



Marine Planning Policy Statement (MPPS) (Consultation Draft)

The Eastern and Midland Regional Assembly welcomes the preparation of the Marine Planning Policy Statement (MPPS) (Consultation Draft), which aims to outline the existing components of Ireland's marine planning system, sets out the hierarchy of marine policies, the strategic principles of marine planning policy and priorities while identifying how marine policy will be monitored and reviewed.

The Eastern and Midland Regional Assembly sets out hereunder recommendations on behalf of the Assembly. This submission has been prepared by the executive of the Regional Assembly and approved by the members of the Eastern and Midland Regional Assembly at its meeting of 11th July 2025.

1.0 Overall Context

The Eastern and Midland Regional Assembly (EMRA) is part of the regional tier of governance in Ireland. It is primarily focused on driving regional development through the formulation, adoption and implementation of the Regional, Spatial and Economic Strategy (RSES), oversight and coordination of County Development Plans and Local Economic and Community Plans, management of EU Operational Programmes, EU project participation, implementation of national economic policy, and additional functions working with the National Oversight and Audit Commission. As a strategic policy body, EMRA also participates in the consultation processes of other relevant strategic plans and policies.

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000, as amended, which includes support for and alignment with the economic policies and objectives of the Government. It should be noted that this legislation has been superseded by the Planning and Development Act 2024, which was signed into law on the 17th of October 2024. However, the provisions of the Planning and Development Act 2024 relevant to the Regional Assemblies have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force.

It is noted that the Planning and Development Act 2024, requires under Section 30 (1) that a Regional Assembly shall commence a review of any RSES in their region within six months of the publication of a revised National Planning Framework. Section 30 (3) also states that where a Regional Assembly reviews the RSES, it shall be materially consistent with the National Marine Planning Framework (2021 or updated) and any relevant National Planning Policies (including the National Planning Framework).

1.1. Expanded legislative provisions for Regional Assemblies with regard to Marine Spatial Planning

The scope of the RSES is further expanded under the Planning and Development Act 2024, including matters of direct relevance to Marine Spatial Planning. In this respect, Section 29 (1) of the Act states that an RSES shall make the following provision in relation to marine and coastal matters-

Section 29 (1) (g) *“a strategy relating to marine and coastal matters that facilitates the coordination of land-sea interactions for coastal planning authorities within the region”*; and Section 29 (1) (h) *“coastal zone management as a consequence of sea level change, including the identification of strategic infrastructure”*.

2.0 Regional Spatial and Economic Strategy (RSES) 2019-2031

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region was made by the Members of the Assembly in June 2019 and is a strategic plan and investment framework to shape future growth throughout the Region. The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of people and places in the Region, from urban to rural, with access to quality housing, travel and employment opportunities for all. The vision of the RSES is supported by sixteen Regional Strategic Outcomes (RSOs), that are aligned with National Strategic Outcomes of the National Planning Framework (NPF) and framed around the three key principles of Healthy Placemaking, Climate Action and Economic Opportunity. Of particular relevance to the MPPS are the RSOs that support a strengthening blue-green economy and protect and enhance international connectivity and regional accessibility (RSO 15), that build climate resilience (RSO 8), support strengthened and healthy urban and rural communities and economies (RSO 3, 4) and support the transition to low carbon and clean energy (RSO 9), along with the sustainable management of water and other environmental resources (RSO 7).

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040) and by coupling new development with the requisite investment in services and infrastructure. In doing so, the RSES supports the spatial, economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Eastern and Midland Region. The RSES also sets the context for local authorities within the Region to develop their City and County Development Plans in a manner that will ensure alignment between national, regional and local plans.

The RSES presents a Spatial Strategy, devised and informed by a complementary Economic Strategy, which provides a framework for future growth, ensuring the delivery of effective regional development through the realisation of viable and vital places. This includes championing the capital city of Dublin as a smart, climate resilient and global city region; securing Growth Centres such as Drogheda and Dundalk which act as regional economic drivers, supporting their wider catchment areas; and promote a network of large economically active Key Towns (which include Swords,

Maynooth, Bray, Navan, Naas, Wicklow, Longford, Mullingar, Tullamore and Portlaoise) that provide employment and services to their surrounding areas. All of this is supported by Self-Sustaining Growth Towns, Self-Sustaining Towns and a network of multifaceted Rural Places.

