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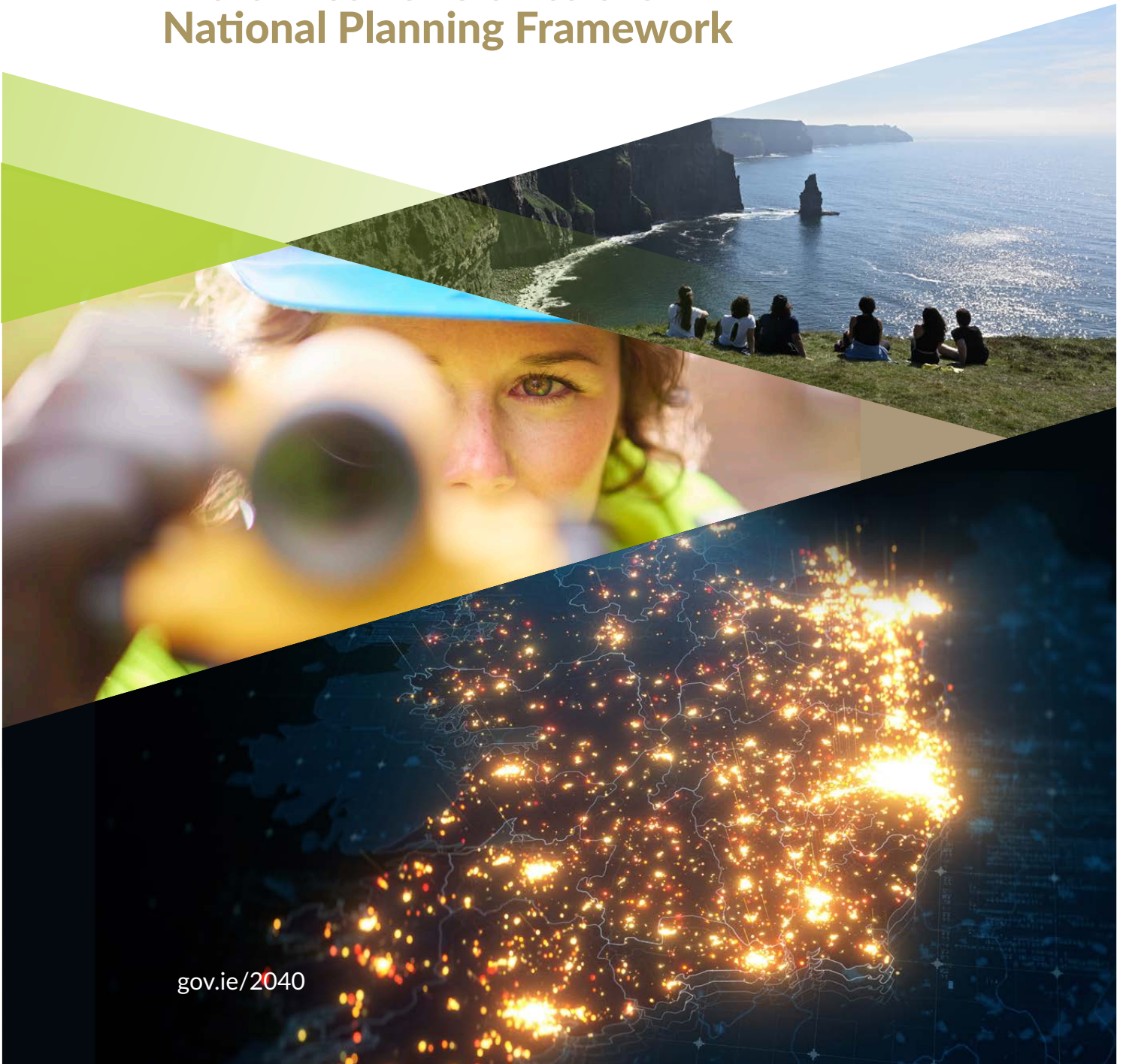


National  
Planning  
Framework

# Strategic Environmental Assessment Non - Technical Summary

Project Ireland 2040

**Draft First Revision to the  
National Planning Framework**



[gov.ie/2040](https://gov.ie/2040)

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# 1 INTRODUCTION

RPS was commissioned by the Department of the Housing, Local Government and Heritage (DHLGH) to assist in undertaking a Strategic Environmental Assessment (SEA) of the draft first revision to the National Planning Framework (NPF, hereafter also referred to as 'the draft Plan') in accordance with the requirements of EU and national legislation on the assessment of the effects of certain plans and programmes on the environment.

