



## Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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### **National Marine Planning Framework – Consultation Draft**

This submission on the National Marine Planning Framework – Consultation Draft has been reviewed by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly (EMRA).

The Eastern and Midland Regional Assembly (EMRA) welcomes the preparation of the National Marine Planning Framework (NMPF) which sets out a strategic approach to manage Ireland's marine activities. The NMPF, when finalised will coordinate with the National Planning Framework - Project Ireland 2040 (NPF) in supporting the sustainable use of the marine resources to 2040 and will be the key decision-making tool for Government Departments, State agencies, regulatory authorities and policy makers for decisions on marine activities.

#### **Background and relevance for the development of a National Marine Planning Framework**

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on the formulation, adoption and implementation of the Regional Spatial and Economic Strategy (RSES), oversight and coordination of Local Economic and Community Plans, management of EU Operational Programs, EU project participation, implementation of national economic policy, and additional functions through working with the National Oversight and Audit Commission.

In line with the provisions of the Planning and Development Act 2000 (as amended) the Eastern and Midland Regional Assembly (EMRA) made the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region on the 28<sup>th</sup> June 2019. The RSES brings together spatial planning and economic policy providing the environment for investment and in doing so it marks a significant policy milestone for not only regional government in Ireland, but also national and local government. The primary statutory objective of the RSES is to support implementation of Project Ireland 2040 – which links planning and investment through the National Planning Framework and ten year National Development Plan (NDP) – and the economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Region. As part of this, it sets the context for each local authority within the Eastern and Midland Region to develop their county and city development plans in a manner that will ensure national, regional and local plans align.

## **Observations on the Draft National Marine Policy Framework**

The Assembly welcomes the preparation of the NMPF which, when finalised, will provide a strategic framework, that, in parallel to the NPF, will guide marine planning and development over the period to 2040. The NMPF is highly relevant to the RSES as terrestrial and marine ecosystems are closely connected, development and uses are interlinked and overlap in tandem with the significance of the marine sector for job creation, maintenance and sustainability in the region. All of this highlights the need for consistency in terms of land use and ocean-based planning. The Assembly welcomes the forthcoming Marine Planning and Development Management Bill 2019 which will streamline planning and licensing application procedures reducing unnecessary duplication of processes.

### National Marine Planning and RSES Alignment

The Assembly welcomes the recognition given in the Draft NMPF to the role of the three Regional Assemblies and the Regional Spatial and Economic Strategies in terms of policy hierarchy and alignment. Section 2.33 would benefit from a broader reference to the strategic functions of the Regional Assemblies which include, in addition to policy making, monitoring and oversight and promoting enhanced co-ordination and a framework for investment throughout the Regions.

In terms of consistency and alignment between the Eastern and Midland RSES and the NMPF (as stipulated in Section 2.35) the attention of the Department is brought to the three key cross-cutting principles of the EMRA RSES; Economic Opportunity, Healthy Placemaking and Climate Action. Each of these principles relate to and support the three main themes and their associated high-level Overarching Marine Planning Policies (OMPPs) of the Draft NMPF; under “Environmental – Ocean Health”, “Social – Engagement with the Sea”, and “Economic – Thriving Maritime Economy”.

Central to the successful implementation of the RSES is the realisation of Regional Strategic Outcomes (RSOs), contained as part of the Strategy and defined as a mechanism to achieve the National Strategic Outcomes (NSOs) of the NPF. Of particular relevance to the NMPF are the RSOs that support a strengthening blue-green economy and protect and enhance international and regional accessibility (RSO 15), that build climate resilience (RSO 8), that support strengthened and healthy urban and rural communities and economies (RSO 3, 4), that support the transition to low carbon and clean energy (RSO 9), along with the sustainable management of water and other environmental resources (RSO 7). The 16 RSOs set out in the RSES are fully aligned to the UN Sustainable Development Goals (SDGs), EU thematic objectives<sup>1</sup>, and the NPF NSOs.