3.0 Submission

This Maritime Planning Policy Statement (MPPS) will apply for a period of three years, until such a time it is revised and a new MPPS is adopted. The Maritime Area Planning Act 2021 allows that such policy statements may be of longer or shorter duration as decided by the Government. The MPPS outlines the following-

- the existing components of Ireland’s marine planning system and the hierarchy of marine policies;
- sets out the strategic principles of marine planning policy that the Government expects relevant planning bodies to observe;
- Ireland’s key marine planning priorities for the management of activities in the maritime space during the lifetime of this MPPS, and
- how marine policy will be monitored and reviewed.

The MPPS has identified specific priorities which represent the State’s key maritime interests, these priorities are *stewardship*, *security* and *prosperity*. As a result, the submission will be structured around these three priorities insofar as they are relevant to the policies and objectives of the RSES and functions of the Regional Assembly. Section 7.2 of the RSES sets out the strategy for *Integrated Land and Marine Planning* including consistency and alignment with the Marine Strategy Framework Directive, national maritime spatial plan (with the National Marine Planning Framework subsequently published in 2021) and a framework for collaborative cross boundary and cross border engagement.

3.1 Stewardship

As outlined in the MPPS, stewardship in marine planning involves identifying and protecting what we value such as our environment, cultural, built, and social heritage. Also, by recognising that our marine environment has an array of ecosystems which provide many benefits and ecosystems services including regulating the climate and supporting fisheries; and the need to protect and conserve cultural and maritime heritage both along the coast and in the water.

RSES Regional Policy Objective (RPO) 7.2 seeks to achieve and maintain ‘Good Environmental Status’ for marine waters and RPO 7.3 supports an ‘Integrated Coastal Zone Management’ approach to the management and protection of coastal resources, while RPO 7.5 seeks to support and enable the sustainable development in the seafood and aquaculture sector while ensuring its preservation in the region and states “EMRA shall work with coastal stakeholders to support the sustainable development of the national Fishery Harbour Centre in Howth and the sustainable growth of the seafood and on-

shore aquaculture sector in the Region, and to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment”.

The role of marine planning in unlocking economic potential including sub-sectors is explored further under prosperity. With regard to cultural heritage, the RSES acknowledges that maritime villages and towns represent a significant cultural heritage resource for the region and local authorities should develop policies for their protection in their development plans. In this respect RPO 7.6 states *“Local authorities shall include in development plans, where relevant, policies for the protection and enhancement of shipwrecks and underwater cultural heritage and shall consult the wreck inventory of Ireland database when assessing planning applications located in marine, riverine or lacustrine environments.”*

The RSES also highlights the Dublin Bay UNESCO Biosphere as one of Dublin’s key heritage assets (covering over 300km²) as it holds such rich environmental, economic, cultural and tourism importance. Protecting heritage assets similar to Dublin Bay is essential for safeguarding biodiversity, encouraging sustainable tourism while preserving our marine environment. Dublin Bay is included in Table 7.1 of the RSES as a Strategic Natural, Cultural and Green Infrastructure Asset in the Region.

EMRA considers that alignment of the MPPS with National Sectoral Adaptation Plans and the National Adaptation Framework as essential for a coordinated, climate-resilient approach to marine planning policy in Ireland. The principles outlined in the MPPS (Section 5) should prioritise the integration of climate change adaptation into coastal and marine planning, following an Integrated Coastal Zone Management (ICZM) approach.

ICZM provides a strategic framework for embedding adaptive measures in local decision making. This must be underpinned by appropriately scaled climate hazard/ vulnerability mapping to ensure an evidence-based resilience planning approach is implemented. The Regional Assembly views the Designated Maritime Area Plans (DMAPs) as essential tools for delivering climate-resilient marine development at the local level.

EMRA also supports a proactive assessment of a range of climate-related coastal risks, such as sea level rise, acidification, erosion, coastal eutrophication, and saltwater intrusion. Adaptation/ resilience measures/ mitigation pathways should seek to benefit biodiversity following a nature-based solutions approach wherever possible (and this may include measures such as appropriate ‘managed coastal retreat’).

In this regard, EMRA recognises the need for, and encourages the development of, a national policy framework on ‘managed coastal retreat’, to identify high-risk areas where phased relocation of people/ vulnerable communities or infrastructure may be required due to persistent erosion and

inundation risks. Local authorities should be supported in preparing site-specific coastal adaptation strategies, where managed coastal retreat is considered a viable long-term resilience measure.

