



Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Ceanncheathrú, Bosca Poist 3000
Eastát Chaisleán Chaile Sheáin
Contae Loch Garman, Éire
T: +353 53 916 0600
F: +353 53 916 0699
E: info@epa.ie
W: www.epa.ie
LoCall: 1890 33 55 99

By email to: npfrev@housing.gov.ie

National, Regional and Urban Planning Section
Department of Housing, Local Government and Heritage
Custom House
Custom House Quay
Dublin
D01 W6X0

11th September 2024

Our Ref: SCP231103.2

Re. Draft First Revision to the National Planning Framework - Consultation

Dear Dr Harris,

We acknowledge your notice, dated 10th July 2024, related to the Draft First Revision to the National Planning Framework (the 'NPF') and Strategic Environmental Assessment Environmental Report ('the SEA ER'). The EPA welcomes the opportunity to make a submission at this stage of the NPF and SEA processes. We also welcome the extensive consultation and engagement with key stakeholders undertaken by the NPF and SEA teams throughout the process. This has helped reflect many of the SEA findings and issues raised during the consultation and NPF revision process in the draft as presented.

The NPF revises the vision for how Ireland will progress economically, socially and environmentally to accommodate up to 6.1 million people by 2040. This requires significant housing development and investment in service infrastructure. Given the importance of a clean, well-protected environment for our health, our wellbeing and our economy, it is vital that future planning and development is carried out in an environmentally sustainable manner. The NPF is well placed, to act as a key driver for addressing the environmental challenges facing Ireland, in partnership with other government departments and state agencies. The NPF should acknowledge and support the need for greater action by competent authorities to implement existing national environmental commitments, regulations/permitting requirements, as well as making greater progress towards achieving EU and national environmental obligations.

The EPA notes the significant changes within the NPF to provide for compact development; transport-oriented development; and to facilitate the development of off-shore renewable generation and associated land-based infrastructure. EPA welcomes, in particular, the

regionalisation of targets for onshore renewables (National Planning Objective 75 (NPO 75)) and the requirement on regional assemblies to allocate renewable generation targets at a local authority level. This approach should be an exemplar for the allocation of other national targets for existing land use policy targets (e.g. forestry).

This submission consists of priority areas that should be addressed as part of the NPF. More specific comments are provided in the Appendices:

- **Appendix I:** Specific comments on the NPF (including the National Strategic Outcomes (NSOs))
- **Appendix II:** Specific comments on the SEA
- **Appendix III:** Suggested amendments to National Policy Objectives (NPOs) and recommendations for additional NPOs.

Appendix III also includes a short list of additional guidance that would, in the view of the EPA, support the consistent high-quality delivery of the NSOs and NPOs.

The priority areas that the EPA considers should be addressed in the NPF are as follows:

- Governance & Monitoring
- Environment & Health
- Investment in Critical Service Infrastructure
- Water Resources
- Climate & Biodiversity
- Circular Economy
- Regulation & Enforcement
- Land Use.

Governance & Monitoring

The EPA recommends that responsible bodies are assigned to NPOs to ensure their implementation. The NPF should also include a more comprehensive overview of the governance associated with implementing the NPOs to facilitate better environmental and societal outcomes.

With regards to monitoring, the Expert Group for the revision of the NPF recommended the establishment of a dedicated unit to monitor the implementation of the NPF. EPA supports this recommendation and further recommends including a commitment to carry out annual environmental monitoring and reporting to support implementation of the NPF.

Environment & Health

Given the central role which planning plays in the context of human health and wellbeing (both health protection and health promotion), the EPA considers that Environment and Health should be included as an NSO.

There is a growing evidence base that there is no safe level of air pollution. In this context, meeting the targets set within the government's Clean Air Strategy would provide a substantial benefit to human health. Consequently, the EPA recommends that NPO 90 be strengthened to explicitly support the achievement of the government's Clean Air Strategy's interim and final targets.

The pro-active management of noise where it is likely to significant impact health and quality of life should be addressed. The EPA recommends that NPO 91 be substantially strengthened to require planning to seek reduced future exposure via improved acoustic design for proposed new

developments, promotion of designation of quiet areas in all local authority development plans and noise action plans and providing for mitigation infrastructure where necessary to reduce existing exposures. Guidance to support this is also proposed (Appendix III).

Investment in Critical Service Infrastructure

Increasing levels of investment and forward planning will be required in critical water, energy and mobility infrastructure to support the continued growth and development of our settlements. NPO 89 should be strengthened to specifically refer to the provision of adequate drinking water, wastewater and energy (including in particular renewable) infrastructure.

The government published updated Green Public Procurement (GPP) policy Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027 in April. EPA recommends that the NPF recognises the important role GPP can play in sustainable planning and development (e.g. construction of buildings).

Water Resources

Our planning system should demonstrate that land use planning and development management can support, protect and enhance our natural environment and help mitigate existing adverse environmental effects from historical poor planning decisions. The consideration of the impact of developments on water quality should be significantly strengthened at the planning stages in order to protect our water resources by way of specific guidance. The pending Water Framework Directive (WFD) Water and Planning related guidance needs to be committed to in the NPF and progressed as a matter of urgency in this context.

The NPF should include commitments for mitigating water quality pressures and improving water quality outcomes for aspects in addition to flooding. Improving hydromorphological outcomes, such as retaining healthy riparian zones and providing larger buffers in urban rivers would be particularly welcome. The NPF strongly focuses on urban wastewater as a water quality issue. While this is important, there are more significant pressures on water quality requiring priority attention, including agriculture, hydromorphology, and forestry which also need to be addressed.

Climate & Biodiversity

The achievement of targets in the Climate Action Plan (CAP) should be prioritised during the planning and implementation stages. Further consideration of land use and the enhancement of carbon sinks should be strengthened in the NPF. The NPF should, where relevant, include a commitment to take the findings of the National Climate Change Risk Assessment (NCCRA) into account over its lifetime. The EPA recommends a new NPO be included for the forestry industry, similar to NPO 34 for the agri-food industry, as it also has a very significant material impact on the delivery of CAP and RBMP targets.

The EPA notes the substantial additional focus on biodiversity protection and enhancement via NPOs 81 to 86, however, an additional NSO is recommended to acknowledge the importance of biodiversity. The climate and nature emergencies should be given higher priority by making stronger commitments for protecting nature, sustainably managing our natural environmental resources, building up climate resilience, continuing to reduce greenhouse gas emissions and speeding up the transition to a low carbon economy.

Circular Economy

Ireland's material use and carbon footprints are strongly interlinked. The EPA acknowledges that the NPF indicates that aggregates and minerals extraction will continue to be enabled where this is compatible with the protection of the environment. The increasing targets for housing and associated service infrastructure will require very substantial amounts of these building materials. The EPA recommends that an NPO be included to prioritise reuse of materials including C&D wastes to improve the circularity of Ireland's economy to reduce the need for virgin materials for building. Also, NPO 77 should be strengthened to promote waste prevention and support the provision of sufficient waste treatment capacity. EPA also welcomes focus on re-use of vacant, derelict and under-occupied buildings, which aligns with national circular economy ambitions.

