



An tÚdarás Rialála Limistéir Mhuirí
Maritime Area Regulatory Authority

First Revision to the National Planning Framework Consultation,
Department of Housing, Local Government and Heritage,
Custom House,
Dublin 1,
D01 W6X0.

Date: 28th August 2024

RE: Submission by the Maritime Area Regulatory Authority (MARA) in response to consultation on the Draft Revised National Planning Framework.

The enactment of the Maritime Area Planning Act 2021 (MAPA 2021) was part of an unprecedented extensive marine management reform programme in Ireland. The Act regulates the maritime area and achieves this regulation by various means, including the National Marine Planning Framework (NMPF). The NMPF contains a vision, objectives and planning policies for all marine-based human activities. It outlines how those activities will interact with each other in an increasingly pressured ocean space. It is the key decision-making tool for Government departments, State agencies, regulatory authorities and policy makers for decisions on marine activities up to 2040.

The establishment of MARA in July 2023 was another means of regulation contained in the MAPA 2021. MARA facilitates a streamlined consenting process for projects in the maritime area and a route for projects to the planning system by assessing applications for Maritime Area Consents (MACs) which are the right to occupy the seabed. A MAC is required before a planning application can be made. It also regulates activity in the maritime area by issuing maritime usage licences and has an important statutory role in compliance and enforcement. In all aspects of its work, MARA must have due regard to the NMPF.

The interface between the marine spatial planning and terrestrial spatial planning systems will be of critical importance to ensure the sustainable development of the maritime area which can be supported by terrestrial infrastructure, environments and communities. MARA plays a key role in the regulation of maritime activities and developments and welcomes a cohesive and integrated marine and terrestrial spatial planning framework.

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The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The National Marine Planning Framework (NMPF) was adopted in 2021 as a parallel strategy to the NPF for Ireland's maritime area. The NMPF has a sectoral focus and addresses policies and objectives for marine activity and development, similarly setting a framework to 2040.

The Key drivers identified for the First Revision of the NPF are noted as follows;

- Climate Transition – addressing sectoral emission targets and Climate Action plan 2023
- Population Demographics – planning for uncertainty
- Regional Balance – the reality of regional ambition and the challenge of transitioning from 'business as usual'
- Digitalisation – impacts on work, retail, commuting and regions
- Investment and Prioritisation – Timing and Prioritisation

In the context of Climate transition, MARA recognises that the development of the Offshore Renewable Energy (ORE) sector will play a key role in how Ireland transitions to a carbon neutral society. MARA is a key enabler in respect of Ireland's ambitions for the ORE sector. MARA also supports delivery of other projects of strategic importance (including cabling and telecoms projects, ports development, drainage projects, sewerage schemes etc.), facilitating Ireland to harness significant benefits from realising a low-carbon economy, ensuring energy security, and presenting new opportunities for economic growth in accordance with the principles of proper planning and sustainable development of the maritime area.

MARA welcomes the opportunity to submit our views on the Draft Revised National Planning Framework (NPF), which brings the opportunity to ensure the NPF is aligned with the National Marine Planning Framework (NMPF). These strategic frameworks together with the National Development Plan 2021, combine to form a single vision for Ireland under the government's long-term overarching strategy Project Ireland 2040. This overarching alignment of policy and spatial planning framework for social, economic and cultural development of Ireland is critical to create a unified and coherent plan for the country and its maritime area.

MARA makes the below specific comments aimed towards strengthening the NPF and to further support its successful implementation. This submission focuses on the main changes reflected in the Draft Revision and where it relates to the land sea interactions and maritime area, and can be summarised as follows;

- Integrated land and Maritime Planning

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- Transboundary Consultation
- Enhanced focus on GHG emissions reductions and renewable energy development
- Importance of Ireland's ports
- Further development of Designated Marine Area Plans (DMAP)
- Clear and timely alignment of Terrestrial Plans with NPF, NMPF and DMAP.
- Integrated Coastal Zone Management Plans
- Hierarchy of Plan and Policy Schematic
- Development of Guidance and Training
- Coastal Planning Authority Functions in the maritime area
- Repowering and International Interconnection

Specific Comments

Integrated land and Maritime Planning.

