



Draft National Ports Policy: Consultation

The stakeholder consultation on the Draft National Ports Policy by the Department of Transport was launched in July 2026. This will inform the preparation of the National Ports Policy, which will be the overarching policy framework for the governance and future development of Ireland's State-owned commercial port network.

The Assembly welcomes the opportunity to consult and sets out hereunder recommendations and observations on behalf of the Eastern and Midland Regional Assembly. This submission has been prepared by the executive and approved by the Cathaoirleach on behalf of the Assembly.

1.0 Overall Context

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional, Spatial and Economic Strategy (RSES), oversight and coordination of City and County Development Plans and Local Economic and Community Plans, management of EU Operational Programmes, EU project participation, and the implementation of national economic policy. As a strategic policy body, EMRA also participates in the consultation processes relating to other relevant strategic plans and policies.

The role and function of the Regional Assembly, including the scope of the RSES 2019-2031, was provided for in the Planning and Development (P&D) Act 2000, as amended. However, this legislation has been superseded by the Planning and Development (P&D) Act 2024, as amended, which was signed into law on 17th October 2024. The provisions of the P&D Act 2024, as amended, relevant to the Regional Assemblies commenced on 2nd October 2025. The P&D Act 2024, as amended, expands the scope of the RSES and the functions of the Assembly, including in relation to matters directly relevant to the Department of Transport, namely integrated land-use and transportation planning, marine and coastal matters that facilitates the coordination of land-sea interactions, and an indication of priorities of infrastructure of scale. The Regional Assembly is further mindful of its obligations, as a 'relevant body', as prescribed under the Climate Action and Low Carbon Development Act 2015, as amended, to perform its functions in a manner consistent with the need to achieve Ireland's national climate objective.

1.1 Regional Spatial and Economic Strategy (RSES)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was made by the Elected Members of the Assembly in June 2019, and it is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports opportunities and the wellbeing of people and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunities for all.

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), the National Marine Planning Framework (NMPF) and achieve alignment of investment priorities with those of the National Development Plan (NDP) and thus Project Ireland 2040, by coupling new development with the requisite investment in services and infrastructure. In doing so, the RSES supports the spatial, economic and climate policies and objectives of the Government by providing a long-term strategic planning and economic framework for the Eastern and Midland Region. The RSES also sets the context for local authorities within the Region to develop their City and County Development Plans (CDPs), and Local Economic and Community Plans (LECPs) in a manner that will ensure alignment between national, regional and local plans.

1.2 Review of the Regional Spatial and Economic Strategy (RSES)

In accordance with Part 3 of the P&D Act 2024, as amended, the Regional Assembly has commenced a review of the RSES for the Eastern and Midland Region, which will build on the progress made under the first RSES. The Department of Transport will be aware that the pre-draft public consultation of the review of the RSES ended on 22nd of May 2026. The Assembly has prepared a Director's Report and is engaging further with the constituent local authorities, relevant key stakeholders, Strategic Planning Area (SPA) Committees and other relevant stakeholders to prepare the Draft RSES.

The Act requires that the new RSES 'shall be materially consistent' with Project Ireland 2040 including the NPF 2025, NMPF 2021, NDP 2025, and other national policies and measures.

1.3 Context for Submission

Under the Planning and Development Act 2024, as amended, the Regional Assembly has no statutory obligation to prepare a submission on the Draft National Ports Policy (NPP). However, having regard to the pivotal role of the NPP in shaping the future development, governance and operation of Ireland's ports, the Assembly considers that the strategic significance of the Draft NPP warrants the preparation of a submission.

2.0 Submission

The Regional Assembly welcomes the opportunity to contribute to the consultation on the Draft NPP issued by the Department of Transport. As recognised in the Draft NPP, the importance of Ireland's ports extends beyond their economic function, and the Assembly recognises that the responsiveness and competitiveness of Ireland's maritime transport industry will be underpinned by the National Ports Policy. Many ports are located within urban areas and environmentally sensitive coastal locations, meaning that their relationship with surrounding communities, which provide their social licence to operate, and the wider marine environment is of shared importance. The Draft NPP presents an opportunity to establish a clear strategic framework to guide the future development, governance and operation of Ireland's ports, ensuring they can respond to emerging challenges while continuing to support sustainable national and regional development.

The consultation document is set out under four themes: Organisational and Ownership Structures; Corporate Governance; Ports Policy and the Development of Maritime Transport; and Future Sustainability. As such, this submission is structured under these four themes. The Assembly has provided observations and recommendations where relevant and has outlined the relevant objectives and policies of the RSES and associated documents, where appropriate.

2.1 Organisational and Ownership Structures

The Assembly wishes to acknowledge the evolution of Ireland's port governance framework, including the transition from the model established under the Harbours Act 1946 to the corporatisation of larger commercial ports under the Harbours Act 1996 and the subsequent categorisation of ports under the National Ports Policy 2013. The preparation of a new National Ports Policy is therefore welcomed as an opportunity to establish an updated strategic framework for the governance, operation and future development of Irish ports.

Development of the National Ports Policy

The Draft National Ports Policy removes the existing Tier 1 and Tier 2 port classifications, and this is broadly welcomed by the Assembly, with the recognition of all previously designated Tier 1 and Tier 2 ports as Ports of National Significance acknowledged. This revised approach reflects the equal strategic importance of these ports in leading the development of the State's future port capacity while supporting national economic growth, trade and connectivity.

As highlighted in Table 1 of the Draft NPP, Dublin Port accounted for 47.25% of the State's port traffic in 2025, demonstrating its critical role in supporting Ireland's economy, international trade and freight connectivity. Accordingly, the future capacity and sustainable development of Dublin Port up to 2040 will require careful consideration to ensure it can continue to accommodate the State's future trade and freight requirements while balancing environmental considerations.