Regulation & Enforcement

A specific NPO committing to address illegal development is needed. For example, the industrial scale extraction of peat is widespread in Ireland. With the exception of Bord na Móna, much of the industry has operated illegally and is characterised by widespread disregard for planning or environmental laws leading to uncontrolled destruction of the natural environment. The EPA has deployed significant resources in taking action against this sector, resulting in successful legal proceedings in the High Court and District Courts. To protect Ireland's peatlands, planning policy must proactively address the issue of unauthorised peat extraction operations. The NPF should support the need to address this issue by including an NPO to address illegal peat extraction and other unauthorised development.

Land Use

As set out in the NPF, the ongoing Phase 2 of the Land Use Review seeks to identify the key demands on public and private land to inform policies for land use. The EPA recommends that a new NPO is included to consider the outputs from Phase 2 to inform all subsequent land use plans. This should include a commitment to support the maintenance of the land use review phase 2 data sets.

Finally, the scale of the environmental challenges facing Ireland remains significant. The EPA is publishing our State of the Environment Report for 2024 (SOER 2024) this autumn. It will set out Ireland's key environmental challenges and opportunities along with recommendations for how these can be addressed. Once published, the relevant aspects of the SOER 2024 should be reflected into the NPF prior to its adoption.

If you have any queries or need further information in relation to this submission, please contact the SEA Team at sea@epa.ie. I would be grateful if you could send an email confirming receipt of this submission.

Yours Sincerely,



Micheál Lehane

Director

Office of Radiation Protection and Environmental Monitoring

Appendix I – Comments on the NPF

This section provides comments on different chapters of the NPF. These comments may also be relevant to other aspects of the NPF and should be considered in this context also.

Chapter 1 – The Vision

Regarding the footnote on page 4, more updated emissions per capita data is now available from the EPA (updated July 2024). Emissions per capita decreased from 11.4 tonnes CO₂eq/person in 2022 to 10.4 tonnes CO₂eq/person in 2023. Ireland's average tonnes of GHG/capita over the last ten years were 12.1 tonnes. <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/latest-emissions-data/>

On page 7, while the EPA welcomes that the need for sustainable management of water, waste and other environmental resources. This could be strengthened by also acknowledging that many of our abundant natural resources are under pressure.

1.3 Shared Goals – Our National Strategic Outcomes

Consideration should be given to the inclusion of a biodiversity goal and health goal in section 1.3 as previously detailed. In addition, the interaction between our environment and health should be more clearly set out via a new NSO or other mechanism.

Chapter 2 – A New Way Forward

2.1 Realising Ambition and Potential

Section 2.1 sets out a vision for using public and private lands for certain strategic purposes “*with a more active approach to the management of land*”. This is welcome but a more proactive approach to the management of land would need to encompass not only physical planning goals but also environmental and climate targets and objectives (e.g. afforestation targets are critical to achieve climate neutrality).

2.2 Overview of the NPF Strategy

In section 2.2 Overview of the NPF Strategy, it is acknowledged that most National Policy Objectives (NPOs) from the existing NPF have been retained under the revised NPF. The EPA welcomes that integrating environmental considerations into land use planning at all levels in the planning hierarchy, remains a key requirement and priority of the NPF.

It would be useful to include a table showing which existing NPOs, retained during the review, have been progressed to date, and which ones remain outstanding. This might help emphasise which elements need to be progressed as a priority. It would also be useful to clarify which NPOs are expected to be achieved within the lifetime of the NPF, or for future reviews of the NPF.

2.6 Securing Compact and Sustainable Growth

The Draft NPF makes frequent reference to compact growth through targeting development of infill and brownfield sites. It is essential to recognise the challenge that will be faced by the generation of excess materials (soil and stone) that will require management as waste or by-products, the capacity for which is constrained, particularly in proximity to the area of greatest generation. The EPA's latest published [construction & demolition national statistics](#) report indicates that 9 million tonnes of construction waste was generated in 2021. It is essential that the NPF recognises the importance of resource efficiency in the construction sector, vis-à-vis sustainable reuse and regeneration outcomes. The potential presence of hazardous fractions in

construction and demolition waste must be recognised and managed accordingly in accordance with the relevant guidelines. EPA suggests that the NPF refers to the need to take account of the EPA [Guidelines for the identification and proper management of hazardous fractions in construction and demolition waste](#) (EPA, 2024), as appropriate.

Chapter 3 – Effective Regional Development

The EPA welcomes that environmental considerations have been reflected in the key future growth enablers for the metropolitan areas. These considerations include promoting large scale public transport initiatives, providing for more sustainable resource use, energy, water and waste, district heating and water conservation measures. We also acknowledge the support for blue and green infrastructure. In particular, the EPA welcomes that the intention to ensure key water and wastewater projects supporting the long-term growth of the metropolitan areas will be delivered.

The EPA welcomes the role that ‘Metropolitan Area Strategic Plans’ will play within the planning hierarchy, providing for integrated and sustainable land use planning. These plans should be supported by strong commitments to protect designated habitats and species, within or adjacent to development boundaries.

3.2 Eastern and Midland Region,

The subsection on Dublin City and Metropolitan Area could benefit from including an additional bullet point on Page 33 as follows;

- *Improving climate resilience with the adoption of sustainable urban drainage systems in new developments and in the redevelopment of existing brownfield areas*

A similar comment could also be included in the related sections on Galway, Cork, Waterford and Limerick.

Chapter 4 – Making Stronger Urban Places

4.1 Why Urban Places Matter

The subsection on the environment could benefit from including an additional bullet point reflecting the incorporation of features such as Sustainable Urban Drainage Systems (SUDS), green roofs and green areas to mitigate adverse environmental impacts and enhance biodiversity. This section could also be amended to include design principles of proposed new greenfield and infill development to incorporate sustainable infrastructure such as SUDS.

Community

Community involvement in the planning, design and management of urban places and areas of amenity is vital to ensure that urban environments, particularly areas of amenity, are of high quality and adequately serve the needs and desires of the local community, across all stages of life course. Greater consideration of the Government’s Wellbeing Framework for Ireland should be given for NPOs 12 and 14, specifically in developing appropriate metrics which could serve monitor progress via both Frameworks.

Chapter 5 - Planning for Diverse Rural Places

5.4 Planning and Investment to Support Rural Job Creation

Agriculture

Given the evidence-based link between agricultural productivity and water quality, consider including a reference to water quality and hydromorphology in the last sentence of the agriculture section on page 74. These are key aspects that should be taken into account.

Forestry

Given the scale of afforestation implied by Ireland's commitment to Climate Neutrality, it is important that the NPF appropriately addresses forestry in its National Policy Objectives. The Forestry subsection on page 75 describes that forest cover is estimated to be at its highest level in over 350 years. The EPA recognises that the level of afforestation is currently still far short of the forest cover required to achieve our climate targets and attain a net sink LULUCF sector. To achieve Ireland's climate targets there needs to be a significant increase in forestry in Ireland while preserving the land required for peatland restoration and rehabilitation. This should also be reflected in the NPF.

