



Teil/Tel: +353 (0)51 860700 Facs/Fax: +353 (0)51 879887  
R-phost/Email: info@southernassembly.ie Idirlíon/Web: www.southernassembly.ie

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

24<sup>th</sup> April 2020

**Re: Draft National Marine Planning Framework  
SRA File Ref: 19/GD003**

A Chara,

The Southern Regional Assembly (SRA) welcome the publication of the Draft National Marine Planning Framework (Draft NMPF) and the opportunity to make a submission. We also welcome the proactive consultation measures taken particularly through the current Covid 19 crises and commend the Department on the Webinar organised on the 21 April 2020 which was very useful.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region came into effect on the 31<sup>st</sup> January 2020 which sets out a 12-year statutory strategic planning and economic development framework for the Southern Region. The primary objective of the RSES is to implement Project Ireland 2040, the National Planning Framework (NPF) and the National Development Plan (NDP- 2018-2027) at the regional level.

Supporting the Region as a first mover in the marine economy under the NMPF is key to the successful delivery of the RSES vision, strategy and objectives. The RSES supports a leading role for the Southern Region in the marine economy, supporting the role of our Tier 1 and Tier 2 ports, regional ports and fishing harbours as drivers of economic growth.

The RSES supports research and innovation in the marine sectors and the development of marine clusters in ICT, biotechnology and marine renewable energy. It supports vibrant coastal towns, economic resilience and innovation for rural and island communities, enabled by investment in connectivity infrastructure (transport and digital).

The sustainable development of a diverse and active tourism offer, including the Wild Atlantic Way, blue-ways and marine leisure sectors is also supported in the RSES. It seeks sustainable development in the marine area to protect our unique marine natural heritage and our coastal cultural heritage.

It seeks good practice implementation in green and blue infrastructure, ecosystems services and infrastructure-led growth to protect our water resources to improve our water quality. Building

resilience to climate change, transitioning to a low carbon society and economy and investing in infrastructure to mitigate against coastal flooding and erosion (Integrated Coastal Zone Management) are supported.

The RSES was prepared in close consultation with key stakeholders. Submissions from the Marine Spatial Planning Section of the Department of Housing, Planning and Local Government assisted in alignment between the RSES and the emerging NMPF. Section 4.9.1 of the RSES, The Maritime Spatial Planning Directive, states the Region will play an active part in assisting the preparation of the Draft NMPF and adopt measures necessary to secure the objectives of NMPF. In addition, Regional Planning Objective (RPO) 77 titled Maritime and Spatial Planning Alignment specifically supports the NMPF.

It is important that the NMPF is informed by the RSES and Metropolitan Strategic Area Plans (MASPs) for Cork, Limerick-Shannon and Waterford and the Regional Policy Objectives relating to the marine contained therein.

The RSES can be viewed at the following link:

<http://www.southernassembly.ie/regional-planning/regional-spatial-and-economic-strategy>.

The sections below set out constructive input and recommendations from the Regional perspective.

In addition, the elected members of the Southern Regional Assembly have considered the Draft NMPF and have raised a number of additional points for your consideration which I have attached in Appendix 1.

The issues raised by the members in summary address (i) greater emphasis on upgrading and maintaining local road networks to improve access between fishing villages and markets, (ii) policies to protect vulnerable Gaeltacht communities, (iii) financial support for projects to dredge smaller fishing ports where there is silting, threatening fishing, rescue services and marine leisure sectors, (iv) policies to prevent potentially duplicative and invasive exploratory activities related to offshore renewable energy projects, (v) seek policies and guidelines that apply best international practice in relation to distances from the shore for offshore renewable energy infrastructure, particularly where the shore is of importance for tourism, where fishing activity could be negatively impacted, or where the coastline has internationally recognised importance (vi) NMPF should stipulate that there should be genuine and meaningful engagement with local communities at the earliest opportunity ahead of the development of offshore renewable energy projects, and there should be a community dividend.

### **1.0 The Significance of the NMPF to the Southern Region**

The marine and coastal environment is a significant feature of the Southern Region's society and economy. The 2016 CSO Census recorded that almost one third (30.5%) of the State's total population living within 1-5 km of the coastline are in the Southern Region (over 383,000 people).

Over a third (37.6%) of the State's total population living within 500 meters to 1 km of the coastline are in the Region (over 123,000 people). Over half (54.5%) of the State's population living within 100 meters of the coastline are in the Region (22,064 people).

Each of the Region's three city and metropolitan areas of Cork, Limerick-Shannon and Waterford have close integration with ports, estuaries and harbours. They are the principal drivers of the Region's economy with a combined 2016 population of over 496,000 people. Each is targeted for significant population and employment growth to 2040 under the National Planning Framework (NPF), with 50-60% growth in each of the city and suburbs<sup>1</sup> alone. This will create significant critical mass and combined potential of almost 159,000 additional people living in cities and metropolitan areas, with direct and indirect interactions to rivers, estuaries, ports, harbours and the marine.

---

<sup>1</sup> As defined by the CSO

The Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) is a good practice precedent in our Region for a land and marine framework to guide the future sustainable development of diverse marine related economic uses and management of an estuary. There are opportunities for Cork and Waterford to replicate similar initiatives as the SIFP. RPO 79: *Shannon Estuary and Other Harbour Plans* of the RSES refers.