Furthermore, the RSES recognises the marine sector as a labour-intensive economic activity which is of particular importance to the region and highlights that development opportunities in the marine or blue economy relate to fishing, renewables, new applications for health and medicine, and tourism to name a few. Marine resources also provide many non-commercial benefits, for example amenity, biodiversity and climate regulation. The valuable contribution that sustainable utilisation of marine resources for balanced regional development and quality of life is closely associated with effective engagement and the protection of the marine environment. The RSES explicitly acknowledges the importance of consistency and alignment between the future NMPF and regional approaches to

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<sup>1</sup> New priorities for EU funding 2021-2027; A Smarter Europe, A greener, low-carbon Europe, A more connected Europe, A more social Europe, a Europe closer to citizens.

marine spatial planning and implementation into future land use plans in the Region in recognition of the opportunity to harness Ireland's ocean potential (RPO 7.1).

#### Sub-National Marine Planning and Collaboration

The Assembly welcomes the commitment expressed in the Draft NMPF to the future preparation of Regional or sub-national marine plans. It is noted that the intention expressed in Section 2.54 is that these plans will be developed through a partnership approach between the National Marine Spatial Plan team and groups of local authorities working on a regional basis. The Strategic Environmental Assessment (SEA) accompanying the Draft NMPF has also highlighted that regional or sub-regional marine plans can address the differing pressures around Ireland extensive coastline and marine waters (SEA, p. 106). Given the increasing demand for marine space, the NMPF can enable stakeholders and the public to ensure a joined-up approach in planning and management, which is supported by the following Regional Policy Objective within the RSES;

*RPO 6.22: EMRA support the preparation of the Marine Spatial Plan (MSP) to ensure alignment, and consistency between land use and ocean based planning, and to ensure co-ordination which supports the protection of the marine environment and the growth of the Marine economy.*

As terrestrial and marine ecosystems are closely connected, the Regional Assemblies and the coastal local authorities have an important role in ensuring integration of land and marine planning within the Region and with Northern Ireland to ensure that management of coasts and marine waters is on an all-island basis. The attention of the Department is drawn to the collaborative platform (RSO 16) that underpins the EMRA RSES in providing a regional framework for collaboration and partnerships and which supports local and regional bodies in leveraging funding and partnership opportunities including those related to the marine economy.

The EMRA has developed a wide range of stakeholders, across the region, nationally and in a European Context, and this has been further enhanced during the collaborative approach that was taken in the formulation of the RSES for the region. With this collective engagement the Assembly provides capacity building for the planning system in the region by providing a common evidence base, a methodological approach to core strategies of local authority development plans including data sets of assets of settlements across the region and fora to deal with strategic, common and cross boundary issues. The EMRA adopts an all-Ireland approach to collaboration with co-operation with relevant departments in Northern Ireland, and where appropriate with the Northern and Western Regional Assembly (NWRA), to support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning, economic growth and related spheres (RPO 11.1). The RSES explicitly promotes the development of a cross-boundary and cross-border strategic management and stakeholder framework to protect the marine environment (RPO 7.2). Similar collaborative and partnership approaches will assist funding and pilot project initiatives in relation to land use and marine priorities as part of future regional marine plans.

The Assembly recognises the opportunities in the changing dynamic in Ireland and the RSES seeks to optimise and lead investment in the Region and maximise the potential of National and European funding. This will be facilitated through partnership with stakeholders and in collaboration with other agencies to deliver on the shared vision of the Strategy and to continue building a sustainable,

healthy and resilient region. The establishment of the RSES Implementation Groups will oversee progress on the implementation of the RSES and identify opportunities to drive regional development (RPO 12.1). This will also include the building of institutional capacity to ensure that all government agencies, local authorities and regional stakeholders have sufficient capacity to access funding sources and successfully attract competitive funding (RPO 6.35).

EMRA continually participate in externally funded learning platforms and projects which develop and share best practice from the region with partners across Europe in the fields of the digital economy, spatial planning and the environment. For example the EMRA developed a strategic management framework and stakeholder engagement model for Dublin Bay (available at: <http://emra.ie/strategic-management-framework-dublin-bay/>) as part of a wider EU Life+ project titled The Celtic Seas Partnership. The project built partnerships between people and organisations to support local level implementation of the Marine Strategy Framework Directive, promote better understanding of marine resources, common goals and adoption of an ecosystem-based approach. It is recognised that learning from good practices will be important particularly in terms of engagement of the planning profession in regional and local marine planning initiatives in the implementation of the NMPF.