The EPA funded SeQUESTER research project has estimated the scale of afforestation that could be needed, in tandem with significant emissions reductions in the agriculture sector, to achieve Ireland's 2050 target of achieving Climate Neutrality. The project found that achieving climate neutrality would require annual afforestation rates of 20-35 thousand hectares between 2025 and 2050, resulting ultimately in an additional 500,000 to over 850,000 hectares of forested area by 2050 (between 7% and 12% of Ireland's total land area).

The EPA led National Climate Change Risk Assessment (NCCRA) is underway and is expected to be published in 2025. This will provide a prioritisation of risk at a national level and inform national and sectoral climate adaptation planning and delivery processes. The outputs of this assessment will inform national adaptation planning and delivery processes to be reflected in the NPF. The NPF could, where relevant, include a commitment to take the findings of the NCCRA into account over its lifetime.

The continued restoration and rehabilitation of Ireland's peatlands is another important measure to reduce the greenhouse gas emissions in the long-term and protect and restore the natural carbon sink function of these valuable carbon stores. The recognition of peatlands as important ecosystems and large carbon stores in the NPF is welcome, however like forestry, the percentage of Ireland's land area that may be involved in restoration/rehabilitation is sufficiently significant to warrant a specific NPO devoted to it.

Chapter 6 – People, Homes and Communities

6.2 Healthy Communities

EPA welcomes the inclusion of Figure 6.2 – *Hierarchy of Settlements and related infrastructure* on page 83. Under the environmental segment of the graphic, consider amending the “access to clean sewage” text to “access to clean **water**”. Also, consider including reference to blue and green infrastructure in figure 6.2.

This chapter should also include text as follows: “*new developments whether infill or greenfield should be designed so as to not adversely impact the surrounding environment, especially in terms of additional load on wastewater treatment or surface drainage systems*”.

6.6 Housing

In *subsection 6.6 – Housing*, references are made to homes, housing and households. For clarity, it may be better to provide one term, with an explanation for what forms of housing it applies to (i.e. apartments, one off houses, semi-detached etc.).

Chapter 8 – Working with our Neighbours

8.2 Ireland and Northern Ireland

The text in *Chapter 8 Working with our Neighbours* could acknowledge that currently some parts of the country (Donegal) get their drinking water from Northern Ireland sources. There is scope

for increased sharing of drinking water and wastewater infrastructure in the border counties. For example, the management of sludge from wastewater and drinking water treatment plants being dealt with in regional sludge hubs. It would be more environmentally sustainable to use the closest sludge hub, irrespective of national boundaries.

Chapter 9 Climate Transition and Our Environment

9.1 Climate and Environmental Quality

EPA recommends that under Section 9.1 Climate and Environmental Capacity, “moving from the existing linear economy to a circular economy” is included in the list of environment challenges.

9.2 Resource Efficiency and Transition to a Zero Carbon Economy

EPA welcomes that the NPF supports improvements in resource efficiency and transition to a zero-carbon economy, protecting and enhancing our natural resources, providing for a cleaner environment (air quality, water quality, and reducing noise pollution).

On page 136, consider amending paragraph 4 as follows “*Proposals to develop areas with potential or known histories of unauthorised waste related activities should include measures for remediation of these lands, **and associated waterbodies...***”.

Climate Action and Planning

EPA acknowledges that Section 9.2 sets out the key climate commitments, targets and policy /legislation required needed to be taken into account to transition to a zero carbon economy. Given that the Climate Action Plan 2024 has been published, the NPF and the SEA should be updated to reflect this.

Under ‘*Emerging Legislation and Policy approaches*’ on page 127, consider including, the *Planning and Development Bill, 2023*. We suggest that references to [Ireland’s Climate Change Assessment \(ICCA\) resources](#), the National Energy and Climate Plan , local authority Climate Action Plans are included in the list of plans in column 1 of page 127.

Land Use Review

The links between the NPF and the national land use review, currently ongoing, could be strengthened by including a NPO to consider any relevant recommendations arising out of the review process of relevance to the NPF. Additionally, a NPO should be included to support the aim of the EU Soil Strategy for ‘*no net land take by 2050*’.

Circular Economy

The section on waste management should also refer to the *National Hazardous Waste Management Plan 2021-2027* and the *National Waste Management Plan for a Circular Economy 2024-2030*.

The Department of the Environment, Climate and Communications is currently developing the next Whole of Government Circular Economy Strategy. This Strategy will have a statutory basis and will set targets for priority sectors such as the built environment.

Section 9.2 sub heading Circular Economy (page 128) refers to a 65% recycling rate. Note that this is a **municipal** recycling rate (municipal waste is made up of household waste and commercial waste of a similar nature).

The government published updated Green Public Procurement (GPP) policy '[Buying Greener: Green Public Procurement Strategy and Action Plan 2024-2027](#)' in April 2024. EPA recommends that the NPF recognises the important role GPP can play in sustainable planning and development (e.g. construction of buildings).

EPA welcomes the opportunities to re-use and regenerate vacant, derelict and under-occupied buildings through implementing the *Town Centre First Policy* and using the *Urban and Rural Regeneration and Development Funds*. These policy areas will help align circular economy ambitions to reduce the use of resources and maintain the value of materials in the economy for as long as possible. This should have a positive impact on C&D waste generation volumes.

Additionally, there are opportunities to '*design out waste*' in construction & demolition projects through early consideration of design, procurement and managing resources and wastes on site. These guidelines, currently voluntary, recommend that planning authorities require a Resource & Waste Management Plan (RWMP) for all construction & demolition projects as best practice to inform planning consents for low carbon and circular development. It is recommended that a commitment is included to ensure that all planning permissions granted include compliance with the RWMP as a standard condition of planning.

Aggregates and Minerals

EPA notes that critical raw materials are referenced on page 127 and 131. The Critical Raw Materials Act (EU Regulation 2024/1252), entered into force in May 2024. The relevant requirements of these Regulations, including Article 13, should be referenced in the NPF.

The [Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects](#) (EPA, 2021) provide guidance for clients, consultants and contractors on building circularity into construction from the design stage through to the construction & demolition stages. EPA recommends that the NPF supports the implementation of these guidelines.

Forestry

This subsection could provide a further discussion of the potential role of Forestry in climate mitigation as well as biodiversity enhancement. This section could also highlight the importance of having the right forestry in the right place given the potential for environmental issues such as water quality issues and biodiversity loss from poorly planned and sited forestry. The recently announced Climate Resilient Reforestation Pilot Scheme could also be referred to.

Renewable Electricity

While offshore renewable energy developments are being progressed by way of Designated Maritime Area Plans, no national or regional plan or strategy exists for Ireland's onshore renewable energy. EPA recommends that the NPF includes an update on the status of the Renewable Electricity Spatial Policy Framework, for which SEA and AA has commenced.

NPO 71 refers to the *promotion of renewable energy generation at appropriate locations*. There have been challenges with locating some wind turbine development in locations susceptible to landslides leading to subsequent environmental damage. It is recommended that text be included in this section on p133 reflecting that "*comprehensive assessments be undertaken, as part of the*

consenting processes for location of renewable electricity generation projects, that address the risk of landslides”.

