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NPF Submissions,
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31 March 2017,

Dear Sir/Madam,

Thank you for providing us with the opportunity to comment on the first public consultation relating to Ireland 2040: National Planning Framework. We have read with interest the Issues and Choices document published in February 2017. The SFI MaREI Centre is at the forefront of research and development on the marine, renewable energy and marine renewable energy and has a long, proven track-record in the areas of marine and coastal management, energy research, remote sensing and climate change adaptation. Accordingly, this submission represents a multi-disciplinary response comprising the views of engineers, biologists, geographers, lawyers and environmental scientists all of whom have the knowledge and experience necessary to input on the design of a future national planning framework for Ireland with reference to their own areas of expertise. We hope you find our comments useful and we would be happy to discuss them further with you, should that be required. Our comments to the initial, general questions are presented first, followed by our detailed comments according to chapter and selected specific questions contained therein.

GENERAL

1. *What should Ireland look like in 20 years?*

There should be an absence, or at least a great reduction in the many issues currently visible with respect to the Irish planning system: the social housing crisis, disparate rural planning, inadequate enforcement of building regulations, limited retrofitting and energy efficiency in many buildings, climate impacts etc. Taking a much broader view, in 20 years, an observer from orbit should be less able to identify the urban environment from the rural environment. Offshore renewable energy and resource harnessing infrastructure should expand from key nodes along our coast, with airspace, and sub-sea space containing clear transport routes that are strategically planned, and not *ad hoc*. Populated areas and human use of the landscape and seascape should be evidently resilient to climate change-induced hazards, potentially even harnessing the consequences of extreme weather events. Pollution of Ireland's natural resources should be minimised and where possible avoided, and our land and marine resources should provide ecosystem services in a sustainable manner resulting in responsible production and consumption by society. Our national governance system for land and marine areas should be integrated in line with international and EU policy. Everyone: government, the private sector and civil society, needs to be involved in planning the type of place Ireland should be in 2040 with government providing the long term vision, well-informed leadership, and appropriate mechanisms with measurable targets to do this.

2. How do we ensure that every place can realise its potential?

We need to recognise that planning should occur in three dimensions: developing a strategy that recognises Ireland as a 3D area containing land surface, sea surface, atmosphere, and sub-sea/subterranean space to manage and develop within. We also need to recognise that these spaces change over time, and are subject to changes and developments beyond our national boundaries. Boundaries need to be clear and, where there is ambiguity, this needs to be addressed so that existing and new planning and management frameworks can be implemented.

As we move further into the 21st century, the *ad coelum* doctrine, whereby the owner of land (note there is no mention of the sea) owns ‘up to the heavens and down to hell’ is completely antiquated and is no longer acceptable. We therefore need to progress to a new doctrine which clearly defines the limits of Ireland’s sovereign territory and 3D regions of responsibility. This has very real implications for enforcement and compliance of existing legislation and key global challenges including people trafficking, drug smuggling, customs evasion etc. The flexibility to incorporate transboundary responsibilities must be factored in and where there is jurisdiction or other uncertainty this needs to be identified and addressed. Such an approach must cover both the marine and land areas, from the top of the atmosphere to the centre of the Earth, thereby enabling us to plan for increased use of new technologies such as airborne drones, deeper drilling technologies etc.

Proactively responding to the impacts of climate change by: i) investing in improved and/or appropriate physical defences and ii) considering the effects of forecast higher frequency weather extremes (temperature, precipitation and wind) during planning, design and construction phases will improve resilience and aid realisation of potential to 2040.

In light of abundant evidence of the benefits to human health of the natural environment, the role of environmental stewardship in managing a widely reported decline in habitat and species diversity as well as issues of access to the natural environment (including through public parks and urban green areas) must be given greater attention within the National Planning Framework. Whilst EU and national legal instruments ensure that environmental and cultural heritage are, to varying degrees, taken into account under current development planning regimes, the National Planning Framework must also be extended to take into account the potential sterilisation of underground or underwater mineral resources for which there is currently little or no provision.