The purpose of this SEA is to: inform the development of the draft Plan; identify, describe and evaluate the likely significant effects of the draft Plan and its reasonable alternatives; and provide an early opportunity for the statutory authorities and the public to offer views on any aspect of this environmental report and accompanying draft Plan documentation, through consultation. This is the Non-Technical Summary (NTS) of the Environmental Report of the draft Plan.

The NPF is the Government's high-level strategic plan for shaping the future growth and development of Ireland out to the year 2040. The NPF was first published in 2018 and has since been significantly influenced both by the evolution of planning policy at national, regional and local levels, and development patterns and trends across the country.

The Planning and Development Act 2000 (as amended), under Section 20C, requires the Government to either revise, replace or state why the Government has decided not to revise the NPF, every six years after the publication of the NPF. The Government decided in June 2023 to undertake a revision to the NPF, in recognition of the need to account for particular changes which have taken place since 2018 which require consideration in the context of potential amendments to the current framework.

The DHLGH is leading the preparation of the draft first revision of the NPF on behalf of Government with input from other departments and agencies which themselves are tasked with developing land-use planning policy. The purpose of this inclusive approach is to allow shared national development goals, including competitiveness and environmental sustainability, to be more broadly considered with the intention of providing greater clarity for all stakeholders. The DHLGH is also the competent authority for the purposes of the SEA process.

## 2 CONTENTS AND MAIN OBJECTIVES OF THE DRAFT PLAN

### 2.1 Background

In 2018, the NPF replaced the National Spatial Strategy as the overall spatial planning and development strategy for Ireland. The NPF, together with the National Development Plan, combine to form Project Ireland 2040, the overarching policy and planning framework for the social, economic and cultural development of Ireland. Since the publication of the NPF in 2018 there have been a number of significant developments in relation to planning policy, guidance and legislation, as well as governance and institutional change.

In addition to the statutory mandate to update the NPF, there is also a Programme for Government (PfG) commitment to update the NPF in 2024. To achieve this, Government published *A Road Map for the First Revision of the National Planning Framework* in June 2023<sup>1</sup>, setting out what had changed, the public engagement and environmental assessment to be undertaken to support the revision, and the steps needed to inform the scope of the first revision. Two key elements feeding into the revision are the new Central Statistics Office (CSO) 2022 census data released and the outputs from an Expert Group convened by the Minister of HLGH in 2023 to provide a high-level overview of the NPF and to identify matters to be considered in the first revision of the NPF. This in turn fed into an Issues Paper prepared to inform discussion with stakeholders.

A programme for delivering the first revision to the NPF was identified with completion anticipated by the end of May 2024. However, in March 2024, the Government agreed to the deferral of the approval of a revised NPF until September 2024 under section 20C 5(b) of the Planning and Development Act 2000, as amended<sup>2</sup>.

### 2.2 Context for the Draft Plan

The NPF 2018 is currently in the sixth year of its implementation. Matters to be addressed as part of the revision to the NPF are set out in section 20C(2) of the Planning and Development Act 2000 (as amended) and relates to the identification of nationally strategic developments that have occurred since the publication of the NPF in 2018. Specifically, the draft Plan has focused on taking into account future population and employment requirements, infrastructural priorities, environmental conservation, co-ordination with marine planning and the promotion of sustainable settlement and transportation regarding climate change.

