

Feedback on Tracked Changes to the First Revision of the National Planning Framework July 2024 (FR NPF 2024)
Cork County Council Ecology Office Comments (including NIR)

Objective No	Objective	Previous NPO	Ecology Office Comments
Cork County Council notes the revised targets as set out in the NPF which aim to provide for increased growth and development nationally as well as in Co. Cork. We welcome the references in the revised NPF to the 4th Biodiversity Action Plan, the National Climate Plan, the Nature Restoration Law and the upcoming National Nature Restoration Plan in the revised NPF. To strengthen linkages between the National Biodiversity Action Plan and to ensure implementation of mitigation measures required to avoid impacts on biodiversity generally and on EU sites in particular (as set out in the NIS for the plan), we have some recommendations for amendments to existing draft objectives and for the addition of new objectives as follows:			
31	Facilitate the development of the rural economy, <i>in a manner consistent with the national climate objective</i> , through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting <i>biodiversity and</i> the natural landscape and built heritage which are vital to rural tourism.	23	Suggest rewording: Facilitate the development of the rural economy, <i>in a manner consistent with the national climate</i> and biodiversity protection <i>objectives</i> , through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting <i>biodiversity and</i> the natural landscape and built heritage which are vital to rural tourism.
34	<i>Support the agri-food industry in promoting Ireland's continued food security in a manner that ensures economic, environmental, and social sustainability while ensuring progress in achieving targets in the National Climate Action Plan and the River Basin Management Plan.</i>	New	Suggest rewording: <i>Support the agri-food industry in promoting Ireland's continued food security in a manner that ensures economic, environmental, and social sustainability while ensuring progress in achieving targets in the National Climate Action Plan and the River Basin Management Plan and the National Biodiversity Action Plan.</i>
55	<i>Support the development of coastal management plans 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>	New	Suggest clarification. At what level, national, regional or local are these plans to be prepared. Who will be preparing them. How will they align with RSES and CDP's When will they be prepared?

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67	<i>The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.</i>	52	Noble aspiration. Would be useful to clarify how environmental limits are to be identified.
74	<i>Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.</i>	New	Suggest rewording: <i>Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, and forestry while protecting biodiversity and the environment. Seek opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.</i>
78	<p><i>Enhance water quality and resource management by preventing or mitigating the risk of flooding by:</i></p> <ul style="list-style-type: none"> <i>Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.</i> <i>Taking account of the potential</i> 	57	Suggest cross reference to obligations on OPW as set out in NBAP 2D7- i.e. development of Nature based solutions for catchment management.

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	<p><i>impacts of climate change on flooding and flood risk and consideration of the Flood Risk Management Climate Change Sectoral Adaptation Plan.</i></p> <ul style="list-style-type: none"> Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process. <p><i>Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places.</i></p>		
81	<p><i>Integrated planning for Green and Blue Infrastructure will be incorporated into the preparation of statutory land use plans while maintaining ecosystem services and ecosystem functions and conserving and/or restoring biodiversity.</i></p>	58	<p>Suggest rewording: <i>Integrated planning for Green and Blue Infrastructure will be incorporated into the preparation of statutory land use plans while with the objective of protecting, maintaining and developing ecosystem services and ecosystem functions and conserving and/or restoring biodiversity.</i></p>
82	<p><i>Identify and strengthen the value of greenbelts and green and blue spaces at a regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.</i></p>	62	<p>Suggest NPF include targets for percentage of land within specified boundaries (settlement boundaries, green belts, MD's) to be set aside for GBI and also target for percentage of tree cover to be maintained / established within settlements.</p>

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83	<i>In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation of the National Restoration Plan.</i>	New	Suggest rewording: <i>In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation and implementation of the National Restoration Plan.</i>
84	<p><i>In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:</i></p> <ul style="list-style-type: none"> <i>Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts, in statutory land-use plan.</i> <p><i>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.</i></p>	New	<p>Suggest rewording: <i>In line with the National Biodiversity Action Plan, the conservation, enhancement, restoration and where necessary mitigation of impacts on biodiversity is to be supported by Integrating policies and objectives for the committing to the</i></p> <ul style="list-style-type: none"> <i>protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts; and</i> <i>the retention of existing habitats and/or sites which are important for maintaining biodiversity (at local/ regional/ national/ international levels).</i> <p>into Statutory Land Use Plans.</p>

