submission	Response submission	consideration	of	nature	of
	EPA submission also includes attached - 'SEA of Local Authority Land-Use Plans - EPA Recommendations and Resources 2023 (Version 1.19)'					

#### 2.2.2 Draft Plan Consultation

The Draft CDEDP, together with the SEA Environmental Report and Natura Impact Statement (NIS) were placed on public display.

Consultation was also undertaken with the Environmental Authorities as specified in Article 13 of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011 and for incorporation of the views of the Environmental Authorities within the Plan or Programme and the SEA Environmental Report.

Submissions received are detailed in Table 2.2 below.

Strategic Environmental Assessment (SEA) Statement

#### Table 2.2 SEA Consultation Response

Submission	Outline of Nature of the Submission	Response to consideration of nature of submission
Department of Housing, Local Government and Heritage (Minister of State for Nature, Heritage and Electoral Reform)	The response from the Department acknowledges the receipt of the draft Plan and environmental assessments. The submission notes that they have forwarded it to Development Applications Unit. No further comments received.	The response has been noted.
Geological Survey of Ireland (GSI)	The submission from GSI encourages the use of their various datasets for EIAR, SEA, planning and scoping processes. GSI highlight their recently completed geological heritage audit for Co. Cork and inclue a link to the full report.	The information provided has informed the preparation of the Plan and the Environmental Report.
Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media	The response from the Department acknowledges the receipt of the correspondence.	The response has been noted.
Environmental Protection Agency (EPA)	The submission from EPA includes the following comments and recommendations: Ensure the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.	The information provided has informed the preparation of the Plan and the Environmental Report.
	Visitor Numbers EPA note that central to the Plan is the aim of increasing visitor numbers. This increase has the potential to disturb or damage the natural environment, if not carefully managed. Where the expected increase in tourist numbers materialises, there may be a need for additional or expanded tourism and tourism-related developments. Such developments may have implications for changes to land use, loss of green field sites, disturbance to natural or cultural heritage (including designated sites and protected species, etc.). It is important that tourism offerings are developed at suitable locations and in an environmentally sustainable manner, which minimises potential adverse environmental impacts.	The Plan and the Environmental Report take into account integrating requirements for environmental protection annd management under Appendix 1 and is also considered throughout the Plan.

Submission	Outline of Nature of the Submission	Response to consideration of nature of submission
	Critical Infrastructure Provision In the context of increased visitor numbers and any potential development, the Plan should recognise the need for adequate and appropriate wastewater and drinking water services to be put in place to service any infrastructural development associated with Plan-related projects, in the interests of protecting both the environment and public health. In this context, Fáilte Ireland should liaise with Úisce Éireann in terms of future needs for provision of adequate critical services.	This is already referenced in Section 6 of Appendix $1 - 6$ . Infrastructure and Capacity Considerations.'. As such this is already included and no further change is required.
	Biodiversity Considerations EPA state that it is important that the various important ecosystem services and designated sites / protected species within the Plan area are afforded significant protection. This should be considered carefully, to ensure that any additional tourism developments are sited, designed, operated and maintained in an appropriate manner. In seeking to enhance tourism developments, the need to maintain and protect the significant environmental resources of the area should also be a clear objective.	The following reference has been added to the final Plan: <i>"Identification and mapping of the key</i> <i>environmental sensitivities of relevance to the</i> <i>Plan are detailed in the SEA Environmental</i> <i>Report and in the AA Natura Impact Statement."</i>
	EPA suggest that key findings of the SEA and AA processes are incorporated into the Plan, as shown in Appendix 1. It may be useful to include a map, showing the key elements of environmental sensitivity in the area.	
	EPA note the commitment to working closely with stakeholders in delivering many of the projects included in the Plan. Those projects should take into account the requirements of the EIA, Birds and Habitats Directives, as appropriate. The potential for cumulative effects that may arise from multiple tourism initiatives needs to be a key consideration also. It will be important that environmental management plans are prepared as appropriate, to ensure that important environmental and cultural resources are afforded significant protection.	The information provided has informed the preparation of the Plan and the Environmental Report.
	EPA advise to refer to the following guidance document- <i>Good practice guidance on SEA for the tourism sector</i> (EPA, 2023), <i>Good practice guidance on SEA and landscape</i> (EPA, 2023), EPA Guidance on the <i>Tiering of environmental assessments</i> – <i>The influence of Strategic</i>	The information provided has informed the preparation of the Plan and the Environmental Report.

Submission	Outline of Nature of the Submission	Response to consideration of nature of submission
	<i>Environmental Assessment on Project level Environmental Impact Assessment</i> (EPA, 2021) and <i>Ireland's Climate Change Assessment</i> (ICCA).	
	The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. Guidance on SEA-related monitoring is available on the EPA website.	The information provided has informed the preparation of the Plan and the Environmental Report.
	The Submission refers to the State of the Environment Report – Ireland's Environment 2020, which should be considered as relevant. EPA also brings to the attention that the next iteration of the report will be published later in 2024.	The information provided has informed the preparation of the Plan and the Environmental Report.
	EPA advises on the preparation of the SEA statement and to send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.	The SEA statement will be prepared as the next step in the SEA process

Strategic Environmental Assessment (SEA) Statement

# **3** SEA Environmental Report

The SEA Environmental Report has been prepared to comply with the provisions of Article 12 of S.I. 435 of 2004 – European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations – as amended by S.I. 200 of 2011 – European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011.

Article 5(1) and Annex I of the *SEA Directive* provides detail on the information to be included in an Environmental Report. **Table 3.1** provides a checklist of the information referred to in Article 5(1) with a confirmation of where the relevant information is contained within the SEA. Refer to the standalone SEA Environmental Report prepared for the CDEDP.

#### Table 3.1 Information required under Annex I of the SEA Directive

Information referred to in Article 5(1)	Environmental Report Section
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Section 2 & Section 4
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 5
(c) the environmental characteristics of areas likely to be significantly affected;	Section 5
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Section 5
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 6
(f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 8 and Appendix 1
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 7
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 10
(j) a non-technical summary of the information provided under the above headings.	Refer to Non- technical Summary Report

Strategic Environmental Assessment (SEA) Statement

# 3.1 Strategic Environmental Objectives

The SEA Directive requires that 'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.' Given the position of the CDEDP beneath the Cork City Development Plan 2022-2028 and Cork County Development Plan 2022-2028 in the land use planning hierarchy, the measures identified in the SEA for the Development Plan have also been considered in this assessment, with some modification where appropriate.

A series of Strategic Environmental Objectives (SEOs) have been prepared in line with current guidance and also with specific reference to the SEA for the CDEDP (refer to **Table 3.2**). The SEOs provide a basis for the assessment of the environmental effects of the CDEDP and are framed in such a manner as to enable the CDEDP to be fully assessed in environmental terms.

SEOs are distinct from the strategic objectives within the CDEDP, although they often overlap and are developed from international, national and regional policies which generally govern environmental protection objectives.

Theme	SEO Code	Strategic Environmental Objective	
	B_1	Ensure compliance with the Habitats and Birds Directives with regard to the protection of Natura 2000 Sites and Annex habitats and species <sup>3</sup> and no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.	
Biodiversity (Flora & Fauna) (B)	B_2	Preserve, protect, maintain and where appropriate enhance the terrestrial, aquatic and soil biodiversity, including internationally, EU and nationally designated sites, habitats and protected species.	
B_3		Ensure CDEDP does not contradict biodiversity protection, restoration and rehabilitation objectives in the Cork City Development Plan 2022- 2028 and Cork County Development Plan 2022-2028	
Population & Human	PHH_1	Promote sustainable high quality tourism within the County that supports economic development and maximises potential for employment and investment.	
Health (PHH)	PHH_2	Improve health and wellbeing by provision of recreational and tourism- related activities.	
Land, Soils & Geology (LSG)	LSG_1	Minimise green field development and protect land and soil resources from pollution and degradation.	
WQ_1 Water Quality (WQ)		Protect, maintain and where necessary improve water quality and the management of watercourses, groundwater and the marine environment, in compliance with the requirements of the WFD objectives and measures.	
	WQ_2	Implement and comply with the provisions of the Flood Risk Management and Sustainable Drainage Systems Guidelines to avoid inappropriate development in areas at risk of flooding.	

#### Table 3.2 Strategic Environmental Objectives (SEOs) for CDEDP

<sup>&</sup>lt;sup>3</sup> 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.

Strategic Environmental Assessment (SEA) Statement

Theme	SEO Code	Strategic Environmental Objective	
Air Quality Naisa 8	ANC_1	Maintain and promote continuing improvement in air quality and noise emissions through the reduction of emissions.	
Air Quality, Noise & Climate (ANC) ANC_2		Contribute towards climate adaptation and mitigation and reduction of greenhouse gas emissions in line with National targets, including Ireland's commitment to realising a climate neutral economy by 2050.	
Material Assets (MA)	MA_1	To contribute towards the protection of public assets and infrastructure, ensure new developments are served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, wastewater, waste and transport) that does not present a danger to human health.	
MA_2		Promote sustainable waste management, minimisation and recovery.	
	MA_3	Promote sustainable transportation including increased use of public transport and active travel measures.	
	CH_1	Protect and avoid impact on places, features and landscapes of cultures and archaeological importance, including entries to the Record Monuments and Places (RMP).	
of architectural heritage, (including en		Protect and avoid impact on places, features, buildings and landscapes of architectural heritage, (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).	
	LV_1To protect landscape character, minimise the loss of historic land features such as mature trees and hedgerows and scenic views.		
Landscape & Visual (LV)	LV_2	Avoid impacts on the statutory landscape & visual designations as identified in the Cork City Development Plan 2022-2028 and Cork County Development Plan 2022-2028.	

# 3.2 Assessment of Effects of the Cork City, Harbour and East Cork Destination Experience Development Plan

The CDEDP has been subject to an assessment for potential effects arising from the implementation of the Plan on the baseline environment as characterised. The assessment was carried out having regard to the Strategic Environmental Objectives (SEOs) established for the aspects of the baseline environment which have potential to be impacted by the CDEDP.

The Cork City Development Plan 2022-2028 states that-

'To support the sustainable growth of tourism and marketing of Cork City as a multi-faceted visitor destination and a gateway to the southern region, Wild Atlantic Way and Ireland's Ancient East by:

a. Working in partnership with Fáilte Ireland, businesses and other stakeholders to support tourism investment, innovation and promotional and marketing strategies;'

The Cork County Development Plan 2022-2028 states that-

'Continue to actively engage, invest, encourage and promote the development of the Wild Atlantic Way and Irelands Ancient East regional brands through sustainable tourism, which will enable visitors to have enjoyable experiences while having regard for the cultural, built and natural heritage, and environmental impacts, including the protection of Natura 2000 sites.'

Strategic Environmental Assessment (SEA) Statement

It is noted that during its preparation the Cork City Development Plan 2022 – 2028<sup>4</sup> and Cork County Development Plan 2022-2028<sup>5</sup>, was subject to full SEA, Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The environmental assessment of the 'Strategic Objectives' and of the 'Catalyst Projects' and 'Destination Enablers' of the CDEDP were set out separately in the Environmental Report. The finding of the assessment is that 10 no. objectives will have either potential positive effects or no effects on the environment. The finding of the assessment is that 17no. strategic objectives will have potential for either negative effects or for uncertain effects on the environment.

There are 6no. catalyst projects and 6no. destination enablers in total and projects 1, 2, 3, 4, 5 & 6, and destination enablers 1, 2, 3 & 6 in the absence of mitigation, could have the potential to result in uncertain environmental effect on cultural heritage. The projects where there is a requirement for development of existing and new infrastructure might also give rise to uncertain environmental effects on other environmental themes and SEOs that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure.