In 2023, the Expert Group's report examined the overall approach of the NPF in the face of the evolving trends which had developed over the intervening five years since the NPF was launched in 2018. In undertaking this review, the Expert Group concluded that the original NPF had remained a strong policy framework with relevance in the face of key drivers of change. However, it acknowledged three broad areas where further strengthening would be needed, notably:

- Targets should be critically reviewed, and consideration given to making them more ambitious and more clearly defined;
- The bodies involved and their roles in the implementation of the NPF should be clarified and strengthened in the first revision (particularly in relation to the Metropolitan Area Strategic Plans [MASPSs]) and mechanisms put in place for more detailed measurement and monitoring of the progress on implementation of the NPF First Revision; and
- There should be greater coordination at whole-of-government level across all infrastructure projects (including the infrastructure projects supported by the National Development Plan (NDP)) and new efforts made to generate broader support for national spatial planning across all of society.

The Expert Group Report proposed *13 recommendations* addressing the broad areas for strengthening the NPF through the revision.

<sup>1</sup> [www.gov.ie/pdf/](https://www.gov.ie/pdf/)

<sup>2</sup> DHLGH, 2024. Statement from Government - 5 March 2024. Available at: <https://www.gov.ie/en/press-release/b7288-statement-from-department-of-housing-local-government-and-heritage/>



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This report along with the final Census 2022 results, informed the preparation of an 'Issues Paper' which is a stakeholder document that provides the basis for detailed examination of the main issues to be considered as a part of the draft Plan. This paper has identified the following themes relating to strategic policy issues for the first revision to the NPF:

- **Climate Transition and our Environment** – Since the publication of the NPF in 2018, the acceleration of the climate crisis has prompted an urgent response in the form of coordinated and targeted action. The revision to the NPF will consider issues of housing, employment, health, education facilities and amenities required by the growing population, along with the infrastructure required to support development in order to ensure sustainable development for our planet and future generations.
- **Population and Demographics** – The Economic and Social Research Institute (ESRI) work undertaken for the NPF in 2018 indicated that Ireland's population will grow by around one million additional people, to almost 5.7 million people by 2040. The current NPF involves planning for growth in each of Ireland's three regions as follows: Eastern and Midland Region an additional 490,000 - 540,000 people; Northern and Western Region an additional 160,000 - 180,000 people; and Southern Region an additional 340,000 - 380,000 people. The ESRI are currently undertaking demographic and econometric modelling work, taking account of the results of the 2022 Census, to update previous research on structural housing demand and produce an updated range of scenarios for long-run new household demand in Ireland.
- **Regional Growth and Ambition** – The NPF in 2018 recognised that continued investment in Dublin and the east would be critical to support the future growth of Dublin as an international city of scale in the national interest. At the same time the need for regional balance was also recognised, alongside compact growth objectives in five key cities. Consideration will be given to the targets for the regions and the cities as part of the revision, accounting for any regional development challenges and the opportunities related to the attractiveness and strengths of Ireland's three regions – for example housing, infrastructure, foreign direct investment (attraction) and enterprise development.
- **Compact Growth** – The Report of the Expert Group included a series of recommendations in relation to compact growth, including a review of the current targets and consideration for more ambitious targets given the overarching climate objectives. The draft first revision of the NPF will consider the acceptance of compact growth among the public, targets for growth and monitoring of targets going forward.
- **Digitalisation** – Small and medium-sized enterprises (SMEs) constitute the vast majority of businesses in Ireland. Planning policy which supports this sector to meet the challenges of digitalisation can make a significant contribution to the achievement of balanced regional development by enabling firms to drive productivity and innovation, open doors to new markets, and better understand and respond to their customers' needs. A proactive plan-led approach can help tackle regional disparities and prevent the creation of a two-speed economy characterised by pockets of digital exclusion and inequality of opportunity.
- **Investment and Prioritisation** – In addressing a number of the recommendations of the Expert Review Group, the draft first revision of the NPF will explore ways of strengthening the aligning of NPF/NDP interaction in the area of: Project Selection and Prioritisation; Institutional Arrangements – Roles and Responsibilities; Monitoring and Reporting; and Better Data.