Making a Just Transition

Regarding peatlands, consider amending the title of the subsection related to just transition as follows *“Making a Just Transition – **Peatlands**”*. A commitment should be given to implementing the actions in the existing National Peatlands Strategy, and to prepare a replacement Strategy. There may also be merit in reproducing the most recent peatlands map of Ireland, available from Trinity College Dublin in this section.

This section describes that peatlands cover 21% of our land area and 64% our total soil organic carbon stock and are the largest store of carbon in the Irish landscape. The EPA funded AUGER project has estimated this carbon stock value to range from between 53% and 75%. The AUGER project determined that peatlands represent two thirds of the total national soil organic carbon stock. It may therefore be appropriate to highlight this range in the section as follows *“Peatlands cover 21% of our land area, and approximately two thirds of our total soil organic carbon stock; they are the largest store of carbon in the Irish landscape”*.

9.3 Protecting Conserving and Enhancing our Natural Capital

Water Resource Management and Flooding

On page 137, consider amending the first sentence as follows: *“Planning is critically important to the management of water resources, **and for the protection of water quality**”*. Consider referring to agriculture related water pressures also in this section.

Nature Based Solutions

There is a need to ensure that implementation of nature-based solutions which maximise benefits across multiple domains (climate adaptation, mitigation, biodiversity, health and wellbeing) are prioritised.

Monitoring and evaluating the performance and impact of nature-based solutions across the multiple societal challenge areas (e.g. climate resilience, water management, air quality, biodiversity, health and wellbeing) should be a core element of NPO 79 and 80 to fully understand the success of implemented solutions, and provide evidence to inform policy and further action for appropriate land use planning and management.

Green Belts and Green and Blue Spaces

In relation to NPO 82, the provision of green and blue spaces and tree canopy cover in settlements is welcome but could be more ambitious. The World Health Organization recommends that all people reside within 300m of green space. The [3-30-300 concept](#) introduced in 2021 provides an internationally recognised approach for creating healthy, green and equitable urban environments which may help to address social inequalities in access to green and blue spaces.

Strategic planning for Biodiversity

Insert the following text after paragraph 4 column 1 of Page 141: *“The SEA Directive provides for the consideration of biodiversity, flora and fauna and the interrelationship with other relevant environmental topics e.g. water, landscape and human health, when undertaking environmental assessment at plan/ programme level.”*

9.4 Creating a Clean Environment for a Healthy Society

In Section 9.4, the supporting text on water quality could refer to the Water Framework Directive, Marine Strategy Framework Directive, Bathing Water Directive and Drinking Water Directive. In addition, relevant aspects of Uisce Éireann's Water Resource Management Plans and their Water Services Strategic Plan should also be considered.

EPA notes in this section that urban wastewater discharges are considered to be one of the principal pressures on water quality, and that the effective treatment and disposal of wastewater is critical. The section on should however, refer primarily to the impacts of agriculture, which is the biggest impact on water quality in Ireland, followed by hydromorphology pressures. These should also be acknowledged as being key pressures on water quality.

The NPF should be further strengthened to ensure that greater consideration is given to the cumulative effect of developments on the receiving environment at the planning stage. For example, in Cavan and Monaghan, there are approximately 168 EPA licensed installations and an additional 5 licence applications being processed in the pig and poultry sector. The potential for cumulative impacts of ammonia from these and other installations/operations on nearby Natura 2000 sites should also be considered at planning stage. Cumulative impacts should be considered for all development types. NPOs 11 and 31 should be strengthened to address this.

Water Quality

Ireland's rich water resources are of strategic importance and clean water, both in our environment, and in our taps, is essential for creating a healthy society and supporting a growing economy.

Our drinking water is sourced from our rivers, lakes and groundwater sources. It is essential that we have a resilient water supply to serve the existing population and for the additional 1 million people projected by 2040. We must also ensure that the water supplies are managed in such a way to protect the environment, for example ensuring there is sufficient flow in downstream rivers to support wildlife and ecological status.

Our water bodies are also a resource for leisure activities, the tourism sector and commercial uses such as shellfisheries, and the majority of our bathing waters are of excellent quality.

EPA consider urban wastewater to be a significant pressure on water quality in Ireland, along with agriculture, hydromorphology and forestry. Key issues that need to be addressed through the framework include:

- Management of intensive agricultural operations and associated activities such as food processing.
- Management of riparian zones, land drainage and development near waterbodies.
- Careful consideration of siting and good management of forestry activities including planting, management and clearfell.
- Appropriate treatment and disposal of wastewater in an environmentally sound manner.

Appropriate treatment means that we need to ensure effluent is treated to a standard that won't pollute the environment, has capacity to manage the population it serves, that storm water overflows operate correctly and that we avoid direct discharges of untreated wastewater.

Urban wastewater treatment plant compliance and remedial actions are therefore a key short-term priority. In the longer term, capacity issues need to be resolved to meet growing demand to

2040 and beyond, especially in sensitive environments, or where more stringent discharge conditions come into force.

Policy should seek to align planned growth with existing water and wastewater infrastructural capacity, to the extent feasible. Uisce Éireann publishes annual water supply and wastewater treatment capacity registers, which can assist with this process.

In areas where no mains drainage is available, it will also be necessary to be vigilant to the risk of contamination to private wells as a source of drinking water from sources such as agriculture slurry, nitres and bacteria from inadequate domestic waste water treatment systems.

In plan-making and decision-making within the planning system, decision makers should consider both the capacity of the receiving environment to accommodate developments where issues such as those in the bullet points above are identified. Whilst statutory environmental legislation provides a baseline, this framework should seek to identify those other plans and policies that allow for planning decisions to allow for the best potential social, economic and environmental outcomes possible.

Air Quality

We can improve local air quality by changing how we heat our homes, specifically by moving away from smoky fuels and choosing cleaner options. Ireland is however not on track to achieve its Clean Air Strategy ambitions to move towards meeting the health-based WHO air quality guideline limits by 2026, and meeting future standards will be very challenging. A road map of concrete actions is required to deliver on the overall ambition of the Clean Air Strategy, and the 2026 and 2030 interim air quality targets. This could be supported in the NPF.

Noise

Consider amending the title of this section on page 145 to “Noise ~~Quality~~”

Noise pollution is a public health issue. Research and strategic noise mapping in Ireland provide data on harmful effects due to prolonged exposure to transport-related noise, particularly from road traffic, with over 1 million people estimated to be exposed to noise levels above the mandatory reporting thresholds.

The first sentence under “Noise Quality” on page 145 should be replaced with “*Although noise is a product of many human activities, including neighbourhood, industrial, commercial, and entertainment activities, the most widespread sources of noise pollution and exposure in Ireland are transport related*”. The text “*in the incorrect place or at the incorrect time or*” should be removed from the second sentence.

Reference should be made to “Noise levels” rather than “Sound levels” in the paragraph entitled “Quiet Areas” on page 145.

Noise is acknowledged as being an environmental policy objective to address, but is not specifically mentioned in the national strategic outcomes (NSOs). This could be incorporated into one of the existing NSO as follows “to prevent or reduce harmful noise effects”. EPA also suggests that the NPO 91 promotes a progressive move towards implementing the WHO noise guideline values.