As highlighted in the RSES, Dublin Port is a critical national facility and a key economic driver for both the Region and the State. Regional Policy Objective (RPO) 8.21 of the RSES states that “EMRA will support the role of Dublin Port as a Port of National Significance (Tier 1 Port) and its continued commercial development, including limited expansion and improved road access, including the Southern Port Access Route.” As such, the RSES supports the continued commercial development of Dublin Port, including potential limited expansion and the delivery of critical infrastructure. The Assembly notes the importance of ensuring that Dublin Port remains a key gateway for trade, supports economic competitiveness, and that congestion is reduced through improved access routes.

The RSES recognises the important role of regional ports as economic drivers for their local communities and regions and supports their sustainable development through the relevant Regional Policy Objectives. The Assembly considers that the transfer of Ports of Regional Significance to local authority-led governance structures under the National Ports Policy 2013 has strengthened the alignment of these ports with regional and local priorities and delivered benefits through the promotion of maritime tourism, enhanced amenity, economic development and place-making. Within the Eastern and Midland Region, these benefits can be observed at Ports of Regional Significance including Drogheda, Dún Laoghaire and Wicklow, as well as other regional ports including Dundalk, Greenore, Arklow, Howth, and Warrenpoint in Northern Ireland.

As outlined in the Draft NPP, the Ports of Regional Significance within the Region listed are Drogheda Port Company, Dún Laoghaire Harbour Company and Wicklow Port Company. The Assembly therefore welcomes the continued recognition of these ports and recommends that the National Ports Policy should also recognise the regional role of Dundalk, Greenore, Arklow, Howth and Warrenpoint Port in Northern Ireland, given their contribution to regional economies, connectivity and maritime activity.

Rosslare Europort legacy ownership structure

While not located within the Eastern and Midland Region, the strategic role of Rosslare Europort in supporting the delivery of Ireland's offshore renewable energy is recognised. Rosslare Europort is also designated as a key strategic node on the Trans-European Transport Network (TEN-T), reinforcing its importance for national and European transport connectivity. Owing to its geographic location and direct maritime connectivity with Europe, Rosslare Europort is well positioned to facilitate offshore renewable energy projects. The port's plans to develop infrastructure capable of accommodating such energy projects are also noted.

Potential for Consolidation in the State-owned commercial port network

The Assembly agrees that an integrated approach to port operations and investment planning would maximise the economic potential of the State's port network and would ensure that investment is prioritised and managed strategically. The designation of all Tier 1 and Tier 2 ports as Ports of National

Significance reinforces the need for an overarching strategic framework for the national ports network. Such a framework should promote enhanced governance arrangements and greater coordination and alignment between ports, recognising their individual and complementary roles and ensuring they work collectively, rather than in isolation, to support trade, energy security, offshore renewable energy and the delivery of wider national and regional development objectives.

Private Ports

The Assembly welcomes the inclusion of Greenore Port within the Draft NPP. As the State's only private commercial port, and located within the Eastern and Midland Region, Greenore Port plays an important role in providing marine and logistical support services to a range of sectors, including agri-feed, construction, renewable energy, livestock exports and manufacturing. Greenore Port has potential to contribute to regional economic development, strengthen supply chain resilience and support emerging opportunities associated with the energy transition.

Overview of the European Union's TEN-T Network

The strategic importance of the TEN-T network is recognised within the Draft NPP particularly in supporting Ireland's connectivity, trade and freight movement. Dublin is one of the four urban nodes identified in Ireland, and forms part of the North Sea-Rhine Mediterranean European Transport Corridor and the Atlantic Transport Corridor. The RSES recognises the need to safeguard strategic transport corridors including the TEN-T to ensure the continued efficient movement of goods, support economic development and maintain Ireland's international connectivity. In this respect, RPO 8.11 of the RSES is to 'support the improvement, and protection, of the EU TEN-T network and the strategic function of the Dublin to Belfast Road network.'

2.2 Corporate Governance

The introduction of a national port performance measurement system, Policy Objective 2, and relevant Key Performance Indicators (KPIs) is welcomed by the Assembly. The Assembly would welcome ongoing engagement on the proposed KPIs, including how they will be monitored, reviewed and updated over time, to ensure that relevant regional policy objectives continue to appropriately reflect the evolving role, performance and requirements of the port sector.

In relation to monitoring implementation of the objectives of the RSES, the Assembly notes that Section 35 (3) of the P&D Act 2024, as amended, permits the Regional Assembly to request a report from the Minister, the NTA, the OPR, the MARA and other relevant public bodies, every three years, setting out progress made in supporting the objectives of the RSES. In this regard, progress reports from the Department of Transport on the implementation of the national port performance measurement system, including updates on relevant Key Performance Indicators (KPIs) and performance outcomes, would assist the Assembly in understanding how ports are operating and

ensure that regional policy objectives continue to align with the evolving role and requirements of the port sector.

The Assembly considers that the addition of the measurement system to monitor performance would align with National Policy Objective (NPO) 107 of the NPF 2025 which seeks to continue to ensure the alignment of the NPF and the NDP through delivery of the National Strategic Outcomes; and NPO 108 which seeks to develop and implement a new programme of monitoring implementation of the NPF 2025, with a focus on measuring outcomes relative to the key strategic objectives including more balanced and effective regional development, compact growth and infrastructure delivery. In addition, it would align with Chapter 12 of the RSES on Monitoring and Implementation.