Other examples of the importance of the marine to the Southern Region include:

- The Region is home to the State's Naval Service and fleet, headquartered at Haulbowline in Cork Harbour.
- All the Tier 1 and Tier 2 Ports in the State outside of Dublin are located in the Region ( Port of Cork Company, Shannon Foynes Port Company, Port of Waterford Company and Rosslare Europort).
- Of the fourteen Ports of Regional Significance under National Ports Policy, six are located in the Region (Bantry Bay, Castletownbere, Kinsale, New Ross, Tralee Fenit, Youghal). Of the six national Fishing Harbour Centres, three are located in the Region (Castletownbere, Dunmore East and Dingle (An Daingean).
- Of approximately 60 coastal marinas, pontoons and jetties on the island of Ireland, over 50% (33) are located along the coast of the Region.
- Of the seven Fishery Local Action Groups (FLAG) Regions, three include the Southern Region. FLAG South East includes Waterford and Wexford, FLAG South includes Cork and FLAG South West includes Kerry and Limerick.
- Renowned research and innovation assets include the Beaufort Research Laboratory and Marine and Renewable Energy Ireland (MaREI) in Ringaskiddy and the development of a Maritime Centre of excellence at Cahercon, Co Clare.
- Strategic power generating facilities are located along the Region's coastline including Whitegate Energy Park and Moneypoint. There is considerable potential for the Region's power generating infrastructure to integrate renewable energy. The former Kinsale Gas Fields have potential for Carbon Capture Storage. The ESB West Wave Project is putting Ireland at the forefront of ocean energy globally. The Tarbert/Ballylongford strategic energy and marine project includes the Shannon Gas LNG project.
- International energy transmission and digital transmission facilities with marine infrastructure and cross sea connections to Europe and the United States include the Hibernia Express Link (undersea fibre optic cable) and the proposed Eirgrid Celtic Interconnector to France, a strategic project for exporting our renewable energy resource and security of supply.
- Coastal tourism is a significant attraction to our Region with the Wild Atlantic Way (WAW) corridor and approximately 90 discovery points located along coastal routes in the WAW Regions of the Haven Coast, Southern Peninsulas and the Cliff Coast.

The above are only some of the examples to highlight the potential of the NMPF to be transformative in driving sustainable growth and economic prosperity of our Region through our marine and coastal assets.

## **2.0 The Preparation of Regional Marine Planning Frameworks**

The SRA welcome the NMPF as a parallel framework to the NPF, delivering on the six National Policy Objectives (NPOs) that relate to the marine sector. The NMPF will provide a long-term, over-arching policy framework at the top hierarchy of plans and sectoral policies for the marine, setting a framework for lower tiered sectoral policies and objectives.

Importantly from the perspective of the Regions, the Draft NMPF states there is a possibility for more detailed regional plans at a later date (page 9) 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 SRA understand, through the Webex public consultation event hosted by the Department on the 21<sup>st</sup> April 2020, that the processes for the Regional Marine Plans have been developed with engagement with the County and City Managers Association (CCMA) and the Land Use and Transport Committee (LUTS).

Through the implementation of the RSES, the SRA can offer important regional level support and partnership to the role of Local Authorities, the CMMA and LUTS committees in the future development of Regional Marine Plans and their processes, especially in the alignment of complimentary regional level land use and marine policy priorities.

Co-ordination between terrestrial and marine planning processes will ensure investment, through the National Development Plan and subsequent investment plans, have aligned priority areas in land use and marine plans at national, regional and local level. Connectivity to our ports and offshore energy production are examples of strategic infrastructure dependent on alignment and cross boundary policy coherence to fulfil their potential.

It is recommended that a) Regional Marine Planning Frameworks should follow, and b) that these should be based on the established statutory regional structures of the Regional Assemblies.

The three Regional Assemblies are tasked with a leadership role to co-ordinate, promote and support the strategic planning and sustainable development of the regions. They are an established, coherent and democratically mandated organisations with a track record of delivery. They provide a fit for purpose mechanism for delivery of Regional Marine Plans in concord with the land-based planning system. The development of alternative structures would not have the benefit of that coherence and could indeed undermine the existing Regional Planning structures in Ireland. We would therefore be strongly concerned at the development of alternative regional structures.

The significant opportunities for marine sectors in our Region are highlighted above. On the basis of these opportunities, Regional Marine Planning Frameworks are recommended as priority actions arising from the NMPF. The NMPF is also a high level and over-arching framework that is too broad to identify all the regional level enablers and priorities to protect our marine resources and drive marine sectors in the Region.

The link between national and local level plans is facilitated through the regional tier. In this regard, the RSES process has proven successful in transposing national policy to the regions and setting a framework with more regional level priorities identified for Development Plans and other plans in the hierarchy to implement. The process also engaged key cross sectoral stakeholders, citizens of our Region and the elected members to contribute to regional policy formation, aligning the national priorities with regional priorities that will achieve implementation of the NPF.

The RSES is a co-production prepared through extensive collaboration and partnerships. Through effective implementation, RSES and MASP monitoring structures will continue to harness these platforms and establish cross-sectoral and cross regional sectoral representation to implement RSES objectives which align with both the NPF and NMPF priorities.

These same collaborative platforms will assist funding and pilot project initiatives. Through the assembly structures, forums for co-ordinated approaches in land use and marine priorities will be established, which is a benefit to regional marine plans.

Furthermore, through effective monitoring, shared baseline data and establishment of regional working groups to improve the coherence of European Site protection and management, the facilitation of data sharing and exchange on transboundary sites will be supported. This has potential alignment with regional marine plans and their implementation.

The SRA is therefore positively positioned to assist the Department in the future regional-plan making process as expressed in Section 2.54 of the Draft NMPF.

