

Draft NMPF Submissions,
Marine Planning Section,
Department of Housing, Planning and Local Government,
Newtown Road,
Wexford.
Y35 AP90



**IRISH PLANNING
INSTITUTE**

Institiúid Pleanála Na hÉireann

Floor 3
The Courtyard
25 Great Strand Street
Dublin 1

T: +353 (0)1 878 8630
F: +353 (0)1 878 8682
E: info@ipi.ie
W: www.ipi.ie

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Re: Draft National Marine Planning Framework

A Chara,

The Irish Planning Institute (IPI) welcomes the publication of the Draft National Marine Planning Framework (Draft NMPF) and the opportunity to make a submission on the same. The IPI made a formal submission at the consultation stage in July 2019 and continues to actively engage in the process.

Marine Spatial Planning (MSP) is a priority for the Institute with a specific cross sectoral Marine Planning Committee established with the goals:

- To promote awareness of MSP amongst planners, stakeholders and the general public.
- To contribute to and advance the development of MSP policy.
- To promote and advance training and education of planners in MSP.
- To develop and maintain networks between the IPI and key stakeholders in MSP domestically, cross-border and internationally.

The Institute considers that, in order to ensure that sustainable development in the marine environment can be supported by terrestrial infrastructure, environments and communities, the interface between the marine spatial planning and terrestrial spatial planning systems will be of critical importance. The governance structures already in place to manage land use planning activities, at central, regional and local levels, can be supplemented and utilised in order to provide a comprehensive planning and development management regime for the marine.

A cohesive and integrated marine and terrestrial spatial planning system is imperative for an island such as Ireland and the sustainable development of competing uses in the maritime environment will require balanced consideration in terms of the associated economic, environmental and social consequences. The Draft NMPF represents the first step in this process and is broadly welcomed by the IPI.

The IPI makes the following recommendations towards strengthening the final NMPF and support its successful implementation.

Ensuring that the Plan is Usable

Whilst the Draft NMPF is a comprehensive document covering a significant breadth of activities, in practical terms the IPI envisages that there may be issues at implementing the plan, either at the plan-making stage at sub-national level, or in decision making during the development consent process. Section 3 of the Draft NMPF sets out a significant range of overarching policies containing an array of key reference documents and hyperlinks to other strategies, plans, Directives and guidance documents that are all, through inclusion in the Draft NMPF, relevant to policy makers and decision makers. It is not indicated, however, how these are to be prioritised or what the interrelationships exist between these various documents and the key sectoral policies. While the Draft NMPF generally promotes the approach of avoiding, minimising or mitigating various environmental effects, it does not set out what sectoral policies are of strategic national importance and, therefore, of overriding public importance (having regard to the principle of IROPI).

The IPI recommends that this section is simplified and more clearly integrated with sectoral policies in order to provide clarity for plan and decision-makers.

Clear Vertical and Horizontal Integration with Terrestrial Planning

Priorities for terrestrial and marine planning are inter-related. For effective integration between both, a suite of marine plans under the national, regional and local tier, matching terrestrial planning, is needed, in addition to those integrated plans required for effective trans-boundary co-operation. The integration between Regional Spatial and Economic Strategies and new Regional Marine Planning Frameworks, aligned with both the NPF and NMPF, is an opportunity to integrate regional maritime with terrestrial planning, with key roles for existing Local Authorities and Regional Assemblies.

An example of shared priorities at the national, regional and local level is the provision of critical transportation infrastructure to strengthen connectivity to, from and between ports which are of strategic importance to our State's economy (Tier 1 and Tier 2 Ports of National Significance, Regional Ports, Fishery Harbour Centres). Section 3 - Infrastructure and Access, addresses the theme broadly. The background and context in Section 14.0 - Ports, Harbours and Shipping raise the important issue of access infrastructure and delivery of the TEN-T Network to support the economic role of our ports for the State's economy. A key issue for Marine Spatial Planning is the co-ordination between terrestrial plans for improved landside access to ports and harbours (especially strategic road and rail networks on the TEN-T) and the seaward access through marine plans (as addressed by the sectoral policies in Section 14). Co-ordination between both will ensure investment through the National Development Plan and subsequent investment plans for improved access (land and sea) for ports, harbours and shipping are aligned priorities in land use and marine plans at national, regional and local level. Strengthened policies in Section 3.0 under Infrastructure and Access and in Section 14.0 would support such alignment and assist implementation of key infrastructure.

It is the IPI's position that an alignment across terrestrial and marine plans should be achieved and mirrored across existing statutory national, regional and local level under Government policy – and such integration should be time bound. While Sections 2.31-35 addresses this to a degree, a clear indication is needed as to how this is achieved in the existing Draft NMPF or how it might be achieved at the sub-national level.

New approaches, including coastal county plans, transboundary coastal partnerships, strategic integrated framework plans for river basins, estuaries and harbours and integrated coastal management zones are opportunities that can assist implementation of the NMPF. Section 3.0 could be strengthened to support such innovative approaches.

The IPI would welcome further clarity in this regard.

Climate Action

Climate action is a significant issue for the NMPF in protecting and planning for the sustainable future of our marine resources, coastal and island communities and the Draft NMPF contains significant references to climate change in Section 3.0. Planners are at the forefront of implementing proactive policies to address the emergency of climate action, climate resilience and the implementation of the Government's Climate Action Plan 2019 and the IPI has, therefore, some additional suggestions for the Draft NMPF.