The EPA is developing integrated guidance for local authorities for the Round 4 noise action plans. There is a need for coordinated national initiatives around planning, health and the transport infrastructure to make improvements and reduce noise exposure. These initiatives need to be ambitious and aimed at reducing the overall population exposed to noise pollution.

The NPF could support the need for clarity regarding the management and mitigation of transport related noise. While local authority noise action plans must be implemented to reduce exposure to noise as a priority, the roles and responsibilities for implementation of transport noise mitigation, is not clear.

Chapter 10 -Implementing the National Planning Framework

EPA notes in paragraph two of page 147, that more effective planning and coordination processes are needed at national, regional, and local level, to ensure the NPF delivers on its commitments and helps shape policies and actions across government departments and state agencies. This need could be supported by including a specific commitment, as an additional national policy objective for this to be progressed.

EPA recommends establishing an NPF Environmental Working Group to provide for oversight of the environmental monitoring and reporting elements of the NPF. The arrangements in place previously for the implementation stages of plans such as the Grid 25 Implementation Plan, Wild Atlantic Way Operational Programme and Food Vision 2030 may be worth considering, as appropriate.

Additionally, consideration should be given to supporting the development of a national land evidence hub that includes national data on soil, landcover, land use, landscape and for maintaining the land use review phase 2 data sets. This hub would be beneficial for plan-making and decision makers at implementation and monitoring stages. In this context, the NPF should include a commitment to support the maintenance of the land use review phase 2 data sets.

National Strategic Outcomes

The following comments are made on the National Strategic Outcomes (NPOs) section of the Draft NPF:

Suggested new NSOs

The EPA recommends that two additional NSOs should be included in the NPF. The first relates to Environment and Health. This would encompass issues relating to water quality, air quality, noise and the benefits of access to nature. The second relates to Biodiversity. The EPA notes the additional focus on biodiversity protection and enhancement via NPOs 81 to 86. An additional NSO to acknowledge the importance of biodiversity would better link these NPOs to the strategic outcomes.

NSO 1

The NSO relating to compact growth should include criteria to protect and develop urban biodiversity and incorporate urban tree cover, as per the Nature Restoration Law (art 8). Noting the commitment to prepare a Nature Restoration Plan for 2026, specific criteria for protecting and managing urban biodiversity and urban tree canopies are easier to consider and implement at the planning and development stages of land use planning.

NSO 4

Specific reference to the commitments in NSO 8 needs to be added to NSO 4 to ensure the two outcomes do not conflict: specifically, NSO 4 mentions “reduce environmental impact” of airports but this should also specifically reference the climate commitments for GHG emission reductions and limits that are mentioned in NSO 8.

NSO 7

Consider including reference to blue spaces in this outcome. NSO 7 should also include an action to ensure resilience against climate impacts on heritage sites, as set out in the Built & Archaeological Heritage Climate Change Sectoral Adaptation Plan.

NSO 8

While reference is made to sustainable land use management in paragraph 4, a reference should also be made to the Land Use Review. There is merit in also acknowledging the legally binding Carbon Budgets and Sectoral emissions ceilings.

Consider rewording the 2050 target text to refer to what is written in the Climate Act “*climate neutral economy*” not later than 2050. This doesn’t necessarily equate to net-zero as referred to paragraph 2 (or it least it might depend on how net zero is defined). In this context, we consider it best to quote the Act directly rather than raise unnecessary definition issues.

Unprecedented annual emissions reductions are required for Ireland to comply with national legislation introduced under the Climate Action and Low Carbon Development (Amendment) Act 2021. These take the form of legally binding Carbon Budgets and Sectoral Emissions Ceilings for 5-yearly periods starting with 2021-2025. The EPA Inventory and Projections reports inform the monitoring of climate action measures. These assessments require that measures have a clear implementation pathway and realistic chance of implementation. The NPF should support progress on the required implementation pathways.

This is needed as recent EPA report on greenhouse gas projections 2022-2040, published in May 2024¹ indicates that the first two carbon budgets (2021-2030), which aim to support achievement of the 51 per cent emissions reduction goal, are projected to be exceeded by a significant margin of between 17 per cent (With Additional Measures - WAM scenario) and 27 per cent (With Existing Measures – WEM scenario).

NSO 9

Bullet point 3 on page 167 could be amended as follows “*Achieving ~~improved outcomes in quality~~ **the necessary quality standards** in respect of drinking water and in wastewater in relation to rural and private water services.*” The text on pages 167 & 168 would also benefit from subdividing drinking water into public drinking water, private drinking water and household wells. The associated NPO (NSO 9) straddles all three, and the text confuses the issues in each sector.

Drinking Water

Regarding drinking water, while public drinking water quality in Ireland is high, there the issues with building resilience into the public drinking water system.

¹ <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-Report-2022-2050-May24--v2.pdf>

For private drinking water supplies, there are issues around drinking water quality and the number of small private suppliers is currently unknown. There is a need for small private suppliers to register with their local authority. EPA suggests including a new NPO to support the recommendations of the Rural Water Review including the establishment of this register.

While household wells are exempt from the drinking water regulations, these are the most likely to be impacted by poorly performing or maintained septic tanks. With the expected population growth proposed in rural areas, the NPF should support the need for proper design, siting and maintenance of septic tanks.

NSO 9 also discusses national wastewater sludge management, however sludges from drinking water plants are also a problem that need to be managed. We currently do not have the infrastructure for the current population, which highlights the challenge of being able to support the population increase expected under the NPF.

Reference should be included on managing water resources in the context of protecting the environment, biodiversity and amenity. Reference should also be made to aligning investment in water infrastructure with environmental priorities identified by the EPA. It is suggested that the text *"and environmental priorities highlighted by the EPA in its national reports"* be added to the end of the first bullet point on p167.

Wastewater

Growth facilitated by developments that obtain planning permission need to be supported by wastewater networks that collect wastewater for treatment at a plant that has the capacity for treating the volume and nature of wastewater associated with the development and does not increase the risk of odour nuisance and overflows.

Where development may be supported by Domestic Waste Water Treatment Systems (DWWTs) the planning system should consider whether permission for a development with a DWWTs is being granted in an area at risk i.e. Zone 1 or 2 in the National Inspection Plan and the findings of local authority's inspections, as required in the National Inspection Plan. It may be the case that a trend could indicate certain systems do not function well in a particular area or that the percolation potential has changed.

Appendix II – Comments on the SEA ER

EPA in its role as an SEA environmental authority, focusses on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

To ensure the content of the SEA aligns with the requirements of the SEA Directive, the SEA environmental report should include an outline of the contents of the NPF and the main objectives of the NPF.

EPA welcomes the inclusion of *Table 2.1 – Recommendations from the Expert Group Review of the Effectiveness of the NPF* and note the proposed 13 recommendations arising from this review. An additional column showing how these recommendations have been taken into account in the NPF would aid clarity.

EPA acknowledges that the SEA refers to the recommendations and key messages from the *EPA's Ireland's Environment – An Integrated Assessment* (EPA, 2020). The next iteration of this report is due to be completed in autumn 2024. Once published, we suggest that relevant recommendations are considered and integrated into the NPF prior to the framework being finalised.