In addition to complimentary marine objectives under the RSES , the SRA are also experienced in the EU Operational Programme 2014-2020. Priority Axis 1 (strengthened research and innovation) includes initiatives under the Marine Research Programme. In addition, the SRA is experienced in EU Territorial Programmes including the Atlantic Area Programme, Priority 2 of which seeks to protect, secure and enhance the marine and coastal environment sustainably.

The SRA is a Programme partner for the current Ireland Wales Programme 2014-20 and was managing authority for the Ireland Programme 2007-2013. These programmes are maritime cross-border programmes which connect organisations, businesses and communities on the west coast of Wales with the south and east coasts of Ireland to seek solutions to shared challenges on both sides of the Irish Sea, to improve the economic and sustainable development priorities of Ireland and Wales. It should be noted that one of the three priorities of the Programme is the adaptation of the Irish Sea and Coastal Communities to Climate Change and to increase capacity and knowledge of Climate Change Adaptation for the Irish Sea and coastal communities.

Regional level marine plans should follow the Regional Assembly coastal geographic structure and align with the RSES for each Regional Assembly, for effective land use and marine planning integration. This compliments the parallel position of the NPF and NMPF at the top of the hierarchy as a framework to guide lower tiered plans, including the regional tier.

To assist such alignment, the SRA fully support the initiatives and actions of the Department and coastal Local Authorities in MSP. The inclusion of Regional Assemblies on repurposed high-level Interdepartmental Groups and Stakeholder Advisory Groups to assist the Department and coastal Local Authorities and prepare towards implementation of the NMPF and future Regional Marine Plans is sought.

- A priority action of the NMPF should be the preparation of regional level plans for the marine, such as Regional Marine Planning Frameworks. Regional marine plans should align with the established statutory regional structures and the coastal boundary of each RSES, for effective land use and marine planning integration at the regional tier and to build on the established successful RSES processes.
- The SRA recommends co-ordination with the Regional Assemblies as a key stakeholder for the preparation of regional marine plans and that this is the mechanism through which the Department can engage with Local authorities on a regional basis.
- In addition to the need for waste water infrastructure, the NMPF could also reference the interaction between waterfront cities and metropolitan areas and the marine environment and sectors adjacent to cities, as a link between marine and land use planning frameworks.
- The potential role of Strategic Integrated Framework Plans (SIFPs) for estuaries, references to good practice example of Shannon Estuary SIFP and opportunities for similar initiatives in other harbours such as Cork and Waterford (supported by the RSES) would provide a link between marine and land use planning frameworks.
- Support resources and upskilling for planners and other professions in the area of marine spatial planning.

- Recommend the inclusion of Regional Assemblies on repurposed high-level Interdepartmental Groups and Stakeholder Advisory Groups to assist the Department and coastal Local Authorities and prepare towards implementation of the NMPF and future Regional Marine Plans.

### **3.0 Overarching Marine Planning Policies (OMPPs)**

#### **3.1 OMPPs for Environmental-Ocean Health**

Draft NMPF policies under the policy grouping of biodiversity, disturbance, Marine Protected Areas, Non-Indigenous Species and Sea Floor Integrity are supported by the SRA. These policies are supported by the following RSES Regional Planning Objectives (RPOs):

- RPO 1: Environmental Assessment
- RPO 110: Ecosystem Services
- RPO 126: Biodiversity
- RPO 127: Invasive Species
- RPO 202: Natural Heritage, Biodiversity and Built Heritage Assets

RPO 1 Environmental Assessment clarifies that any reference to support for all plans, projects, activities and development in the RSES should be considered to refer to ‘environmentally sustainable development’ that has no adverse effects on the integrity of European sites. Further, where infrastructure development is supported with an interaction in the marine area, such as supporting the economic opportunities of ports (RPO 147) for example, mitigation is integrated within the objective as follows:

- Undertake feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPA and SAC;
- Port development in the Region must adhere to the European Commission guidelines on the Implementation of the Birds and Habitats Directives in Estuaries and Coastal Zones in order to protect European Sites;
- Any economic activity which utilises the marine resource shall also have regard to Ireland’s obligations under the Marine Strategy Framework Directive (MSFD) which requires achieving and maintaining Good Environmental Status (GES) of coastal and marine waters (comprising both the water column and the seabed beneath it).

Policies under Marine Litter are supported by RSES RPOs for the circular economy and regional waste management (RPOs 107 and 108). Protecting our water resources and improving the quality of our water (achieving at least good status) are strongly supported by the RSES. RPO 111 Water Resources and RPO 112 in particular seeks commitments to achieve and maintain “At Least Good” status, except where more stringent obligations are required for high ecological status, and no deterioration of status for all water bodies under the Marine Strategy Framework Directive and its programme of measures, the Water Framework Directive and the River Basin Management Plan.

The RSES is committed to implement regional policy consistent with the Climate Action Plan 2019. Important RPO’s to address climate action and transition to a low carbon society and economy are provided. These objectives support Draft NMPF policies Climate Action 1-5 and include:

- RPO 87 Low Carbon Energy Future
- RPO 88 National Mitigation Plan and National Adaptation Framework
- RPO 89 Building Resilience to Climate Change
- RPO 90 Regional Decarbonisation.

The Climate Action Regional Offices while noted as a ‘key reference’ should be recognised in the NMPF as playing a key role.

The SRA recommend strengthened reference and policy support to 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 have interaction with priorities for the marine and coastal areas.

### **3.2 OMPPs for Social- Engagement with the Sea**

The SRA support Draft NMPF objectives to promote the development of vibrant, accessible and sustainable coastal and island communities. Alignment between the RSES and regional marine plans will be important to address land and sea interactions and assist continuity in stakeholder co-ordination for implementation.