Section 3.0 of the Draft NMPF should be strengthened with stronger reference and direct policy support for the initiatives of the Climate Action Regional Offices (CAROs) in assisting and supporting the respective Local Authorities in the regions in implementing their climate action strategies, which will interact with priorities for the marine and coastal areas.

The IPI welcomes the integration of offshore renewables to transition to decarbonisation of our energy supply and bring new economic opportunities for rural communities. It is important that local communities are consulted and central to the decision-making process as they are the traditional users of the sea in a variety of forms, either through employment, recreation or cultural identity. Due regard should also be had to existing uses such as aggregates, aquaculture or others with a view to exploit the potential for multi-uses. As the marine environment is four dimensional (seabed, water column, surface and air), the possibility for co-existent activities should always be considered.

The IPI recommends a re-balancing of the approach in the policies for Petroleum under Section 10.0 to reconcile security of supply and a just transition away from our reliance on carbon energy sources with the urgent need for climate action under the Governments Climate Action Plan 2019 and priorities for research, innovation and integration of marine renewable resources to energy grids.

Specific policies should also be included for Integrated Coastal Zone Management for the protection of coastal resources and communities against coastal erosion, flooding and other threats.

Promotion of the Marine Economy

The opportunities for Ireland to be a global leader in the dynamic marine economy, and for locations along our coastline to be first movers under MSP, are significant. The IPI supports the overarching policies in Section 3.0 Economic- Thriving Marine Economy for employment in the marine sectors. The sustainable delivery of infrastructure (including digital and transport connectivity), access to education, innovation, and research and development, will act as enablers for the economic vitality and resilience of our marine sectors and coastal communities. Strengthened policy support in Section 3.0 and specific sectoral support in Section 4.0 for innovation in all marine sectors, centres of excellence for marine research and development and support for marine clusters of economic activity

are recommended. These sectors will present multi-faceted roles for the planning profession in marine and terrestrial planning to assist the implementation of the NMPF and Local Authority planning networks will be key to achieving this.

Effective Implementation, Education and Training

The IPI supports the development of marine plans that are clear, concise and fully implementable across all tiers, to ensure that decision-makers are fully empowered and can effectively realise the objectives contained in the plans. Section 21 of the Draft NMPF sets out the implementation arrangements for the plan, but below the national level, the objectives are not as clear as they might be. There are opportunities for Regional Assemblies and Local Authorities to assist in the implementation of MSP, both through existing terrestrial planning and any new sub-national MSP tier. Indeed, much of the detail will be contained in sub-national plans prepared by Regional Assemblies or Local Authorities. It is noted, however, that timelines for implementing the sub-national marine planning framework have not been committed to in the Draft NMPF, as per the IPI's original consultation submission. The IPI strongly recommends adopting clear and defined timelines around this tier of plan making.

The IPI supports the preparation of detailed guidelines to assist the profession in areas such as preparation of plans for the marine at different levels of the hierarchy and processes under changing legislation such as the Marine Planning and Development Management Bill 2019. This is seen a crucial next step in the successful implementation of the NMPF given the level of integration and overlap with the array of policies and guidelines set out in Section 3. The preparation of such guidance should be time bound and a key objective for the NMPF.

At national level, supporting investment in education and training is important for upskilling professions to work efficiently under MSP. This is key to successful implementation so that the human capital and skills are in place across the public and private sectors in driving progress under MSP and implementing the NMPF.

The IPI strongly supports education, training for planning students and upskilling of the existing profession to ensure a skilled workforce is readily available to deliver on the needs of the NMPF and new consent regime. It is essential that appropriate training and education be made available for An Bord Pleanála, Regional Assemblies and Local Authorities, and supported by central funding, owing to the role they will be playing in the upcoming development management processes (the IPI will be rolling out relevant CPD in this area). It should also be noted that there are third level institutions capable of providing MSP courses and CPD. Such support should be specifically addressed and supported under Section 21 - Implementation.

Public Participation

It is critical that any plans, at any level, involve cross-community consultation and consensus in order to provide the policies and objectives contained therein with the optimal chance of success. This includes not only the infrastructure, energy and economic actors and providers, but also other

stakeholders that are affected by development, either directly or indirectly. The IPI commends the Department's MSP team in its significant efforts to engage the wider public and stakeholders in the making of this Draft NMPF, including extensive use of social media. The IPI would, however, strongly recommend that the final NMPF sets out clear and unambiguous guidelines and targets for plan consultation at the sub-national level.

Conclusion

The planning profession (represented by the IPI) has extensive experience in preparing plans and strategies at all levels of governance (national, regional and local) and assessing applications for development and other activities. Professional planners are, therefore, in the opinion of the IPI, uniquely placed to provide advice on the design and development of the new marine planning system and can play a key role in the preparation and implementation of a full suite of marine plans in the years ahead.

The IPI welcomes the opportunity to give its views on the Draft NMPF and strongly encourages direct consultation with us, through our Council and our dedicated Marine Spatial Planning Committee. This will be of particular importance for upcoming stages, including the licencing system. Such engagement will ensure that the planning profession, networked with other key stakeholders in MSP, is enabled to contribute positively and to assist the Department in its implementation of the NMPF, and the completion of other marine spatial planning processes, which are critical to the successful delivery of the NMPF at regional, sub-regional and local level.



Dr Conor Norton MIPI

President 2020 - 2021

Irish Planning Institute
Floor 3, The Courtyard
25 Great Strand Street
Dublin 1
Ireland
Tel: +353 1 878 8630
E: president@ipi.ie