

MPPS Consultation,
Marine Spatial Planning Section,
Department of Housing, Planning and Local Government,
Newtown Road,
Wexford
Y35 AP90

Email to msp@housing.gov.ie

7 August 2019

Dear Sir/ Madam

Public Consultation on National Marine Planning Policy Statement

The Royal Town Planning Institute (RTPI) Ireland is a leading planning body for spatial, sustainable, integrative and inclusive planning. We work to promote the art and science of planning for the public benefit and doing so we:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places; and
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

Thank you for the opportunity to comment on the Marine Planning Policy Statement consultation draft. Our comments are set out below.

General Comments

RTPI Ireland welcomes the publication of the draft. Spatial Planning is an important function, especially given a rise in competing demands in the marine environment. It is essential therefore that the Government continues to maintain this as a priority.

We are pleased to see the recognition of a need for a strong link between marine and terrestrial planning and that efforts are being made to ensure that these are joined up. There will be implications arising from development and decisions made in the marine environment on land, and vice versa. Given this we need to ensure that the frameworks put in place complement and support one another. This means approaches to developing a National Marine Spatial Plan must be taken forward hand in hand with land use planning documents and strategies including the National

Planning Framework, the National Development Plan, Regional Economic and Spatial Strategies and development plans. We also welcome the ambition to move towards a single state consent system for the maritime area and to eliminate the unnecessary duplication of development management process across marine and land use planning. There is a need to engage early in the development of the NMPF with key stakeholders including council and Regional Assemblies.

We are pleased that the principles of, and approaches taken to, land use planning provide the framework upon which to base approaches to marine planning. We welcome approaches to ensure that the NMPF and the NPF will be used as forward planning documents which help support a plan led approach to development and conservation in the sea and on land. However, we wonder if there is a need to explore if there is a need for a regional dimension to the NMPF either through specific, distinct plans or through the NMPF having a specifically regional dimension looking to the particular assets, and circumstance in different parts of Irish waters.

As a professional body for planners in Ireland, we very much welcome the fact that the Government has recognised the need for training and support to allow officials to learn about the specific issues encountered in marine spatial planning, along with any new regime and processes which are put in place to manage the marine environment. We would be very pleased explore how we can work with the Government, the OPR, other institutes and education institutions to support this

In terms of the policy content of the consultation draft, we welcome the 3 goals set out in the paper, especially the strong emphasis given to sustainable development and biodiversity. We are also pleased to see that the Government sees a role for the NMPF in supporting ambitions to tackle climate breakdown. Both marine and land use planning can and should have important and influential roles in the forthcoming Government Climate Plan to Tackle Climate Breakdown.

Principles for the NMPF

RTPI Ireland believes that a number of principles should be at the heart of developing the NMPF. These are principles that we have also advocated for the NPF:

1. It should be ambitious.

RTPI Ireland believes that the NMPF and the planning system in general can do a great deal for Ireland. This will require the NPF facing up to often difficult decisions where there will be winners and losers. It will benefit no-one if these are ducked as developers, investors and communities need clarity, certainty and predictability. The document needs to provide that.

2. It should prioritise.

There is a need to prioritise investment and the levers that can encourage investment, such as infrastructure, both in marine areas and on land to support ambitions for Irish waters. It should be borne in mind that this will not always require new development. It is often about making the best use of the assets that are already in place.

3. It should be integrative.

We feel that a key role for the NMPF is to bring together and reconcile the objectives of various other strategies and objectives published by the Government and its agencies, including those covering, for example, transport; low carbon, energy strategy, and tourism.

4. It should be influential.

The NMPF should lead, rather than follow. It should be seen as the key spatial plan for the Government's approach to Irish waters. In doing this it must influence the priorities and resource allocation of Government. It should also promote a collaborative approach between the Government and private sector companies and sectors where risk and rewards are shared.

5. It should be resourced.

There is a need to ensure that the ambitions of the NMPF are backed up with resources (staff and money) to allow for its drafting, engagement and publication, as well as its delivery.

6. It should focus on delivery.

RTPI Ireland is of the view that the NMPF works towards a number of specific national targets, framed within a number of national outcomes, which are set out in a broader planning policy. .

7. NMPF needs to be based on sound evidence and needs to be monitored to ensure it continues to be fit for purpose.

RTPI Ireland is of the view that a sound and transparent evidence base must be in place to demonstrate why policy directions and priorities have been taken in the NMPF.

We would be happy to discuss or clarify any aspect of our submission. Our Director, Craig McLaren can be contacted on 08925 15649 or contact@rtpireland.com if you would like this be arranged.

Yours faithfully

Aidan Culhane

Aidan Culhane MRTPI
Chair