#### **Access**

Policies for improved public access to the marine are welcomed. Access must be sustainable, planned and designed to avoid adverse effects on natural heritage. The focus for access policies in the Draft NMPF is on tourism and recreation mostly. Strategic access between ports on the TEN-T Network and completion of access infrastructure to ports as part of the core and comprehensive routes are critical for the State's economy. Improved access to ports, harbours and marinas is also important to support marine economic activity and improved access to our coastal settlements and island communities. These themes are supported in the RSES by:

- RPO 142 Ports
- RPO 143 Ports and Airports
- RPO 144 Port Infrastructure
- RPO 146 High Quality International Connectivity – Ports
- RPO 147 Economic Opportunities of Ports

Refer to recommendations below under Rural Coastal and Island Communities for further strengthened supports for transport and digital infrastructure investment to improve connectivity with coastal areas.

- The SRA recommend strengthening overarching marine planning policies for access to include sustainable delivery of projects to complete the TEN-T Networks and deliver improved access infrastructure to ports, harbours and marinas as an enabler for economic activity in our rural coastal and island communities.
- Support should be expressed in policies for water-based transport services, in particular in harbour areas associated with cities and metropolitan areas and as a potential transport mode under metropolitan area transport strategies.

#### **Employment**

There is one over-arching policy in support of a net increase to marine related employment. Strengthened support for innovation in the marine economy sectors is needed to reflect the opportunities for Ireland and the regions to be global leaders in marine research and development. This includes traditional sectors including fishing and port activities where technology will bring innovation and value-added processes.

Growth in new sectors including marine renewables, marine ICT and marine biotechnology are future growth sectors, with our coastal assets already playing leadership roles (examples cited above).

While sectoral policy under Offshore Renewable Energy (in Section 11.0 of the Draft NMPF) supports the establishment of Ireland as a world leader in offshore renewable energy deployment, it is important that overarching marine policies provide support for innovation across renewable energy and other diverse marine economy sectors. These themes are supported in the RSES by:

- RPO 76 Marine Economy
- RPO 78 First Mover under the National Marine Planning Framework

- RPO 79 Shannon Estuary and Other Harbour Plans
- RPO 80 Marine Resource and Blue Economy
- RPO 81 Fishery Harbour Centres and Local Authority Harbours
- RPO 82 Seafood Sector
- RPO 85 Renewable Offshore Energy
- RPO 86 Marine Cluster.

Our two national economic corridors recognised in the NPF (the Eastern Corridor and Atlantic Economic Corridor) integrate coastal settlements, ports & harbours, centres of education, research and innovation in marine sectors as drivers for these economic corridors. RSES supports these corridors under:

- RPO 41 Atlantic Economic Corridor (AEC)
- RPO 42 Eastern Corridor (Dublin Belfast Economic Corridor extending to Rosslare Europort).

The RSES also supports cross boundary project partnerships between settlements and economic drivers at a sub-regional level. County Development Plans will expand on the sub regional economic role of collaboration networks. At a regional level, important support is included under RPO 30 Inter-Urban Networks as Regional Drivers of Collaboration and Growth. Marine assets will play a strategic economic role in developing these networks.

The RSES sets out some examples including a North Kerry-West Limerick-Shannon Estuary-Clare coastal network (integrating the economic role of towns such as Listowel, Newcastle West , Kilrush with the SIFP for the Shannon Estuary and Tier 1 Port of Shannon Foynes) and a West Cork Marine network (integrating West Cork settlements such as Clonakilty, Skibbereen and Bantry with coastal tourism, marinas, research and development centres, fishery centre at Castletownbere, Port of Cork (Bantry) etc). A potential network along the N24 road and rail corridor connects both our economic corridors driven by strengthened connectivity between the Ports at Shannon Foynes, Waterford and Rosslare Europort.

Such regional level support in land use plans for the marine economy, marine networks and strategic road and rail corridors to the major ports will support employment growth related to the ports and for our rural coastal areas.

The SRA recommend strengthened policy support under employment to reflect innovation, research and development in marine sectors. Strengthened support is recommended for the leading role our coastal assets are playing on a global stage in marine sectors, inclusive of innovation for our fishing and port activities , growth in marine ICT, marine renewables and marine biotechnology sectors. In line with regional objectives under the RSES, the NMPF should recognize and support clusters of marine economic activity, strategic transport corridors which connect inland areas to Ports and development of marine networks along or coastal areas.

### **Rural and Coastal Communities**

This theme is a good example of the importance of complementarity between land use and marine plans and priorities.

Policies in support of rural and coastal communities are welcomed and supported in the RSES under:

- RPO 2 Planning for Diverse Areas
- RPO 26 Towns and Villages
- RPO 27 Rural
- RPO 43 Rural Economy and EU Good Practices
- RPO 45 Action Plan for Rural Development and Rural Development Programme 2014-2020
- RPO 46 Digital and Physical Infrastructure in Rural Areas
- RPO 47 Rural Partnership Models



- RPO 48 Innovation Hubs and Centres of Excellence
- RPO 49 Innovation in Rural areas
- RPO 83 Island and Coastal Communities
- RPO 84 Fishing Local Area Group (FLAG)
- RPO 196 Gaeltacht.

Digital connectivity is critical for the revitalisation of rural areas. The relational proximity of all locations will improve with advances in technology. Access to high-speed, high capacity digital and communications infrastructure is required across the region.

