



Ref: OA26.323952

24 February 2026

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1

Dear Sir/Madam

Re: Proposed development of Rosslare Europort Offshore Renewable Energy (ORE) Hub

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council has reviewed this marine application as a new departure in Irish marine planning. The justification for a suitable port facility to facilitate the operations, maintenance, and servicing of the offshore renewable arrays is acknowledged and recognised. Within this context, we also acknowledge that a location in this general area is necessitated by virtue of proximity to existing and permitted schemes off the east coast, as well as proximity to the Draft South Coast Designated Maritime Area Plan (SC-DMAP).

From the outset, it should be made clear that the Heritage Council support renewables as the preferred form of energy. Climate change is having an impact on our habitats, and ecosystems. Therefore, this is a natural heritage issue and notwithstanding the need to continue to reduce energy demand at source, any energy generation should be primarily sourced from renewable sources.

Our comments on this application should not be viewed as an impediment to the scheme but rather to ensure that all heritage matters have been adequately covered, therefore ensuring the initial schemes necessary for the offshore renewable sector are robustly assessed and environmentally informed. More importantly however, is that all impacts are fully identified so as to identify accurate and proportionate mitigation.

Our comments are divided by the main heritage themes:

- Ecology

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- Landscape and Seascape
- Cultural Heritage

An overlapping theme of the reporting which accompanies the application is the lack of due regard to the National Marine Planning Framework Project (NMPF) Ireland 2040 policies. This is evident in the landscape chapter and in the policy context chapter where no mention of the following policies from the NMPF are mentioned:

- Seascape and Landscape Policy 1
- Biodiversity Policy 1 – 4
- Heritage Assets Policy 1

This does need to be rectified.

Ecology

Comprehensive surveying work and assessment has been included with the application by means of the Appropriate Assessment carried out with respect to European designated sites as well as the following chapters in the Environmental Impact Assessment Report (EIAR):

- Terrestrial Ecology
- Benthic Ecology
- Fish, Shellfish and Turtle Ecology
- Marine Mammals
- Ornithology

The marine environment reporting has accounted for trophic level relationships from benthic seabed impacts through to marine and ornithological impacts. It is clear that there will be local negative impacts on various fauna and habitats due to the dredging and reclamation work. This also includes noise impacts associated with construction activity (blasting activities), with particular risk evident for marine mammals, with vessel movements and other disturbances potentially impacting on seabirds.

The ecology chapters in the EIAR and the Appropriate Assessment indicate that the most sensitive receptors appear to be marine mammals, namely harbour porpoise and harbour seal species, primarily due to noise related construction activities particularly any blasting. Though all the marine mammals assessed may encounter some effects, with some impacts also expected on seabirds, these effects have not been considered significant in the reporting. Some habitat loss will occur in the 24.5-hectare reclamation area, while there will be certainly temporary loss of seabed habitat due to dredging.

The EIAR reporting and the AA reporting is based on the likelihood of 'significant effects', rather than any negative effects. In this regard, isolated applications are not likely to pass a threshold that

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would necessitate refusal based on ecological receptors. In this specific case, the Heritage Council emphasise that the cumulative effects will be the main avenue of impact, and planning authorities should carefully consider such effects.

We acknowledge and welcome in this case, that the SC DMAP was acknowledged as worthy of note, albeit it was not included in the cumulative assessment as no planning application/EIAR has been completed. Whilst this is conventionally sound in planning terms, given that this development is clearly linked with the servicing of the offshore renewable sector off the south and east coasts, cumulative impacts will be essential to understanding ecological impacts.

The planning authority may be justified in seeking an assumption of cumulative impacts from the offshore schemes to come, rather than relying on these subsequent applications to 'pick up the tab' on cumulative impacts. However, if this is not considered sound in planning terms, the planning authority needs to expressly note this and therefore a record has been established that future cumulative impacts will be important considerations for future offshore developments in the area. This has been suggested in the EIAR and therefore needs commensurate acknowledgment in the decision-making reporting.

This is important in terms of all ecological receptors but particularly for certain seabirds with sensitive disturbance thresholds i.e. red-throated diver and common scoter, or any species that are sensitive to changes in prey abundance.