Integration of the SEA into the NPF

The SEA includes many aspects which reflect 'good' practice. This is particularly evident in how alternatives have been considered and how existing environmental problems have been identified.

Environmental Baseline

The baseline could provide a clearer description of the inter relationships between the environmental aspects, at national scale. This could be addressed by including a schematic showing how the environmental criteria covered by the SEA Directive interact (e.g. water quality interacts with population and human health, biodiversity, flora and fauna, etc.)

Climate

Ireland's [Climate Change Assessment](#) (ICCA) provides a comprehensive report on climate change and on the challenges it poses and response options available. This should be consulted and referenced in the SEA ER.

We note the references to EPA emissions data for 2022, this could be updated to reflect the latest information from 2023. [Ireland's Provision Greenhouse Gas Emissions 1990-2023](#) (EPA, 2024) is now available.

Biodiversity

In Section 5.3 (existing environmental pressures/problems with biodiversity, flora and fauna), EPA suggests that the NPF also refers to Dáil Éireann's 2019 declaration of the national biodiversity and climate emergency. From an All of Government plan perspective, the NPF should reflect and support the necessary commitments to be implemented to address the decline in nature across the key relevant sectors, including agriculture and forestry.

Drinking Water

References to the *Drinking Water Quality in Public Supplies Report 2022* (EPA, 2023) should be updated to the latest report [Drinking Water Quality in Public Supplies Report 2023](#) (EPA, 2024).

Circular Economy

The EPA's [Circular economy and waste statistics highlights report 2021](#) (EPA, 2023) should be taken into account, as appropriate and where relevant.

Landscape

The SEA acknowledges the absence of national or regional guidance and assessments to conserve and protect areas of high scenic amenity or sensitivity. We suggest that reference could be made on the EPA's [Good practice guidance on SEA and landscape](#) (EPA, 2023), which could help inform the integration of landscape considerations in the SEA process. Similarly, the REFRAME EPA funded research project will provide a toolkit for how landscape character assessments can be undertaken in a consistent manner. It is due to be finalised later this autumn.

The definition of landscape should be amended to reflect the definition in the Planning Act, as amended and in the European Landscape Convention. The Convention covers land and water (inland and seas), and natural, rural, urban and peri-urban landscapes. Significantly, it includes every-day or degraded landscapes as well as those that might be considered outstanding.

Section 5.3.9.4 Existing Environmental Pressures/ Problems: Landscape and Seascape references the existing National Landscape Strategy, while it later states that the absence of a cohesive national landscape strategy is an issue. This apparent contradiction should be clarified.

Noise

While the NPF and SEA (Section 4.3.12.2 on page 26) mostly focuses on transport related noise pollution sources, there are other aspects around noise management that should also be considered. The NPF and SEA should consider all significant sources of noise pollution.

Additionally, the amended noise regulations SI 663/2021 could also be referred to and considered in the SEA. These regulations cover new assessments for harmful effects covering 'High Annoyance', 'High Sleep Disturbance' and 'Ischaemic Heart Disease' considerations.

Relationship with plans and programmes

In *Chapter 4 - Review of the Relevant Plans and Programmes*, EPA welcomes that the chapter contains a comprehensive list of key international, European, and national policies, plans and programmes considered in preparing the SEA. We recommend updating the reference to the EU Nature Restoration Law to reflect its adopted status.

Assessment of Alternatives

We note the SEA Environmental Objectives (SEOs) set out in Chapter 6. We welcome that the EPA's guidance on the development and assessment of Alternatives in SEA has been incorporated into the SEA. We also welcome that the process of how alternatives were considered has been clearly set out in Table 7-3. We note the preferred alternatives, and the accompanying recommended mitigation measures associated with these. There is merit in collating these and showing how these have been reflected in the NPF. While the alternatives review different aspects of the NPF under separate headings and discusses and selects a preferred option for each relevant area, EPA suggests for clarity that an overall summary of the preferred approach is provided at the end of this chapter.

Mitigation

In Section 8.2, we note the assessment parameters for the SEA. There is merit in comparing the previous baseline used for the first NPF/SEA against the baseline for the review of the NPF. This would help determine which aspects of the environment may require more robust mitigation, stronger policy implementation measures to address declines in environmental quality in the review of the NPF or would benefit from further environmental monitoring.

The SEA describes how and to what extent the recommended mitigation measures have been addressed in the NPF. EPA recommends that in finalising the NPF, the recommendations (including mitigation measures) of the environmental assessment processes (SEA and AA) are fully integrated, as appropriate, into the NPF. Where specific SEA and AA recommendations are not fully brought into the final NPF, the reasons for this should be clarified.

Monitoring

We note that *Section 9.2 – Monitoring Proposals* discusses the environmental monitoring related aspects. In Table 9.4, consider amending of the wording of some as rows as follows:

- For Water (p231), there is a typographical error with one of the targets. One target should refer to drinking water, rather than urban wastewater, given that the associated indicator refers to “boil notices and water restrictions”.
- For air quality, consider amending the target text to reflect the commitment to achieve interim WHO targets in 2026 and 2030 and achieve final WHO guideline values by 2040. as set out in the Clean Air Strategy.
- *Water – level of phosphorous in water bodies:*
Nutrients in waterbodies (nitrogen and/or phosphorous) are of specific importance in areas that are identified as sensitive areas or catchments to sensitive areas. In the Target column, ensure wastewater discharge authorisation (WWDA) compliance with the UWWT Directive, to ensure that required wastewater discharges are treated to ensure their nutrient levels do not contribute to the pollution of sensitive areas or their catchments.

Additional aspects to consider in the monitoring programme

- Water:
 - UWW Compliance entry focuses solely on UWWT Directive compliance, WWDA compliance should also be included.
 - Reduction of incidents reported due to overflows from the WWWs that are not caused by heavy rainfall.
 - Reduction in UÉ notifications to BIM and SFPA regarding discharges that may impact shellfish waters.
 - Increased submission of shellfish assessments required under the WWDAs to ensure all WWDAs that require additional UV treatment (or equivalent) and steps are taken to reduce the microbiological loading in the WWD to protect shellfish waters.
 - Reduction in the bathing water prohibition/restriction notices due to Wastewater works.
- Air Quality:

- We note emissions and ambient concentrations (as monitored by the National Ambient Air Quality Monitoring Network) are used interchangeably, the metric should consistently refer to and be based on either emissions or concentrations. Two metrics could also be developed for National emissions and another for ambient concentrations.
- Population and Human Health:
Consider any relevant data from the [Well-being Framework for Ireland](#) (Government of Ireland, 2024)

We also suggest that the monitoring table take account of the SEA's Strategic Environmental Objectives, as these can help clearly identify and link environmental objectives to the necessary monitoring regime needed.

Article 10 of the SEA Directive states that the significant environmental effects of implementing a plan/programme shall be monitored in order, *inter alia*, to identify at an early-stage unforeseen adverse effects and to be able to undertake appropriate remedial action. A comprehensive monitoring programme alongside the NPF could prove to be particularly useful in terms of filling data gaps, measuring indicators over time and monitoring the “real” effects of implementing the NPF. This Monitoring Programme should be flexible enough to take account of specific environmental issues and unforeseen adverse impacts should they arise. The Monitoring Programme should also be adaptive in terms of changing environmental targets. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities where possible. The monitoring programme should be included in the NPF.

