

From: Brian McCarthy [REDACTED]

Re: Clare County Council - Submission on the National Marine Planning Framework Baseline Report

Clare County Council welcomes the opportunity to make a submission on the National Marine Planning Framework Baseline Report. County Clare with its 344km coastline has a particular interest in the development of Marine Spatial Planning and welcomes this high level national framework. We consider our coastline as one of our most valuable resources within the County and we also see it as having a regional and national importance in terms of its habitats, scenic beauty, tourism and commercial activity and its potential for additional diversity. Clare County Council considers that there is huge potential to harness the marine resources along the County Clare coastline for transport, renewable energy and industry, and growing the 'blue economy' at a local, regional and national level.

I would like to draw your attention to the Clare County Development Plan 2017-2023 in particular to Vol 1 Written Statement (Chapter 12 Marine and Coastal Zone Management) and also to **Vol 7 Strategic Integrated Framework Plan for the Shannon Estuary**. These are the relevant key policy documents that relate to Marine Spatial Planning within County Clare.

Having regard to the Consultation Question headings suggested, Clare County Council would like to make the following observations

Co. Clare has a number of Ferry Operators located at Doolin pier (serving the Aran Islands and also offering Cliffs of Moher Cruises) and at Kilimer (serving a Shannon Estuary crossing to Tarbort in Co. Kerry). It is recommended that the importance of such marine offerings should be included for consideration in the National Marine Planning Framework and subsequent Spatial Plans.

Moneypoint in West Clare operates as an electricity power generation plant and has a deep water port associated with it. This is a strategic location at a national level with significant capacity to further contribute to the Marine economy. It is strongly recommended that this site would be examined with regard to its potential in any emerging Marine Spatial Plan.

County Clare has a number of Blue Flag beaches along its coastline and it is the Council's objective to maintain and extend this Blue Flag status to additional beaches over the coming years. Any Marine Spatial Planning must address the implementation of the EU Bathing Water Directive and how that

can be translated to improved water quality, management and monitoring at a local level. The importance of leisure tourism associated with key beaches across the county and country is a key economic activity.

Co. Clare has a strong tradition of aquaculture, fishing, seaweed harvesting and tourism centred on its coastline. It is recognised that there is potential in the emerging areas of energy resources and renewable energy for the future.

Management of the coastal area is currently the responsibility of various different authorities. It is a strong recommendation from Clare County Council that this current situation requires reform, This is particularly relevant to the area of foreshore and offshore and to the consenting process associated with developments in these areas. The ultimate goal should be the speeding up of the consenting process and potentially a process which would allow local authorities to play a more proactive role in the management of their coastal areas. The current consenting process appears as a protracted system which ultimately acts as a barrier to the promotion of Irelands Marine environment as a place to do business. Clear procedures and commitments need to be put in place to ensure that obstacles to international opportunities are removed and as a country we do not lose test sites or development opportunities.

It is suggested that a number of strategic locations along the Irish coastline should be identified to accommodate focused development. It is recommended that the Shannon Estuary would be one of these Nationally Important sites and given the specific reference made in the National Planning Framework to the Shannon Estuary Strategic Integrated Framework Plan (SIFP) (case study- Chapter 7) it is strongly recommended that the SIFP would be incorporated into the National Marine Planning Framework Plan together with a recommendation that it would be incorporated into all regional and local Marine Spatial Plans going forward.

Clare County Council submits that the Shannon Estuary, is one of Ireland's foremost natural resources, with unrivalled potential for development and job creation on the western seaboard, and this has not been given due recognition in the Baseline Report. Clare County Council proactively led the development of the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) and the Department of Housing, Planning, Community and Local Government were directly involved in its preparation and indeed continue to play an active role in the steering committee for the project and in the implementation and promotion of the plan.

While the SIFP is discussed as a case study in the NPF, it does not mention the potential for development and job creation associated with the plan nor does it reference the zoning of significant tracts of land for Marine-Related Industry on the Estuary. Moreover, there is an absence of reference to Moneypoint in the case study. Given the national importance of the estuary, its potential to attract multi-national development and the significant work that has been undertaken to progress its promotion and development, it is essential that it is given due recognition and support in the National Marine Planning Framework.

As the SIFP is the first inter-jurisdictional land and marine based framework plan in Ireland, it is suggested that should be cited as best practice in Integrated Land and Maritime Planning. It is an example of how we can integrate land and marine planning and, through a multi-agency approach, develop the marine environment in a sustainable and planned manner. Links to the website where the entire SIFP can be downloaded should also be provided (www.shannonestuary.ie).

Clare County Council is committed to capitalising upon new opportunities that arise within the maritime sector, this is evident with the identification of the Clare Maritime Economic Zone at Cahercon on the Shannon Estuary, where it is intended to re-purpose an existing site to provide maritime training as well as serving as a testing ground for renewable technologies. It is intended that the facility will be operated by Clare County Council in partnership with other agencies. This is a strategically important project in terms of national, regional and the local economic development. Support for type of initiative will be critical in securing funding and support to ensure that it can be delivered.

Clare County Council would suggest that consideration should be given to zoning marine areas for specific development. Using a County Clare example it is suggested that the 2 deep water ports identified in the Shannon Estuary Strategic Integrated Framework Plan in Co. Clare would receive a specific Marine/Maritime zoning to reflect their strategic location and the deep water nature of the sites.

Investment is required at a National Level to allow for access to marine resources for both visitors and locals. Investment will also be required to address waste water discharge from settlements along the national coastline and Irish Water will be a Key Stakeholder in addressing historic situations. Investment will also be required in the electricity grid and in port facilities. This will be key to the development of industries associated with fishing (both commercial and leisure), tourism,

access to the islands (of which in Co Clare there are 27km of coastline) and industries. The National Marine Planning Framework should support a commitment for this investment at a National Level.

Protection measures will have to be considered and integrated into the Framework, looking at flooding, coastal erosion, beaches and sand dunes and how best to protect areas subject to degradation and damage. Currently Clare County Council is engaged in preparing coastal erosion and flood risk management studies for areas with the County that have been identified as being at High Risk of coastal flooding and are implementing works for the management of that risk. National funding will have to be made available to allow for the continuation of this process across the country and for the carrying out of protection works where required and deemed appropriate.

It is recommended that a commitment should be made in the National Marine Framework Plan that strengthens and provides greater support and assistance to coastal communities and the islands. These are areas where sustainable maritime communities can thrive but they are often restricted by delays in licensing, permitting and other approvals. It is critical in allowing local communities and enterprise to avail of supports that may be available in the future.

Finally any proposal on National Marine Planning must also examine the Foreshore Licence function and effectiveness.

Again I would like to take this opportunity to thank you for the opportunity to make a submission on the National Marine Planning Framework and to wish you well in the forthcoming stages of this process.

Yours Sincerely

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