In this respect the Assembly wishes to draw attention to the [Regional Development Monitor \(RDM\)](#)¹ which provides a series of mapping and visualisation tools (continually updated) which are intended to be of assistance to policy and decision makers in gaining a greater insight into social, economic and environmental trends to aid better monitoring.

Future Funding

The Assembly agrees that increased funding opportunities for ports should be considered and therefore supports Policy Objective 3 of the Draft NPP, recognising the strategic role of ports in supporting trade, international connectivity, economic development, climate action and the delivery of offshore renewable energy projects. Given the evolving demands placed on ports and the need to provide appropriate infrastructure to support future capacity requirements, investment will be essential to ensure that ports can continue to fulfil their functions. The Assembly welcomes the recognition of the need to explore a wider range of funding mechanisms, including EU funding opportunities, to support the sustainable development and resilience of the port sector.

2.3 Ports Policy and the Development of Maritime Transport

Future Capacity Requirements

Ensuring sufficient future port capacity will be essential to supporting Ireland's trade, economic growth and competitiveness. Ports of National Significance will continue to play a critical role in meeting future demand and facilitating national and regional development. Within the Eastern and Midland Region, it is noted that Dublin Port has already identified and is progressing the strategic infrastructure projects required to deliver its capacity objectives to 2040, including the Alexandra Basin Redevelopment (ABR), the MP2 Project and the Third and Final Masterplan (3FM) Project. The successful delivery of these projects will be critical in ensuring that Dublin Port can continue to meet the State's future trade and freight requirements. The Assembly also welcomes the inclusion of the climate targets in line with the National Climate Action policy. To support their implementation, the

¹ The Regional Development Monitor (RDM) Hub will soon move to www.regionalmonitor.ie

final policy document should provide clearer guidance on the infrastructure, investment priorities and operational measures expected of Ports of National Significance to achieve these emission reduction and energy efficiency targets.

Findings of the Irish Ports Capacity Study 2023

Policy Objective 5 of the draft NPP relates to future capacity forecasting analyses, and the Assembly welcomes this objective and the commitment to undertake regular national port capacity forecasting. Given the strategic importance of Dublin Port to the State's port network, the outputs of future capacity assessments will be important in informing policy and infrastructure investment.

Post-2040 port capacity recommendations

Policy Objective 6 of the Draft NPP relates to master planning and strategic development needs of port infrastructure. The Assembly supports this and agrees that the immediate priority should be to maximise the use of existing port infrastructure, improve operational efficiency and expand existing port assets, where appropriate, before developing significant new capacity. The Assembly welcomes the requirement that State-owned commercial port companies must review their masterplans to ensure alignment with the adopted National Ports Policy.

The Assembly acknowledges the Government's recognition that existing port infrastructure on the east coast will be unable to meet projected demand beyond 2040 and that additional port capacity will be required. The Assembly would welcome the inclusion in the National Ports Policy of further detail relating to post-2040 port capacity on the east coast.

Location of Dublin Port

The Assembly notes the Government's recognition that the relocation of Dublin Port would present significant challenges and would be difficult and impractical to deliver. Dublin Port's strategic importance extends beyond the Eastern and Midland Region and the State, reflecting its role within an integrated all-island economy and its contribution to national trade and connectivity. The Assembly considers that the National Ports Policy should specifically recognise the importance of port-city integration and provide greater policy support for initiatives that strengthen the relationship between ports and their surrounding urban areas. This might include the identification of opportunities to enhance active travel, public realm, heritage, biodiversity and community access, where these are compatible with the safe and efficient operation of port activities.

Cruise Tourism Capacity

The Draft NPP states that cruise tourism has the potential to provide economic benefits to local and regional economies, while also requiring careful consideration of environmental impacts and the capacity of port infrastructure. Given Dublin Port's role within the Eastern and Midland region and the current pressures on port capacity, the Assembly supports the preparation of further evidence on the

environmental and economic impacts of cruise activity as outlined in Policy Objective 7. The Assembly would welcome engagement on the findings of this assessment to help inform future policy approaches and ensure that cruise tourism develops in a sustainable manner, aligned with national planning policy objectives and to ensure the protection of local communities and environments.

Irish Maritime Development Office (IMDO)

The Assembly welcomes Policy Objective 8 of the Draft NPP and the recognition of the importance of skills development within the maritime and logistics sectors, including the expanded role proposed for the Irish Marine Development Office (IMDO) in this area. Given the strategic importance of Ireland's marine assets and the future development of ports, particularly in supporting offshore renewable energy projects and associated infrastructure, the National Ports Policy should provide further consideration of potential skills gaps and future skills requirements within the maritime economy. Identifying these needs will be important in supporting the delivery of energy infrastructure, innovation and employment opportunities required to grow the sector.

As set out in the RSES, the Assembly recognises the importance of the marine economy. Fishing is a substantial sub-sector in the coastal planning authorities in the Region, with Howth being one of six National Fishery Harbour Centres and several small fisheries clusters located along the eastern seaboard including Wicklow, Clogherhead and Dún Laoghaire. While the traditional fishing industry faces challenges in relation to seasonal employment, fish stocks and coastal hazards, there are also opportunities for diversification and development of bio resources including seafood, aquaculture and offshore renewables. RPO 7.5 of the RSES seeks to support and enable the sustainable development of this sub-sector in the Region.

Research undertaken to inform the review of the RSES has also identified a number of emerging transition sectors, including green construction, offshore and onshore renewable energy, the circular bioeconomy and advanced manufacturing, where the Region has the assets to develop new competitive strengths. Offshore renewable energy is expected to generate new employment opportunities but also highlights the need to address emerging skills gaps. This reinforces the importance of Policy Objective 8 of the Draft NPP in ensuring that future skills development is aligned with the evolving needs of the maritime economy.