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85	<i>In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address no net loss of biodiversity within their plan making functions.</i>	New	<p>Suggest rewording: <i>In line with the objectives of the National Biodiversity Action Plan, Planning Authorities should seek to address shall commit to ensuring that there is no net loss for biodiversity within their functional areas arising as a result of their planning and development functions.</i></p> <p>Note: The NIS commits the Department to the development of guidance to assist Planning Authorities to achieve the objective of working towards no net loss of biodiversity as a necessary mitigation to ensure the avoidance of impacts on EU sites. It is recommended that the commitment to the preparation of such guidelines be included in this objective and cross referenced to the NBAP objective 3C2.</p> <p>Consider also amending objective to require LAs to aim for Biodiversity Net Gain rather than No Net Biodiversity Loss.</p>
86	<p><i>Enhance the conservation status and improve the management of protected areas and protected species by:</i></p> <ul style="list-style-type: none"> <i>Implementing relevant EU Directives to protect Ireland's environment and wildlife and support the objectives of the National Biodiversity Action Plan;</i> <i>Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites;</i> <i>Continued research, survey programmes and monitoring of habitats and species.</i> 	59	<p>Suggest rewording committing to the resourcing of Regional and Local Authorities to support the implementation of the National Biodiversity Action Plan, County Biodiversity Action Plan and National Restoration Plan.</p>

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Recommendations for Additional Objectives:

1. Include NBAP Vision for Biodiversity and the National Climate Objective as overarching guiding principles of the NPF.
 - **National Climate Objective: Achieve a competitive, low-carbon, climate-resilient, biodiversity rich and environmentally sustainable and carbon neutral economy by 2050.**
 - **NBAP Vision: Biodiversity in Ireland is valued, conserved, restored and sustainably used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits for all people.**
2. Include an objective to reflect action 3C2 of the NBAP - OPR Biodiversity Guidance – link to mitigation measure specifying the development of such guidance in the NIS.
3. Include an objective to reflect action 3C3 of the NBAP i.e. need for alignment of RSES, CDP's and LAPs with NBAP.
4. Include an objective committing to alignment of the National Land Use review with the objectives of the NBAP.
5. Include a timebound commitment for the designation of Marine Protected Areas.

Observations on Mitigation Measures Set out in Draft Revised NPF - Natura Impact Statement

1. There is an overarching mitigation measure set out in the NIS for the revised NPF which commits to the identification, describing and mapping of ecological corridors and stepping-stones outside of EU sites. The measure relies on account being taken by Planning Authorities of these corridors during plan preparation and project consenting. It is suggested that this mitigation could be achieved through the development of County Biodiversity Action Plans and or Green Infrastructure Strategies, therefore, it is assumed that it is expected that this measure would be implemented at County Level. In order for this mitigation to be successful, and for Local Authorities to remain in compliance with same, the exercise of identifying, mapping and describing ecological corridors outside EU sites, will need to be completed on a timeline which allows it to inform the next round of plan making and land use zoning. We recommend that this measure would be included as an objective within the NPF and that the linkage of this to the AA process be made clear in the plan (cf Objectives 83, 84, 85 and 86). Guidance and resourcing will be required to ensure that this exercise is carried out to a high standard and in a consistent manner across the state. It is recommended that the NPF would include commitments to provide for same.
2. There is a commitment in the NIS mitigation measures to the preparation and publication by the Department of a science-based methodology by which no net loss can be demonstrated for Local Authorities land use planning remit. It is stated in the NIS that the mitigation will address viable options/mechanism to address losses where these are identified at a project level. It is desirable that this guidance would be prepared and delivered in advance of the next CDP cycle to ensure Planning Authorities remain in compliance with the mitigation measures specified within the

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			NIS established for the revised NPF. It is recommended that Objective 85 of the plan itself would include this commitment.

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