Where potential negative or uncertain environment effects have been identified appropriate mitigation has been provided as set out in **Section 3.3** of this Report.

In working with the SEA process, the Plan acknowledges the requirement for any development to adhere to best practice in terms of environmental governance. Indeed protection and enhancement of the environment is a critical pillar underpinning the core objectives and success of the CDEDP. In this context any proposals for development arising from the CDEDP must meet the proper planning and sustainable development policies, objectives and development management provisions of the statutory *Cork City Development Plan 2022-2028* and *Cork County Development Plan 2022-2028*.

Following the consultation stage, a number of minor amendments were made to the CDEDP. Refer to the Environmental Report.

#### **3.3 Mitigation Measures**

The finding of the environmental assessment in the Environmental Report is that, if unmitigated, a number of the actions of the Cork City, Harbour and East Cork Destination Experience Development Plan have potential for uncertain or negative effects on aspects of the environment. These potential negative and / or uncertain effects, which derive from potential works resulting from the relevant action, focus primarily on biodiversity, water, cultural heritage, material assets and landscape. This section of the Environmental Report identifies measures for the mitigation and avoidance of potential uncertain or negative environmental effects.

This Plan sits at the lower level of the hierarchy and must comply with relevant higher-level strategic actions / plans. These documents include plans and programmes, which have also been subject to their own environmental assessment processes, as relevant.

The projects included in this Plan will have to comply, as relevant, with the various provisions of legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which this Plan is not part and does not contribute towards. The Plan includes requirements for environmental protection and

<sup>&</sup>lt;sup>4</sup> Cork City Development Plan 2022-2028- <u>https://www.corkcity.ie/en/cork-city-development-plan/</u>

<sup>&</sup>lt;sup>5</sup> Cork County Development Plan 2022-2028 - <u>https://www.corkcoco.ie/en/resident/planning-and-development/cork-county-development-plan-2022-2028</u>

Strategic Environmental Assessment (SEA) Statement

management including the ones set out in the *Regional Tourism Development Strategies 2023-2027* especially the *Ireland's Ancient East Regional Tourism Development Strategy*.

As stated in the CDEDP these include:

- Infrastructure Management With respect to infrastructure (including drinking water, wastewater, surface water, waste and transport) consideration must be given to the available capacity and the potential impact on existing infrastructure, as well as the potential environmental effects arising from the provision of new infrastructure and / or from a likely increase in tourism-related pressures. Any such environmental effects will be appropriately mitigated. The promotion of developing visitor friendly infrastructure where it is required is encouraged.
- Visitor Management Those receiving funding will be requested to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant effects including loss of habitat and disturbance, including ensuring that new projects are located at a suitable setback from ecological sensitivities.

Research by Fáilte Ireland has shown improved environmental outcomes (including improved attainment of conservation objectives) in areas operating appropriate visitor management strategies. Visitor management strategies will be required for proposed plans, programmes and projects that are to receive funding as relevant and appropriate.

Green Infrastructure and Ecosystem Services - Those receiving funding shall contribute towards the maintenance of existing green infrastructure and its ecosystem services, taking into account the output of the Mapping and Assessment of Ecosystem Services project being undertaken by the NPWS. Proposals for the development of any green infrastructure should demonstrate the synergies that can be achieved with regard to the: provision of open space amenities; sustainable management of water; the enhancement, protection and management of biodiversity; protection of cultural heritage; and protection of landscape sensitivities.

Consideration and implementation for all environmental mitigation measures as set out in Irelands Ancient East Regional Tourism Development Strategy will also be considered a requirement as appropriate.

The majority of the mitigation measures are achieved through the detailed environmental protective policies and objectives as set out in the Cork City & County Development Plan 2022-2028. The Development Plan provides for sustainable planning and management control of all development in Cork County & City – including the delivery of Destination Experience Development Plans through continued collaboration with Fáilte Ireland.

Proposals for development within the CDEDP area must comply as appropriate with the relevant provisions included within the Cork City and County Development Plan 2022-2028. Given that the CDEDP sits within and at a lower level in the planning hierarchy, the measures contained to the Development Plan, and in its Natura Impact Report (NIR), SEA Environmental Report / SEA Statement and Strategic Flood Risk Assessment (SFRA) are applicable to the CDEDP.

Therefore, the key environmental protection measures included in the Cork City and County Development Plan 2022-2028, provide for appropriate and detailed mitigation of potential uncertain environmental effects of the CDEDP. These measures include the following selected aims / policies / objectives as detailed in **Table 3.3** below.

Table 3.3 Protective objectives as detailed in the Cork City Development Plan 2022-2028 and Cork County Development Plan 2022-2028
--

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
Protective Objectives	Protective Objectives
Biodiversity (including Flora & Fauna)	
SO5 – Green and Blue Infrastructure, Open Space and Biodiversity	MCI 7-3 Integrated Coastal Zone Management
Manage and enhance green and blue infrastructure, to protect and promote biodiversity, ecology and habitat connectivity, protect natural areas, enhance landscape character and maritime heritage, and manage access to green and blue spaces that provide recreation, amenity and natural areas.	(a) Support the development of an integrated approach to coastal zone management in Ireland generally and in particular to foster the application of this concept in appropriate coastal zones throughout the County including Cork Harbour.
<i>Objective 6.1 – Cork City Green &amp; Blue Infrastructure Study and Strategy</i>	MCI 7-5 Marine Leisure
To manage, protect and enhance the Green and Blue Infrastructure assets of Cork City in line with the Cork City Green and Blue Infrastructure Strategy set out in the Development Plan, and to support the actions, opportunities and projects identified in the Cork City Green and Blue Infrastructure Study 2021.	<ul> <li>(a) Support the development of rural Cork's coastal marine leisure facilities, where they are compatible with other objectives and policies in this Plan and any Natura 2000 designations.</li> <li>(b) Proposals for development of marine leisure facilities will be subject to ecological impact assessment and, where necessary, Appropriate Assessment, with a view to ensuring the avoidance of negative impacts on designated sites, protected species and on-sites or locations of high biodiversity value.</li> </ul>
Objective 6.5 Trees & Urban Woodland	MCI 7-7 Designated Bathing Areas
<ul> <li>a. To protect and enhance the City's tree and urban woodlands in public and private ownership. Cork City Council will seek to survey, map and maintain existing important individual and groups of trees, using Tree Preservation Orders as appropriate;</li> <li>b. To encourage the planting of new urban woodlands and trees where appropriate throughout the City and particularly where there are deficiencies</li> </ul>	Support and protect Designated Bathing Areas as valuable local amenities and as an important tourism and local recreation resource and continue to work with local communities to identify appropriate new Bathing Areas for monitoring. Encourage the provision of the water services infrastructure required to maintain and improve water quality in these areas having regard to water quality, access, environmental and other sensitives when identifying / developing new recreational bathing areas.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
<i>in tree coverage as identified in the Cork City Green and Blue Infrastructure Study;</i>	
c. To support the preparation of a City Tree Strategy which provides a vision for long-term planting, protection and maintenance of trees, hedgerows and woodlands;	
d. To support retaining existing trees and the planting of new trees as part of new developments subject to care on the species of tree and the siting and management of the trees to avoid conflict with transport safety and residential amenity in particular;	
e. To promote the planting of pollinator friendly native deciduous trees and mixed forestry to benefit biodiversity	
Objective 6.6 Rivers, Waterway and Wetlands	EC 8-1 Cork Harbour
<ul> <li>a. To protect and maintain the integrity, and maximise the potential, of the natural heritage and biodiversity value of rivers, associated watercourses and wetlands in Cork City, and to</li> <li>b. To promote an integrated approach to optimising opportunities associated with rivers, waterways and wetlands generate biodiversity, recreation, tourism, and economic benefits.</li> </ul>	b. Guide the sustainable future management of different uses in the Cork Harbour area, through a specific planning framework initiative, including strategic economic uses, while protecting the sensitive ecosystems and designated natural habitats including the Cork Harbour SPA and the Great Island Channel SAC.
Objective 6.22 Natural heritage and Biodiversity	WM 11-11: River Channel Protection
<ul><li>a. To protect, promote and enhance Cork City's natural heritage and biodiversity;</li><li>b. To support the implementation of the National Biodiversity Plan and the All-Ireland Pollinator Plan and successor publications in Cork City;</li></ul>	a) Ensure adequate protection measures along watercourses, keeping them free from development by ensuring development is kept 10m or other appropriate distance from stream and river banks is line with best practice for riparian corridors. Development altering the hydromorphology of a watercourse will not normally be permitted, where it may result in the

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
c. To support and implement the biodiversity actions from the Cork City Heritage and Biodiversity Plan (2021-2026) in partnership with all relevant	deterioration in the status of a water body through for example, impacts on water quality, quantity or flow rate, riparian habitat or protected species.
stakeholders; d. Cork City Council will seek to establish and use a City biodiversity database, accessible across all council departments for consideration in land management decision-making;	<ul> <li>b) There will be a presumption against the use of culverts and opportunities to actively remove existing culverts and re-naturalise/ daylighting watercourses will be encouraged in development proposals.</li> <li>c) Where river crossings are considered necessary, clear span river crossing</li> </ul>
e. Cork City Council will work with communities to enhance existing, and the delivery of new, biodiversity-rich areas throughout the City including individual buildings, streets, public and private spaces by supporting the provision of green roofs and walls, rain gardens, biodiversity-rich parklets, rainwater harvesting, natural banks and naturalised SUDS;	structures shall be used on fisheries waters where possible. The Council will consult with Inland Fisheries Ireland in relation to any such proposals.
<i>f.</i> Cork City Council will seek, where appropriate, to enhance the linear habitat connectivity, including the interconnection and enhancement of:	
Woodlands, gardens, open spaces, fields and hedgerows.	
• Coastal habitats, river catchments, lakes, streams, ponds.	
Aquatic, marginal and bank side habitats.	
• Parks, playing fields and recreational areas.	
Upstream of mapped flood zones.	
• City transport routes.	
Objective 6.23 Designated Sites and Protected Species	WM 11-12 Surface Water Management
To protect and enhance designated sites and areas of natural heritage and biodiversity and the habitats, flora and fauna for which it is designated, and to protect, enhance and conserve designated species.	Manage surface water catchments and the use and development of lands adjoining streams, watercourses and rivers in such a way as to minimise damage to property by instances of flooding and with regard to any

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	conservation objectives of European sites within the relevant catchments and floodplains.
Objective 6.25 Non-designated Areas of Biodiversity Importance	WM 11-13 Flood Plains and Wetlands
Cork City Council will seek to map the City's ecological networks and corridors of local biodiversity value outside of designated areas, and to work with local stakeholders in supporting the effective management of features which are important for wild flora and fauna and habitats.	a) Protect the County's floodplains, wetlands and coastal areas subject to flooding as vital green infrastructure which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences in the future.
	<i>b)</i> Ensure that development does not impact on wetland sites within river / stream catchments and seek the restoration of degraded wetlands.
Objective 6.26 Alien Invasive Species	GI 14-1 Countywide Green and Blue Infrastructure Objectives
To support the implementation of measures to control and prevent the introduction, establishment or spread of ecologically damaging alien invasive species (e.g. Japanese Knotweed and Himalayan Balsam).	a) Create an integrated and coherent green infrastructure for the County by encouraging the retention and strengthening of substantial networks of green space in urban, urban fringe and the wider countryside to serve the needs of communities now and in the future and as a key contributor to climate mitigation and climate adaptation.
	b) Develop the green infrastructure network (including green corridors) to ensure the conservation and enhancement of biodiversity, including the protection of Natura 2000 European Sites, the provision of accessible parks, open spaces and recreational facilities (particularly within settlements), the sustainable management of water, the maintenance of landscape character and the protection and enhancement of architectural and archaeological heritage.
	c) Capitalise on and highlight the multifunctional benefits/opportunities (ecosystem services) that green and blue infrastructure can present. Seek to advance the use of nature based solutions as an alternative to traditional

