



Consultation on Draft National Planning Framework

Thank you for the opportunity to make a submission on the draft National Planning Framework. Please find below some brief observations from the Irish Forum on Natural Capital. Due to our limited resources, we are unfortunately not in a position to develop a more comprehensive response but hope nonetheless that our submission may inform your thinking on this very important topic.

Yours faithfully,

Professor Jane Stout

Chairperson, Irish Forum on Natural Capital

General Observations:

The Irish Forum on Natural Capital (IFNC) welcomes the inclusion of natural capital terminology in the Framework under *National Policy Objective 54* and in the title of *sub-chapter 8.3*, and indirectly in *National Policy Objective 59I*, but we consider that the opportunity to embed the natural capital approach into the Framework as a decision-making tool has been missed.

The natural capital concept is fundamentally about natural assets, for example wetlands, rivers, coasts and forests. These assets deliver a flow of services that economies depend on, from food, fuel and fibre that are traded on markets, to non-market services like flood mitigation, air and water purification, and carbon sequestration, as well as less tangible

benefits such as physical and mental health, inspiration and wonder. In order to ensure the ongoing flow of these services and the benefits they provide for free to society and the economy, it is imperative to manage the asset. This is what the natural capital approach aims to do.

This approach aims to support a better understanding of the flows of benefit/disbenefit between the five main forms of capital: financial, built, human, social and natural (below, Fig 1). By assessing natural assets in terms of their biophysical condition, their risk of being run down, and, where possible and practical, their value to society in economic terms, we are in a better position to understand trade offs and make resource allocation decisions that enhance the value of these natural assets rather than degrade it.

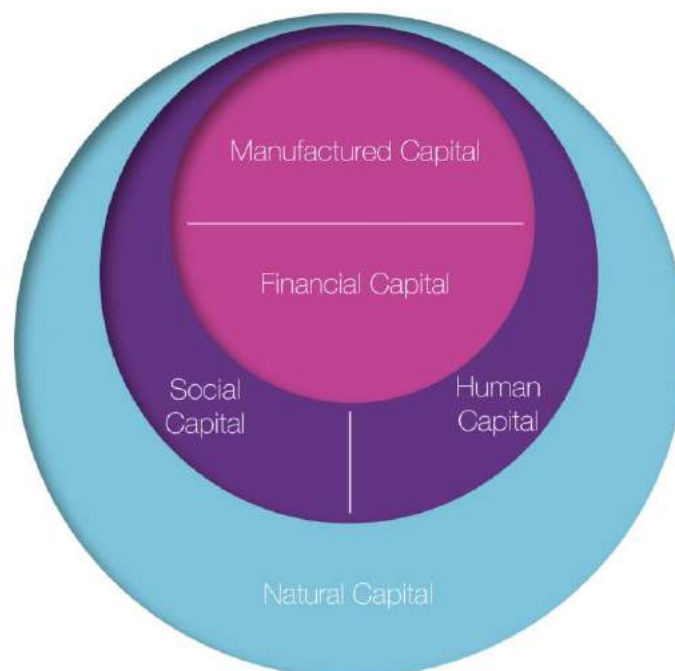


Fig 1: The Five Capitals: manufactured, financial, social and human capital are embedded in natural capital

While the mention of natural capital on p73 under 'Bioeconomy' seems misplaced and does not make sense, the IFNC strongly welcomes the sub-chapter 8.3 'Protecting, conserving and enhancing our natural capital'. However, this sub-chapter deals in the first instance with the ecosystem services of water purification and flood mitigation without also calling for assessment or investment mechanisms to 'protect, conserve or enhance' the assets that provide those services (e.g. wetlands, forests, hedgerows, rivers). In the second instance, it deals with green infrastructure, where the acknowledgement of the 'environment' as an

asset that can deliver long-term benefits is very welcome. However, this section could be strengthened by articulating the need for a natural capital approach to assess these assets, understand their risk status, measure the value they provide to the economy, or develop investment mechanisms to lock in long-term benefit. While Figure 8.3 'The Landscape Wheel' is useful, it could benefit by incorporating the Total Economic Value of natural capital (Fig 2) and the full range of ecosystem services it delivers (Fig 3).