The National Planning Framework must involve people. Public consultation is one step in this process but to ensure ownership of the Framework, and hence a greater likelihood of support and compliance, it is essential that communities and individuals participate in the process. This needs to be facilitated through bottom-up approaches rather than the traditional model of imposing a plan on them and risking a lack of support. Involving community representatives in the planning process will enable co-design and co-production of actions which are more likely to be supported by the local communities and the public at large. It may also facilitate an ethos of personal responsibility and ownership with regards to safeguarding their local environment.

Towns and cities should be key nodes for economic, spatial and social development. The powers of local authorities should be strengthened with respect to certain key issues. The NPF must, therefore, explore innovative and sustainable financing mechanisms, especially at the local level, to support development. The planning process at all levels should be linked to investment and financing policies and options.

3. *Where will jobs be located and what will these jobs be?*

A national development master plan should be based on a distributed but fully interconnected network of designated primary and secondary population centres with the critical mass to support a well-diversified set of industries and services and thus supporting a diverse range of sustainable job opportunities. This type of approach will ensure flexibility of the economy and society, protecting us from the impacts of global shifts and trends.

4. *Where will we live and what types of housing will be needed?*

Development should be encouraged in more inland locations and further away from the risks associated with climate change, for example, construction should be avoided in floodplains and in coastal areas that are subject to increased risks from projected climate changes. It may be that ‘planned retreat’ will be needed in areas that are severely impacted. Ireland has no policy on planned retreat or indeed on ‘holding the line’. Future housing will need to be resilient to weather anomalies, extreme events and cognisant of projected climate changes. Development should be reasonably dense to reduce *per capita* consumption of energy, water and land. Houses are only one part of the whole neighbourhood, which should leverage ecosystem services and promote green amenities. Developments should also be well connected in terms of transport and communications, developed in a manner that fosters strong resilient communities who are engaged in regional and national development. Measures should be introduced to dis-incentivise one-off dispersed housing, whilst positively encouraging clustering into well-ordered communities with sufficient critical mass to be sustainable in terms of essential infrastructure needed to support vibrancy, social cohesion and well-being.

5. *What are the key services people will need?*

Services needed include those relating to advances in communications; transport (including increasing uptake of electric vehicles); community-based energy and food production systems where possible; new and innovative mechanisms to foster community engagement and participation; employment/entrepreneurship development services; access to clean water and sanitation across all of society.

6. *Where will Ireland fit in a wider (geographical) context?*

Ireland’s geographical position as the entry point to the EU from the Americas makes it strategically important from a defence perspective. With increased maritime activity and global threats, enforcement and compliance at sea becomes more fundamental and important in an international context. Sea-going authorities (e.g. the Irish Naval Service, Coast Guard, Commissioners of Irish Lights, Sea-Fisheries Protection Authority etc.) therefore need to be significantly resourced and supported. Given the very high ratio of sea area to population, Ireland has strong grounds to expect significantly increased levels of financial and other supports from States that benefit directly and indirectly from the services these agencies provide. When the UK leave the EU, Ireland will be one of two remaining EU countries where English is an official language. Though the impacts of this are unknown, they represent an uncertainty which may need to be considered in planning going forward.

7. *What are the planning responses to key environmental challenges?*

Planning should be precautionary rather than reactionary. It needs to be ecosystem-based, linking maritime and terrestrial dimensions. Approaches such as Adaptive Management, Integrated Coastal Management and Maritime Spatial Planning, including their principles of participation, vertical and horizontal integration, transboundary cooperation and iterative review, need to be implemented at

all levels of governance. Planning should be knowledge-based, there should be efforts and targeted action plans to advance research on environmental issues and challenges such as climate change-related impacts; protection of priority habitats, etc. Planning actions and decisions should be based on evidence and the NPF must draw on and support research and technological advancements. In order to support coherent and effective planning at sea through Maritime Spatial Planning (MSP), planning along Ireland's coast needs to be improved to support offshore services and new, emerging sectors (such as offshore renewable energy, offshore aquaculture, etc.). Planning responses need to be adaptive and reviewed regularly due to the dynamic nature of the environment.