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	infrastructure. Seek to advance an ecosystem services approach and ecosystem services valuation as a decision-making tool in plans and projects.
	d) Recognise rivers and streams (and their wider riparian corridors) as one of the natural foundations for multi-functional green and blue infrastructure corridors. Seek to strengthen ecological linkages which watercourses have with other water dependent habitats as well as with hedges/treelines, woodland and scrub in the wider landscape.
	e) Ensure that all settlements have an adequate level of quality green and recreational infrastructure (active and passive) taking into account existing deficits, planned population growth as well as the need to serve their surrounding hinterlands.
	f) Achieve a net gain in green infrastructure through the protection and enhancement of existing assets and through the provision of new green infrastructure as an integral part of the planning process. Encourage the provision of different green infrastructure elements, such as trees in urban areas and green roofs in town centres, so that a net gain in green infrastructure is achieved over the lifetime of this Development Plan.
	g) Seek to increase investment in green infrastructure provision and maintenance by accessing relevant EU funding mechanisms and national funding opportunities including tourism related funding.
	<i>h)</i> Integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes, as appropriate, while protecting biodiversity and other landscape resources.
	<i>i)</i> Support initiatives and programmes which seek to strengthen the green and blue infrastructure and work with communities and other stakeholders in furthering the green and blue infrastructure concept.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
Objective 6.27 Areas of Geological Importance	BE 15-1: Support and comply with national biodiversity protection policies
To seek the conservation of important features of geological interest in Cork City.	a) Support and comply with the objectives of the National Biodiversity Plan 2017-2021 (and any future National Biodiversity Plan which may be adopted during the period of this Plan) as appropriate,
	b) Implement the current County Biodiversity Action Plan and any future updated Plan;
	c) Support and comply with biodiversity policy set out in other national and regional policy documents as appropriate.
Objective 10.20 – The River Lee	BE 15-2: Protect sites, habitats and species
a. To ensure that the River Lee is maintained as a defining feature of the City Docks.	a) Protect all natural heritage sites which are designated or proposed for designation under European legislation, National legislation and International
b. To secure access to the riverside and provide walkway / cycleways (see Volume 2: Mapped Objectives).	Agreements. Maintain and where possible enhance appropriate ecological linkages between these. This includes Special Areas of Conservation, Special Protection Areas, Marine Protected Areas, Natural Heritage Areas, proposed
c. To update the Public Realm Strategy for the City Docks to take into account the evolving masterplan for the City Docks (north and south).	Natural Heritage Areas, Statutory Nature Reserves, Refuges for Fauna and Ramsar Sites. These sites are listed in Volume 2 of the Plan.
d. Measures will be put in place to enhance the River Lee's biodiversity value.	b) Provide protection to species listed in the Flora Protection Order 2015, to
e. To provide new active recreational infrastructure to improve access to the river, and to repair and enhance steps and slipways.	Annexes of the Habitats and Birds Directives, and to animal species protect under the Wildlife Acts in accordance with relevant legal requirements. The species are listed in Volume 2 of the Plan.
	c) Protect and where possible enhance areas of local biodiversity value, ecological corridors and habitats that are features of the County's ecological network. This includes rivers, lakes, streams and ponds, peatland and other wetland habitats, woodlands, hedgerows, tree lines, veteran trees, natural and semi-natural grasslands as well as coastal and marine habitats. It particularly

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	<i>includes habitats of special conservation significance in Cork as listed in Volume 2 of the Plan.</i>
	d) Recognise the value of protecting geological heritage sites of local and national interest, as they become notified to the local authority, and protect them from inappropriate development.
	e) Encourage, pursuant to Article 10 of the Habitats Directive, the protection and enhancement of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.
	BE 15-6: Biodiversity and New Development
	Provide for the protection and enhancement of biodiversity in the development management process and when licensing or permitting other activities by:
	a) Providing ongoing support and guidance to developers on incorporating biodiversity considerations into new development through preplanning communications and the Council's guidance document 'Biodiversity and the Planning Process – guidance for developments on the management of biodiversity issues during the planning process' and any updated versions of this advice;
	b) Encouraging the retention and integration of existing trees, hedgerows and other features of high natural value within new developments;
	c) Requiring the incorporation of primarily native tree and other plant species, particularly pollinator friendly species in the landscaping of new developments;
	d) Fulfilling Appropriate Assessment and Environmental Impact Assessment obligations and carrying out Ecological Impact Assessment in relation to development and activities, as appropriate;

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	e) Ensuring that an appropriate level of assessment is completed in relation to wetland habitats subject to proposals which would involve drainage or reclamation. This includes lakes and ponds, watercourses, springs and swamps, marshes, heath, peatlands, some woodlands as well as some coastal and marine habitats;
	f) Ensuring that the implementation of appropriate mitigation (including habitat enhancement, new planting or other habitat creation initiatives) is incorporated into new development, where the implementation of such development would result in unavoidable impacts on biodiversity - supporting the principle of biodiversity net gain.
	BE 15-7: Control of Invasive Alien Species
	Implement best practice to minimise the risk of spread of invasive alien species, on Council owned or managed land, and require the development and implementation of Invasive Alien Species Management Plans for new developments where required.
	BE 15-8: Trees and Woodlands
	a) Protect trees the subject of Tree Preservation Orders.
	b) Make use of Tree Preservation Orders to protect important trees or groups of trees which may be at risk or any tree(s) that warrants an order given its important amenity or historic value.
	c) Encourage the provision of trees for urban shading and cooling in developments in urban environments and as an integral part of the public realm.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	d) Preserve and enhance the general level of tree cover in both town and country. Ensure that development proposals do not compromise important trees and include an appropriate level of new tree planting.
	e) Where appropriate, to protect mature trees/groups of mature trees and mature hedgerows that are not formally protected under Tree Preservation Orders.
Population and Human Health	
Objective 7.25 Sustainable Tourism	TO 10-1 Promotion of Sustainable Tourism in County Cork
To support the sustainable growth of tourism and marketing of Cork City as a multi-faceted visitor destination and a gateway to the southern region, Wild	Promote a sustainable approach to the development of the tourism sector within Cork County while;
Atlantic Way and Ireland's Ancient East by: a. Working in partnership with Fáilte Ireland, businesses and other stakeholders to support tourism investment, innovation and promotional and marketing strategies;	a) Ensuring the protection of the natural, built and cultural heritage assets of the county, including Natura sites, which are in themselves part of what attracts visitors to the county.
b. Supporting the implementation of the Cork City Tourism Strategy 2017-2022, the Local Economic and Community Plan-2016-2021 (Pure Cork) and their successor strategies;	b) Having regard to cumulative impacts increased visitor numbers and visitor facilitates can have on local infrastructure, sensitive areas and sites, water quality, biodiversity, soils, ecosystems, habitats and species, climate change
c. To support the implementation of the Tourism Destination Plan for Cork City and East Cork;	etc. c) Supporting investment in placemaking and the regeneration of towns and
<i>d.</i> Develop existing tourist attractions and activities, while seeking investment in new attractions that help to diversify the tourism market;	villages in recognition of the role 'People and Place' make in attracting visitors to Ireland; encouraging the development of tourism and other facilities within
e. Support the development of cultural facilities such as the Crawford Art Gallery and the Cork Events Centre;	settlements to support such regeneration and compact growth. d) Work in partnership with public and private sector agencies to implement
f. Support initiatives that improve the sustainability of tourism, and support eco-tourism along with the reduction of the carbon footprint of tourist accommodation, attractions and activities;	the key tourism objectives in this Plan, while first ensuring early consultation with landowners around any new proposed routes and facilities.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
g. Support high quality proposals, initiatives and pilot projects that represent opportunities to provide new or enhanced visitor facilities and attractions. This also extends to proposals that utilise technology to improve visitors' experiences and aid interpretation and navigation and seek to better leverage the city's network of green and blue infrastructure as tourism attractions;	<i>e)</i> Assist community groups to access funding for appropriate, sustainable and beneficial tourism developments.
h. Seeking to manage, where appropriate, any increase in visitor numbers to semi-natural areas in order to avoid significant effects including loss of habitat and disturbance, by ensuring that new any projects, such as greenways, are located a suitable distance from ecological sensitivities, such as riparian zones;	
i. Seeking to manage, where relevant, any increase in visitor numbers to key habitats and / or any change in visitor behaviour in order to avoid significant effects, including loss of habitat and disturbance, by ensuring that new projects and activities are located a suitable distance from ecological sensitivities. Visitor / Habitat Management Plans may be required for proposed projects where relevant and as appropriate.	
	TO 10-2 Wild Atlantic Way and Irelands Ancient East
	Continue to actively engage, invest, encourage and promote the development of the Wild Atlantic Way and Irelands Ancient East regional brands through sustainable tourism, which will enable visitors to have enjoyable experiences while having regard for the cultural, built and natural heritage, and environmental impacts, including the protection of Natura 2000 sites.
Land, Soils and Geology	
	BE 15-10: Soils

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	a) Ensure the protection and conservation of the soils in County Cork by encouraging sustainable management practices and the reuse of brownfield lands.
	b) Identify areas of poorer soil in the County acknowledge their potential value for wildlife, and respect their limitations, particularly in terms of their assimilative properties to prevent pollution.
Water Quality	
Objective 9.4 – Sustainable Urban Drainage Systems (SUDS) a. To require that all planning applications for new development incorporate Sustainable Urban Drainage Systems (SUDS) in so far as possible. Such proposals shall be accompanied by a comprehensive SUDS assessment including run-off quantity, run off quality and impacts on habitat and water quality.	WM 11-1: EU Water Framework Directive and the River Basin Management Plan a) Protect and improve the County's water resources and ensure that development permitted meets the requirements of the River Basin Management Plan and does not contravene the objectives of the EU Water Framework Directive.
<ul> <li>b. To encourage the provision of green roofs and green walls as an integrated part of Sustainable Urban Drainage Systems (SUDS) and which provide benefits for biodiversity, wherever feasible.</li> <li>c. To investigate the feasibility of preparing Sustainable Urban Drainage Systems (SUDS) guidelines for Cork City during the lifetime of the plan. In the interim The Department of Housing, Local Government and Heritage document: Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design - Best Practice Interim Guidance Document, will provide guidance in this regard.</li> </ul>	<ul> <li>b) Promote compliance with the River Basin Management Plan and associated environmental standards and objectives set out in the European Communities (Environmental Objectives) Surface Water Regulations, 2009 and the European Communities (Environmental Objectives) Groundwater Regulations, 2010, to prevent deterioration; restore good status; reduce chemical pollution, and achieve water related protected areas objectives in rivers, lakes, groundwater, estuaries and coastal waters (as applicable).</li> <li>c) Secure the objectives and facilitate the implementation of the associated Programme of Measures of the River Basin Management Plan 2018-2021 and any successor plan for ground, surface, estuarine, coastal and transitional waters in the Plan area as part of the implementation of the EU Water Framework Directive.</li> </ul>