Strengthened support in the Draft NMPF for the delivery of improved digital infrastructure to coastal and island communities is recommended as a key enabler for economic and social development. This is a good example of land use and marine planning integration to deliver a shared infrastructure priority to all locations. In addition to Chapter 4 Strong Economy outlined above, digital connectivity is also supported by RSES RPOs 134 Smart Cities and Smart Region, RPO 135 High quality high capacity international digital transmission, RPO 136 National Broadband Plan (NBP) and RPO 138 Digital strategies.

Investment in national and regional road corridors are important for connectivity with coastal and island communities. This is a further good example of land use and marine planning integration to deliver a shared infrastructure priority to all locations. Road based transport is often the only viable and sustainable mode for rural and peripheral locations such as coastal areas. It is essential for “life lines” whereby smaller urban settlements and rural areas can access essential services, including health, education, retail, employment etc. and interchange with other public transport modes in key settlements through a safe and well-maintained road network. This is particularly important for strengthened connectivity to rural coastal areas. A high-quality road network is needed for successful rural public transport services (such as Local Link), the movement of freight and emergency services.

RSES RPOs 167 National Road Projects and 168 Investment in Regional and Local Roads support investment in strategic road corridors to ports and along coastal routes, which will strength accessibility to ports, harbours and settlements in coastal areas. Further, RPOs 158 Intra-regional Rural Connectivity, RPOs 172 Rural Transport and 173 Tourism Corridors provide additional support for rural connectivity infrastructure.

Investment in port and harbor infrastructure including piers, water-based transport services and passenger facilities are also important for good quality access and services to island communities for residents, workers and visitors.

- The SRA recommend strengthened policy support for digital and road transport connectivity (including rural public transport) to ports and harbours, coastal areas and islands, as key enablers for economic and social revitalisation of our rural coastal and island communities.
- The SRA recommend strengthened policy support for port and harbour infrastructure including piers, water-based transport services and passenger facilities for quality access infrastructure and services from the coast to island communities.

### **Coastal Communities and Renewable Energy**

The Draft NMPF would 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.

### **Culture and Heritage**

Policies for marine cultural heritage are welcomed and supported by RSES RPOs 194 Arts, Heritage and Culture and RPO 202 Natural Heritage, Biodiversity and Built Heritage Assets.

### **Seascape and Landscape**

Policies for landscape and seascape are welcomed and are relevant for RSES RPO 129 Landscape and the development of a Regional Landscape Strategy.

### **Transboundary**

The policy for transboundary impacts recognises shared issues with terrestrial planning and seeks consultation with terrestrial planning authorities for a marine proposal where relevant. This policy highlights the importance of aligned regional level land use and marine based plans and is welcomed.

### **3.3 OMPPs for Economic-Thriving Maritime Economy**

The SRA support overall objectives for the sustainable development of a thriving ocean economy and the development of vibrant, accessible and sustainable rural coastal and island communities. The policies that follow address co-existence between different marine uses and sectors and alignment of infrastructure between land based and marine based needs. Policies in support of the marine economy warrant strengthening to give national policy support to key enablers that will help drive the marine economy. Policies supporting continual education, skills development and training in marine sectors should also be promoted for economically resilient coastal communities and future job opportunities. Examples of strengthening for this theme are addressed above and applicable for a thriving marine economy.

In addition to above recommendations for employment and enabling infrastructure, specific policies supporting lifelong learning, education, skills development and training in marine sectors should also be promoted for economically resilient coastal communities.

## **4.0 Key Sectoral Policies and Objectives**

Policies provided across marine related sectors and activities in Sections 4.0 to 20.0 of the Draft NMPF are welcomed and reflect the diversity and importance of the marine to our society and economy. In a similar manner to the link between overarching marine policies and sector policies in the Draft NMPF, observations in the above sections also apply to policies for marine sectors.

### **4.1 Sectoral Policies and Objectives Supported by the RSES**

The RSES aligns positively with the following priority sectors

#### **Seafood Sectors**

Draft NMPF objectives to produce high quality food, protect and enhance the social and economic fabric of rural coastal and island communities through the seafood sector are supported by the RSES under:

- RPO 76 Marine Economy
- RPO 80 Marine Resource and Blue Economy
- RPO 81 Fishery Harbour Centres & Local Authority Harbours
- RPO 82 Seafood Sector.

#### **Defence and Security**

Support for investment in maritime services programmes to support aids to navigation and Coast Guards activities is included under RPO 146 High Quality International Connectivity -Ports. Further, under the Cork MASP, support for the role of the Irish Naval Service at Haulbowline is provided through Section 2.3 and Cork MASP Policy Objective 3, Cork Harbour.

### **Energy – Transmission**

Objectives and policies under Section 9.0 for transmission networks, including interconnectors, for diversity of renewable sources and security of supply are welcomed. Support for the Celtic Interconnector between Ireland and France from a location in the Southern Region is specifically supported by the RSES. Alignment is achieved under:

- RPO 103 Interconnection Infrastructure
- RPO 221 Renewable Energy Generation and Transmission Network
- RPO 222 Electricity Infrastructure
- RPO 223 International Energy Interconnection Infrastructure
- RPO 224 Delivery of Energy Networks

### **Energy- Offshore Renewable Energy**

Objectives and policies under Section 11.0 for offshore renewable electricity supply and the transition from use of fossil fuels are supported by the RSES. Draft NMPF support for offshore wind farms, wave, tidal, floating wind, enabling projects and infrastructure and provision of emerging technologies and supply chains are welcomed. Positioning Ireland as a world leader in off shore renewable energy deployment is an opportunity that can be driven through our marine resources, research and development assets and is fully supported by the RSES which seeks to position the region as a leader in these sectors. RSES RPOs in support of off shore renewables include:

- RPO 85 Renewable offshore energy
- RPO 86 Marine Cluster
- RPO 87 Low Carbon Energy Future 2015-2030
- RPO 90 Regional De-carbonisation
- RPO 95 Sustainable Renewable Energy Generation
- RPO 96 Integrating Renewable Energy Sources
- RPO 98 Regional Renewable Energy Strategy
- RPO 99 Renewable Wind Energy
- RPO 100 Indigenous Renewable Energy
- RPO 134 Smart Cities and Smart Region
- RPO 147 Economic Opportunity of Ports
- RPO 219 New Energy Infrastructure
- RPO 221 Renewable Energy Generation and Transmission Network
- RPO 222 Electricity Infrastructure

It is noted in comments below that sectoral policies under Section 10 Petroleum, somewhat contradict the positive policy support for marine renewable energy sectors. Long term growth in the marine renewable energy sectors in the NMPF needs to be a priority over long term growth in carbon energy sources.

### **Fisheries**

Objectives and policies in support of our fisheries, the need for infrastructure investment to support the role of our fishery harbor centres and improved access infrastructure is welcomed. The role of fisheries is support by RSES RPO 82 Seafood Sector and RPO 81 Fishery Harbour Centre and Local Authority Harbours.

### **Ports , Harbours and Shipping**

Objectives and policies in support of the strategic economic role of our ports, harbours and shipping activities are welcomed and strongly supported across a number of RSES and MASP objectives. The diverse range of activities facilitated by ports, including the movement of goods, movement of people, fisheries, renewable energy, cruise tourism, defence and emergency services etc. are supported.

Investment in improved multi-modal transport access to the Southern Region's ports, support for infrastructure to deliver the TEN-T Network combined with a Regional Freight Strategy are sought to

improve the efficient movement of people and goods between ports and to/from ports, centres of economic production and markets.

The Southern Regions' ports have capacity to cater for additional freight and passenger movement and can play a strategic national role in the state's port activity which can at the same time alleviate pressure on Dublin Port and congestion on port access routes in the GDA. The adoption of an approach which prioritises use of the Tier 1 and Tier 2 ports in the Region would be consistent with the NPF policy for balanced regional development.

The use of smart technologies in port activities and freight management is supported as part of a smart region. Investment under port masterplans are supported. In addition, each MASP contains a specific objective in support of ports as a driver for growth in each city and metropolitan area. Examples include:

- RPO 140 International Connectivity
- RPO 141 Regional Freight Strategy
- RPO 142 Ports
- RPO 144 Port Infrastructure
- RPO 145 Regional Ports and Harbour Strategy
- RPO 146 High Quality International Connectivity – Ports
- RPO 147 Economic opportunities of ports
- Cork MASP Policy Objective 13 Port of Cork
- Limerick Shannon MASP Policy Objective 16 Shannon Foynes Port
- Waterford MASP Policy Objective 15 Port of Waterford

Importantly for the landuse and marine planning alignment, RPO 142 Ports specifically seeks:

- To strengthen and develop the strategic international, national and regional economic roles of our Tier 1 Ports (Port of Cork and Shannon-Foynes Port) and Tier 2 Ports (Port of Waterford and Rosslare Europort) and support the strategic role of our region's port and harbour assets under the National Marine Planning Framework;
- Support the achievement of Ports of National Significance Tier 1 status for the Ports of Waterford and Rosslare Europort
- Strengthen and develop the strategic regional economic role of other regional fishery harbours, ports and harbours;
- Support the export, fisheries, marine tourism and marine economy potential of port and harbour assets in the Southern Region as listed in Table 6.2 and support investment in the transition to smart technologies of port and harbour assets.
- Support the sustainable development of the 9 no. strategic development locations adjoining sheltered deep-water in line with the recommendations of the SIFP for the Shannon Estuary

RPO 147 Economic Opportunities of Ports specifically seeks:

- Protect the marine related functions of ports in the Region including landside accessibility to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses. Harness sustainable economic opportunities from the ocean economy and the role of Ports in the Region in realising the full potential of the ocean economy.
- Particular regard should be had to Ireland's forthcoming National Marine Planning Framework subject to the implementation of mitigation measures outlined in the SEA and AA undertaken where necessary
- Support the role of ports, where appropriate, in facilitating the sustainable development and operation of off-shore renewable energy development
- Support sustainable and appropriate enabling infrastructure development to harness our ocean wealth at regional and local levels including grid, pier and port facilities to support renewable energy and export potential.

### **Telecommunications**

Policies in support of international telecommunications transmission are welcomed and supported by RSES RPO 135 High quality high capacity international digital transmission which supports projects including the Hibernia Express subsea cable line located at Cork Internet Exchange and the Ireland-France subsea cable.

### **Sports, Recreation and Tourism**

Policies in support of sports, recreation and tourism, in particular support for improved access, initiatives such as the Wild Atlantic Way, coastal greenways and blueways etc. are welcomed and align with similar RSES support. Examples of alignment include:

- RPO 53 Tourism
- RPO 54 Tourism and the Environment
- RPO 125 Green Infrastructure Corridors
- RPO 173 Tourism Corridors
- RPO 174 Walking and Cycling
- 
- RPO 200 Green Infrastructure and Recreation
- RPO 201 National Trails, Walking Routes, Greenway and Blueway Corridors
- Cork MASP Policy Objective 15 Cork Tourism
- Cork MASP Policy Objective 17 Metropolitan Open Space, Recreation & Greenbelt Strategy
- Limerick Shannon MASP Policy Objective 19 Tourism
- Limerick Shannon MASP Policy Objective 20 Metropolitan Open Space, Recreation & Greenbelt Strategy
- Waterford MASP Policy Objective 18 (former Objective 15) Tourism
- Waterford MASP Policy Objective 21 Metropolitan Open Space, Recreation and Greenbelt Strategy

Promoting healthy communities and high quality of life, enabled by interacting with our coast and high environmental quality in our marine environment, is supported through the RSES , specifically under Chapter 7 Quality of Life and other sections as outlined above.