8. What infrastructure is required – what are the national priorities?

Infrastructure planning should be coordinated across industrial sectors. There is little merit in planning offshore renewable energy developments along the west coast if there is no suitable port access or grid infrastructure, for example. An energy transport network/grid that is capable of adapting to fluctuations in renewable energy inputs, and capable of either offloading, or storing excess generated energy should be enabled.

Transport should be a national priority. Public transport to link rural areas to larger cities and coastal areas should be improved. The links between different modes of transport need to be strengthened, for example, if a port is expanded, it will create more jobs and consequently the nearby town and its facilities must be capable of supporting such an expansion. The development of infrastructure, particularly those with long design lives, should recognise the risks posed by projected climate changes, e.g. sea level rise, and should account for these in their design, development and management.

Sustainable management of resources requires a good understanding of ecosystems as a whole and how these change due to human pressures and climate change. The existing nationwide network of *in situ* monitoring stations should be expanded to include historically less well monitored areas, and cover a more diverse range of sites, from inland to transitional, coastal and offshore waters, to upstream and downstream watersheds and to atmospheric, land surface and within-soil sensors. Earth Observation (remote sensing) should become a standard source of environmental information alongside traditionally used field measurements, and deployed to assist with the implementation of national and EU policies. New technologies, such as cloud processing and web-based IT should be established as norms in research, for access, processing and interrogating 'Big Data' for environmental and social research. Internet security mechanisms should be put in place to complement these efforts, and national, open source Big Data centres for multi-disciplinary research should be further developed.

9. How should a National Planning Framework be implemented?

The National Planning Framework needs to be more than a framework: it should be supported by integrated and dedicated strategies and plans with allocated responsibilities and timelines across all levels of governance from central Government Departments to local authorities. This is the only way planning can be coherent. The NPF needs to have statutory backing as is stated in the consultation paper. This is critical to its future success and will help to ensure that government departments, sectoral agencies, regional and local authorities tailor their initiatives to the NPF. This will also help with future assessment and evaluation of successes from the Framework. The NPF must identify and prioritise national development/infrastructure initiatives. Implementation schedules for these initiatives should be detailed to include cost estimates, investment and financing sources.

10. What will success look like?

Success can be evaluated according to a range of factors depending on what aspect is being assessed. At the macro-level success would encompass the attainment of clearly defined metrics for gains in efficiency of governance, planning and public procurement. Concrete evidence of institutional learning having taken place with demonstrably less overlap and repetition of tasks and responsibilities might be another indicator. Some examples of success could be: increased diversity of income sources for individuals (supported by enhanced innovation and entrepreneurship); increased parity between individual incomes and between rural and urban incomes; decreased insurance costs and less insurance claims arising from extreme weather events; less infringement proceedings taken against Ireland for breaches of EU law, etc. Improvements in governance transparency supporting specific allocation of responsibility and liability in planning processes and outcomes; efficient and prioritised planning processes for construction of community-owned renewable energy and individual private micro-generation projects as well as Near Zero Energy Buildings (NZEBS), are just some of the suggestions we would have in this regard.

CHAPTER-SPECIFIC COMMENTS

Chapter 2 - Ireland's National Planning Challenges

Of the four counties identified as having the largest increases in population over the past twenty years, three are coastal. This emphasises the need to incorporate coastal processes in future plan making as well as the need to put climate change adaptation at the centre of our policy-making. This needs to be reflected not only in the National Planning Framework but in all the associated sectoral plans and local authority plans (County Development Plans, Local Area Plans etc.).

Chapter 3 – People's Health and Well-Being

Section 3.3 on linking health and well-being to place needs to recognise the pivotal role that coasts and the marine environment have to play in health and well-being. This highlights the importance of environmental stewardship in management of declining habitats and species diversity, which should be embedded in all levels of the planning framework. Coastal areas, and beaches in particular, have a high recreational value and are popular with the local population as well as tourists yet management of these resources is *ad hoc* and fragmented. Local authorities assume a *de facto* management role but with little or no statutory clarity in terms of jurisdictional remit or support in terms of funding. This will become increasingly important as the population grows and environmental pressures increase. It also takes on additional significance if the natural environment is to be placed at the centre of the nation's health and well-being in future. Ensuring healthy lives and promoting well-being for all at all ages is also one of the UN's Sustainable Development Goals to be achieved by 2030.