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	d) Support an integrated and collaborative approach to local catchment management in order to assist in the implementation of the River Basin Management Plan.
	e) In acknowledgement of the sustained pressures on ecological status being experienced in Blue Dot catchment waterbodies, additional measures, as deemed necessary to protect and restore these waterbodies to high status may be required for development permitted in such catchments. Measures may include, but are not limited to, a water management plan (including the construction phase), tertiary treatment and appropriate SUDs measures.
	f) Support the prioritisation of the provision of water services infrastructure in:
	• Metropolitan Cork, the Key Towns and Main Towns to complement the overall strategy for economic and population growth while ensuring appropriate protection of the environment.
	• All settlements where services are not meeting current needs, are failing to meet the requirements of the Urban Wastewater Treatment Directive, and where these deficiencies are – interfering with Councils ability to meet the requirements of the Water Framework Directive; or – having negative impacts on Natura 2000 sites; and
	g) Development may only proceed where appropriate wastewater treatment is available which meets the requirements of environmental legislation, the Water Framework Directive and the requirements of the Habitats Directive.
Objective 9.7 – Water Quality	WM 11-2: Surface Water Protection
a. To ensure the delivery of the relevant policies and objectives of The River Basin Management Plan for Ireland 2018 – 2021 and any subsequent plan, including those relating to protection of water status, improvement of water	a) Protect and improve the status and quality of all surface waters throughout the County, including transitional and coastal waters.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
status, prevention of deterioration and meeting objectives for designated protected sites.	b) At least secondary treatment should be provided to all wastewater discharges from any new development, to surface waters.
b. To support Irish Water in its implementation of Water Quality Management Plans for ground, surface, coastal and estuarine waters as part of the implementation of the EU Water Framework Directive and in the development of Drinking Water Protection Plans.	
c. To support the provision of mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans in line with the Water Framework Directives and River Basin Management Plans.	
d. To have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Documents No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.	
Objective 9.8 Flood Protection	WM 11-3: Groundwater Protection
To protect, enhance and manage the City's floodplains, wetlands and coastal habitat areas that are subject to flooding as vital 'green infrastructure' which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reduce the need to provide flood defence infrastructures. Cork City Council will also require that all proposed flood protection or alleviation works will be subject to Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any European Sites and that the requirements of Article 6 of the EU Habitats Directive are met.	a) Preserve and protect groundwater and surface water quality throughout the County.
	<i>b)</i> Prevent or limit, as appropriate, the input of pollutants into groundwater and prevent the deterioration of the status of all bodies of groundwater.
	c) Protect, enhance and restore all bodies of groundwater and ensure a balance between abstraction and recharge of groundwater with the aim of achieving good groundwater quantitative status and good groundwater chemical status.
	d) Reverse any significant and sustained upward trend in the concentration of any pollutant resulting from the impact of human activity in order to progressively reduce pollution of groundwater.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	e) Achieve compliance with any standards and objectives established for a groundwater dependant protected area included in the register of protected areas.
Objective 12.1 – Land Use and Flooding	WM 11-14 Strategic Flood Risk Management
To Facilitate the appropriate management and sustainable use of Flood Zones A & B identified by the Strategic Flood Risk Assessment.	a) Support the implementation of
	• the EU Flood Risk Directive (20010/60/EC) on the assessment and management of flood risks,
	• the Flood Risk Regulations (SI No 122 of 2010),
	• the Guidelines on 'The Planning System and Flood Risk Management' (2009) and
	• the recommendations of the South Western CFRAM study.
	b) Application of the flood policies of this Plan shall be fully informed by the recommendations contained in the updated Strategic Flood Risk Assessment (June 2022) accompanying the Plan, including the conclusions of Justification Tests contained therein.
	WM 11-15: Flood Risk Assessments
	To require flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.
	- For sites within Flood Zone A or B, a site specific Flood Risk Assessment will be required.
	- For sites within Flood Zone C, an examination of all potential sources of flooding, and consideration of climate change (flood risk screening

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	assessment), will be required. In limited circumstances where the 'Flood Risk Screening assessment' identifies potential sources of flood risk, a site specific flood risk assessment may also be required.
	- All proposed development must consider the impact of surface water flood risks on drainage design through a Drainage Impact Assessment. The drainage design should ensure no increase in flood risk to the site, or the downstream catchment.
	WM 11-16: Flood Risks – Overall Approach
	Take the following approach in order to reduce the risk of new development being affected by possible future flooding:
	• Avoid development in areas at risk of flooding; and
	• Apply the sequential approach to flood risk management based on avoidance, substitution, justification and mitigation of risk.
	• Where development in floodplains cannot be avoided, applications for development must meet the definition of Minor Development or have passed the Justification Test for Development Plans in the updated SFRA and can pass the Justification Test for Development Management to the satisfaction of the planning authority.
	• Consider the impacts of climate change on the development.
	In areas where the Justification Test for Development Plans has not been applied, or has been failed, the sequential approach should be applied as follows:
	•In areas where there is a high probability of flooding - 'Flood Zone A' - avoid highly and less vulnerable development as described in Section 3 of 'The

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	Planning System and Flood Risk Management – Guidelines for Planning Authorities' issued in November 2009 by DoEHLG.
	• In areas where there is a moderate probability of flooding - 'Flood Zone B' - avoid 'highly vulnerable development' described in section 3 of 'The Planning System and Flood Risk Management – Guidelines for Planning Authorities' issued in November 2009 by DoEHLG.
	• In areas where there is low probability of flooding – 'Flood Zone C' all uses may be considered subject to a full consideration of all flood risks.
	WM 11-17: Development in Flood Risk Areas
	When considering proposals for development, which may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2 of the Guidelines, the following criteria must be satisfied:
	1. The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of these Guidelines.
	2. The proposal has been subject to an appropriate flood risk assessment that demonstrates:
	a. The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk;
	b. The development proposal includes measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible;
	c. The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design,

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	implementation and funding of any future flood risk management measures and provisions for emergency services access; and
	d. The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes.
	The acceptability or otherwise of levels of residual risk should be made with consideration of the type and predicted future use of the development and the local development context.
	The development is assessed not to have the potential to give rise to negative or adverse impacts on the integrity of Natura 2000 sites or Natural Heritage Areas or proposed Natural Heritage Areas.
Air Quality, Noise and Climate	
SO4 – Climate & Environment	CS 2-8: Climate Change
Transition to a low-carbon, climate resilient and environmentally sustainable future. Implement climate mitigation and adaptation measures that reduce our carbon footprint including sustainable energy consumption, sustainable transport, circular economy, green construction and flood risk mitigation and adaptation.	Promote sustainable settlement and transportation strategies in urban and rural areas, including the promotion of measures to;
	a) Reduce energy demand in response to the likelihood of increases in energy and other costs due to long term decline in non-renewable resources,
	b) Reduce anthropogenic greenhouse gas emissions, and address the necessity for adaptation to climate change, in particular, having regard to location, layout and design of new development.
	(c) Address climate change with particular emphasis on transport provision, by implementing the policies and objectives of this CDP.
Objective 2.11 Low Carbon City	ET 13-27: Carbon Emissions Reduction

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
Put in place mechanisms to support the delivery of a lower carbon, sustainable city where development avoids, mitigates and adapts to the effects of climate change while protecting and enhancing Cork City's environmental assets.	<ul> <li>a) To reduce carbon emissions in the county by achieving national, regional and any potential county targets to progress the national targets as set out in the Climate Action Plan (2021).</li> <li>b) To seek to reduce greenhouse gas emissions by promoting energy efficiency</li> </ul>
	and the development of renewable energy sources utilising the natural resources of County Cork in an environmentally sustainable manner consistent with best practice and planning principles.
Objective 5.1 – A Climate Resilient City	BE 15-12: Air Quality
To create a more climate resilient, low carbon and environmentally sustainable City where our stakeholders and communities participate in, and benefit from integrated climate and environment action measures which also offer other social, economic and biodiversity benefits.	a) Monitor air quality and air quality trends in accordance with EU policy directives, preserve good air quality where it exists, and take appropriate action, where required, including the provision of additional air quality monitoring infrastructure in urban areas and along major roads.
	<i>b)</i> Radon barriers should be provided in all new developments in compliance with best practice and relevant Building Regulations.
	c) Air emissions associated with all new development are to be in line with Environmental Quality Standards as set out in the Air Quality Standards Regulations 2011, or any updated/superseding documents.
Objective 9.18 – Air Quality	BE 15-13: Noise and Light Emissions
a. To protect and improve air quality in Cork City in accordance with the provisions of EU Directives and national legislation on air pollution and support the actions of the City Council's Air Quality Strategy 2021-2026, and its successors.	a) Seek the minimisation and control of noise pollution associated with activities or development, having regard to relevant standards, published guidance and the receiving environment.
b. To continue to monitor air quality results submitted from selected locations throughout the City in co-operation with the Environmental Protection	b) Ensure noise-sensitive developments are adequately protected from potential sources of noise (e.g. national roads). New developments should take account of, and mitigate against, any existing noise sources.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
Agency and support the creation of a regional air quality and greenhouse gas emissions inventory.	c) Support the implementation of Noise Action Plans prepared for the Cork County area.
	d) Seek the minimisation and control of light pollution associated with activities of development, having regard to relevant standards, published guidance and the receiving environment and Dark Sky principles.
	e) Review and update Cork County Council Policy Guidelines for Public Lighting to take account of impacts of public lighting on wildlife and night skies.
Objective 9.20 – Noise	Climate Action
To support the implementation of the objectives of The Cork Agglomeration Noise Action Plan 2018 – 2023 and promote the pro-active management of	CA 17-1: Support national and local climate change objectives set out in the following:
noise where it is likely to have significant adverse impacts on health and quality of life.	National Planning Framework
	Southern Region Spatial and Economic Strategy
	• Climate Action Plan (2021 or any successor plan).
	• National Climate Change Adaptation Framework (2018 or any successor framework).
	• National Mitigation Plan (2017 or any successor plan). • Cork County Council Climate Change Adaptation Strategy.
	<i>CA 17-2:</i> In order to achieve a reduction in greenhouse gas emissions, an increase in renewable energy production, an increase in energy efficiency and enhanced biodiversity, support the transition to a low carbon, competitive, climate resilient and environmentally sustainable economy by 2050 through implementation of the polices of this plan that seek to deliver the following:
	• compact growth,
	<ul> <li>integrated land use and transport,</li> </ul>

