

## **Marine Spatial Planning Framework Baseline Report**

The following is a response from Waterford City and County Council Planning Authority in respect of consultation questions contained in the MSPF Baseline Report (pg 102).

1. The Planning Authority acknowledges the Baseline Report and welcomes the opportunity to make a submission. It is considered that the baseline report provides a comprehensive summary of all sectoral activities taking place in Ireland's marine space.
2. It is the opinion of the Planning Authority that the MSPF should provide a clear policy basis for all sectoral activities contained in the baseline report. For example, the exploration of oil/gas and other industrial related marine based activity requires strong supporting infrastructure on land to ensure effective delivery of this raw material, thereby limiting the locations where such activity would be feasible. It may therefore be necessary to designate certain areas along the coast as being suitable to accommodate industrial activity, i.e. locations with a robust infrastructure located in a robust landscape capable to handle these industrial activities. Areas where there is a strong tourism/amenity value should be deemed unsuitable to provide supporting infrastructure for heavy industrial activities such as oil and gas exploration, and should be ruled out from a policy perspective.
3. It is considered that the Marine Plan Objectives broadly capture the substance of each sectoral activity and the Planning Authority has nothing further to add at this stage.
4. It is the opinion of the Planning Authority that a policy based approach should largely be adopted as a means of supporting the objectives of Ireland's Marine Plan. There may be scope for a prescriptive zoning approach for certain areas of the coastline depending on environmental sensitivities and to ensure land areas are protected, e.g. Bull Island, the mudflats in Wexford – areas where there are overriding environmental considerations which would restrict any marine related development. Regarding Waterford, Dungarvan Harbour and the Cunnigar sand spit have been subject to coastal erosion and consideration should be given to policies which avoid their further erosion in this regard.
5. A hierarchical approach should be adopted on a par with the NPF so as to provide for marine plans at national, regional and local level. Funding for marine related projects could be allocated through the National Development Plan.

6. The protection of vulnerable areas, e.g. cities and towns is a key issue for planning and requires proactive response to climate change in terms of managing sea levels and coastal erosion. The designation of flood zones and no-go areas for development is one example of climate change adaptation and should help protect our urban areas in the event of flooding. Other ways of addressing climate change include the increased deployment of off shore renewable energy.
7. Continued cooperation is required with neighbouring authorities regarding transboundary marine planning; it is held that this is a matter for respective governments and should be dealt with at government level.
8. In terms of maximising the sustainable potential of our ocean resource, one suggestion would be to increase the research funding for off-shore renewables. The deployment of off-shore renewable energy is an important factor in the transition to a zero-carbon economy and meeting Ireland's renewable energy targets. To this end, it is important that the necessary funding is made available to progress technological advancements in this sector to ensure its commercial viability and determine site suitability.
9. The implementation of the SEA and AA Directives must ensure that Good Environmental Status is achieved. GES is the barometer by which the success of any marine plan will be measured. The realisation of objectives covered by GES could include the following:
  - Appropriate recycling of treated effluent from coastal located treatment plants;
  - Introduction of more stringent litter control measures e.g. banning of single-use plastics which might otherwise be disposed of at sea;
  - Screening of surface waters before they are discharged to estuarine waters.
10. Following publication of a single national marine plan, the delivery of forward planning goals contained within the NMPF should be progressed on a hierarchical basis, i.e. through regional plans and local plans. At the local level, a prescriptive zoning approach could be adopted designating robust/vulnerable areas etc of the coastline as necessary.
11. In order to achieve greater efficiencies in administration, it is considered that a Department of Marine Planning should be established. The functions of all the

various existing departments involved in the marine space should be re-deployed to this single department.

12. The successful implementation of the NMPF would include the following:

- Provision for the preparation of marine spatial plans at regional and local level and allocation of appropriate resources at regional and local level to produce such plans;
- Mechanism to demonstrate whether GES has been achieved to include an appropriate monitoring system comprising environmental targets and indicators;
- Deployment of off-shore renewable energy at appropriate locations;
- Increase in economic activity in our coastal areas without resulting in negative impacts on GES.

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