What policies can the NPF include to effect improvements to our general health, including physical and mental wellbeing, in Ireland over the next twenty years?

The natural environment is an important factor in improving physical health and mental wellbeing. The NPF should take account of the value of Ireland's natural environment and help improve and increase outdoor and recreational areas.

Chapter 4 – A Place-Making Strategy

At the opening of Chapter 4, particular attention is given over to cities; the notion that satellite towns should support the growth of cities has the potential to significantly impact negatively on energy efficiencies and emission targets by displacing the workforce outside of the urban footprint and therefore incentivising private car-ownership. This will drive upward transport-related energy consumption and *per capita* usage of land, energy and water. To counter this, development should occur on the existing footprint of the city as much as possible and should be balanced with environmental resilience (a ‘green cities’ approach). If development must flow outside of the existing urban footprint (due to lack of available space) into neighbouring towns, significant investment should be made to improve public transportation networks to reduce the impact of commuting on road networks and associated vehicular emissions, moreover, residential development in particular (both outside and inside the city) must become denser so as to limit the footprint of urban development on the natural environment.

It is stated that the role of the Regional Assemblies is to co-ordinate local authorities to secure shared national and local objectives and that the primary vehicle for this is the preparation and implementation of Regional Spatial and Economic Strategies (RSEs). If the latter will be used to deliver certain strategic policies of the NPF, we would suggest that these are not limited to purely economic issues. The NPF should seek to deliver sustainable development which includes social and environmental considerations, not just economic aspects. A focus solely on economics suggests this is Ireland’s priority.

It would be helpful if some text was added to describe how/if the regional authorities interact with their counterparts in Northern Ireland, given section 4.1.3 of the same chapter already highlights the importance of an all-island approach. A cross-reference to section 4.4 should also be inserted as this expands on the North-South dimensions.

Whilst Section 4.2.16 refers to the National Strategy for Higher Education to 2030 and the National Skills Strategy 2025 generally speaking there is little mention of the role that research can play in assisting with the design and implementation of the NPF. Ireland’s higher education institutes are successful in many international, EU and national funding programmes and are in a strong position to inform the development of relevant plans and policies as well as their implementation in different types of environment. The MaREI Centre, for example, combines the expertise of a wide range of research groups and industry partners, with the shared mission of solving the main scientific, technical and socio-economic challenges across the marine and energy sectors. We also host the International Project Office for Future Earth Coasts, a project to support sustainability and adaptation to global change in the coastal zone. MaREI also hosts The Entrepreneur Ship, a hub for entrepreneurs and innovation in areas such as robotics, big data, power generation, cyber security, unmanned systems and power storage as they relate to our ocean and energy systems. This represents a clustering of research and small industry with direct transferable lessons for other key sectors and potentially other regions.

Section 4.3, on the potential of rural Ireland, should recognise that the majority of Ireland’s coastal areas are rural in character but hold huge potential for future economic and social development (for example, through the development of offshore aquaculture, marine renewable energy, coastal and marine-based tourism through promotion of the Wild Atlantic Way etc.). Increasing activity will put increasing pressure on the receiving environment, already experienced in some coastal towns and villages during the Summer season, which should be accounted for in future

planning policy. There also needs to be strong coherence between this planning framework and the implementation of Maritime Spatial Planning, in whatever form that might take.

The role of EU policy in rural policy should be included. For example, the Europe 2020: Smart, Sustainable and Inclusive Growth strategy and the EU Flagship Initiative: "Innovation Union" advocates for economic recovery through building the bio-economy and mobilising Key Enabling Technologies (KETs). From a research perspective the Rural Renaissance theme of Horizon 2020 aims to tackle rural out-migration due to a lack of jobs by providing stakeholders with opportunities to participate in KETs/bio-economy research and innovation, enhancing social capital and creating jobs *where people want to live*.