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	sustainable transport choices,
	• liveable settlements,
	<ul> <li>renewable energy production and reduced energy consumption,</li> </ul>
	<ul> <li>enhanced ecological biodiversity and</li> </ul>
	• climate adapatation measures such as through flood risk management, sustainable urban drainage systems and high quality placemaking and design.
Cultural Heritage	
SO7 – Heritage, Arts and Culture	TO 10-5 Protection of Natural, Built and Cultural Features
Protect and enhance the unique character and built fabric of the city, its neighbourhoods, urban towns and settlements by caring for Protected Structures, archaeological monuments and heritage, Architectural Conservation Areas and intangible heritage. Identify, protect, enhance and grow Cork's unique cultural heritage and expression in an authentic and meaningful way. Ensure Cork's heritage, culture and arts are celebrated and developed to create an attractive, vibrant and inclusive place to live, work, study and visit.	Protect and conserve those natural, built, and cultural heritage features that form the resources on which the County's tourist industry is based. These features will include areas of important landscape, coastal scenery, areas of important wildlife interest, historic buildings and structures including archaeological sites, cultural sites including battlefields, the Gaeltacht areas, arts and cultural sites, the traditional form and appearance of many built up areas and promote access and interpretation of archaeological sites in State and Local Authority ownership.
Objective 8.1 Strategic Archaeology Objective	HE 16-1: County Heritage Plan
a. To protect and preserve archaeological monuments as listed in the Sites and Monuments Record (SMR), Record of Monuments and Places (RMP) and the Wreck Inventory of Ireland Database (WIID). All sites can be accessed on the Historic Environment Viewer (www.archaeology.ie). The National Monuments Service will be informed of all development proposals which relate to Sites and Zones of Archaeological Interest.	Continue to implement the current County Heritage Plan (2005) in partnership with relevant stakeholders and any successor of this document.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
b. Cork City Council will have regard to the relevant national statutory policies and guidelines, including Frameworks and Principles for the Protection of the Archaeological Heritage and to best practice guidance documents published by the Heritage Council and the Institute of Archaeologists of Ireland.	
c. To preserve the character and setting of the medieval city wall and defences, which is a National Monument, according to the recommendations of the Cork City Walls Management Plan (2007) and the National Policy on Town Defences (2008).	
d. To promote the retention, reuse, and enhancement of buildings and other elements of architectural, archaeological and other significance.	
e. To ensure that development reflects and is sensitive to the historical importance and character of the city and its hinterland, in particular the street layout and pattern, plot sizes, building heights and scales.	
<i>f.</i> To improve and encourage access to and understanding of the architectural and archaeological heritage of the city.	
Objective 8.2 Protection of the Archaeological Resource	HE 16-2: Protection of Archaeological Sites and Monuments
a. Cork City Council will protect and enhance the archaeological value of the sites (and their settings) listed in the Record of Monuments and Places (RMP) and the Historic Environment Viewer.	Secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments and their setting included in the Sites and Monuments Record (SMR) (see www.archaeology.ie) and the Record of Monuments and Places (RMP) and of sites, features and
b. Cork City Council will ensure that development proposals will protect and preserve archaeological sites discovered since the publication of the Record	objects of archaeological and historical interest generally.
of Monuments and Places (RMP).	In securing such preservation, the planning authority will have regard to the
c. To ensure the preservation of archaeological remains in-situ, in accordance with national policy (and in the interests of sustainability), impacts on the buried archaeological environment should be avoided where possible.	advice and recommendations of the Development Applications Unit of the Department of Housing, Local Government and Heritage as outlined in the Frameworks and Principles for the Protection of the Archaeological Heritage policy document or any changes to the policy within the lifetime of the Plan.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
Objective 8.4 Protection of the Medieval Historic Core	HE 16-3: Underwater Archaeology
a. Where development is proposed within the medieval historic core a policy of minimising the impact on the archaeological resource will be promoted. Any proposed development will be assessed on the level and amount of undisturbed archaeology present on the site.	Protect and preserve the archaeological value of underwater archaeological sites and associated underwater and terrestrial features. In assessing proposals for development, the development will take account of the potential underwater archaeology of rivers, lakes, wetlands, intertidal and sub-tidal
b. Cork City Council will seek to protect Cork's medieval street pattern, and in particular, seek to conserve and enhance the laneways within the setting of the streetscape.	environments through appropriate archaeological assessment by a suitably qualified archaeologist.
c. Development proposals will seek to retain historic building lines and traditional plot widths where they derive from medieval origins. The physical integrity of the medieval core should be respected through the retention of plot sizes which can be achieved by the refurbishment of existing buildings.	
Objective 8.5 Protection of Cork's Medieval City Wall and Defences	HE 16-4: Zones of Archaeological Potential in Historic Towns and Settlements
a. Cork City Council will ensure preservation insitu of the Medieval City Wall and Defences and will have regard to the preservation and enhancement of the line of the City Wall when considering development proposals in its vicinity. Disturbance, removal and alteration of the line of the City Wall will not be permitted. An appropriate buffer zone between the City Wall and the development will also be required.	Proposed development works in Historic Towns and settlements, Zones of Archaeological Potential, Zones of Notification and the general historic environs in proximity to the zones, should take cognisance of the impact potential of the works, and all appropriate archaeological assessments employed to identify and mitigate the potential impacts.
b. Cork City Council will seek to improve public awareness and increase knowledge and appreciation of the medieval city walls.	
Objective 8.8 Underwater Archaeology	HE 16-5: Zones of Archaeological Potential
Cork City Council requires that all development proposals which will impact on marine, riverine, lacustrine, intertidal/sub-tidal environments, and areas	Protect the Zones of Archaeological Potential (ZAPs) located within historic towns, urban areas and around archaeological monuments generally. Any development within the ZAPs will need to take cognisance of the upstanding

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
of former reclaimed land, shall be subject to appropriate archaeological assessment.	and potential for subsurface archaeology, through appropriate archaeological assessment.
Objective 8.9 Preservation of Archaeology within Open Space in Developments In development proposals where archaeology is to be retained in-situ the archaeological remains will be protected, safeguarded and, where suitable, be interpreted in an accessible manner. Where the archaeology being preserved is located in open space, then this will be in addition to the overall open space provisions.	HE 16-6: Industrial and Post Medieval Archaeology Protect and preserve industrial and post-medieval archaeology and long-term management of heritage features such as mills, limekilns, forges, bridges, piers and harbours, water-related engineering works and buildings, penal chapels, dwellings, walls and boundaries, farm buildings, estate features, military and coastal installations. There is a general presumption for retention of these structures and features. Proposals for appropriate redevelopment including conversion should be subject to an appropriate assessment and record by a suitably qualified specialist/s.
Objective 8.10 – Archaeological Management Strategy for the City	HE 16-7: Battlefield, Ambush and Siege Sites and <i>Defensive Archaeology</i>
a. Cork City Council will seek to prepare and implement conservation and management plans for National Monuments and Recorded Monuments in Cork City Council ownership.	Protect and preserve the defensive archaeological record of County Cork including strategic battlefield, ambush and siege sites, and coastal fortifications and their associated landscape due to their historical and cultural
b. Cork City Council will seek to develop an archaeological strategy for the city, to include management and protection of strategic research locations.	value. Any development within or adjoining these areas shall undertake a historic assessment by a suitably qualified specialist to ensure development does not negatively impact on this historic landscape.
c. Cork City Council will seek to develop an archaeological GIS for archaeological investigations undertaken in the city.	
d. Cork City Council will seek to ensure that the tourism strategy within the medieval historic core and in areas/setting of historic monuments should draw on its archaeological heritage and should reflect a strong and authentic sense of place.	
Objective 8.17 Conservation of the City's Built Heritage	HE 16-8: Burial Places
a. To seek to ensure the conservation of Cork City's built heritage.	

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
b. To ensure that Cork's Built Heritage contributes fully to the social and economic life of the city and to pursue actions that ensure Cork's built heritage will benefit from good custodianship and building occupation.	Protect all historical burial places and their setting in County Cork and encourage their maintenance and care in accordance with appropriate conservation principles.
<i>Objective 8.18 Reuse &amp; Refurbishment of Historic Buildings</i>	HE 16-11: Archaeological Landscapes
a. The City Council will actively encourage the re-use of historic buildings in the interests of conservation and environmental sustainability to minimise waste and optimise on the embodied energy in existing buildings.	To protect archaeological landscapes and their setting where the number and extent of archaeological monuments are significant and as a collective are considered an important archaeological landscape of heritage value.
b. Uses which will have a minimal impact on the character of historic structures will be encouraged.	
c. Alterations will adhere to best practice conservation standards.	
d. The reinstatement of lost features and removal of unsympathetic additions will be encouraged where appropriate. e. It is recognised that the protection and retention of historic buildings within the medieval city, has the dual advantage of protecting the rich archaeological resource and the Recorded Monument of the City Wall.	
Objective 8.19 Record of Protected Structures	HE 16-13: Undiscovered Archaeological Sites
To maintain a Record of Protected Structures (RPS) which shall include structures or parts of structures which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, and which it is an objective to protect.	To protect and preserve previously unrecorded archaeological sites within County Cork as part of any development proposals. The Council will require preservation in situ to protect archaeological monuments discovered. Preservation by record will only be considered in exceptional circumstances.
a. Any changes or alterations to the character of a Protected Structure which would in the opinion of Cork City Council, have a material effect on the character of the structure, will require planning permission;	
b. Cork City Council will have regard to the relevant statutory guidance issued by the central government department responsible for the built heritage,	

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
including the Architectural Heritage Protection Guidelines for Planning Authorities;	
c. Proposals for demolition of a Protected Structure shall not be permitted except in exceptional circumstances and where it can be shown that a greater public interest will be served which outweighs the loss to the architectural heritage;	
d. Any alteration or demolition of a Protected Structure shall require the preparation of a full drawn and photographic record to Best Conservation Practice;	
e. A broad range of uses will be considered for the regeneration / reuse of protected structures that are derelict / underutilised;	
<i>f.</i> Where the planning authority accepts the principle of demolition a detailed written and photographic inventory of the building will be made and sent to the Cork City & County Archives and the Irish Architectural Archive for record purposes;	
g. Where a planning application is being granted for development within the curtilage of a Protected Structure, the conservation of the protected structure will be prioritised as the first phase of the development to prevent endangerment, abandonment and dereliction.	
Objective 8.20 Historic Landscapes	HE 16-14: Record of Protected Structures
Cork City Council will ensure that the designated and undesignated historic landscapes and gardens throughout the city are protected from inappropriate development and enhanced where possible.	a) The identification of structures for inclusion in the Record will be based on criteria set out in the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	b) Extend the Record of Protected Structures in order to provide a comprehensive schedule for the protection of structures of special importance in the County during the lifetime of the Plan as resources allow.
	c) Seek the protection of all structures within the County, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. In accordance with this objective, a Record of Protected Structures has been established and is set out in Volume Two Heritage and Amenity, Chapter 1 Record of Protected Structures.
	d) Ensure the protection of all structures (or parts of structures) contained in the Record of Protected Structures.
	<i>e)</i> Protect the curtilage and attendant grounds of all structures included in the Record of Protected Structures.
	<i>f</i> ) Ensure that development proposals are appropriate in terms of architectural treatment, character, scale and form to the existing protected structure and not detrimental to the special character and integrity of the protected structure and its setting.
	g) Ensure high quality architectural design of all new developments relating to or which may impact on structures (and their settings) included in the Record of Protected Structures.
	<i>h) Promote and ensure best conservation practice through the use of specialist conservation professionals and craft persons.</i>
	<i>i)</i> In the event of a planning application being granted for development within the curtilage of a protected structure, that the repair of a protected structure is prioritised in the first instance i.e. the proposed works to the protected structure should occur, where appropriate, in the first phase of the

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	development to prevent endangerment, abandonment and dereliction of the structure.
Objective 8.22 National Inventory of Architectural Heritage (NIAH)	HE 16-15: Protection of Structures on the NIAH
Cork City Council will have regard to Ministerial recommendations to the City Council to consider the designation of the buildings and gardens listed in the National Inventory of Architectural Heritage as Protected Structures. Cork City Council will consider the structures listed in the NIAH for protection, by designation of Protected Structures; by the adoption of Architectural Conservation Areas to protect groups of buildings; or by whatever other means the Council considers will most effectively protect the architectural heritage of the city. These Ministerial Recommendations will be taken into account when the Cork City Council is considering proposals for development that would affect the historic or architectural interest of these structures. Cork City Council will seek to engage with key stakeholder groups, including public representatives, building owners and the public to develop the most appropriate response for the protection of specific buildings, groups of buildings and historic areas.	Protect where possible all structures which are included in the NIAH for County Cork, that are not currently included in the Record of Protected Structures, from adverse impacts as part of the development management functions of the County.
<i>Objective 8.27 - Elements of Built Heritage</i>	HE 16-16: Protection of Non-Structural Elements of Built Heritage
Cork City Council will ensure the protection of important elements of the built heritage and their settings as appropriate.	Protect non-structural elements of the built heritage. These can include designed gardens/garden features, masonry walls, railings, follies, gates, bridges, shopfronts and street furniture. The Council will promote awareness and best practice in relation to these elements.
Objective 10.22A – City Docks Built Heritage	HE 16-18: Architectural Conservation Areas
It is an objective of Cork City Council to a. Conserve and enhance designated and, where possible, undesignated built heritage assets of the City Docks in accordance with the policies set out in	Conserve and enhance the special character of the Architectural Conservation Areas included in this Plan. The special character of an area includes its