EMRA are currently developing a Regional Development Monitor to analyse socio-economic trends across the three Regional Assemblies (Eastern and Midland, Southern, and Northern and Western) which will provide a common, up-to-date shared evidence base with information on assets, economic base, settlement functions and economic performance to be published as open data where appropriate, in accordance with RPO 6.36. This will enable understanding of how towns and localities have developed to date, thus enabling the identification of growth constraints, the assets and the growth opportunities that will enable evidenced based decision making. Through effective monitoring, shared baseline data and the establishment of regional working groups will facilitate the development of regional marine plans and their implementation.

The RSES process has proved successful in transposing national planning policy to the regions and the Regional Assemblies are therefore positively positioned to assist the Department in any future marine sub-national/regional-plan making process as expressed in Section 2.54 of the Draft NMPF. It is recommended that a priority action of the NMPF should be the preparation of regional level plans for the marine, such as Regional Marine Planning Frameworks, in collaboration with the Regional Assemblies. Regional marine plans should align with existing regional structures and the coastal boundary of each RSES, for effective land use and marine planning integration at the regional tier.

### Overarching Marine Planning Policies

The overarching marine planning policies (OMPP) set out in the NMPF are grouped according to three themes; environmental, social and economic. It is acknowledged that the policies apply to all proposals capable of having impacts in the maritime area including land-based development. (Note: the related planning policies set out in the supporting text should include the reference number e.g. Biodiversity 1, 2, 3, 4 as per Table 1 p. 26, and placed in a highlighted box for emphasis and ease of reference).

## *Environmental – Ocean Health*

The detailed approach and consideration to environment related planning policies for ocean health is a welcome addition. In terms of OMPPs relating to biodiversity, the Draft NMPF Strategic Environmental Assessment (SEA) notes that a specific policy supporting integrated coastal zone management (ICZM) would be welcome to provide a clear mechanism to maintain, restore and enhance biodiversity in the coastal zone (SEA, pg. 125). The RSES recognises and supports the ICZM approach which can assist in meeting obligations under the Water Framework Directive (WFD), MSFD, and Nature Directives. It enables collaborative and stakeholder engagement approaches to the management and protection of coastal resources against coastal erosion, flooding and other threats (RPO 7.3). It is recommended that the NMPF include specific policies to support an ICZM approach for the management and protection of coastal resources and communities.

The Draft NMPF recognises ‘Natural Capital’ as a new concept requiring a sound footing in regulation to enable its understanding and role in an ecosystem approach to marine management. National policies supporting the protection and enhancement of ‘Natural Capital Assets’ and promoting an ecosystem services approach in cross-sectoral policy considerations, are welcome and are aligned with the Climate Strategy of the EMRA RSES. The RSES ‘Climate Action’ key principle is underpinned by the objective “to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this”. Further, ‘Natural Capital’ is a key indicator in the asset-based approach used to inform the growth strategy of the RSES.

The RSES recognises that the incorporation and consideration of an ecosystem services approach can lead to significant enhancements in relation to planning policy as well as at project stages and is recommended to be used by local authorities in the preparation of development plans and other statutory land use plans (RPO 7.21). To enhance knowledge and expertise in this area, EMRA has partnered with other Regional Authorities and agencies across Europe on a new EU Interreg Project – PROGRESS – Promoting the Governance of Regional Ecosystem Services – which, through an exchange of best practice and learning, will achieve an improvement in the making and implementation of regional and local policies in this area.

In terms of Marine Protected Areas, it is noted that the UNESCO Dublin Bay Biosphere is not referenced in the Draft NMPF and does not appear to be indicated on the map of designated sites (pg. 44) despite it being an internationally significant designated site that is managed by the Dublin Bay Partnership, which includes the local authorities, Dublin Port Company, Fáilte Ireland and the NPWS. It is recommended that the maps be updated to recognise and identify this internationally significant designated site.

In terms of Climate Change, the Assembly welcome the OMPPs that support proposals that contribute to a reduction in greenhouse gas emissions and incorporate adaptation measures. It is recommended that the Climate Action Regional Offices (noted under ‘key reference’) be recognised in the NMPF as playing a key role in assisting and supporting the respective local authorities in the regions in implementing their climate action strategies in accordance with RPO 7.33.