Port Marine Code

The Assembly welcomes Policy Objective 9 to develop an Irish Port Marine Code to provide a clearer and more coordinated framework for safety, governance and operational standards across the port sector.

2.4 Future Sustainability

Decarbonising the maritime transport sector

The Assembly welcomes the Government's commitment to the decarbonisation of the maritime transport sector and the transition towards alternative fuels and associated infrastructure. The Assembly further recognises the important role of ports in supporting this transition, including through the development of alternative fuels infrastructure at appropriate strategic locations and along key freight and logistics corridors within the TEN-T network.

To ensure alignment with wider policy objectives, the National Ports Policy should consider relevant EU and national climate, energy, environmental and economic policy frameworks, including the EU Renewable Energy Directive, REPowerEU, the Climate Action Plan, the National Biodiversity Action Plan, the Nature Restoration Plan (forthcoming), the National Hydrogen Strategy, the National Biomethane Strategy and the Integrated National Energy and Climate Plan 2021–2030.

Alternative Fuels

The Assembly welcomes Policy Objective 11 of the Draft NPP and the commitment to assess the feasibility of developing alternative fuel infrastructure within State-owned commercial port companies. Given the strategic role of ports in supporting the energy transition and the decarbonisation of the transport sector, the Assembly notes the potential value of this research in informing future planning policy and infrastructure requirements. The Assembly recognises that the transition to alternative fuels will require collaboration between ports, shipping companies and relevant stakeholders, supported by further research and innovation to identify appropriate infrastructure and fuel solutions that will support a greener and more sustainable maritime sector.

The Assembly notes the importance of the sustainability of alternative fuels and agrees with the position set out in the Draft NPP that renewable e-fuels are likely to represent one of the most promising pathways to the decarbonisation of maritime transport. The Assembly also welcomes the recognition given to wind-assisted propulsion technologies and considers that operational measures, including the moderation of vessel speeds, can also contribute to emissions reductions and should be recognised as part of a broader approach to the decarbonisation of maritime transport.

The Assembly further notes that the Draft NPP states that Government, agencies and authorities will continue to guide, align and coordinate research and innovation investments in support of the decarbonisation of maritime transport. The Assembly considers that this commitment should be reflected more fully within the associated policy objective, which should extend beyond research activity and include the identification and removal of unintended operational, regulatory and administrative barriers to the adoption of emissions-reduction technologies and practices. Such barriers may arise through the interaction between business-as-usual approaches within State agencies and authorities and the introduction of new technologies, fuels and operational models. This

approach would be consistent with the Climate Action Plan 2025 by ensuring that the National Ports Policy contributes to the decarbonisation of maritime transport and the wider logistics chain.

Green Shipping Corridors

The Assembly notes that the development of Green Shipping Corridors remains at an early stage and supports the Government's commitment under Policy Objective 12 to establish a Green Shipping Corridor with the UK by 2030. The Assembly welcomes the 'Greening the Irish Sea: The Central Corridor' study examining the feasibility of green shipping lanes between Dublin and Holyhead, particularly given Dublin Port's strategic role within the Eastern and Midland Region.

Passenger Transport

The Assembly recognises the important role of maritime passenger transport as a lower-emission alternative to aviation, both in terms of its significantly lower emissions at present and its considerable potential for further decarbonisation over the medium to long term. This is reflected in the Draft NPP, particularly through its support for Green Shipping Corridors. The Assembly considers that the National Ports Policy should recognise the contribution of passenger ferry services to sustainable transport and connectivity and support the provision of high-quality and affordable port and ferry services and associated infrastructure for passengers as well as freight.

The Assembly considers that the needs of passengers travelling on foot, by bicycle, by public transport and by private vehicle should be recognised within the National Ports Policy and include an objective to improve timetable integration between maritime passenger services and onward transport connections. Further to this, the policy should ensure that appropriate infrastructure and services are available to facilitate passengers travel without motor vehicles. Such an approach would support wider national objectives relating to sustainable mobility, modal shift and transport decarbonisation.

Onshore Power Supply

The Assembly recognises the importance of Onshore Power Supply (OPS) infrastructure in supporting the decarbonisation of maritime transport and reducing emissions from port operations. Given Dublin Port's designation within the TEN-T network, the delivery of OPS infrastructure will require consideration of electricity grid capacity and supporting energy infrastructure.

The NPF 2025 emphasises climate action and the need for Ireland to transition to a carbon neutral and climate resilient society. A key component of this transition is accelerating the growth of renewable energy generation. New policies within the NPF promote the accelerated roll-out of renewable energy infrastructure, aligning with Ireland's commitment to achieving climate neutrality no later than 2050, a 51% reduction in greenhouse gas emissions by 2030 and the legally binding objectives set out under the Climate Action and Low Carbon Development (Amendment) Act 2021.

This aligns with the requirements of the Planning and Development Act 2024, as amended, which require the RSES to include a Regional Renewable Energy Strategy that identifies and facilitates electricity grid infrastructure, including upgrade projects and supporting infrastructure, to accommodate renewable energy generation and support the transition to a low-carbon economy. The revised RSES will therefore have regard to the role of grid capacity and energy infrastructure in enabling the decarbonisation of strategic assets, including ports, and in supporting the delivery of measures such as OPS infrastructure.