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
Chapter 8: Heritage Culture and Arts and Chapter 11: Placemaking and Managing Development;	traditional building stock, material finishes, spaces, streetscape, shopfronts, landscape and setting. This will be achieved by;
b. Utilise conservation strategies to ensure that built heritage assets are integrated into the urban design, architecture and public realm strategies for developments;	(a) Protecting all buildings, structures, groups of structures, sites, landscapes and all other features considered to be intrinsic elements to the special character of the ACA from demolition and nonsympathetic alterations.
c. Require inventories for each development proposal to ensure that undesignated heritage assets are recorded, understood and conserved, where	(b) Promoting appropriate and sensitive reuse and rehabilitation of buildings and sites within the ACA and securing appropriate infill development.
possible.	(c) Ensure new development within or adjacent to an ACA respects the established character of the area and contributes positively in terms of design, scale, setting and material finishes to the ACA.
	(d) Protect structures from demolition and non sympathetic alterations.
	(e) Promoting high quality architectural design within ACAs.
	(f) Seek the repair and re-use of traditional shopfronts and where appropriate, encourage new shopfronts of a high quality architectural design.
	(g) Ensure all new signage, lighting advertising and utilities to buildings within ACAs are designed, constructed and located in such a manner they do not detract from the character of the ACA.
	(h) Protect and enhance the character and quality of the public realm within ACAs. All projects which involve works within the public realm of an ACA shall undertake a character assessment of the said area which will inform a sensitive and appropriate approach to any proposed project in terms of design and material specifications. All projects shall provide for the use of suitably qualified conservation architects/ designers.
	(i) Protect and enhance the character of the ACA and the open spaces contained therein. This shall be achieved through the careful and considered strategic

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	management of all signage, lighting, utilities, art works/pieces/paintings, facilities etc to protect the integrity and quality of the structures and spaces within each ACA.
	(j) Ensure the protection and reuse of historic street finishes, furniture and features which contribute to the character of the ACA.
	HE 16-19: Vernacular Heritage
	a) Protect, maintain and enhance the established character, forms, features and setting of vernacular buildings, farmyards and settlements and the contribution they make to our architectural, archaeological, historical, social and cultural heritage and to local character and sense of place.
	b) Cork County Council encourages best conservation practice in the renovation and maintenance of vernacular buildings including thatched structures through the use of specialist conservation professionals and craft persons. Development proposals shall be accompanied by appropriate documentation compiled by experienced conservation consultant.
	c) There will generally be a presumption in favour of the retention of vernacular buildings and encouragement of the retention and re-use of vernacular buildings subject to normal planning considerations, while ensuring that the re- use is compatible with environmental and heritage protection.
	HE 16-20: Historic Landscapes
	a) Recognise the contribution and importance of historic landscapes and their contribution to the appearance of the countryside, their significance as archaeological, architectural, historical and ecological resources.
	<i>b) Protect the archaeological, architectural, historic and cultural element of the historic/heritage landscapes of the County of Cork.</i>

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
	c) All new development within historic landscapes should be assessed in accordance with and giving due regard to Cork County Councils 'Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings' or any other relevant guidance notes or documents issued during the lifetime of the Plan.
	HE 16-23: Cultural Heritage
	Protect and promote the cultural heritage of County Cork as an important economic asset and for its intrinsic value to identity of place and the well being of people within the County.
	HE 16-26: The Arts
	a) Provide for balanced development of arts infrastructure in County Cork that meets the cultural and artistic needs of communities, supports creative activity and enhances cultural, economic and social life in communities.
	b) Consider proposals for development of arts spaces and facilities including performance, exhibition, studio and other arts related facilities in appropriate locations, where proposals are in accordance the other policies and objectives of this Plan.
	c) Encourage the provision of arts, cultural and entertainment facilities, the commissioning of new works of art for the public realm in association HE proposals, where appropriate and having regard to Public Art: Per Cent for Art Scheme, General National Guidelines" (2004), as amended in 2019.
	d) Promote and facilitate sustainable development and the creation and display of art and heritage works in public areas while complying with the planning and environmental criteria and development management standards.
	e) Acknowledge and support the implementation of objectives set out in the Arts Plan and Culture and Creativity Strategy (and any plan / strategy

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028	
	hereafter), which will be supported through effective collaboration with the County Arts Office.	
	f) Undertake an evidence based 'needs' approach during the lifetime of the Development Plan in collaboration with the Arts Office to identify the spatial distribution/concentration of arts and culture 'assets' across the county, and to inform future/area needs provision including the co-location of services and activities. This may inform the pursuit of specific arts and arts infrastructure projects in association with the County Arts Office, through the National URDF funding programme or, such other funding programmes during the lifetime of the Development Plan.	
Landscape & Visual		
Objective 6.9 Landscape	GI 14-9 Landscape	
a. To preserve and enhance Cork's landscape character, key landscape assets and views and prospects of special amenity value;	a) Protect the visual and scenic amenities of County Cork's built and natural environment.	
b. Landscape will be an important factor in all development proposals, ensuring that a proactive view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability;	b) Landscape issues will be an important factor in all land-use proposals, ensuring that a pro-active view of development is undertaken while protecting the environment and heritage generally in line with the principle of sustainability.	
c. To ensure that new development meets the highest standards of	c) Ensure that new development meets high standards of siting and design.	
placemaking, siting and design;	d) Protect skylines and ridgelines from development.	
d. To protect those prominent open hilltops, valley sides and ridges that define the character of the Cork City Hinterland and those areas which form strategic, largely undeveloped gaps between the main Hinterland settlements from development;	e) Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.	

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
<i>e.</i> To discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments;	
f. To support, as appropriate, any relevant recommendations contained in the National Landscape Strategy for Ireland 2015-2025.	
Objective 6.11 Landscape and Development	GI 14-12: General Views and Prospects
To ensure that the management of development throughout Cork City will have regard for the value of the landscape, its character, distinctiveness and sensitivity in order to minimize the visual and environmental impact of development, particularly in designated areas of high landscape value where higher development standards (layout, design, landscaping, materials) are required.	Preserve the character of all important views and prospects, particularly sea views, river or lake views, views of unspoilt mountains, upland or coastal landscapes, views of historical or cultural significance (including buildings and townscapes) and views of natural beauty as recognized in the Draft Landscape Strategy.
Objective 6.12 Landscape Preservation Zones	GI 14-13: Scenic Routes
To preserve and enhance the character and visual amenity of Landscape Preservation Zones through the careful management of development. Development will be considered only where it safeguards the value and sensitivity of the particular landscape and achieves the respective site-specific objectives.	Protect the character of those views and prospects obtainable from scenic routes and in particular stretches of scenic routes that have very special views and prospects identified in this Plan. [].
Objective 6.13 Areas of High Landscape Value	GI 14-14: Development on Scenic Routes
To conserve and enhance the character and visual amenity of Areas of High Landscape Value (AHLV) through the appropriate management of development, in order to retain the existing characteristics of the landscape, and its primary landscape assets. Development will be considered only where it safeguards to the value and sensitivity of the particular landscape. There will be a presumption against development where it causes significant harm or injury to the intrinsic	a) Require those seeking to carry out development in the environs of a scenic route and/or an area with important views and prospects, to demonstrate that there will be no adverse obstruction or degradation of the views towards and from vulnerable landscape features. In such areas, the appropriateness of the design, site layout, and landscaping of the proposed development must be demonstrated along with mitigation measures to prevent significant alterations to the appearance or character of the area.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
assets, the visual amenity of the landscape; protected views; breaks the existing ridge silhouette; the character and setting of buildings, structures and landmarks; and the ecological and habitat value of the landscape.	b) Encourage appropriate landscaping and screen planting of developments along scenic routes
Objective 6.14 Cork City View Management Framework	GI 14-16: Prominent and Strategic Metropolitan Greenbelt Map
a. To protect the strategic panoramic, linear, river prospect or scenic route views identified in this Plan and ensure that development proposals do not have an undue detrimental impact on these views;	Protect those prominent open hilltops, valley sides and ridges that define the character of the Metropolitan Cork Greenbelt and those areas which form strategic, largely undeveloped gaps between the main Greenbelt settlements.
b. Development proposals will be assessed against their impact on the designated view if it falls within the foreground, middle ground or background of that view. New development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the designated views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views;	
c. Development proposals that could affect a designated view should be accompanied by an assessment that explains, evaluates and justifies any visual impact on the view affected. The scoping process for determining whether a development proposal is likely to affect a designated view should be completed in consultation with Cork City Council. The assessment should demonstrate that the proposal is consistent with the relevant objectives of this Plan. The assessment should form part of a design statement or townscape and visual impact assessment submitted with a planning application;	
d. Development in the foreground and middle ground of a designated view should not be overly intrusive, unsightly or prominent to the detriment of the view. Most designated views are seen in a 120 degree field of view. It is not	

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
expected that the view outside of this field of vision should be assessed unless specified by Cork City Council;	
e. Strategic and local landmark buildings will need to be considered in the scoping of views to identify the potential impacts of development proposals.	
Objective 10.98 – Protection of Natural Landscape	ZU 18-13: Green Infrastructure
<ul> <li>a. Protect the visual and scenic amenities of the Hinterland's built and natural environment.</li> <li>b. Landscape is an important consideration in all development proposals, ensuring that a proactive view of development is undertaken while maintaining respect for the environment and heritage generally in line with the principle of sustainability.</li> </ul>	<ul> <li>Three subcategories of Green Infrastructure zonings have been identified to</li> <li>a) Retain and provide for open space and recreational amenities within Green Recreational (Open Spaces/ Park) areas;</li> <li>b) Retain and generally protect appropriate areas for their landscape, amenity or nature conservation value or their current or future flood management role, within Green Conservation (Landscape amenity/ nature conservation) area;</li> </ul>
c. Ensure that new development meets high standards of siting and design.	and
d. Discourage proposals necessitating the removal of extensive amounts of trees, hedgerows and historic walls or other distinctive boundary treatments.	c) Retain and provide for active recreational facilities within Green Active (Active Open Space) areas.
	No development other than development which supports Green Infrastructure will be considered in these areas. Any proposals in Green Infrastructure areas will need to ensure the protection and enhancement of the integrity of biodiversity and to recognise the importance of wildlife corridors and sites of nature conservation and be in accordance with Article 10 of the Habitats Directive.
Material Assets	
SO3 – Transport & Mobility	TM 12-2 Active Travel
Integrate land-use and transportation planning to increase active travel (walking and cycling) and public transport usage. Enable the key transport	TM 12-2-5: New paths and cycleways/ greenways and upgrades to existing paths and cycleways/greenways will be sensitively designed having regard to environmental, nature conservation, landscape and other heritage

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
projects in the Cork Metropolitan Area Transport Strategy (CMATS) delivering multi-modal usage and smart mobility, accessible for all.	considerations, and committing, in particular to providing appropriate set- backs from water courses where new paths and cycleways/greenways are proposed along rivers, streams, lakes or other sensitive areas. The development of a greenway strategy for the County is required to guide consideration of future greenway identification and development in a plan-led approach.
SO8 – Environmental Infrastructure	BE 15-14: Waste Prevention and Management
Ensure efficient and sustainable use of water services, enhance water quality	a) Support the policy measures and actions outlined in
and resource management. Manage waste generation and treatment and support the principles of the circular economy. Improve air quality and promote pro-active management of noise. Enable the sustainable delivery of digital infrastructure, renewable energy and environmental improvements.	- 'A Waste Action Plan for a Circular Economy Ireland's National Waste Policy 2020-2025', and
	- Southern Region Waste Management Plan 2015 – 2021, or any successor plans
	b) Support circular and climate resilient economy principles and associated strategic infrastructure, prioritising prevention, reuse, recycling and recovery, and to sustainably manage all types of waste by ensuring the provision of adequate waste recovery, recycling and disposal facilities for the county.
Objective 4.4 – Active Travel	BE 15-17: Waste Prevention and Management
To actively promote walking and cycling as efficient, healthy, and environmentally friendly modes of transport by securing the development of a network of direct, comfortable, convenient, and safe cycle routes and footpaths across the city.	a) Planning applications for infilling of marginal land through soil importation will be supported where it can be demonstrated that the developments accord with proper planning and sustainable development, ensuring that they are compatible with the protection of environmental resources including water
To support the 15-minute city concept and walkable neighbourhoods with adequate walking and cycling infrastructure connected to high-quality public realm elements, including wayfinding and supporting amenities (benches, water fountains, bike stands).	quality, Natura 2000 sites, biodiversity, archaeological and landscape resources.
	b) Support will be provided for locating suitable sites within the county for the safe disposal of construction and demolition waste in conjunction with the Southern Waste Region.