## 2.3 Scope of the Draft Plan and Proposed Revisions to the NPF

The proposed first revision to the NPF is building on the vision that commenced in 2018, holding firm on the broad strategy of balanced regional development, clustered and compact growth, and improved connectivity. However, it is also seeking to update the framework based on the changes to social, economic and legislative drivers over the last five years and adapt to existing and new pressures relating to housing, provision of services, biodiversity loss and climate change among others. The draft Plan sets out the following key areas of change:

- **Demographic Change:** Since the publication of the NPF and the subsequent NPF Roadmap, the results of Census 2022 have been published. The proposed Revision is to the NPF targets, on a largely pro-rata basis throughout Ireland, additional projected population growth to 2030, in line with the current NPF strategy approach. This will effectively mean more targeted growth everywhere to 2030, including for the four Regional Cities as key elements of strategy.

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- **New Sustainable Communities:** Planned growth in the metropolitan area would be targeted towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.
- **Balanced Regional Development:** The proposed Revision to the NPF will maintain the objective of a 50:50 split of growth between the Eastern and Midland Regional Assembly (EMRA) and the Northern & Western Regional Assembly (NWRA)/ Southern Regional Assembly (SRA) Regions.
- **City-Focused Growth:** The proposed Revision to the NPF will maintain the targets for the cities; with the focus being on the need for enhanced mechanisms to support delivery in the revised strategy.
- **Compact Growth:** The National Policy Objectives 3b and 3c in NPF established a target to deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs and at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints. Examining data for housing completions in 2022, the average rate across all counties was c.60% of development taking place within settlement boundaries. The proposed Revision to the NPF will not include an increase in compact growth targets. However, greater clarity is provided in relation to the definition of 'built up area' and there is commitment to a monitoring system that will track implementation of the targets in a consistent way for all major settlements and this will facilitate potential consideration of amended targets in future revisions.
- **Climate Transition and Environment:** There has been significant development in national climate policy since the adoption of the NPF and this is reflected in new and enhanced policy approaches proposed as part of the emerging approach to the Revision. The proposed Revision to the NPF will include new policies in relation to renewable energy development to support the achievement of the national targets set out in the Climate Action Plan 2024. The proposed Revision also includes policies to ensure alignment with changes in biodiversity legislation that will contribute towards tackling the issue of biodiversity loss. The proposed Revision to the NPF will continue to promote the need to respond to known flood risks in plan-making, and highlights potential for nature-based solutions to assist with drainage and reduce risks of flooding. The likelihood of risks arising from rising sea levels in terms of coastal areas is also reflected as is the value of green and blue infrastructure.
- **Transport:** The proposed Revision to the NPF reflects updated national transport policy with a particular focus on the principles of 'avoid, shift and improve'. Specific projects and studies are referenced that are essential for improving regional and intra urban connectivity. Emerging national policy developments relating to Sustainable Mobility Policy and Transport Orientated Development are overtly supported. The important role of cycling is also highlighted, with particular emphasis on the implementation of the National Cycle Network Plan (2024).
- **Working with our Neighbours:** The 2018 NPF reflects on the ongoing cooperation and collaboration that exists between Ireland and Northern Ireland. The United Kingdom has since left the European Union. The proposed Revision to the NPF sets out objectives for strategic cooperation and investment for mutual benefit on the island of Ireland.
- **Investment and Funding:** The proposed Revision to the NPF identifies key strategic investments needed under each of the 10 National Strategic Outcomes to support the NPF strategy.
- **Implementation: Institutions and Delivery:** The proposed Revision to the NPF signals a need to consider institutional and governance reforms in order to support more balanced regional and city-focused growth and to harness capacities at regional and local levels to deliver on regional and local objectives e.g. an enhanced role for the Land Development Agency (LDA) in order to support the development of new sustainable communities.

## 3 STRATEGIC ENVIRONMENTAL ASSESSMENT METHODOLOGY

The SEA Directive – Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment – requires that an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment. The purpose of SEA, as defined in Article 1 of the SEA Directive, is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development”. In Ireland, the SEA Directive has been transposed into national legislation through S.I. No. 435 of 2004 (European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended, and S.I. No. 436 of 2004 (Planning and Development (Strategic Environmental Assessment) Regulations 2004, as amended).