There are many shared aims and overlapping areas of co-ordination and activity between terrestrial and maritime area planning, including the development of renewable energy and associated green industrial development, supporting the improvement of our port infrastructure, tourism and environmental co-ordination. The alignment and updating of the NPF to incorporate additional marine spatial planning objectives and to further align with the NMPF is welcomed by the MARA.

It is noted that the NPF acknowledges the importance of integration between land and marine planning and the many shared aims and overlapping areas of coordination and activity across the two regimes. Consideration to the inclusion of a reference to the National Marine Planning Framework in the National Policy Objective 103 would be welcomed specifically in this regard.

All decisions on individual applications determined by the relevant planning authority under the MAP Act, must secure and be consistent with the objectives of the NPF and NMPF. Of note however is Schedule 5 of the Maritime Area Planning Act (2021), which sets out the criteria to which MARA shall have regard in its consideration of a Maritime Area Consent (MAC) and whilst the NMPF is listed the NPF is not. Therefore, developments, which are terrestrial in nature but which interface and extend into the nearshore of the maritime area for example; coastal protection works, bridge schemes and flood defence works along tidal stretches of rivers etc., are required to seek a Maritime Area Consent (MAC). For a number of these projects seeking a MAC there are no corresponding NMPF Policy Objectives with which the projects align, however there are Policy Objectives in the NPF which would be of relevance.

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Some consideration could be given to acknowledging the nature of such projects spanning between terrestrial and maritime areas. Highlighting such linkages between land, coastal and marine management and consenting frameworks (MACs and planning) in supporting text or a specific policy would be welcomed.

Transboundary Consultation.

As sub-national marine spatial planning develops in Ireland, it will be informed by transboundary considerations both in relation to land-based concerns and in relation to transboundary marine matters. MARA would support the establishment of clear mechanisms to facilitate the consistent and efficient transboundary consultation with our neighbouring administrations, such as the United Kingdom and our EU partners, on maritime projects and plans to ensure an efficient, integrated and sustainable approach to the management of our marine resource

Enhanced focus on GHG emissions reductions and renewable energy development.

MARA welcomes the reflection of broader policy changes since the publication of the original NPF to reflect climate action commitments, including Government Climate Action Plans and European Directives. One of the primary objectives of the NPF is to improve resource efficiency and promote the movement towards a low carbon economy. The inclusion of National Policy Objective 56 is welcomed specifically in this regard.

Importance of Ireland's ports

Given the identification of offshore renewable energy as a key element of the approach to reducing carbon emissions across a number of sectors, including transport and electricity generation, ports in our regions have a natural advantage with proximity to potential offshore renewable energy locations and will play a critical role in facilitating the development maintenance and operation of the sector through the accommodation of supporting infrastructure. The sustainable and timely development of Ireland's ports is critical to enable the future realisation of our Energy targets in delivering ORE. The inclusion of the amended wording to National Policy Objective 51 and additional National Policy Objective 52 is welcomed specifically in this regard.

Further development of Designated Marine Area Plans (DMAP)

The delivery of further sectoral and multi-sectoral DMAPs would assist in delivering at a more regional and local level a sustainable plan led approach to coherently guide competing offshore maritime developments unlock the potential along our coastline. It will be imperative these future DMAPs are aligned and integrated with local and regional plans and also the NPF and NMPF. The inclusion of a policy supporting the

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development of future sectoral and multi-sectoral DMAPs, and ensuring their alignment with the NPF and NMPF and the National Development Plan through the delivery of the National Strategic Outcomes would be welcomed.

Clear and timely alignment of Terrestrial Plans with NPF, NMPF and DMAP.