If the monitoring identifies adverse impacts during the implementation of the NPF, DHLGH should ensure that suitable and effective remedial action is taken.

Guidance on SEA-related monitoring, updated in 2023, is available on the EPA website at <https://www.epa.ie/publications/monitoring—assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>

We also bring to your attention EPA Guidance on the [Tiering of environmental assessments – The influence of Strategic Environmental Assessment on Project level Environmental Impact Assessment](#) (EPA, 2021), that may offer useful guidance in terms of future projects that may arise from the policy statement and how their environmental assessments could be linked with this SEA.

SEA Statement – “Information on the Decision”

Once the NPF is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the NPF;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the NPF;
- The reasons for choosing the NPF adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the NPF.

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available at
<https://www.epa.ie/publications/monitoring—assessment/assessment/strategic-environmental-assessment/guidance-on-sea-statements-and-monitoring.php>

Environmental Authorities

In addition to your own department, the statutory environmental authorities include:

- Environmental Protection Agency;
- Minister for Environment, Climate and Communications; and
- Minister for Agriculture, Food and the Marine.

Appendix III – Comments on the NPOs

This appendix provides additional comments on the NPOs as described in the NPF. We also suggest areas that may benefit from new NPOs to address other environmental challenges. Where recommendations are made to include new NPOs, opportunities to integrate these recommendations within an existing NPO could also be considered. Where new or amended NPOs are considered, they should be assessed in accordance with the relevant SEA criteria in the Environmental Report. They should also be considered in the context of the Appropriate Assessment and the Strategic Flood Risk Assessment. Many of the objectives could benefit from greater clarity in terms of whether the commitments provided will be implemented or progressed over the lifetime of the NPF. Additionally, once adopted, preparing an interim progress report indicating how the NPOs are being implemented would be very useful.

Table AP3-1 – Suggested amendments to National Policy Objectives in the NPF

Chapter	Objective	Suggested NPO amendments
2	NPO 11	Needs to include the consideration of the receiving capacity of the environment, along with the cumulative impact from other activities. These considerations should be given at development plan making stage, where planned growth at a settlement level is determined, and during the consideration of individual development proposals.
4	NPO 12	Strengthen by adding <i>“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being, supported by urban biodiversity measures.”</i> Additionally, this NPO should reference the Government’s Well-being Framework for Ireland.
4	NPO 14	This NPO might also reference progress within the context of the Government’s Well-being Framework for Ireland.
5	NPO 29 & 30	While we note these objectives provide some constraints on one off housing in the countryside, these should be strengthened by considering stricter requirements. It is important to limit new one-off rural housing, as it makes providing critical service infrastructure more expensive, requires greater travel by car, and can fragment and disturb areas/corridors of local biodiversity.
5	NPO 31	Consider including reference to water quality in this objective, <i>“...while at the same time noting the importance of maintaining and protecting biodiversity, the water environment and the natural landscape and built heritage which are vital to rural tourism”</i> . This NPO should be further strengthened by acknowledging that facilitating the development of the rural economy should be contingent on the capacity of the receiving environment, along with the cumulative impact from other activities.
5	NPO 34	We note the support for the agri-food industry while looking to achieve progress with environmental targets associated with climate change and water quality. The SEA recommends that further support for the agri-food industry is more closely linked to improvements

Chapter	Objective	Suggested NPO amendments
		in water quality. This could be better reflected in the wording of the objective. This could also be further strengthened by including reference to <i>compliance with the Birds and Habitats Directives and the targets of the National Biodiversity Action Plan</i> . In supporting the agri-food industry, environmental monitoring associated with the NCAP and the RBMP and related Plans/ Programmes e.g Food Vision 2030 should be reviewed on a regular basis. Relevant aspects of the environmental monitoring programmes established for these Plans should be reflected in the NPF Monitoring Programme as appropriate.
7	NPO 55	Suggested amending as follows: <i>“Support the development of preparation and implementation of regional and local integrated coastal zone management plans, associated guidance and research to address the likely effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.”</i>
9	NPO 67	Consider amending as follows: <i>“The planning system will be responsive to our national environmental challenges and commitments and ensure that development occurs within environmental limits and authorisations, having regard to and where feasible enhances the environment including biodiversity, taking account of the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital”</i> . The NPF should also clarify how environmental limits are going to be determined. We suggest that a glossary of terms is provided for in the NPF which includes a definition of the term ‘environmental limits’ there.
9	NPO 68	Consider amending the objective text, <i>to also promote the use of building materials that have achieved by-product or end-of-waste status</i> . This will help promote the use of such materials to achieve a circular economy, while avoiding unnecessary waste generation.
9	NPO 71	Suggested amendment - <i>“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet to contribute to meeting national objectives towards achieving a zero carbon climate neutral economy by 2050 while ensuring no associated negative environmental outcomes.”</i>
9	NPO 74	Amend existing text to reflect the need to <i>protect the water environment</i> .
9	NPO 77	Replace the wording of the NPO as follows - <i>“Prioritise waste prevention (including re-use) and follow the waste hierarchy in relation to the management of waste generated, where preparation for re-use and recycling is prioritised over energy and other recovery and disposal to landfill. Provide adequate waste treatment capacity and improve access to recycling infrastructure to make it easier to support segregation of special, bulky and hazardous wastes.”</i>
9	NPO 78	Suggested Amendment - <i>“Enhance water quality and resource management by managing the riparian zone to prevent or mitigate the risk of flooding, improve water quality and hydromorphology and improve the local environment by:</i>

Chapter	Objective	Suggested NPO amendments
		<ul style="list-style-type: none"> • Ensuring riparian zone management informs place-making by managing planned development in areas at risk of flooding and the wider riparian zone, in accordance with The Planning System and Flood Risk Management Guidelines. • Taking account of the potential impacts of climate change on flooding, flood risk and water quality/ hydromorphology and consideration of the Flood Risk Management Climate Change Sectoral Adaptation Plan. • Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process. The forthcoming 46 Local Catchment Management Plans may also provide valuable focus. • Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature-based solutions, and restoring riparian zones and natural river functions, to create safe places.” <p>We also recommend including an additional bullet point acknowledging the <i>Catchment Flood Risk Management Plans and the need for their implementation and provide a commitment to prepare guidance on how to develop and implement nature-based solutions for surface water run-off in existing environments.</i></p>
9	NPO 79	<p>Suggested amendment - <i>“Support the management of stormwater, rainwater and surface water flood risk through the use of nature-based solutions, sustainable drainage systems and holistic management of the riparian zone to also provide enhanced multiple benefits.”</i></p> <p>Additionally, monitoring of the performance and impact of the nature-based solutions should be included in this NPO.</p>
9	NPO 80	Similar to the suggestion made for NPO 79, monitoring of the performance and impact of the nature-based solutions should also be included in NPO 80.
9	NPO 81	Consider adding <i>“or enhancing”</i> after <i>“maintaining”</i> .
9	NPO 82	<p>Consider taking account of the need to develop existing settlements and ensure compact and sequential patterns of growth <i>“incorporating measures to restore, enhance and protect urban biodiversity at the planning and development stage.”</i></p> <p>Additionally, this NPO could be more ambitious. A suggested approach is the WHO 3-30-300 concept.</p>
9	NPO 84	<p>“In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:</p> <ul style="list-style-type: none"> • Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts <i>and seeking to enhance biodiversity</i>, in statutory land-use plans.