### 3.1 The SEA Process

The SEA Directive requires that certain plans and programmes, which are likely to have a significant impact on the environment, be subject to the SEA process. The main objective of SEA is to ensure that the environmental effects of a plan are identified during plan development, providing the opportunity for negative environmental effects to be avoided, mitigated or compensated and for positive environmental effects to be enhanced, where opportunities arise. In this way, environmental considerations can be integrated into the preparation of plans and programmes, in this case the draft Plan. The SEA process is broadly comprised of the following stages:

- **Screening of draft Plan(completed):** The purpose of this stage of the process was to reach a decision, on whether or not an SEA of the draft Plan was required.
- **Scoping and statutory consultation for draft Plan(completed):** The purpose of this stage of the process was to clarify the scope and level of detail to be considered in the environmental assessment. This was done in consultation with the defined statutory bodies for SEA in Ireland.
- **Preparation of Draft Environmental Report (current stage):** The purpose of this stage of the process is to assess the likely significant impacts on the environment as a result of implementation of the draft Plan and consideration of reasonable alternatives. The output from this stage of the process is an SEA Environmental Report which records this assessment. Consultation on the draft Plan and Environmental Report are also part of this stage.
- **Consultation on draft Plan and associated environmental reports (next stage):** The draft Plan, SEA Environmental Report and Natura Impact Statement are published on the DHLGH website for public consultation.
- **Evaluation of Consultation Submissions:** Any submissions or comments received as a part of the public consultation will be taken into consideration during the finalisation of the Plan.
- **Preparation of SEA Statement:** The purpose of this stage of the process is to identify how environmental considerations and consultations have been integrated into the final plan culminating in the production of an SEA Statement.

#### 3.1.1 Stage 1: Screening

Screening for SEA was undertaken by DHLGH in 2023, on behalf of the competent authority (i.e., MHLGH) to determine whether the draft Plan would or would not be likely to have significant effects on the environment. Mandatory SEA is required for plans and programmes that are prepared for certain specified sectors, notably town and country planning or land use, and which set the framework for future development consent of projects listed in Annexes I and II to the EIA Directive.

Having regard to the above, it was determined by the EU and International Planning Regulation (EUIPR) Unit of the DHLGH on behalf of the Minister that the draft first revision to the NPF would be subject to SEA on a mandatory basis under Article 3(2)(a) of the SEA Directive.

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### 3.1.2 Stage 2: Scoping

**Geographical Scope:** The NPF is a national level document and is intended to give context to lower-level plans including the Regional, Spatial and Economic Strategies (RSES), City and County Development plans and Local Area Plans. As such, its geographic scope is focussed on primarily terrestrial- based activities occurring at the national to regional scale.

**Temporal Scope:** The recommendations put forward in the NPF and this revision have a longer perspective and may take a number of years / cycles to be realised and to take full effect. As a result, the time lines for assessment of long-term impacts extend beyond the timeframe of the actual plan. For the purpose of the SEA, a short-term horizon of 2030, a medium-term horizon of 2030 to 2050 and a long term horizon of beyond 2050 have been considered.

**Environmental Scope:** All of the environmental topics listed in the SEA Directive were scoped in for the assessment of the draft Plan. These are: biodiversity, flora and fauna; population and human health; land, soils / sediments; water, landscape and seascape; air; climatic factors, material assets; and cultural heritage including archaeology and architecture and the interrelationship between these factors.

Article 11(1) of the SEA Directive contains a mandatory requirement to consult the relevant environmental authorities as specified in Article 9(5) prior to making a decision on the scope and level of detail of the SEA Environmental Report. In this regard, the following bodies were provided with a scoping report in Q4 2023:

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

In parallel, consultation was also undertaken with the Department of Agriculture, Environment and Rural Affairs (DAERA), Northern Ireland.

To facilitate the scoping consultation two key approaches were undertaken: A scoping report was issued to the statutory consultees for SEA and DAERA for a four-week consultation from 7 November 2023 to 6 December 2023. During this consultation period, a Scoping Workshop was held at the Custom House in Dublin on 21 November 2023 that was attended by a wider stakeholder group. Taking into consideration feedback from SEA consultees and the wider group of stakeholders, a broad assessment of the potential for the draft Plan to influence the environment was carried out.