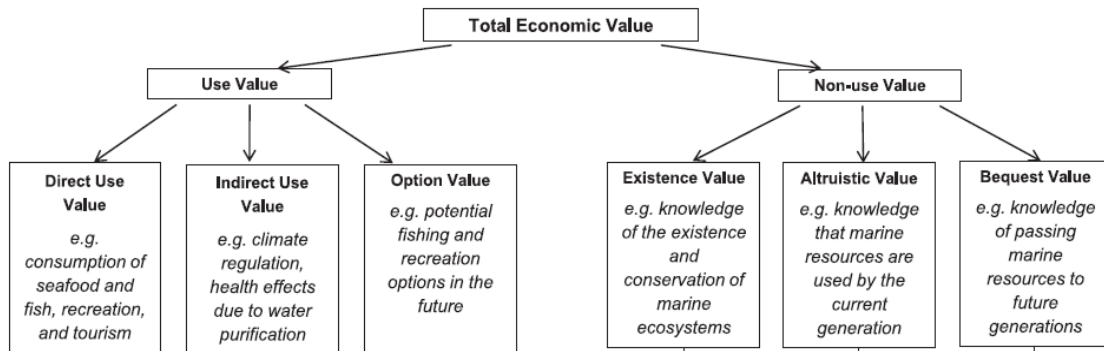


Fig 2 – Total Economic Value

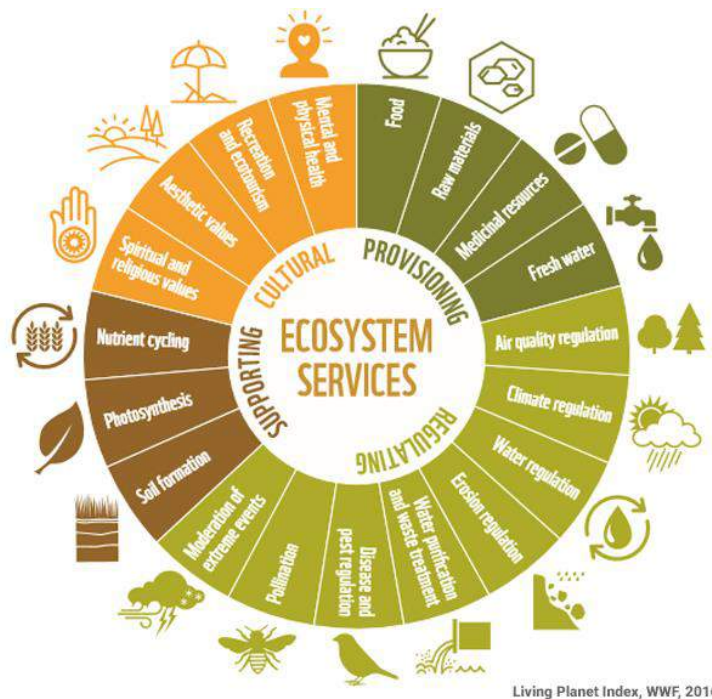


Fig 3: Ecosystem Services (note that the supporting services are fundamental to the delivery of regulating, provisioning and cultural services)

The Framework relies heavily on traditional regulatory mechanisms such as SEA, EIA and AA to integrate environmental considerations into decision-making. Were the Plan to be ambitious and proactive, it would call for measures and tools to embed natural capital into decision-making. This should be underpinned by a commitment to ensure investment in natural capital – both in the developing and applying the approach at national and local authority levels nationwide, and in actual capital maintenance and enhancement of the assets themselves – in order to move us well beyond the current regulatory regime and towards an integrated system of environmental management.

The potential of the natural capital approach will not be realised without Ireland-specific research to test international approaches, tools and methodologies at landscape scale and develop case studies that can be applied to the decision-making process. A pilot project has already been scoped by the IFNC following a workshop that included representatives from NPWS, DCCA, EPA, OPW, Fingal Co. Co., Intel, Eirgrid, TCD, NUIG, UCD, DCU and many others. The IFNC would welcome the opportunity to present this multi-disciplinary, multi-institutional pilot project to the Department and/or deliver a workshop on the natural capital approach.