Aside from this, we make the following comments:

- We accept the species-specific approach for identifying which of the qualifying interests of the relevant SPAs/ SACs may be impacted, and therefore which SPAs and SACs have been screened in/out. We would request that 'the Commission' satisfy itself that cumulative effects on bird species in particular have been adequately considered in relation to the screening out of all the SPAs, including the Seas off Wexford cSPA which overlaps with the development boundary.
- We note the suspended sediment dispersion impacts on habitats associated with the Carnsore Point SAC and accept that significant effects on this habitat can be ruled out.
- Specific mitigation for pre-construction surveys should be conditioned with regard to existing seabird occupied nests currently on the outer wall (Kittiwake and Black Guillemot)
- Strict conditions are needed, as suggested in the EIAR, for Marine Mammal Observer led surveys of marine mammal activity in the lead up to any piling, drilling, dredging or blasting construction activities. This should be included for maintenance dredging also.
- Mitigation in terms of pollution control and response frameworks and speed limits to be included also.

Several mitigation measures have been suggested for ecological impacts and should be secured by condition. However, we emphasise those above as without such mitigation measures on the marine mammals for example, the impacts would have remained significant, and the scheme would be unacceptable.

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Landscape and Visual

The Seascape, Landscape and Visual Assessment in its current form has some shortcomings. In specific landscape and seascape terms, the most relevant receptors are the landscape units/areas, or in the case of Wexford any distinctive landscapes. The main seascape character areas and units are also key receptors. For this application the following are the most relevant:

- Landscape Character Unit – *Coastal* as identified in the Wexford County Development Plan 2023-2029
- Regional Seascape Character Area 13 – Southeast Irish Sea as identified in Regional Seascape Character Assessment for Ireland as supported through Seascape and Landscape Policy 1 of the National Marine Planning Framework 2024

There has been no assessment of the Regional Seascape Character Area 13. The Heritage Council considers this a significant oversight.

In addition, Section 23.4.3 assesses receptor sensitivity and has re-defined the sensitivity that the landscape character unit “Coastal” had been assigned i.e. a high sensitivity in the Wexford County Development Plan. The reporting suggests that ‘medium’ sensitivity is more suitable, primarily because the site location “is a landscape influenced by highly anthropogenic features such as large warehouses, business parks and major transport corridors and is not considered distinctive or sensitive at local, regional or national level”.

The Coastal landscape unit as defined in the Wexford County Development Plan has a high sensitivity based on a limited ability to absorb new development. Whilst near views and experiences of the port are indeed industrial in character, it is our view that changing the landscape sensitivity to ‘high’ based on more ‘micro’ level views of the port is inaccurate. The coastal area from Rosslarefort to Greenore point is the macro landscape view and landscape character should be viewed at the landscape scale. The wider area does have a distinctive character that reflects Wexford’s relatively straight coasts of sand or shingle backed up by low cliffs and sand dune systems. This has been acknowledged in the report which does note that much higher sensitivity exists in the wider surrounds of the study area. The departure from the assigned sensitivity in the adopted Wexford County Development Plan 2023-2029 is questionable.

With regards to *Regional SCA 13 – South East Irish Sea*, the chapter has not included this as a receptor. Seascape character areas as defined in the Marine Institute’s Regional Seascape Character Assessment and supported by the National Marine Planning Framework are now standard in all marine applications. This is a significant oversight, and this chapter needs to be revisited to include an assessment of this receptor.

We agree that landscape and visual assessments are an objective assessment of the development’s impact on inherent landscape and seascapes, the primary aim of which is to give the decision maker a full account of impacts, so that they can make an informed decision when balanced against other planning considerations (positive or negative). However, in this case there

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are gaps in the assessment and therefore a fully informed decision cannot be made and accurate mitigation suggested.

Cultural Heritage

We are satisfied that the Cultural Heritage Chapter in the EIAR has provided adequate information on any potential archaeological and architectural heritage impacts. Conditions will be required however, namely with respect to archaeological monitoring during the dredging/reclamation phase and works that result in land disturbance.

In addition, we note that the development footprint does not include the NIAH listed lighthouse (15704834) which is within the harbour area. Although no commentary on the setting of this structure has been provided, and whilst the development does see an expansion of port activities, this does not necessarily impact on the maritime setting of a lighthouse, which is associated with port and harbour use.

Conclusion

The Heritage Council acknowledge the need for an ORE Hub in this location, and the existing port and harbour facilities at Rosslare would provide a logical expansion to facilitate offshore operations and maintenance requirements. There are some shortcomings in the terms of the seascape assessment, and we have suggested strict conditions for ecological matters to ensure there are no significant negative impacts on ecological receptors. However, we do submit that cumulative impacts on the marine environment will need to be carefully considered going forward.

I trust these views will inform the Commission's determination of the application.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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