‘Connecting places through infrastructure’ should consider ports and future access to these in light of the expansion of existing, and development of new, marine sectors as well as the possible implications of Brexit and projected climate changes. Development that is deemed to be strategic and/or nationally significant should be planned in its entirety and not split into different phases covering different elements. There is also a strong need to enable local communities and individuals to have a say in development planning proactively rather than through the current reactive system. Such engagement may be facilitated through existing structures and initiatives within local communities, such as Community Development Committees, Tidy Towns, An Taisce Clean Coasts Programme, etc.

Our capital, cities and towns

Questions

Taking on board all of the relevant environmental and physical capacity issues, what role should our cities have as part of the NPF?

Cities concentrate people and activities into discrete geographic locations, this has the potential to limit environmental deterioration and increase quality of life, provided our cities are fully cognisant of environmental impacts (noise, pollution, waste, temperature, water etc.) and are designed/developed to reduce these impacts (and where possible eliminate them). Cities should have a key role in the NPF in terms of forming partnerships with smaller conurbations and together identifying priorities and pressures faced in securing and growing their international attractiveness. Therefore, cities within the NPF should form partnerships with towns, and provide the link between housing and infrastructural development planning priorities.

How might we develop one or more strong regional complements to Dublin that can address their whole city-region, including interactions between settlements?

The very nature of cities is to compete for resources (including attracting FDI) and it is difficult to break this cycle as inherently cities are not “allowed to fail”. However, many of the resources needed to sustain and grow cities (for example water, energy, land) are limited. Therefore, the notion of redirecting resources from one city to another is ultimately unrealistic. Moreover, it is problematic to package a city simply as “An alternative to Dublin”. Cities outside of Dublin need to make a “unique offering”, for example, the opportunity to attract activities associated with the green or blue economy and forging such a unique identity for a city (e.g. Galway) should be prioritised within the NPF. Where possible, planning should incentivise developing the uniqueness of cities. However, it is important to stress that lack of finance and affordable housing ultimately encumbers the development of cities, therefore the NPF needs to clearly articulate mechanisms to unlock funding.

Do we need to reform and strengthen administrative and governance structures so that they are capable of delivering the necessary alliances, collaboration and actions to build up our cities and their regions?

This should be done as a matter of priority. Development and environmental issues do not respect administrative boundaries, therefore, it does not make sense to rely on such mechanisms to deliver actions. Alliances and partnerships between cities and regions should be managed through voluntary, flexible and pragmatic partnerships between local and regional authorities. Existing governance structures should be examined with a view to establish a coordinated All-Island approach.

How might we develop an urban policy that distinguishes between development within the existing built-up area of cities and towns and greenfield development sites?

Densification (as opposed to ‘sprawl’) is an effective means of reducing *per capita* consumption of energy, water and land. Moreover, higher population densities (urban areas) tend to exhibit lower social vulnerability (as this reduces isolation). Both brown-field and green-field development have commonalities, for instance, both should prioritise as a matter of urgency the preservation of green infrastructure for achieving Sustainable Urban Drainage Systems (SUDS) and off-setting potentially high thermal loading. One key difference will be in the eventual land use of an area. In this regard, given the high concentration of people, urban developments should discourage vehicular access (which degrades air quality locally) and enable pedestrian access.

How might we distinguish between the role of towns within the wider hinterland of the cities and those located outside the influence of the cities?

This may not be a useful distinction. Generally, the NPF should reflect the interconnectivity and between urban areas across the primary regional assemblies and recognise that there are “orders of influence” between cities and surrounding conurbations rather than specific towns that are isolated entirely from the influence of other urban areas.

What measures could be used to examine potential densification scenarios that may be applied to parts of existing urban areas?

Research and Science should be leveraged here to conduct, for example, scenario-based impact assessment (in terms of environmental deterioration, noise or air pollution) improvements in building energy performances, transport / congestion modelling and so forth.

Our Regions

Questions

What are the levers for effective regional development?

Effective regional development should begin with setting clear and shared objectives for the regions, in line with the objectives of the NPF and other key strategic policies. This should be supported by partnerships between authorities to apply a coordinated and integrated approach.