Chapter	Objective	Suggested NPO amendments
		<ul style="list-style-type: none"> Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs."
9	NPO 85	<p>Suggested amendment - <i>"In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address achieve no net loss of biodiversity and feasible actions to enhance biodiversity within their plan making functions."</i></p> <p>Additionally, include a commitment to prepare guidance on how to deliver <i>"no net loss of biodiversity in the plan making process"</i>.</p> <p>NPOs 84 & 85 could also be expanded to refer to government department sectoral planning needing to support integrating policies to protect and restore biodiversity.</p>
9	NPO 86	Clarify bullet point 2, relating to <i>"facilitating sustainable activities within Natura 2000 sites."</i>
9	NPO 89	Strengthen the NPO by specifically referring to the efficient and sustainable use and development of wastewater, drinking water and energy (including in particular renewable) infrastructure.
9	NPO 90	<p>NPO 90 could be strengthened to explicitly support the achievement of the government's Clean Air Strategy's interim and final targets. This additional specificity would also enable better monitoring of the achievement of this objective.</p> <p>Odour nuisance and radon should also be considered as part of this NPO.</p> <p>Additionally, this objective could also acknowledge the need for the assessment of impact of air emissions on sensitive habitats as required under Articles 9 and 10(4) of the NEC Directive.</p>
9	NPO 91	NPO 91 should be strengthened to require planning to seek reduced future noise exposure via improved acoustic design for proposed new developments, promotion of designation of quiet areas in all local authority development plans and noise action plans and providing for mitigation infrastructure where necessary to reduce existing exposures. This NPO should also consider <i>promoting the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life</i> and to foster an integrated approach to deliver improvements.

Table AP3-2 - Recommended additional National Policy Objectives for the NPF

Chapter	Aspect	Suggested new NPOs
4	Circular economy	Consider including a new NPO recognising the need for the sustainable management of aggregates and other raw materials to support achievement of the circular economy.
5	Forestry	Consider a new NPO for forestry as follows: <i>“Continued afforestation is to be encouraged, this should be sustainable in terms of the composition and siting of forestry to prevent adverse environmental effects such as siltation of watercourses, loss of nutrients and to encourage biodiversity. Consideration should also be given to encouraging practices such as agri-forestry where appropriate which encourages land use diversity”.</i>
9	Land Take	Consider including an objective supporting the aim of the EU Soil Strategy for ‘no net land take by 2050’.
6	Land Use Review	Consider including a new NPO to include a commitment to support the findings and recommendations of the Land Use Review. Commitments should also be given to support the maintenance of the land use review phase 2 data sets.
6	Quality of Life	An additional NPO should be included to support the Well-being Framework for Ireland, in order to capture and measure progress across quality of life as well as equality dimensions.
9	Sustainable land management	An additional NPO should be considered for inclusion to <i>Prepare a National and Regional Aggregate Plan(s) to capture existing capacity and promote an integrated approach to the sustainable aggregate management and production.</i>
9	Unregulated activities	A new NPO related to unregulated activities including peat extraction operations should be included. This should strengthen the NPF’s commitments to climate resilience, sustainable resource management and the protection and restoration of biodiversity. In addition, align the NPF with the ambition of the National Peatlands Strategy; strengthen protection for peatlands and the environment; and support the impetus for increased enforcement resources <u>for</u> all relevant agencies, regulators and departments to eliminate illegal peat extraction activities and to protect peatlands as an ecosystem, resource and carbon sink.
9	Peatlands	Consider a new NPO to prepare a medium to long-term strategic national level land use plan for peatlands under State ownership.
9	Research & Development	Consider a new section in the NPF including a new NPO on research and development. Consider including commitments for the following research as part of this NPO: 1. The integration of medium and longer-term environmental considerations into decision and policy making. 2. Capacity and opportunities for and barriers to the circular and bioeconomy in Ireland.

Chapter	Aspect	Suggested new NPOs
		<p>3. Providing knowledge, expertise, data, evidence, technologies and solutions to enable the transition to a competitive, low-carbon, climate resilient and environmentally sustainable society and economy.</p> <p>4. Commitment to continued research on the effective and context specific implementation of nature-based solutions with the view to informing the preparation of guidance for planning authorities.</p>
9	Climate	Include a new NPO for Local Authorities to implement the relevant actions set out in their local Authority Climate Action Plans in their forward planning decision-making.
9	Water Quality	<p>Consider an additional NPO to address non-compliant SWOs as follows <i>“support the upgrading of stormwater overflows that do not meet relevant criteria and that are identified as causing an impact of waterbodies as identified under the Water Framework Directive”</i>.</p> <p>The planning system should consider the findings of the local authority’s National Inspection Plan of domestic wastewater treatment systems to ensure any adverse trends are evaluated for consideration as part of the proposed growth and development in areas which are close to at risk water bodies or co-located with drinking water wells.</p>
9	Drinking Water	Consider a new NPO to support the recommendations of the Rural Water Review including the establishment of a register for small private drinking water supplies.
9	Green-Blue Infrastructure	Consider including a new NPO to prepare Green and Blue Infrastructure Strategies at regional and local authority level informed by mapping of existing green and blue infrastructure at a regional and local level.
9	Local Biodiversity Action Plans	Consider including a new NPO supporting the implementation of local authority biodiversity action plans and their greater integration into local authority land use planning.
9	Landscape	The National Landscape Strategy (Action 6), requires periodic <i>“State of the Landscape”</i> reports to be prepared. An NPO should be included to reflect this commitment.
10	Environmental Data Hub	Consider an NPO supporting the development of a national land evidence hub that includes national data on soil, landcover, land use, landscape and for maintaining the land use review phase 2 data sets.

Table AP3-3 - Recommended Guidance to support delivery of the NPOs

The following guidance should be considered as part of the NPF:

- a. Noise planning guidance to inform local authority land use plans and noise action plans.
- b. Water planning guidance to better integrate natural water management under the WFD into development planning processes. This especially could look at urban drainage which is a significant pressure.
- c. Guidance for local and regional authorities, on how to protect biodiversity and avoid biodiversity loss, in land use planning.
- d. Guidance to assist planning authorities develop and manage existing brownfield sites. The guidance should take account of chemicals such as PFAS. For the development of guidance, the EPA guidance for licensed sites [OEE Guidance on the Management of Contaminated Land & Groundwater at EPA Licensed Sites](#) and the UN guidance [Draft guidance on identification & management of sites contaminated with POPs](#) are good starting points to consider.
- e. Guidance on how planning authorities can consider the receiving capacity of the environment, both at development plan-making stage where planned growth at a settlement level is determined and as well as at the stage of consideration of individual development proposals.