Recognising the increasing threat to local communities, strategic infrastructure, and the need to protect key ecosystems/ ecologically sensitive areas, EMRA calls for targeted research and investment in coastal protection measures, which considers the risks (identified above) and with a particular emphasis on nature-based solutions/ mitigation. This would inform the selection of suitable measures in the DMAPs and ensure they are developed within a transparent and inclusive process.

EMRA recommends that a dedicated Coastal Climate Risk Section is included within the MPPS to identify vulnerable areas of the country—such as Dublin Bay, East Wicklow, and parts of Louth in the EMRA Region—and which is based on the latest climate hazard and flood risk mapping.

3.2 Security

Regarding energy security, the MPPS states effective marine planning is critical to Ireland's energy security and establishing an offshore electricity transmission network is essential to unlocking Ireland's full offshore renewable energy (ORE) potential. The RSES notes that the Region will need to shift from its reliance on using fossil fuels, including natural gas, as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources. A transition to a low carbon, circular and climate resilient region is imperative. EMRA supports an increase in renewable energy sources under Regional Policy Objectives (RPOs) 4.84, 7.35 8.23, 10.20 and 10.24 listed in the RSES. This includes the use of offshore wind energy.

In particular, RPO 10.24 recognises the importance of advancing offshore energy projects such as wind, wave, and tidal energy and associated developments such as Ireland's domestic and international grid connections. RPO 10.24 states *"Support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources 'Offshore Renewable Energy Development Plan' and any successor thereof including any associated domestic and international grid connection enhancements."*

As set out in the MPPS, as marine activities become more technologically advanced with digital platforms, they become vulnerable to cyber-attacks. The RSES promotes sectoral opportunities in cyber security, particularly in Dublin and the Eastern SPA (Section 6.4). To capitalise on the strengths of its own enterprise base, the RSES states that Dublin should explore opportunities for further development, and this includes marine energy.

Protection of sub-sea cables is vital and the RSES identifies such key telecommunications and electrical infrastructure as part of the regional growth strategy as it enables social and economic activity.

The Region is home to the largest national seaport, Dublin Port, several regional ports of significance and smaller harbours. These include Arklow, Drogheda, Dundalk, Dún Laoghaire, Greenore, Howth, Wicklow and Warrenpoint in Northern Ireland with RPOs 8.21, 8.22, 8.23 and 8.24 seeking to support the role and functions of such ports (explored further in Section 3.3 below).

As set out in Section 3.1 above, RPO 7.5 in the RSES also recognises the importance of food security in the context of the sustainable growth of the seafood and aquaculture sector.

Alongside energy and digital infrastructure, environmental security must be achieved. The Assembly supports an approach which embeds coastal hazard mapping and flood risk assessments into marine infrastructure planning. This will align with the National Adaptation Framework and support a resilient and secure coastal economy. Protection of ports and cables should also factor in long-term climate projections, particularly where coastal retreat in high-risk zones could compromise the viability of infrastructure.

3.3 Prosperity

The MPPS acknowledges the important role marine planning plays in unlocking the future potential of the maritime economy. The RSES describes the marine sector as a labour-intensive economic activity which is of particular importance to the Region, given its significance for job creation, maintenance and sustainability. Chapter 6 Economy and Employment of the RSES highlights development opportunities in the marine or blue economy including fishing, renewables, and tourism to name a few. Furthermore, as highlighted above, marine resources provide many non-commercial benefits too, for example amenity, biodiversity and climate regulation.

The MPPS details how effective marine planning supports the sustainable management of marine space and resources by balancing competing demands and maximizing economic potential. In particular RPO 6.22 seeks to ensure that marine and terrestrial planning systems are aligned and consistent. The policy states: *“EMRA support the preparation of the Marine Spatial Plan (MSP) to ensure alignment, and consistency between land use and ocean-based planning, and to ensure co-ordination which supports the protection of the marine environment and the growth of the Marine economy.”*

The MPPS recognises the marine economy as a key enabler for regional economic growth, in particular for coastal communities. As set out in the RSES, fishing is a substantial sub-sector in the coastal planning authorities in the Region, with Howth being one of six National Fishery Harbour Centres and a number of small fisheries clusters along the eastern seaboard including Wicklow, Clogherhead and Dún Laoghaire. While the traditional fishing industry faces challenges in relation to seasonal employment, fish stocks and coastal hazards, there are also opportunities for diversification and

development of bio resources including seafood, aquaculture and offshore renewables. RPO 7.5 of the RSES seeks to support and enable the sustainable development of this sub-sector in the Region.