Are there strategic issues (i) across local authority boundaries or (ii) on an inter-regional basis, that the Regional Assemblies can co-ordinate to ensure more effective sub-regional and regional outcomes?

Climate change will have economic, social and environmental impacts for Ireland across multiple scales (national, regional and local). The challenge for local authorities will be to develop local level plans that account for climate impacts across local authority boundaries and increase the resilience of

these areas to ongoing and projected climate changes. The regional assemblies can play a role in ensuring integration of cross authority climate impacts through the provision of over-arching and regional adaptation plans.

Rural Ireland

Questions

How can the rural parts of Ireland close to urban areas be protected from development pressures that are likely to arise to accommodate further population growth?

Planning of urban areas should consider rural parts that are close by to ensure that the pressures associated with eventual integration of those rural parts into the expanding urban areas are catered for proactively. Policy and planning measures may include advanced identification of land for infrastructure and services, improving connectivity from these urban areas to the rural parts and guided land development.

What measures need to be in place to allow those who have a genuine need to live in the countryside to be accommodated?

Improvement of public transport connections from rural areas to nearby towns is critical.

Ireland in an all-island context

Questions

How can the NPF facilitate co-ordination between settlements that share connections across the border between Northern Ireland and Ireland and how should this be reflected in the document?

There should be actions within the NPF to enhance partnership and close working relationships between regional and local authorities across the border to jointly explore economic development opportunities and enhance integrated cross border maritime and terrestrial planning.

What mechanisms are needed to ensure a joined-up approach to strategic infrastructure and investment decisions that have a cross-border dimension and are there examples of best practice?

Whilst high-level Governmental working groups and those between development agencies are important and have a role to play, the operational level should not be ignored. Development agencies on both sides of the border should actively try to engage with local and regional representatives, businesses and sectors to develop clustered approaches to business and infrastructural development.

How do we co-ordinate mutually beneficial ways to address common environmental challenges across shared catchments?

Coordination is not usually the problem with cross-border groups: the key issues tend to surround sustainability and funding which are always at risk when working within uncertain political climates. Invasive Species Ireland is a great example of two agencies working together for a common environmental purpose. Any cross-border initiatives like this should have a funding stream which is not threatened by changes in political leadership or changes in departmental responsibilities.

Integrated Land and Marine Development

We suggest that the section entitled 'Marine Spatial Planning' should be amended to 'Maritime Spatial Planning' in accordance with the terminology used in the EU Directive on

establishing a framework for MSP and the transposing Irish legislation, European Union (Framework for Maritime Spatial Planning) Regulations 2016 (S.I. No. 352 of 2016).

It is critical that the geographic scope of Ireland's first Maritime Spatial Plan is decided upon before finalisation of the National Planning Framework. The MSP Directive applies from the baseline (low water mark or straight baseline as applies to most of the Irish north, west and parts of the southern coast) to the limits of national jurisdiction, usually 200 nautical miles but again in an Irish context this extends further seaward due to our accepted extended continental shelf claims under Article 76 of the Law of the Sea Convention. The Issues and Choices paper identifies coastal protection and flood management as two areas where land and maritime planning need to integrate. These areas have long been neglected in Irish coastal and marine planning and management. Local authority jurisdiction usually ends at Mean High Water yet they are often the first responders in terms of emergencies due to erosion, storms and coastal flooding. Whilst aspects of the jurisdictional ambiguity might be addressed in the forthcoming Maritime Area and Foreshore (Amendment) Bill 2013, this has yet to appear. Any consideration of coastal protection and flood management should recognise natural processes of erosion and accretion and the legal implications of changing boundaries for future development planning.

Questions

In thinking about what Ireland might look like in twenty years' time, what is the future for Ireland's coastline, islands and offshore?