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
To support the expansion of the Cork Bikes scheme. To accommodate other innovations such as electric bikes, public car hire, and other solutions that will encourage active travel. To support the rollout of the NTA 5 Year Cycle Plan. To support and engage with the Safe Routes to School programme.	<ul> <li>c) Construction and Environmental Management Plans (CEMPs)/ Construction and Demolition Management Plans shall be prepared for larger scale projects as set out in paragraph 15.12.24 and this requirement shall be assessed on a case-by-case basis as part of the development management process.</li> <li>d) Support the implementation of the recommendations and policies of the National Hazardous Waste Management Plan 2014-2020.</li> </ul>
Objective 5.7 Sustainable Energy Community	
To support SEAI Sustainable Energy Community initiatives and Energy Cork in working with local communities to deliver energy efficiency and renewable energy projects.	
Objective 5.10 Energy Conservation and Efficiency	
To support and help create high levels of energy conservation and energy efficiency in both new and existing buildings.	
Objective 5.11 Energy Efficiency Considerations	
New development proposals are expected to maximise energy efficiency through location, siting, orientation, layout, design, stormwater drainage and landscaping. This includes seeking to optimise energy efficiency through thermal insulation, passive ventilation and cooling and passive solar design.	
Objective 5.12 Energy Use Management	
Development proposals are encouraged to incorporate best practice in technologies that help reduce energy use or enables the monitoring and management of energy use.	
Objective 9.1 – Irish Water	

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
a. To work with Irish Water to ensure the efficient and sustainable use and development of water resources and water services infrastructure in the City.	
b. To work with Irish Water to identify and facilitate the timely delivery of water and wastewater projects in order to facilitate development in accordance with the Core Strategy.	
c. To work with Irish Water in promoting water conservation and demand management measures among users and support the implementation of measures such as leakage reduction and network improvements.	
d. To support Irish Water in the development and implementation of the National Water Resources Plan and Drinking Water Safety Plans.	
e. To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works.	
Objective 9.12- Waste Management	
a. To support the sustainable management of waste in line with the objectives of the Southern Region Waste Management Plan 2015-2021 and the National Waste Management Plan for a Circular Economy (NWMPCE) when published, which will replace the existing Regional Waste Management Plans.	
b. To facilitate the transition to a circular economy facilitating the value recovery and recirculation of resources in order to generate minimal waste.	
c. Continue to fulfil duties under the Waste Management (certification of historic unlicensed waste disposal and recovery activity) Regulations 2008 (S.I. No 524 of 2008), including those in relation to the identification and registration of closed landfills.	

Cork City Development Plan 2022-2028	Cork County Development Plan 2022-2028
d. To encourage the recycling of construction and demolition waste and the reuse of aggregate and other materials in future construction projects. Applications for large infrastructure projects shall be accompanied by a Construction and Environmental Management Plan that includes details of how construction and demolition waste generated is to be managed and, where reuse/recycling is not practicable, disposed of, in line with legislative requirements.	
Objective 9.13-Energy	
To support a safe, secure and reliable supply of energy in association with the appropriate service providers including EirGrid, the Electricity Supply Board (ESB) and Bord Gáis Energy. It is also aimed to facilitate expansion in order to ensure satisfactory levels of supply (subject to appropriate environmental assessment and the planning process) and support the safeguarding of strategic energy corridors from encroachment by other developments that could compromise the delivery of energy networks.	
Objective 9.16 - Digital Strategy	
To support the implementation of the Digital Strategy for the City and work with the Southern Regional Assembly and other stakeholders to seek investment in the delivery of accessible and improved high speed, high capacity digital infrastructure and rollout of the National Broadband Plan.	
Objective 9.19 - External Lighting	
To require that external lighting proposals minimise the harmful effects of light pollution, are energy efficient, and do not have an excessive impact on residential or visual amenity, biodiversity or result in the distraction of road users.	

Cork City, Harbour and East Cork Destination & Experience Development Plan Strategic Environmental Assessment (SEA) Statement

# 4 Assessment of Alternatives

#### 4.1 Introduction

Article 5(1) of the SEA Directive requires the Environmental Report to consider reasonable alternatives taking into account the objectives and geographical scope of the plan or programme and the significant environmental effects of the alternatives selected.

Alternatives put forward should be reasonable, realistic and capable of implementation. They should also be in line with the appropriate strategic level at which the plan will be implemented within the national planning hierarchy. As preparation of the Cork Destination Experience Development Plan is a non-statutory plan, the 'do-nothing' or 'do-minimum' scenarios are viable alternatives, as is the 'do-something' scenario.

### 4.2 Alternative 1: Do-nothing / Do-Minimum

Tourism operations in Cork City and County would continue to operate as at present outside of a plan, whose objective is to facilitate, promote, support and coordinate the various stakeholders involved in tourism activities and interest.

### 4.3 Do-something (Alternatives 2A and 2B: Prepare a Plan)

The do-something scenario sees the preparation of a Plan that seeks to better manage tourism in Cork City and County. The Plan will facilitate, promote, support and coordinate the various stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a manner that is consistent with existing and emerging plans that have been subject to environmental assessment.

While the Plan would co-ordinate activities and stakeholders in the tourism area, it would not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent (such frameworks fall under the remit of other public authorities). Therefore, any projects arising from the Plan would be required to comply, as relevant, with the various provisions of documents that form the statutory decision-making and consent-granting framework.

In essence the Plan would present a five year sustainable tourism development plan for Cork City and County. The key objectives of the Plan would be:

- Ensure local experiences are brought to life through the development of the optimal mix of hero and ancillary tourism products that attract visitors and retain them for longer in the destination.
- Unlock the economic growth potential of an area by progressing a range of key initiatives that will motivate tourists to explore the wider destination.
- Develop a sustainable basis for commercial tourism development centred on creating strong signature, supporting and ancillary experiences that are commoditised through the creation of saleable experiences that excite consumers and buyers alike.
- Create the conditions to attract leisure visitors on a year-round basis to Cork to immerse themselves actively in the community, interacting with local people.
- Strengthen the value of tourism to the local community by providing sustainable employment opportunities.

There are two separate alternatives under the 'do-something' (prepare a Plan) scenario.

Strategic Environmental Assessment (SEA) Statement

#### Alternative 2A: A Plan with Additional Requirements for Environmental Protection and Management

Fáilte Ireland provides funding for sustainable tourism projects including land use and infrastructural development and land use activities. In order to achieve funding (including promotion) for land use or infrastructural development or land use activities, Alternative 2A would require stakeholders to demonstrate compliance with measures relating to sustainable development, environmental protection and environmental management contained within the relevant Fáilte Ireland published guidance and documents.

In order to be realised, projects included in the Plan (in a similar way to other projects from any other sector) would have to demonstrate compliance, as relevant, with various provisions of legislation, policies, plans and programmes that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

Further environmental requirements would be integrated into the Plan under Alternative 2A, relating to infrastructure capacity, visitor management and green infrastructure and ecosystem services.

#### Alternative 2B: A Plan without Additional Requirements for Environmental Protection and Management

Alternative 2B would not include the requirements for environmental protection and management described under Alternative 2A. Projects would continue to be required to comply, as relevant, with the various provisions of documents that form the statutory decision-making and consent-granting framework.

#### 4.4 Assessment of Alternatives

Three reasonable alternatives for the CDEDP have been identified and assessed as set out in **Table 4.1**. The potential effects of the reasonable alternatives on the SEOs categorised as follows:

- Potential Positive Environmental Impact (indicated by '+')
- Potential Negative Environmental Impact (indicated by '-')
- Potential Positive and Negative Environmental Impacts (indicated by '+/-').
- Uncertain Environmental Impact ((indicated by '?').
- Neutral, No or Insignificant Environmental Impact (indicated by '0')

#### 4.5 Reasoning for Selection of the Preferred Alternative

Whilst unlikely to have negative environmental effects, Alternative 1 does not deliver positive benefits for tourism in Cork City and County.

Alternative 2A will deliver effective benefit and response for tourism in Cork City and County, whilst at the same providing for sustainable development and environmental protection.

Alternative 2B will deliver effective benefit and response for tourism in Cork City and County, but without ensuring environmental protection.

Given the tourism and environmental benefits, Alternative 2A is selected as the preferred approach.

Strategic Environmental Assessment (SEA) Statement

#### Table 4.1 Assessment of Alternatives for the Cork City, Harbour and East Cork DEDP

Reasonable Alternative	Description	SEO	Environmental Assessment	Environmental Evaluation
Alternative 1 Do-nothing / Do- Minimum Alternative 2A	Tourism operations in Cork City and County would continue to operate as at present outside of a plan, whose objective is to facilitate, promote, support and coordinate the various stakeholders involved in tourism activities and interest.	All SEOs All SEOs	+/-	In comparison to other alternatives, this alternative could give rise to potential uncertain or unplanned environmental effects across all environmental factors. It is likely that this alternative will not realise the wider stakeholder benefits that would be achieved with from a coordinated plan approach. In comparison to other alternatives, this approach may generate uncertain or negative environmental effects, which would not be counterbalanced by the positive environmental effects associated with other alternatives. In comparison to other alternatives, this alternative could give rise to be positive environmental effects associated with other alternatives.
Do-something Prepare a Plan with Environmental Considerations	County would be facilitated, promoted, supported and coordinated through the preparation of a Plan, with environmental considerations, that seeks to better manage tourism in Cork City and County		+	protection of the environment across all environmental factors. At the same time this alternative will also realise the wider stakeholder benefits that would be achieved with from a coordinated plan approach. In comparison to other alternatives, this approach would generate positive environmental effects.
Alternative 2B Do-something Prepare a Plan without Environmental Considerations	Tourism operations in Cork City and County would be facilitated, promoted, supported and coordinated through the preparation of a Plan, without environmental considerations, that seeks to better manage tourism in Cork City and County	All SEOs	+/- or -	<ul> <li>While it is likely that this alternative will realise the wider stakeholder benefits that would be achieved with from a coordinated plan approach, in comparison to other alternatives, this alternative could give rise to potential uncertain, unplanned or negative environmental effects across all environmental factors.</li> <li>In comparison to other alternatives, this approach would generate negative environmental effects.</li> </ul>

Cork City, Harbour and East Cork Destination & Experience Development Plan Strategic Environmental Assessment (SEA) Statement

# 5 Monitoring

Monitoring of the CDEDP and its implications on the environment is important to ensure that the environment is not adversely affected through the implementation of the Plan. In accordance with Article 10 of the SEA Directive, monitoring must be carried out of the significant environmental effects directly related to the implementation of the Plan "*in order to, inter alia, identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.*"

Monitoring is based around indicators which allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the assessment. Each indicator to be monitored is accompanied by the targets. The monitoring programme may be updated to deal with specific environmental issues - including unforeseen effects - as they arise. Such issues may be identified by the Council or identified to the Council by other agencies.