The integration of the NPF with Regional and local terrestrial plans and their alignment with the NMPF and the published South Coast Draft DMAP and any future DMAP, is essential to enable the transparent assessment and timely delivery of consents for projects to support ORE enabling port and terrestrial infrastructure. Inclusion of a policy to support the timely review and alignment of regional and local land-use plans with the NPF and NMPF would aid in the delivery of key onshore infrastructure. This will enable the full potential of the marine economy and renewable energy in a sustainable manner.

Integrated Coastal Zone Management Plans

The development of Integrated Coastal Zone Management Plans for the protection of vulnerable coastal resources and communities against coastal erosion, flooding and other threats, whilst maintaining ecosystem services and conserving and/or restoring biodiversity is a challenge. Given the broad range of stakeholders with responsibilities to manage these risks, and the complex legal and regulatory framework an integrated and co-ordinated approach is required. The inclusion of the National Policy Objective 55 is welcomed, however consideration could be given to the inclusion of wording requiring an integrated and co-ordinated approach in this regard.

Hierarchy of Plan and Policy Schematic

Having regard to the fast emerging policy papers, and plans and frameworks a plan and policy hierarchy schematic of the various NPF, NMPF, DMAP, Policy Statements, Development Plans etc. would be welcomed. A plan and policy schematic linking both the NPF and NMPF and the relevant hierarchy of plans and policies would provide clarity for all practitioners involved in plan making and consenting responsibilities.

Development of Guidance and Training

Mara supports the development of detailed planning guidelines and specifically marine related guidance to assist professionals and practitioners involved in the consenting and plan making roles to successfully implement the NPF and NMPF. Specific guidance for appropriate assessment in the nearshore area would ensure robust process, evidence based decision making, and a consistent approach across consenting authorities.

MARA also strongly supports the development of a programme for research, education, training and upskilling in marine spatial planning topics for students and practitioners to bridge the terrestrial maritime gap and ensure the important roles they

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play in integrating terrestrial and marine planning policy and deliver effectively on the objectives of the NPF and NMPP.

Coastal Planning Authority functions in the maritime area

MARA would welcome the clear setting out of the functions and jurisdiction of the Coastal Planning Authorities(CPA) in the nearshore area within the NPF. Localised land-sea interactions and the important role that CPA's play in exercising their functions within their nearshore area should be highlighted. Setting out clearly the role and functions of CPA's would further support the seamless integration of localised land sea interactions. MARA suggests that the future development of DMAP, for specified parts of the nearshore area, could also provide an evidence based and planned approach to the management and sustainable development of the nearshore area.

Repowering and International Interconnection

MARA notes the many significant changes proposed to energy policy and objectives, generally indicating increased support for renewable energy development and associated infrastructure.

Some additional supportive text is added on repowering and international interconnection, but neither benefit from a new, topic-specific National Policy Objective. Given the level of EU action on these topics and their importance in the creation of a reliable, secure renewable energy supply, and the movement to a circular economy, such topic-specific National Policy Objectives would be beneficial.

Concluding Comments

Overall, the revised NPF proposes a more prescriptive approach to the management of the use of land in order to meet Ireland's climate and energy targets. The Draft Revision brings the NPF into alignment with other recent Government action, such as the National Marine Planning Framework, the Future Framework Policy Statement for Offshore Renewable Energy and the Designated Maritime Area Plan process. If this approach is adopted in the final NPF, it will be important that the implementation timelines and process facilitates achievement of the 2030 targets.

If you have any queries or require further information in relation to this submission, please contact Niamh Lennon in the Assessment, Research and Data Unit in MARA directly.

I would be grateful if receipt of this submission, could be formally acknowledged by email to the following info@mara.gov.ie .

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Yours sincerely,

A handwritten signature in blue ink, appearing to read "Niamh Lennon", is shown within a rectangular frame.

Niamh Lennon

Senior Marine Advisor Planner

Assessment, Research and Data Unit

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