As illustrated in Table 1 below, regional renewable electricity capacity allocations have been identified in the NPF 2025 for the three Regional Assemblies. These allocations are intended to facilitate the accelerated delivery of renewable electricity infrastructure, including onshore wind and solar energy generation, and support the achievement of the 2030 targets set out in the Climate Action Plan. The Eastern and Midland Region has been allocated responsibility for delivering 25% of the national share of onshore wind capacity and 45% of solar PV capacity by 2030.

Table 1: Regional Renewable Electricity Capacity Allocations

Region	Energised capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030	Energised Capacity 2023 (MW)	Additional Renewable Power Capacity Allocations (MW)	Total % of National Share in 2030
	Onshore Wind			Solar PV		
Eastern and Midlands	284	1,966	25%	306	3,294	45%
Northern and Western	1,761	1,389	35%	0.3	959	12%
Southern	2,622	978	40%	138	3,302	43%
Total	4,667	4,333		445	7,555	

Source: Table 9.1 Regional Renewable Electricity Capacity Allocations, National Planning Framework 2025

The Assembly considers that the National Ports Policy should recognise the role of the Regional Assemblies in supporting the delivery of onshore renewable energy and how this will enable the rollout of onshore power supply (OPS) infrastructure and contribute to the decarbonisation of Ireland's ports.

Offshore Renewable Energy (ORE)

The Assembly acknowledges the Government's objective of delivering at least 5 GW of offshore wind capacity by 2030, together with an additional 2 GW for green hydrogen and other non-grid uses, as

set out in the Climate Action Plan 2024. The Assembly recognises the importance of the plan-led approach to delivering offshore renewable energy development which is overseen by cross-Government Offshore Wind Delivery Taskforce. However, the Assembly would appreciate greater detail in the National Ports Policy on the implementation of the developer-led Phase One, the accelerated Phase Two work programme, and the Future Framework. The inclusion of a dedicated policy objective or implementation roadmap, with indicative timelines, would provide greater certainty.

Ports will play a critical strategic role in supporting the construction, assembly and deployment of offshore renewable energy projects. The Government's proposed multi-port approach is welcomed. Notwithstanding, the Assembly notes the need for further detail on how this multi-port approach will operate in practice, including how ports within the Eastern and Midland region will interact with ports in other regions.

The development of offshore renewable energy presents significant economic opportunities including the creation of employment, the growth of SMEs, the development of maritime supply chains and the establishment of supply chain clusters in and around ports. The Assembly supports the continued recognition of these benefits within the final policy. The RSES identifies the important role that marine planning plays in unlocking the future potential of the maritime economy. The Assembly recognises the marine as a labour-intensive economic sector which is of particular importance to the Region, given its significance for job creation, maintenance and sustainability. The Assembly notes that there are development opportunities in the marine or blue economy including fishing, renewables, and tourism. Furthermore, the Assembly recognises that marine resources provide many important non-commercial benefits and ecosystem services such as amenity, biodiversity and climate regulation which it considers should be fully recognised within the final NPP.

The use of ports as hubs for offshore renewable energy development aligns with the objectives of the RSES which supports the protection of ports from inappropriate uses while promoting diversification and in line with Ireland's renewable energy ambitions. In this regard, RPO 8.23 of the RSES supports the protection of the marine related functions of ports in the Region in order to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses, whilst supporting complimentary economic uses including the potential for facilitating offshore renewable energy development at ports.

In addition, RPO 10.24 of the RSES recognises the importance of advancing offshore energy projects such as wind, wave, and tidal energy and associated developments such as Ireland's domestic and international grid connections. It further supports the sustainable development of Ireland's offshore renewable energy resources.

The Assembly considers that the National Ports Policy should establish a clear strategic framework setting out the role of ports. This should recognise the varying roles that ports may perform in relation

to offshore wind, wave, tidal, solar and hydrogen projects, including survey and site investigation, design, construction, assembly, operation and long-term maintenance. The Assembly considers that the provision of such a strategic framework would provide greater certainty for local authorities and other strategic landholders to identify and safeguard appropriate lands for complementary landside infrastructure and port-related uses. Close coordination with the Department of Climate, Energy and the Environment in the preparation of the National Designated Maritime Area Plan (DMAP) for Offshore Renewable Energy will be essential to ensure alignment between marine spatial planning, port investment and the delivery of Ireland's offshore renewable energy ambitions.

The references to Designated Maritime Area Plans (DMAPs) in the Draft NPP, including the South Coast Designated Maritime Area Plan (DMAP), are welcomed. Regional Assemblies have a statutory role in the preparation and coordination of DMAPs under the Maritime Area Planning Act 2021 where designated as the competent authority. Continued engagement with Regional Assemblies on the implementation of DMAPs would support effective marine spatial planning and the coordinated delivery of offshore renewable energy. This aligns with the NPP which identifies an opportunity for the co-location of offshore renewable energy and green industrial demand, particularly in rural and coastal communities.

The Assembly also welcomes the establishment of the Ports Co-ordination Group and would welcome engagement and regular updates to inform the implementation and monitoring of port and offshore renewable energy infrastructure.

Integrated Logistics

Resilient and integrated hinterland connections are essential to supporting the long-term competitiveness of Ireland's ports and safeguarding supply chain resilience. As identified in the All-Island Strategic Rail Review (2024), there is potential to enhance both passenger and freight rail services, and the Draft National Ports Policy supports the further development of rail connectivity.

The challenges identified in the Draft NPP in relation to the viability and expansion of rail freight in Ireland are recognised, the continued investment in rail connectivity remains important where it can support economic objectives, emissions reduction and more sustainable freight movement. The Assembly considers that the integration of ports with road, rail and logistics networks is particularly important for the efficient movement of goods, with Dublin Port on the TEN-T network requiring appropriate hinterland connections to support their continued development.