The RSES further recognises the importance of this sector to rural economies. The importance of promoting diversification of rural livelihoods while protecting our natural and built heritage. In particular RPO 6.7 states *“Support local authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy, tourism, and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.”*

As defined in the MPPS, marine planning plays a role in shaping key maritime infrastructure, including ports, harbours, shipping terminals, and offshore facilities. This will be achieved by identifying strategic areas for investment, enhancing infrastructure connectivity, and linking land and sea transport systems. In this respect Ireland’s Marine Planning Framework supports the efficient and safe flow of goods, people, and energy—boosting trade, commerce, and broader economic growth.

In line with the MPPS, the RSES highlights that Ireland’s port and shipping services play an important role as enablers of economic growth. Irish ports are critical infrastructure for international trade, with over 90% of our international trade travelling by sea, and they also serve as logistics and distribution hubs. It is also noted that the Eastern and Midland Region is strategically located on part of the trans-European transport network from Belfast to Rosslare Europort and is linked to the U.K. across the Irish Sea.

In particular, Dublin Port is a port of national significance identified as a Tier 1 port. It is recognised in the RSES as a critical national facility, a key economic driver for the Region and the nation. As a major trading centre, it has seen sustained growth with volumes expected to increase exponentially by 265% over the 30 years to 2040. RPO 8.21 states *“EMRA will support the role of Dublin Port as a Port of National Significance (Tier 1 Port) and its continued commercial development, including limited expansion and improved road access, including the Southern Port Access Route.”* The policy supports the continued commercial development of Dublin Port - including potential limited expansion and the delivery of critical infrastructure such as the Southern Port Access Route. It is important to ensure Dublin Port remains a key gateway for trade, supports economic competitiveness, and congestion is reduced through improved access routes.

As stated in Section 3.2 above, regional ports of significance and smaller harbours include Arklow, Drogheda, Dundalk, Dún Laoghaire, Greenore, Howth and Wicklow and are supported through RPO 8.22 which recognises the role that regional ports play in facilitating specialised trade, maritime tourism, and regional economic activity. The policy states *“The EMRA supports ports of Regional*

Significance that serve an important regional purpose and/or specialised trades or maritime tourism; and the accessibility requirements of regional ports within the Region, from within their regional catchments will be addressed through the provision of improved access routes, where necessary and improved access to the national and regional road networks. Opportunities for the use of rail, where such ports are connected to the rail network is also promoted.”

The RSES supports the protection of ports from inappropriate uses while promoting diversification and in line with Ireland’s renewable energy ambitions, the use of ports as a hub for offshore renewable energy development. In this regard RPO 8.23 of the RSES states *“The EMRA supports the protection of the marine related functions of ports in the Region in order to ensure the future role of ports as strategic marine related assets is protected from inappropriate uses, whilst supporting complimentary economic uses including the potential for facilitating offshore renewable energy development at ports.”*

The MPPS highlights the importance of the marine planning system ensuring the sustainable and safe use of marine resources so all citizens can benefit without impacting our coastal environment. In support of this, RPO 8.24 states *“The undertaking of feasibility studies to assess the capacity of ports to accommodate development or increased activity without causing likely significant effects on European sites including designated SPAs and SACS.”*

To ensure continued ‘prosperity’, a close alignment with ‘stewardship’ must be achieved. The Eighth Environment Action Programme implements the European Green Deal until 2030 and is guided by a long-term vision to 2050 of achieving wellbeing for all, while staying within the planetary boundaries¹. While the MPPS demonstrates partial alignment with the planetary boundaries framework by promoting climate-resilient marine development, nature-based solutions, and ICZM, supporting boundaries related to climate change, biosphere integrity, and land-system change, this should be enhanced, with specific reference to ocean acidification, nutrient pollution, and marine chemical contamination, which are critical to maintaining safe ecological thresholds.