### *Social – Engagement with the Sea*

In terms of ‘Social – Engagement with the Sea’, the OMPPs would benefit from reference to health and well-being as a key component. As stated in the SEA, a key message for the NMPF is recognition of the benefits of a good quality environment to health and wellbeing and is particularly relevant in the context of experience, sport and recreation (SEA, pg. 44). It is recommended that OMPP ‘Social Benefits 2’ could be expanded to support proposals that promote health and well-being. This will align with RSES RSO 4 Healthy Communities and the overall RSES key principle of Healthy Placemaking. The supporting narrative would also benefit from reference to the DCCAE Code of Practice for Wind Energy Development in Ireland Guidelines for Community Engagement which contains principles for effective community engagement for wind energy projects that can be applied to both onshore and offshore projects.

In terms of the Transboundary OMPP, as terrestrial and marine ecosystems are closely connected, the Regional Assemblies and the coastal local authorities have an important role in ensuring integration of land and marine planning within the Region and with Northern Ireland to ensure that management of coasts and marine waters is on an all-island basis. As aforementioned, the RSES explicitly promotes the development of a cross-boundary and cross-border strategic management and stakeholder framework to protect the marine environment (RPO 7.2).

### *Economic – Thriving Maritime Economy*

In terms of ‘Economic – Thriving Maritime Economy’ the OMPPs would benefit from a reference to ‘clustering’ and the support for marine activities and initiatives that facilitate and support clustering for innovation and entrepreneurship. Clustering is a key component of the Economic Strategy of the RSES which seeks to diversify local and rural economies and create quality jobs, and achieve a sustainable, competitive, inclusive and resilient Region.

### NMPF Sectoral Policies and Marine Management

The marine environment in Ireland to date has generally been managed on a sector by sector approach and there is a need for an integrated approach which takes into account the management of the entire marine ecosystem. This includes a need to balance competing coexisting activities and uses in the marine environment. The Draft NMPF has set out Sectoral Marine Planning Policies for each individual marine sector/activity in the maritime area and has also highlighted the interdependent nature of activities by indicating policy relationships, which is a welcome addition. The attention of the Department is drawn to Best Practice Guidelines which were produced as part of the aforementioned Celtic Seas Partnership which were designed to support better management of activities in the Celtic Seas. They include advice on the difficulties of working across borders and sectors and the co-location of marine renewables with other marine industries. The Celtic Seas Partnership helped to build relationships and create partnerships between scientists, governments and users of the sea. The Best Practice Guidelines<sup>2</sup> include:

1. Encouraging effective marine management and decision-making across borders.
2. Encouraging harmonious co-existence of marine renewables projects with other marine uses and interests

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<sup>2</sup> <http://www.celticseaspartnership.eu/celtic-seas-partnership/best-practice-guidelines/>

### 3. Encouraging positive interaction and preventing conflicts between marine stakeholders.

The Guidelines also advocate the importance of data, using evidence-based scientific information and effective communication between stakeholders.

#### *Marine Infrastructure*

The National Planning Framework (NPF) highlights the maritime sector's key role within the economy as an important gateway for the movement of people and freight between Ireland and its trading partners. Both the NPF and the RSES recognise that Ireland's port and shipping services play an important role as enablers of economic growth. Irish ports are critical infrastructure for international trade, with over 90% of our international trade moving by sea and also serve as logistics and distribution hubs. It is also noted that the Eastern and Midland Region is strategically located on part of the trans-European transport network from Belfast to Rosslare Europort and is linked to the U.K. across the Irish Sea.

The Eastern and Midland Region is also home to the largest sea port in the country, Dublin Port, and also contains a number of regional ports of significance and smaller harbours. Dublin Port is recognised in the RSES as a critical national facility, a key economic driver for the Region and the nation. As a major trading centre it has seen sustained growth with volumes expected to increase exponentially by 265% over the 30 years to 2040. The Assembly welcome the NMPF Sectoral Marine Planning Policies (SMMP) with respect to Ports, Harbours and Shipping and emphasise the following Regional Policy Objectives within the RSES which provide supportive policy alignment:

*RPO 8.21: The 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.*

*RPO 8.22: The EMRA supports ports of Regional Significance that serve an important regional purpose and/or specialised trades or maritime tourism; and the accessibility requirements of regional ports within the Region, from within their regional catchments will be addressed through the provision of improved access routes, where necessary and improved access to the national and regional road networks. Opportunities for the use of rail, where such ports are connected to the rail network is also promoted.*

*RPO 8.23: The EMRA 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.*

*RPO 8.24: The EMRA supports the undertaking of feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPAs and SACs.*

#### *Dublin – Belfast Economic Corridor*

The Dublin-Belfast Economic Corridor is a key element and economic driver for the EMRA region. The Corridor is underpinned by a strong presence of transport infrastructure that connects the two main cities of scale on the Island. Its area of influence hosts a combined population- between Northern Ireland and the Republic of Ireland - of more than 3.3 million people of which Drogheda, Dundalk and Newry are part. The Corridor is also the national entry point to the island through its

airports and ports with three major airports, Dublin Airport, Belfast International Airport and Belfast City Airport, and significant ports in Belfast and Dublin, with complimentary ports along the Corridor. It offers extended strategic connections throughout the Island through links with the TEN-T network and the Dublin- Rosslare route.

The Corridor has the capacity to provide the only potential paired city growth pole of scale on the Island- reaching a European benchmark 5 million population target to compete with similar city regions in the EU. The Draft NMPF highlights the challenges facing the wider economy post-Brexit in terms of impact on future trade, our route to market, supply chains, and transport logistics. The imperative to counteract Brexit with a proactive spatial economic policy adds to the international significance of the Dublin-Belfast Economic Corridor. It is recommended that the significance of the Corridor be stated and recognised in the NMPF. The RSES has identified a number of sectoral opportunities associated with the Dublin-Belfast Economic Corridor (including Dundalk and Drogheda) that includes marine energy, wind energy and energy storage.

### *Fishing Clusters*

Fishing is a substantial sub-sector in the Eastern and Midland Region, with Howth being one of six National Fishery Harbour Centres and a number of small fisheries clusters 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.

The Draft NMPF supports the maintenance and sustainable development of our seafood industry, particularly in recognition of our strong fishing heritage and its contribution to vibrant, accessible sustainable coastal and island communities. The RSES provides RPO 7.5 to support and enable the sustainable development of this sub-sector in the region;

*RPO 7.5: 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.*

The RSES further recognises the importance of this sector to rural economies which can be enhanced through innovation and diversification;

*RPO 6.7: Support local authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.*

It is also noted that one of the strategic principles and high-level priorities highlighted in the Draft NMPF is to support the preservation and enjoyment of Ireland's rich marine related cultural and heritage assets. The RSES acknowledges that maritime villages and towns represent a significant cultural heritage resource for the Region and local authorities are required to develop policies for the protection of same in their development plans;



*RPO 7.6: Local authorities shall include in development plans, where relevant, policies for the protection and enhancement of ship wrecks and underwater cultural heritage and shall consult the Wreck Inventory of Ireland Database when assessing planning applications located in marine, riverine or lacustrine environments.*

### *Renewable Energy*

The Draft NMPF highlights the critical role it will play in facilitating climate change and mitigation, through policy support of offshore renewables and carbon capture and storage. In terms of future initiatives, it is considered that focusing on effective community engagement will be essential for building public confidence and to help Ireland achieve transition to renewable energy. An increase in community participation in renewable energy projects such as community ownership models should be supported in this regard. The RSES supports an increase in the amount of new renewable energy sources in the Region. This includes, amongst others, the use of wind energy – both onshore and offshore:

*RPO 10.24: Support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements.*

### Implementation Arrangements

Section 21 of the Draft NMPF provides a list of public bodies that have a role in making policies, plans or programmes relevant to the maritime; and it is recommended to include the Regional Assemblies. In terms of Appendix F and supporting actions to implement the NMPF, it is recommended that an additional action be included on the future intention to prepare sub-national/regional marine plans to be co-ordinated with the Regional Assemblies as a key stakeholder in their preparation and adoption.

### **Conclusion**

The Regional Assembly welcomes the opportunity to further engage on the process of preparing the National Marine Policy Framework and the executive looks forward to continuing engagement with the MSP team.

Regards,



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Jim Conway

Director

Eastern and Midland Regional Assembly

6<sup>th</sup> April 2020