The SRA recommend strengthened policy support for quality place making , health and well-being and high quality of life for coastal and island communities, enabled through holistic physical, social and environmental infrastructures.

### **Waste Water Treatment and Disposal**

Through the NPF and RSES, Irish Water has identified the need to review projects under it's investment plans and take account of increased rates of growth. Necessary upgrades will be identified in Irish Water's 2020-2024 Investment Plan and subsequent plans. RSES RPOs 208 Irish Water and Water Supply, RPO 209 Strategic Water Supply Projects, RPO 211 Irish Water and Waste Water and RPO 212 Strategic Wastewater Treatment Facilities support Draft NMPF sectoral policies under this theme.

RPOs in support of improved water quality are also relevant and align with the Draft NMPF including RPO 112 Water Quality, RPO 121 Effective Collaboration to Implement River Basin Management Plans and Water Framework Directive and RPO 123 River Basin Management Plan and Spatial Planning.

## **4.2 Sectoral Policies and Objectives Recommended for Strengthening**

The SRA recommend strengthened content for the following sectors and priority areas.

### **Energy – Carbon Capture and Storage**

Support of feasibility studies to use the Kinsale Head gas field for Carbon Capture and Storage (CCS) in the Draft NMPF is welcomed. Objectives under Section 7.0 , to develop CCS as a safe, viable technology to support the decarbonisation of electricity generation and CO<sup>2</sup> producing industrial

processes are also positive. RSES RPO 104 Energy Storage and Carbon Capture seeks collaboration between stakeholders and investment to develop innovation, advances in technology and pilot projects for the sustainable development of energy storage and carbon capture within the Region. To strengthen our Region's innovation in carbon reduction, policies, similar to support for other sectors in the draft, should also be set in compliment to CCS objectives.

The SRA recommend the inclusion of policies for Carbon Capture and Storage, in compliment to objectives for this sector under Draft NMPF Section 7.0, to encourage stakeholder and pilot projects to assist our transition to a low carbon economy.

### **Energy – Offshore Gas Storage**

Support for offshore storage of gas as a source of energy should be evolved to greater reflect the potential of renewable gas, including the potential for indigenous renewable gas production and the bio-economy, leading to carbon reductions. Support for gas storage should also be evolved to support the transition of the gas network to a carbon neutral gas network by 2050 (as supported by Gas Networks Ireland). Such themes are supported by RSES RPOs as outlined above for renewable energy and RPO 225 Gas Networks.

Draft NMPF objectives under Section 8.0 support off shore gas storage. The SRA recommend that objectives should support indigenous renewable gas production and transition of the gas network to a carbon neutral network by 2050.

### **Energy-Petroleum**

Regarding the specific themed sector, with objectives and policies, supporting petroleum exploration for security of supply, the SRA question the priority given to long term use of carbon fuel at this level. In the context of the Climate Action Plan 2019, National Mitigation Plan and National Adaptation Framework, published since the Government's White Paper for Energy, the objectives and policies for Petroleum stand out as being contrary to the urgency of climate change actions. Objectives and policies under Section 10.0 to explore and develop Ireland's indigenous petroleum resources in order to deliver significant and sustained benefits, such as import substitution, fiscal return and to maximise the long-term supply of petroleum contradicts the priority that should be given to renewable energy (with significant benefits to the marine renewable energy sectors) and the need to transition away from carbon fuels (Section 11.0).

The SRA recommend 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. As worded, support for the long-term supply and role of petroleum as a priority sector contradicts Draft NMPF Section 11.0 which supports the establishment of Ireland as a world leader in offshore renewable energy deployment.

### **Green and Blue Infrastructure**

Green and blue infrastructure is of particular relevance to water quality and interactions between land use and the marine. As stated in the introduction to this submission, our Region's three metropolitan engines for growth at Cork, Limerick-Shannon and Waterford are closely interconnected with rivers, estuaries, ports, the coast and protected habitats in the marine. Developing innovative approaches

to sustainable infrastructure as these cities and metropolitan areas grow is critically important for sustainable interactions with marine resources.

Valuing our natural capital through an ecosystems approach and fostering good practices upstream to protect water quality can have positive economic benefits in addition to improving the quality of the environment. The Draft NMPF should reflect the importance of sustainable infrastructure in our land use planning to protect and benefit our water and marine environment and the sectors that depend on it.

The RSES states that green and blue infrastructure should be a key concept of a local authority's Development Plan, informing actions and strategy around economic development, placemaking. Additionally, local authorities should work with their neighbouring authorities to coordinate the production of green infrastructure strategies across their boundaries.

Spatial planning can play a significant role in ensuring that the design of developments prevent and reduce diffuse pollution, including the use of Sustainable Drainage Systems (SuDS). The RSES promotes the guidance document, *Planning for Watercourses in the Urban Environment* published by Inland Fisheries Ireland which provides an integrated watercourse protection strategy. RSES RPOs that support this theme include:

- RPO 110 Ecosystem Services
- RPO 117 Flood Risk Management and Biodiversity
- RPO 122 Sustainable Drainage Systems (SuDS)
- RPO 124 Green Infrastructure.