Ecosystem-based management principles should be embedded within marine economic planning, marine spatial planning and project appraisal to ensure that development, such as port expansion or aquaculture, respects ecological carrying capacities and does not adversely compromise marine biodiversity and ecosystem function. This aligns with RSES RPO 6.22. The MPPS should also be aligned with the EU’s Nature Restoration Law and its legally binding targets for the restoration of degraded ecosystems, including marine and coastal habitat particularly given its high carbon sequestration

¹ EPA (2024) State of the Environment Report 2024. Website: <https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/irelands-state-of-the-environment-report-2024.php>. The Planetary Boundaries Framework refers to nine key Earth system processes which allow a safe operating space for humanity without destabilising the Earth’s environment/ causing irreversible damage.

potential. In this regard, the MPPS should note the importance of 'Blue Carbon'. The MPPS should align with the Marine Strategy Framework Directive and seek the expansion of Marine Protected Areas, where necessary to meet 'Good' Environmental Status targets.

Protection and restoration of marine ecosystem including seagrass beds, salt marshes, and coastal wetland habitats, assists with carbon sequestration, climate resilience and adaptation and will be essential to contribute to Ireland's obligations under the Nature Restoration Law and the EU Biodiversity Strategy 2030.

Accordingly, DMAPs will need to incorporate spatial buffers or exclusion zones around critical 'Blue Carbon' habitats and be informed by robust ecological, water quality assessments, etc. Such measures would significantly strengthen the MPPS's contribution to planetary boundary stewardship while supporting sustainable, climate-smart marine development and ultimately support Ireland's prosperity.

3.4 Governance of Marine Planning

The MPPS should identify the steps necessary to enhance the awareness and understanding among relevant stakeholders including other Government Departments, State Agencies, Local Government, developers and the general public regarding Marine Planning Governance. The role of different Departments and Agencies, their structure and allocated responsibilities/powers for marine planning and related consent processes should be clarified. There is a particular need to ensure clarity around enforcement roles and powers.

Adequate resourcing of the bodies engaged in marine planning and environmental governance, including MARA, NPWS, An Coimisiún Pleanála and Local Authorities is essential to avoid delays in consent processes. Guidance for project applicants is required and adequate information must be available/ provided early in the application process. To reduce the need for the consenting process/ reduce workloads, the new Planning and Development Regulations should identify appropriate 'exempted development' relating to small-scale non-intrusive activities in the coastal area.

3.5 Role of the Regional Assemblies in Marine Spatial Planning

Marine Spatial Planning (MSP) is a process that requires the collaborative approach of multiple users to ensure that marine resources are sustainably used, achieving ecological, economic, and social objectives. As noted in Section 4 of the Draft Policy Statement, Regional Assemblies may play a crucial role in this process, particularly in the preparation and coordination of Designated Maritime Area Plans (DMAPs), acting as designated competent authorities and coordinating body for these plans, as set out in Section 20 of the Maritime Area Planning Act 2021.

The Regional Assemblies, in their ongoing work with coastal planning authorities and stakeholders, can ensure a coordinated and strategic approach to marine and coastal planning at regional and local levels, while also supporting the provision of detailed planning policy for the nearshore area. EMRA will support delivery of a central implementation pillar of MSP for plan-led maritime development.

The inclusion of reference to the role of the Regional Assemblies in the DMAP process in the Draft Policy Statement is welcomed and EMRA eagerly awaits further communication from the Department and liaison regarding this process, to enable effective delivery. Notably, EMRA and other Regional Assemblies will require adequate resourcing in MSP, having regard to the Ministerial Action Plan on Planning Resources (2024), a welcome and timely intervention to address significant capacity deficits across the planning system.

4.0 Recommendation

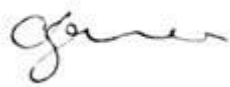
The following recommendation by the Regional Assembly should be taken into consideration in the finalisation of the Marine Planning Policy Statement:

1. To ensure consistency between the Marine Planning Policy Statement and the RSES, and to ensure effective implementation of the RSESs, the Marine Planning Policy Statement should have regard to the statutory role of the Regional Assemblies in relation to marine and coastal matters as it relates to the work of the Department.
2. To enhance the overall MPPS, the Department of Climate, Energy and the Environment are requested to ensure that the MPPS, DMAPS and ICZM is informed by the National Climate Adaptation Framework, adaptation plans and the EU Environmental Action Programme with an evidence-based ecosystem services approach to management of the coastal zone/ marine environment, identifying areas in need of protection (i.e. communities, infrastructure and ecosystems) and providing greater clarity to the governance of marine planning.

5.0 Conclusion

The Regional Assembly welcomes the opportunity to engage in the process of preparing the new Marine Planning Policy Statement and looks forward to continuing engagement with the Department of Climate, Energy and the Environment in relation to marine spatial planning matters.

Regards,



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11th July 2025