Ireland's coast, islands and offshore water are expected to become busier with a growing range of human activities in the next 20 years. Effective Maritime Spatial Planning, that includes active stakeholder engagement, and development and application of future scenarios, is required to avoid conflicts and ensure sustainable, shared use of our marine resources. This is also relevant to EU policy goals such as implementation of the Galway Statement on Atlantic Ocean Cooperation. Ireland's coast, islands and offshore area represent huge potential for future investment and economic development, however, without effective planning to support offshore development and sustain the existing communities and infrastructure, Ireland's coast and offshore will not achieve its full potential. Ireland's coastal areas need more supporting infrastructure now as well as in the context of possible future development. Effective coastal planning should greatly improve the planning and development potential for the offshore. As most coastal areas in Ireland can be categorised as rural, they will require consideration within any future rural planning policies.

How can coastal and island communities contribute to a national vision for Ireland, as part of the NPF?

Coastal and island communities have a unique knowledge of their local areas and this should inform future planning policies and management actions. What is needed are mechanisms to engage such communities. They are not always going to go to public meetings in Dublin or their closest large town. They might not have access to broadband or have reliable internet to access materials online. This should not be what restricts their ability to contribute. Like citizens all over the island, they need to be valued and assured that their opinions and contributions will be considered and used to actually inform planning policy. It is not sufficient to consult: there must be a greater level of participation and definite ability to influence key policies for the areas in which *they* live.

How can the goals of the Integrated Marine Plan be spatially represented in a National Planning Framework?

The goals of the Integrated Marine Plan could be identified in the NPF and their possible implications for terrestrial planning outlined. Such implications could relate to job opportunities, need for enabling infrastructure, projected growth targets etc. There are multiple online sources of spatially represented marine and coastal information (Irish marine atlas, MIDA, ocean energy Ireland etc.) but few of these are integrated with each other in any way and specifically they do not link with anything on land in terms of infrastructure, applicable policies or administrative responsibilities. This is not conducive to transparency or accountability in governance. We have years of experience with environment assessment in its many guises (EIA, SEA and AA) but there is no central portal for accessing the outcomes of such processes let alone utilising data already collected. There is a critical need to learn from experience and integrate our systems whether for public information, governance, environmental protection, education, economic development.

What, policies, measures or actions need to be advanced to enable Ireland's marine resource to adapt to the effects of climate change (e.g. coastal erosion, flooding, sea level rise etc.)?

There are no national, regional or local level policies for coastal management, erosion, flooding or sea level rise. Ireland has invested in conducting mapping for Preliminary Flood Risk Assessment but it is difficult to see where this is taken into account in County Development Plans, Local Area Plans and planning decisions. There should be a requirement for all planning decisions to explain how flood risk, sea level rise, environmental impacts and opinions expressed in response to public consultations etc. on a particular development have been taken into account prior to a decision being made. This would be similar to the Post-Adoption Statement produced after a Strategic Environmental Assessment in the UK.

Under the Climate Action and Low Carbon Development Act, 2015 local authorities will have to produce and implement adaptation plans for their functional areas. These plans need to connect with the marine and coastal environment and be cognisant of projected sea level rise, increased storminess, etc. regardless of the planning remit of the local authorities in a jurisdictional sense. There is also a need for capacity building and training within local authorities on how national level scenarios can be made meaningful to local settings. Likewise, sectoral adaptation planning must be linked with local authority plans and the over-arching national adaptation and planning framework.

Chapter 5 - Ireland's Unique Environment – Sustainability

In the context of Ireland's Unique Environment and the sustainability of this environment, it must be recognised that climate change should not be considered as a separate pressure but will exacerbate existing pressures on Ireland's environment as well as creating new pressures. For example, although Ireland's natural and semi-natural habitats and the biodiversity that these contain are under direct pressure from development, changing climate conditions, e.g. due to increases in temperature and changing patterns of precipitation, will decrease the underlying resilience of these areas and in doing so exacerbate existing development pressures.

Risk analysis frameworks should be put in place to assess the impact of natural hazards and the increased severity of the latter due to climate change on cultural heritage sites. Mitigation and adaptation plans, adapted to the specific type of cultural heritage and hazard, should be incorporated into national policy, and implemented as required.

Ecotourism should be enabled and promoted through national and local authorities to ensure sustainable use and protection of cultural heritage (including sites, but also customs and practices).