The Assembly welcomes the ongoing investment in port-related rail infrastructure and considers that continued Government support for enhancing rail freight capacity and improving connections to ports in line with the recommendations of the All-Island Strategic Rail Review (2024) will be essential. The Assembly considers that the final NPP should address how rail connectivity can be expanded and better utilised as part of a wider integrated transport network which supports ports and their associated logistics functions.

Circular Economy and Emerging Technologies

Ports have an important role to play in supporting the transition towards a circular economy, including through innovation, digitalisation and the adoption of emerging technologies to improve resource efficiency and the sustainability of port operations. The RSES supports the transition towards a more circular economy, which is essential to improving resource efficiency and enabling the Region to make more sustainable use of resources.

A sustainable bioeconomy is an essential element of the renewable segment of the circular economy and has the potential to support the transition towards a low-carbon economy through the sustainable use of renewable biological resources, including opportunities linked to marine-based industries, waste management and other emerging sectors. The Assembly recognises the opportunities arising from the bioeconomy, including in relation to marine-based industries, waste management, innovation and sustainable economic development. National Policy Objective (NPO) 67 of the NPF supports the circular and bioeconomy including through greater efficiency in land and materials management.

In line with Regional Strategic Outcome (RSO) 9 of the RSES, EMRA supports the development and implementation of plans, programmes and projects for climate action aimed at accelerating the transition to a low carbon and circular economy, including Climate Action Plan 2024 (and subsequent CAPs). Furthermore, in line with RPO 7.34 of the RSES, the Assembly continues to engage with key local, regional, national and European stakeholders to better understand and explore the complexities of changes involved in decarbonisation and the transition to a sustainable economy.

The Assembly notes Policy Objective 15 of the Draft NPP and the proposal to establish a maritime transport forum to facilitate the sharing of best practice in relation to the circular economy. The Assembly would welcome inclusion in this forum to ensure that regional perspectives and opportunities within the Region are considered in the development of future circular economy initiatives within the maritime sector.

The Assembly recognises that increasing digitalisation and the adoption of emerging technologies within the maritime sector will provide opportunities to improve the efficiency, sustainability and resilience of port operations. Building on the existing RSES focus on sectoral opportunities in cybersecurity, particularly in Dublin and the Eastern Strategic Planning Area (Section 6.4 of the RSES), to capitalise on the strengths of its own enterprise base, the RSES states that Dublin should explore opportunities for further development, and this includes marine energy.

Sustainability and Natural Resources

The Assembly recognises the significant challenges posed by climate change and the need for ports to adapt to increased climate risks, including sea level rise and extreme weather events. Sections 29

(1)(e), 1(f) and 1(g) of the Planning and Development Act 2024, as amended, state that an RSES shall make provision for strategies relating to onshore renewable energy; climate change adaptation and mitigation; and marine and coastal matters that facilitate the coordination of land-sea interactions for coastal planning authorities within the region. Sections 29 (1)(h), 1(k), 1(m), 1(o) further require an RSES to make provision for matters including coastal zone management as a consequence of sea level change, including the identification of strategic infrastructure; the preservation and protection of the environment and its amenities; a strategy relating to landscape and landscape character that coordinates the categorisation of landscapes, in terms of their capacity to absorb particular types of development, across the region so as to ensure a consistent approach to the protection of the landscape; and, a flooding and flood management plan for the region.

Climate Action is one of the three key principles of the RSES, and the Climate Strategy of the RSES aims to ensure that the RSES drives climate resilience throughout the Region and accelerates climate action. Furthermore, the RSES supports the transition to low carbon and clean energy, climate mitigation in line with global and national targets and harnessing the potential for a better distributed renewables-focused energy system to support the transition to a low carbon economy by 2050 (RSO 9). Climate change and climate focused Regional Planning Objectives (RPOs) are integrated throughout the RSES and include priorities related to the built environment, sustainable transport, energy and waste, flood resilience and water, and green infrastructure and ecosystem services (Section 7.9 of the RSES).

As Ireland transitions away from reliance on fossil fuels, ports will play an increasingly important role in facilitating the energy transition, including supporting offshore renewable energy projects, green hydrogen development, and the construction, maintenance and servicing of renewable energy infrastructure.

Biodiversity, Water Quality, Air Pollution and Dredging

The Assembly welcomes the strong emphasis in the Draft NPP on reducing the environmental impacts of port operations and ensuring that future port development is undertaken in a manner that protects biodiversity, water quality, air quality and the wider marine environment. The Assembly agrees that ports have an important role to play in protecting biodiversity, particularly given the sensitive coastal and marine environments in which they operate and supports the recognition of the National Biodiversity Action Plan 2023–2030, the Water Action Plan 2024: A River Basin Management Plan for Ireland and the National Marine Planning Framework (NMPF). The Assembly welcomes the publication of the Strategic Environmental Report, the Pre-Consultation NIS and the Strategic Flood Risk Assessment alongside the Draft National Ports Policy and notes that the environmental assessment process must be a fully integrated component of policy development, with the findings of the SEA, NIS, and SFRA directly informing the final version of the National Ports Policy.

The Assembly considers that the National Ports Policy should also recognise the importance of marine and near-shore ecology, including estuarine, intertidal and coastal ecosystems which support

biodiversity, fisheries, ecosystem services and ecological resilience. Port planning, development and operation should be informed by an ecosystem-based approach that seeks to avoid, minimise and mitigate ecological impacts and, where appropriate, promote biodiversity enhancement measures. Such an approach would be consistent with the objectives of the NMPF, the National Biodiversity Action Plan and emerging National and European policy relating to ecosystem restoration and marine environmental protection.

