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NPF Submissions,
Forward Planning Section,
Department of Housing, Planning, Community and Local Government,
Custom House,
Dublin D01 W6X0

10 November 2017

Re: National Planning Framework

Dear Sir/ Madam,

We welcome this opportunity to comment on the Draft National Planning Framework (NPF). In particular, we wish to make a submission in relation to Chapter 6: Realising our Island and Marine Potential. We feel that this represents an opportunity to recognise and publicly discuss the significance of our natural environment, in particular, our marine and coastal resources as major economic, environmental and social assets. The importance of these resources to Irish citizens cannot be underestimated or undervalued.

The inclusion of integrated land and maritime planning within the NPF is a positive step towards achieving a co-ordinated approach to strategic spatial planning on this island. In this regard we wish to submit the following comments:

Governance

- The relationship between planning policy and maritime policy in Figure 6.2 needs further clarification. The maritime system lacks specific detail on how marine spatial planning will be implemented across different scales i.e. will there be regional marine plans? Who will have responsibility for developing the 'regional based approach'? Will these regional strategies be statutory?
- At a local level, how will coastal management planning and ICZM be developed and implemented?
- You have included the Shannon Strategic Integrated Framework Plan as a case study. However, there is little context or reference to how this approach can be integrated with any future land and marine planning system. Will it influence a regional marine approach or be used for ICZM?

Maritime Resources

- A number of marine uses and resources appear to have been neglected in the NPF. Besides the main economic sectors such as ports, fishing and offshore renewable energy being highlighted, recreation, leisure, sport, historical and cultural heritage, coastal landscapes and seascapes and marine biodiversity are additional resources which deserve to be conserved and managed sustainably for the benefit of Irish citizens. Land use and marine planning should aim to balance development with environmental quality and provide opportunities for communities.
- Outdoor recreation including wildlife watching, sailing, extensive beaches and historical and cultural heritage are valuable assets within our coastal and marine areas. Improved and increased accessibility to coastal and island areas will be an important consideration for land-based spatial planning, particularly in relation to community and tourism development. In addition to electricity, communications and transport provision, it would be useful to highlight how a national network of cycling and walking (i.e. greenways and blueways) could link with community networks and provide low impact access to coastal and island areas. The NPF together with marine spatial planning can help to ensure infrastructure and onshore facilities are provided in a co-ordinated way.

Integration

- There is no information within the NPF in relation to the marine consenting process and how it will be integrated with the land and marine planning systems. It would appear that the marine planning and consenting processes are separate and therefore it is difficult to consider how cumulative impacts will be assessed for developments within the coastal zone. Will there be two separate consenting processes for developments with both land-based and off-shore elements?
- The wording of National Policy Objective 40 is quite challenging i.e. 'Regional and local development plans will take account of and integrate relevant maritime spatial planning issues'. We suggest that this should be stronger i.e. 'must be in accordance with objectives of the maritime spatial plan(s)' to ensure a more integrated approach.

We hope you find our comments useful and look forward to participating in further consultations as part of the development of the NPF.

Yours sincerely,

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Prof. Geraint Ellis; [REDACTED]

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