The aesthetic, historic and communal values of cultural heritage assets should be assessed and promoted to the public, aiming to develop positive attitudes towards cultural heritage protection and foster a community of volunteers, who will help maintain tangible and intangible aspects of Ireland's cultural heritage.

How can the NPF help to ensure we get a sustainable balance between catering for a growing population and avoiding or addressing environmental pressures?

Catering for a growing population and all plans and strategies associated with achieving these aims need to include the consideration of existing environmental pressures and how these might change into the future as a result of changing climate conditions. In addition, consideration of any new/emerging climate risks and the impacts that these might have on existing environmental pressures is required.

How do we plan for growth in such a way that supports a transition to a low carbon and climate resilient economy and what planning policy measures are needed to achieve this?

As climate change and its impacts are a cross cutting issue, it is essential that all policies are cognisant of projected climate changes and that these policies are integrated across government, both vertically and horizontally.

What strategic energy infrastructure is needed to support the economy and society and realise the transformation of Ireland's energy system to meet climate change and energy obligations and in what areas should it be located?

Grid development to the west coast and interconnectors to mainland Europe are needed to encourage development of offshore wind and wave and tidal in the longer term. This would also need to be accompanied by appropriate support mechanisms, feed-in-tariffs etc.

What measures should be implemented in order to safeguard our landscapes, seascapes and heritage and ensure that Ireland continues to be an attractive place to live, visit and work?

There needs to be careful consideration of the measures required and these should include hard, green and soft measures. Measures should be taken proactively to ensure the continued resilience of our landscapes, seascapes and heritage and should adopt the precautionary principle.

Chapter 6 - Equipping Ireland for Future Development - Infrastructure

Infrastructure planning should consider developments offshore likely to occur by 2030 and should not be limited to land-based infrastructure.

What are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?

Critical infrastructure for water supply, waste and refuse treatment are high on the list.

Strategic and critical minerals development that caters for projected requirements for all classes at local/regional/national and EU level. Safeguarding existing and potential resources from inadvertent sterilisation by urban and rural development is crucial. Undertaking a planned programme of mineral resource reconnaissance and assessment is essential to provide an informed evidential foundation for this.

What do we need to do to make best use of existing infrastructure?

Facilitate and support dissemination and public engagement activities. Enable stakeholders and researchers from various disciplines to come together to develop innovative uses and applications of existing infrastructure.

How can we ensure that the provision of infrastructure can be planned to match future demand and how can the NPF reflect this?

Visioning exercises conducted locally and nationally should be used to decide on key infrastructural developments and also to get a sense of what people want in their area in future.

How do we ensure that existing and new development can be supported by the timely provision of social infrastructure?

A range of incentives and controls. Bring together representatives from regulatory/planning authorities and society to develop common plans on the ways forward.

Chapter 7 - Enabling the Vision – Implementing the National Planning Framework

Questions

What barriers exist to implementation?

Lack of baseline data for key resources and assets. Lack of long term vision on behalf of leaders. Parochialism, Nimbyism which can be addressed through education and electoral reform. Lack of public engagement which can be addressed by greater support and by involving local communities through existing frameworks and initiatives.

How best can sustainable planning outcomes be recognised and rewarded?

Tax incentives in very specified cases and local incentives to become involved.

What levers are needed to deliver greater efficiencies in administration and governance, when it comes to implementing and monitoring the NPF?

Instilling a culture of institutional administrative accountability and responsibility with top down leadership and inbuilt performance compliance metrics thrashed out in partnership with the civil service unions.

What the key indicators for measuring the successful implementation of the NPF?

How it matches up on an ongoing basis with international recognised examples of best practice, and the extent to which poor outcomes are learned from and avoided.

Should you wish to discuss any of our responses further, please contact me directly and I can direct you to the appropriate person.

Kind regards,



Anne Marie O'Hagan (Marine Governance Group) [REDACTED]

With contributions from: Paul Alexander, Joseph Ansong, Aoife Deane, Ellen MacMahon, Barry O'Dwyer, Linda O'Higgins, Eirini Politi, Rory Scarrott and Gerry Sutton.