The Assembly also notes that light pollution is an emerging environmental consideration in coastal and port environments. Artificial lighting can have adverse impacts on seabirds, marine mammals, fish populations and near-shore ecological processes. The Assembly considers that the National Ports Policy should encourage the use of best-practice lighting design and management approaches that minimise unnecessary illumination and impacts on sensitive habitats, while maintaining operational safety, navigation and security requirements.

The Assembly considers that the final National Ports Policy should formally adopt the SEA's proposed New Policy Objective for Biodiversity to ensure alignment with the 4th National Biodiversity Action Plan and the development of Biodiversity Adaptation Plans. Additionally, the Assembly considers that the final policy should expand its climate objectives to require mandatory Decarbonisation Plans for all ports to address identified gaps in climate mitigation as recommended in the Environmental Report. In line with the SFRA, the Assembly considers that the NPP should require that all future port expansions and masterplan reviews adhere to the SFRA's proposed Sequential Approach and Justification Test to ensure long-term resilience against coastal flooding and sea-level rise.

The Assembly further considers that consideration should be given to emerging European and international policy, including the EU Ocean Pact and the UN Agreement on the Conservation and Sustainable Use of Marine Biological Diversity of Areas beyond National Jurisdiction (BBNJ), where relevant to future port development. In addition to legal obligations, such provision will ensure consistency with RPO 7.2 of the RSES which seeks to achieve and maintain 'Good Environmental Status' for marine waters and RPO 7.3 which supports an 'Integrated Coastal Zone Management' approach to the management and protection of coastal resources. Furthermore, RPO 7.5 of the RSES seeks to support and enable the sustainable development in the seafood and aquaculture sector while ensuring its preservation in the Region. It further states that EMRA shall work with coastal stakeholders to support the sustainable development of the national Fishery Harbour Centre in Howth and the sustainable growth of the seafood and on shore aquaculture sector in the Region, and to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment.

Sea Level Rise, Coastal Change Management and Adaptation

As highlighted above, the Assembly recognises the challenges posed by climate change, including sea level rise, coastal flooding and coastal erosion. The Assembly agrees that ports will need to invest in

mitigation and adaptation measures to ensure that port infrastructure becomes more resilient to protect their critical role in the economy.

The Assembly welcomes Policy Objective 16 and the requirement for Ports of National Significance to develop Climate Adaptation Plans to address Coastal Change Management, to be updated at five-year intervals. The Climate Adaptation Plans should align with the NPF and have regard to the National Coastal Change Management Strategy, once prepared, to ensure a coordinated approach to coastal resilience.

As noted above, the Assembly has a role under the Planning and Development Act 2024, as amended, in relation to climate change adaptation and mitigation, marine and coastal matters and coastal zone management. Continued engagement between port authorities, Regional Assemblies, local authorities and relevant stakeholders will be important to ensure that climate adaptation measures are effectively coordinated and support the long-term resilience of coastal communities.

Port Network Resilience and Security

The Assembly recognises the importance of strengthening the resilience of Ireland's ports and supports the proposed review of port infrastructure resilience, which will include an examination of port connectivity and capacity. The Assembly considers that this review should adopt a coordinated approach that considers the resilience of the wider transport network, including road and rail connections, reflecting the integral role of ports in supporting the economy and ensuring supply chain resilience.

The Assembly welcomes Policy Objective 17 and the commitment to support resilience testing, including cyber resilience, across all ports and sea routes. As digitalisation becomes increasingly embedded within port operations, strengthening cyber resilience is essential to safeguard critical infrastructure.

The Assembly acknowledges the importance of security across ports given their strategic function. Protection of sub-sea cables is vital and the RSES identifies such key telecommunications and electrical infrastructure as part of the regional growth strategy which enables social and economic activity. The Assembly notes that responsibility for port security rests with individual port authorities and considers that there is merit in adopting a more coordinated strategic approach to port security across the national port network.

The Assembly suggests that consideration be given to incorporating port security within the review of the port masterplans required under Policy Objective 6, to promote greater consistency in security planning, information sharing and resilience across the Ports of National Significance, while recognising the differing operational requirements of individual ports.

Gender balance, diversity, inclusion and accessibility

The Assembly acknowledges the importance of promoting gender balance, equality and diversity across Ireland's ports. The Assembly considers Policy Objective 18 to be a positive initiative and supports the development and implementation of Gender and Diversity Equality Action Plans.

The Assembly further acknowledges the importance of ensuring that maritime transport infrastructure is accessible and inclusive for all users and welcomes Policy Objective 19 and the continued implementation of accessibility requirements within maritime transport.

3.0 Recommendations/Observations

The Regional Assembly requests that the Department takes the following recommendations into account in the finalisation of the National Ports Policy to ensure consistency with Project Ireland 2040 (National Planning Framework, National Marine Planning Framework and National Development Plan), the Climate Action Plan 2025, the Regional Spatial Economic Strategy (RSES) and any future RSES, and other relevant policies.