Fáilte Ireland is responsible for monitoring and the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, clear resolution plan will be produced with assigned responsibilities, timelines and monitoring to address environmental damage and cause of the same. It is recommended that the monitoring for the CDEDP is undertaken utilising the outputs of monitoring and reviews of the Cork City & County Development Plans for efficiency and given that similar data sets will be used to measure the progress of each plan.

Environmental indicator assessment during monitoring can show positive / neutral impacts or negative impacts on the environment. Where an indicator value highlights a positive / neutral impact on the environment, it is likely that the objectives of the CDEDP are well-defined with regard to the environment. Conversely where the objectives of the CDEDP have a negative impact on the environment, it may be necessary to review the objectives of the CDEDP or to take some other form of intervention. For example, if an objective is having a significant adverse impact, an amendment may be considered during the lifetime of the CDEDP.

Refer to **Table 5.1** below for the monitoring programme set for the SEA which includes details on the indicators, targets and data sources to monitor the progress of the CDEDP.

Strategic Environmental Assessment (SEA) Statement

#### Table 5.1 Environmental Monitoring Programme

SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency			
	iodiversity (Flora & Fauna) (B)						
B1	Ensure compliance with the Habitats and Birds Directives with regard to the protection of Natura 2000 Sites and Annex habitats and species <sup>6</sup> and no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.	Conservation status of habitats and species protected under European and International legislation.	Maintenance of favourable conservation status for habitats and species protected under European and International legislation to be unaffected by implementation of the Plan.	Department of Culture, Heritage and the Gaeltacht's National Monitoring Report for the Birds Directive under Article 12 (every 3 years) Department of Culture, Heritage and the Gaeltacht report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years) Irish Wetland Bird Survey (I-WeBS) data. EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes. Lower tier environmental assessment and decision making by local authorities.			
B2	Preserve, protect, maintain and where appropriate enhance the terrestrial, aquatic and soil biodiversity, including internationally, EU and nationally designated sites, habitats and protected species.	Conservation status of habitats and species protected under International and National legislation.	Maintenance of favourable conservation status for all habitats and species protected under International and National legislation to be unaffected by implementation of the Plan.	EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes.			

<sup>&</sup>lt;sup>6</sup> 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.

SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
B3	Ensure CDEDP does not contradict biodiversity protection, restoration and rehabilitation objectives in the Cork City Development Plan 2022-2028 and Cork County Development Plan 2022-2028.	To comply with the biodiversity policies and objectives of the Cork City & County Development Plan.	No contravention of the biodiversity policies and objectives of the Cork City & County Development Plan	Cork County & City Council monitoring likely significant environmental effects of the developments and compliance with policies and objectives of the CDP.
Popula	tion & Human Health (PHH)			
PHH1	Promote sustainable high quality tourism within the County that supports economic development and maximises potential for employment and investment.	To comply with the tourism and economic development policies and objectives of the Cork City & County Development Plan	No contravention of the tourism and economic development policies and objectives of the Cork City & County Development Plan	Central Statistics Office (CSO) census data. Lower tier environmental assessment and decision making by local authorities. Input from any other relevant Fáilte Ireland monitoring programmes.
PHH2	Improve health and wellbeing by provision of recreational and tourism-related activities.	Occurrence of a spatially concentrated deterioration in human health arising from environmental factors resulting from the CDEDP, as identified by the Health Service Executive (HSE) and / or Environmental Protection Agency (EPA).	No spatial concentrations of health problems arising from environmental factors as a result the CDEDP.	Publicy available data from HSE and EPA to be reviewed. EPA State of the Environment reporting. Lower tier environmental assessment and decision making by local authorities. Input from any other relevant Fáilte Ireland monitoring programmes.

SEO	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
Ref. LSG1	Promote urban infill / brownfield development and protect land and soil resources from pollution and degradation.	Extent of conversion of land cover / green field to developed / artificial surfaces.	Contribute towards the target of the SEA for the National Planning Framework's (2018) to "Maintain built surface cover nationally to below the EU average of 4%."	CORINE mapping surveys (every 5 years). EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes.
Water	Quality (WQ)			
WQ1	Protect, maintain and where necessary improve water quality and the management of watercourses, groundwater and the marine environment, in compliance with the requirements of the WFD objectives and measures.	Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009). Groundwater compliance with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC, subject to exemptions provided for by Article 4 of the WFD. Reference to EPA WFD Monitoring programme and status of surface waterbodies, groundwater bodies reported.	No deterioration in the status of any groundwater or surface water, or adverse effect upon the ability of any groundwater or surface water to achieve 'good status' as a result of the CDEDP.	Information issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual). Review of WFD status of Bathing Waters, green flag / blue flag for beaches. EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes.
WQ2	Implement and comply with the provisions of the Flood Risk Management and	Flood-related incidences related to the CDEDP.	Compliance with the Flood Risk Management Guidelines and to	Lower tier environmental assessment and decision making by local authorities.
	Sustainable Drainage Systems Guidelines		ensure that any new	מווע עפנוצוטוו ווומגוווע שע וטכמו מענווטרונופג.

SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
	to avoid inappropriate development in areas at risk of flooding.		developments granted planning permissions are on appropriately zoned lands.	Input from any other relevant Fáilte Ireland monitoring programmes. Review of planning applications for any new infrastructure to be accompanied by standalone flood risk assessment report in sensitive areas.
	lity, Noise & Climate (ANC)	I	1	
ANC1	Maintain and promote continuing improvement in air quality and noise emissions through the reduction of emissions.	Demonstration of compliance with air quality and noise provisions. Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network.	To maximise the amount of measures relating to air quality and noise minimisation being implemented.	EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes. Review of Cork City Air Quality Dashboard for air quality monitoring data results and EPA data for air quality monitoring.
ANC2	Contribute towards climate adaptation and mitigation and reduction of greenhouse gas emissions in line with National targets, including Ireland's commitment to realising a climate neutral economy by 2050.	Demonstration of compliance with provisions relating to climate adaptation and mitigation.	To maximise the amount of measures relating to climate adaptation and mitigation being implemented.	EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes.
MA1	To contribute towards the protection of public assets and infrastructure, ensure new developments are served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, wastewater, waste and	Number of incompatible developments (supported by the plan) adversely affecting existing or planned infrastructure, including water supply, wastewater	No incompatible development (supported by the plan) adversely affecting existing or planned material assets infrastructure.	Review of Annual Environmental Reports prepared by Uisce Éireann. Review of publicly available data from EPA monitoring. EPA State of the Environment reporting.

SEO	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
Ref.	transport) that does not present a danger to human health.	management, energy and transport infrastructure.		Input from any other relevant Fáilte Ireland monitoring programmes.
MA2	Promote sustainable waste management, minimisation and recovery.	Tonnes of hazardous waste received at Council Waste Management Facilities annually. Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually. Tonnes of Bulky waste received at Council Waste Management Facilities annually. Tonnes of garden waste received at Council Waste Management Facilities annually.	Increase waste recycling in the County. Reduce waste generation in the County.	EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes.
MA3	Promote sustainable transportation including increased use of public transport and active travel measures.	% change in modal split. Kilometres of permanent segregated cycling network. Kilometres of permanent integrated cycling network. Number of Electric Vehicle charging points in the county. Total Area of road reallocated for sustainable alternatives.	Percentage increase in the number of public transport users in the County Increase kilometres of permanent segregated cycling network. Increase kilometres of permanent segregated cycling network. Increase number of Electric Vehicle charging points in the county. Increase Total Area of	Review delivery of sustainable transport projects via Cork County Council / NTA. Lower tier environmental assessment and decision making by local authorities. Input from any other relevant Fáilte Ireland monitoring programmes.

SEO	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
Ref.			road reallocated for sustainable alternatives	
Cultura	al Heritage (CH)	I		
CH1 CH2	<ul> <li>Protect and avoid impact on places, features and landscapes of cultural and archaeological importance, including entries to the Record of Monuments and Places (RMP).</li> <li>Protect and avoid impact on places, features, buildings and landscapes of architectural heritage, (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural</li> </ul>	Percentage of entries to the Record of Monuments and Places protected from significant adverse effects arising from the Plan. Percentage of entries to the Records of Protected Structures and Architectural Conservation Areas and their	No adverse effects on archaeological or cultural heritage resulting from implementation of the Plan. No adverse effects on architectural heritage resulting from implementation of the Plan.	Review of data available from National Monuments Section of Department of Housing, Local Government and Heritage. Input from any other relevant Fáilte Ireland monitoring programmes. Lower tier environmental assessment and decision making by local authorities.
Londor	and National Inventory of Architectural Heritage (NIAHs)).	context protected from significant adverse effects arising from the Plan.		
	· · · · · · · · · · · · · · · · · · ·			
LV1	To protect landscape character, minimise the loss of historic landscape features such as mature trees and hedgerows and scenic views.	Number of unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in Development Plans and other statutory land-use plans.	No unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in Development Plans and other statutory land-use plans.	Input from any other relevant Fáilte Ireland monitoring programmes.
LV2	Avoid impacts on the statutory landscape & visual designations as identified in the Cork City Development Plan 2022-2028	Status of High Amenity Zones and Views and Prospects.	All action and development proposals supported by the plan must comply with policy objectives relating to the protection of High Amenity	Input from any other relevant Fáilte Ireland monitoring programmes.

SEO	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
Ref.				
	and Cork County Development Plan 2022-	Number of developments	Zone and Views and Prospects	Lower tier environmental assessment
	2028.	permitted that result in	defined in the CDP.	and decision making by local authorities.
		avoidable adverse impacts on	No development supported by	
		High Amenity Zones and Views	the plan should have an adverse	
		and Prospects.	impact on High Amenity Zones	
			and Views and Prospects.	

Strategic Environmental Assessment (SEA) Statement

### 6 References

Council Directive Habitats Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

Environment Director General of the European Commission (2003). *Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment*.

EPA (2024). Spatial Information Resources Inventory.

EPA (2022). SEA Pack.

EPA (2023a). Good Practice Guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector.

EPA (2023b). SEA of Local Authority Land-Use Plans – EPA Recommendations and Resources.

EPA (2020). Ireland's Environment – An Integrated Assessment.

EPA (2015). Strategic Environmental Assessment Resource Manual for Planning Authorities – Integration of SEA Legislation with Procedures for Land Use Plans.

EPA (2013). Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes: Practitioner's Manual.

EPA (2023). SEA Process Checklist [Consultation Draft 2024].

EPA (2003). Development of Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland – Synthesis Report.

Fossitt, J.A. (2000). A Guide to Habitats in Ireland.

*European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations* 2011 (S.I. No. 200/2011).

*European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. No.* 435/2004).

European Parliament and Council Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

Government of Ireland (2018). Project Ireland 2040 – National Planning Framework.

Government of Ireland (2004). Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional Authorities and Planning Authorities.

Inland Fisheries Ireland (2020) Planning for Watercourses in the Urban Environment.

Inland Fisheries Ireland (2016) *Guidelines on Protection of Fisheries during construction works in and adjacent to Waters.* 

Cork County Council (2022). Cork County Development Plan 2022 – 2028.

Cork City Council (2022). Cork City Development Plan 2022 – 2028: Strategic Environmental Assessment Statement.

OPW (2009). The Planning System and Flood Risk Management – Guidelines for Planning Authorities.

Planning and Development Act 2000, as amended.

Planning and Development Regulations 2001, as amended.

## Brady Shipman Martin

#### DUBLIN

Mountpleasant Business Centre Ranelagh Dublin 6 D06 X7P8 +353 1 208 1900

#### CORK

Penrose Wharf Business Centre Penrose Wharf Cork +353 21 242 5620

mail@bradyshipmanmartin.com www.bradyshipmanmartin.com