To enhance knowledge and expertise in this area, the SRA has partnered with other Regional Authorities and agencies across Europe on a new EU project called Blue Green City which is funded through INTERREG Europe.

The SRA recommend strengthened land use and marine planning alignment through sectoral support for blue and green infrastructure and ecosystems services approaches through lower tiered plans and projects in spatial planning to protect and improve the quality of our water resources and downstream marine resources.

### **Flooding, Coastal Erosion and Integrated Coastal Zone Management**

Despite the threat of sea level rise and need for climate change adaptation, specific policy support for actions relating to coastal flooding and coastal erosion are absent. RPO 120 of the RSES specifically addresses this theme and states it is an objective to support measures (including Integrated Coastal Zone Management) for the management and protection of coastal resources and communities against coastal erosion, flooding and other threats. Statutory land use plans shall take account of the risk of coastal erosion.

The SRA recommend specific policies to support measures (including Integrated Coastal Zone Management) for the management and protection of coastal resources and communities against coastal erosion, flooding and other threats.

### **5.0 Other Observations**

In addition to the above recommendations, the SRA have the following observations:

- There are multi-sector/agency committees in place for the preparation of the Draft NMPF which will be repurposed to oversee implementation. The SRA would welcome roles in implementation committees and structures for the preparation of regional marine plans.
- In many policies, a marine activity or project must try to (a) avoid, (b) minimise and (c) mitigate effects in order of preference. It is important to ensure the SEA/AA process for the Draft NMPF

integrates robust environmental mitigation to sectoral policies for consistency of interpretation at implementation stage.

- The provisions under the Marine Planning and Development Management Bill 2019 are welcomed to streamline processes and reduce unnecessary duplication of processes for marine related projects.
- The Maritime Development Office the Department of Transport, Tourism and Sport has commissioned a Ports Capacity Study which commenced in 2018 and is due for completion in 2019. The purpose of the study is to assess capacity within the Irish port system to meet present and future demand. The SRA would welcome access to this study, which will assist implementation of RSES RPO 145 Regional Ports and Harbour Strategy.

### **Conclusion**

The SRA supports the role of the NMPF and the analysis undertaken to inform Draft NMPF policies and objectives. Recommendations are provided for constructive input to the process and to strengthen implementation of the NMPF through to the RSES and MASPs. The RSES has framed specific objectives for consistency and alignment and in support of the Southern Region as a first mover under the NMPF. The Region will play an active part under national and regional marine planning and will adopt measures necessary to secure the objectives of the NMPF.

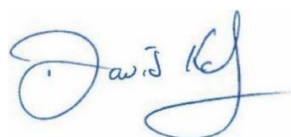
RSES objectives compliment Draft NMPF policies and will be effective in aligning land use priorities to enable the sustainable development of marine resources. Likewise, policies implemented through the NMPF will assist implementation of marine activities to drive our Region's economic progress.

Importantly, following the higher-level framework of the NMPF, regional marine planning frameworks need to follow to fully support the potential and address the issues for marine sectors at the regional level. Such plans need to align with the established RSES and Regional Assembly structures, for effective alignment and implementation of land use and marine planning objectives.

The inclusion of Regional Assemblies on repurposed high-level Interdepartmental Groups and Stakeholder Advisory Groups to assist the Department and coastal Local Authorities and prepare towards implementation of the NMPF and future Regional Marine Plans is sought.

The SRA would welcome continued engagement with the Department in the development of marine planning policies and specifically regional marine plans. The RSES team are available for future consultation and clarities required regarding this submission.

### **Mise le meas**



---

David Kelly  
Director Southern Regional Assembly



**Appendix 1**  
**Points Raised by the Members of the Southern Regional Assembly**

- Greater emphasis is needed in the NMPF on the importance of upgrading and maintaining local road networks to improve access between smaller fishing villages and markets. An example is the An Rinn Gaeltacht in Co. Waterford, where good road access is needed to get fish and shellfish to market.
- Greater reference and policies to protect vulnerable Gaeltacht communities, many of which are on the coast and which are also small fishing or aquaculture settlements (an example is Heilbhic, An Rinn, Co. Waterford). Support ring-fenced funding to ensure the sustainability and viability of rural Gaeltacht communities involved in indigenous industries, such as schemes to cover costs of dredging of fishing ports that are silting up. Silting threatens the livelihoods of fishermen, the life-saving activities provided by the RNLI, commercial and leisure boating communities.
- Policies are needed to prevent potentially duplicative and invasive exploratory activities related to offshore renewable energy projects. The NMPF should prevent multiple companies from carrying out the same or similar exploratory activity. Applications for foreshore licences should not be approved where the same shoreline and seabed is likely to be disturbed by more than one company.
- Policies should seek best international practice in relation to distances from the shore for offshore renewable energy infrastructure, particularly where the shore is of importance for tourism, where fishing activity could be negatively impacted, or where the coastline has internationally recognised importance (e.g. Copper Coast Geopark in Waterford). Prospective offshore renewable energy projects, while welcome from the point of view of reducing carbon footprint, should not be too close to shore and should not disrupt views over significant lengths of a coastline. Such guidance should also be sought through relevant offshore renewable energy guidelines.
- The NMPF should stipulate that there should be genuine and meaningful engagement with local communities at the earliest opportunity ahead of the development of offshore renewable energy projects, and there should be a community dividend.