The Assembly makes the following recommendations:

1. The Department should ensure consistency between the National Ports Policy, the NPF, and the NMPF having regard to the enhanced statutory role of the Regional Assemblies in relation to marine and coastal matters as set out in the Planning and Development Act, 2024, as amended.
Reason: To ensure full alignment between national policies and to reflect the enhanced role of the Regional Assemblies as set out in the Planning and Development Act 2024, as amended.
2. The National Ports Policy should reference the statutory role of the Regional Assemblies in preparing Regional Renewable Energy Strategies and other related provisions, as set out in the Planning and Development Act 2024, as amended, and the NPF 2025.
Reason: To reflect the enhanced role of the Regional Assemblies under the Planning and Development Act 2024, as amended, and to align with the policies and objectives of the NPF 2025.
3. The National Ports Policy should demonstrate alignment with EU and national energy policy frameworks such as the EU Renewable Energy Directive, REPowerEU, the Climate Action Plan 2025, the National Hydrogen Strategy, the National Biomethane Strategy and the Integrated National Energy and Climate Plan 2021–2030.
Reason: To ensure full alignment between EU and national policies.
4. The National Ports Policy should demonstrate alignment with the National Marine Planning Policy Statement, the Offshore Renewable Energy Development Plan, the National Designated

Maritime Area Plan, the Nature Restoration Plan and National Landscape Strategy and provide detail on how it will influence regional strategies on renewable energy, marine and coastal matters, climate change adaptation and mitigation.

Reason: To ensure full alignment between national policies.

5. The National Ports Policy should ensure that future port development and associated infrastructure are informed by relevant environmental protection requirements and provide clearer guidance on the infrastructure, investment priorities and operational measures expected of Ports of National Significance to achieve emission reduction and energy efficiency targets, including support for alternative fuels infrastructure, operational efficiency measures and other measures which contribute to the decarbonisation of maritime transport.

Reason: To ensure alignment with European Directives, national legislative requirements and Climate Action Plan objectives.

6. The environmental assessment process must be fully integrated with NPP development, with the findings and recommendations of the SEA, NIS, and SFRA directly informing the final version of the National Ports Policy. The National Ports Policy should also be informed by the requirements under the EU Nature Restoration Regulation (EU) 2024/1991 to ensure that port related infrastructure is fully aligned with EU and national legislative requirements relating to the environment.

Reason: To ensure alignment with European Directives and national legislative requirements.

7. The National Ports Policy should recognise the importance of marine and near-shore ecology, including estuarine, intertidal and coastal ecosystems, and encourage an ecosystem-based approach to port planning and development. Consideration should also be given to the management of light pollution within port environments in order to minimise impacts on sensitive habitats and species.

Reason: To support biodiversity protection, ecosystem resilience, climate adaptation objectives and consistency with the NMPF, the National Biodiversity Action Plan, Climate Action Plan 2025 and emerging marine restoration policies.

8. The National Ports Policy should identify future skills requirements and potential skills gaps within the maritime economy particularly in the context of the strategic role of ports in supporting offshore renewable energy projects and associated infrastructure.

Reason: To support the maritime economy and ensure alignment with the NPF 2025, NMPF and the RSES.

9. The National Ports Policy should place greater emphasis on the circular economy, including the role of the bioeconomy and its potential to support the transition to a low-carbon economy, including opportunities linked to marine-based industries. Consideration should

also be given to how increased resource efficiency, reuse, repair, remanufacturing and bioeconomy activities could reduce future freight demand relative to current business-as-usual projections, with potential implications for long-term port capacity requirements.

Reason: To ensure alignment with the NPF 2025, Climate Action Plan 2025, national economic policies and the RSES.

Observations: The following are observations by the Regional Assembly for the consideration of the Department in the finalisation of the National Ports Policy:

1. The National Ports Policy should include an objective to develop an overarching strategic framework for Ports of National Significance to support enhanced governance, greater coordination, collaboration and clarity on the individual and complementary roles of each port and their role in the delivery of ORE including Wind to Wave, Tidal, Solar and Hydrogen.

Reason: In the interest of best practice.

2. The National Ports Policy should include further detail on the proposed national port performance measurement system and Key Performance Indicators (KPIs), including monitoring, review and reporting arrangements.

Reason: In the interest of best practice.

3. The National Ports Policy should provide further detail on the implementation of the multiport approach for ORE, including timelines for Phase One, Phase Two and the Future Framework for offshore renewable energy development. The Assembly would also welcome engagement with the Ports Co-ordination Group, including regular updates on the implementation and monitoring of port and offshore renewable energy infrastructure.

Reason: In the interest of best practice.

4. The National Ports Policy should recognise the regional role of Dundalk, Greenore, Arklow, Howth and Warrenpoint in Northern Ireland, acknowledging their contribution to regional economies, connectivity and maritime activities.

Reason: In the interest of best practice.

5. The National Ports Policy should support a coordinated approach to port master planning, ensuring alignment between the masterplans of Ports of National Significance and the National Ports Policy with resilience and security considerations included in revised masterplans.

Reason: In the interest of best practice.

6. The National Ports Policy should address the role of ports in supporting port-city integration and initiatives that enhance the relationship between ports and surrounding urban areas,

including active travel, public realm, heritage, biodiversity and community access, where compatible with safe and efficient port operations.

Reason: To support the wider economic, environmental and community benefits arising from well-integrated port development.

7. The National Ports Policy should support maritime passenger transport by improving passenger ferry services, connectivity and associated infrastructure, including integration with onward public transport and provision for passengers travelling without motor vehicles.

Reason: In the interest of best practice.

8. The Assembly wishes to draw attention to the [Regional Development Monitor \(RDM\)](#)² which provides a series of mapping and visualisation tools which are intended to be of assistance to policy and decision makers in gaining greater insights into social, economic and environmental trends to aid better monitoring.

Reason: In the interest of best practice.

4.0 Conclusion

The Regional Assembly welcomes the opportunity to engage in the process of preparing the National Ports Policy and looks forward to continuing engagement with the Department of Transport.

Regards,



Clare Bannon,
Director
Eastern and Midland Regional Assembly
20th August 2026

² The Regional Development Monitor (RDM) Hub will soon move to www.regionalmonitor.ie