### 3.1.3 Stage 3: Preparation of Draft Environmental Report

This Environmental Report contains the findings of the assessment of the likely significant effects on the environment resulting from implementation of the draft Plan. It reflects the requirements of the SEA Directive and the transposed SEA Regulations by providing the following information:

- An outline of the contents of the draft Plan, main objectives of the draft Plan and its relationship with other relevant plans and programmes.
- The relevant aspects of the current state of environment, environmental characteristics of the geographical areas covered by the draft Plan, including any issues identified and their likely evolution in the absence of the draft Plan.
- Key environmental protection objectives set at the international and national levels that are relevant to the draft Plan.
- The likely significant effects of the draft Plan on different environmental parameters, mitigation measures that can help prevent reduce and as fully as possible offset any significant adverse effects on the environment with the implementation of the draft Plan, and a set of alternatives that were considered during the development of draft Plan and associated discussion regarding the preferred alternative from both Plan and environmental perspective.
- Any difficulties encountered during the assessment process, including data limitations.
- Proposed monitoring framework for significant effects identified (including uncertain effects where these could become significant).



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- Appendices, including the consultation responses tables, and SEA matrices.

This Non-Technical Summary document accompanies the SEA Environmental Report.

### 3.1.4 Stage 4: Public Consultation

Public consultation will be carried out on the draft Plan, the SEA Environmental Report and the Natura Impact Statement during Q2/Q3 of 2024.

### 3.1.5 Stage 5: Evaluation of Consultation Submissions

The submissions and comments received during the public consultation period will be reviewed and considered during the finalisation of the draft Plan. Any further revisions done to the draft Plan will be subject to further assessment.

### 3.1.6 Stage 6: Preparation of SEA Statement

An SEA Statement will be prepared and this will identify the extent to which the environmental considerations and consultations have been incorporated into the final plan and assessment of any changes that are made to the draft Plan following consultation.

## 3.2 Links to Appropriate Assessment

Although SEA Directive is the primary directive in environmental assessments for plans and programmes, an Appropriate Assessment is also undertaken for the draft Plan owing to the overlap between the two processes, particularly related to human health, biodiversity, water etc.

The EU Habitats Directive places strict legal obligations on Member States to ensure the protection, conservation and management of the habitats and species of conservation interest. Article 6 (specifically Article 6(3) and 6(4)) of the Directive) oblige member states to undertake an 'appropriate assessment' (AA) for any plan or project which may have a likely significant effect on a Natura 2000 site. The Habitats Directive has been transposed into Irish law by the Planning and Development Act 2000, as amended, and the European Communities (Birds and Natural Habitats) Regulations 2011, as amended 2021.

Regulation 42(A) of S.I. No. 293 of 2021 (European Union (Birds and Natural Habitats) (Amendment) Regulations, 2021) outlines that:

*“(1) Where the Minister proposes to undertake or adopt a plan or project which is not directly connected with or necessary to the management of the site as a European Site, the Minister shall request that a screening for Appropriate Assessment be carried out by the Ecological Assessment Unit to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the European site.*

*(2) The Ecological Assessment Unit shall carry out a screening for Appropriate Assessment under paragraph (1) before the Minister makes a decision to undertake or adopt a plan or project is taken.”*

All plans and projects that either individually or in combination with other plans, are likely to have a significant effect on any site in the Natura 2000 network i.e., those designated as Special Areas of Conservation or Special Protection Areas, collectively referred to as 'European sites', or the National Site Network in Northern Ireland, require an appropriate assessment (AA) of these effects to determine if they will adversely affect the integrity of these sites. If the effects are deemed to be significant, potentially significant, or uncertain then the plan or project must undergo Stage 2 AA.

Based on the Government's Roadmap (June 2023), the Ecological Assessment Unit (EAU) of the NPWS in the DHLGH gave early consideration to the requirement for AA under the EU Habitats Directive as transposed into Irish legislation. A formal determination on the first revision to the NPF was then made by the EAU which concluded that AA of the draft Plan would be required, and a Natura Impact Statement (NIS) should be prepared.

### 3.3 Links between SEA, AA and Plan-Development Processes

Figure 1 shows how the SEA process links to the plan-development and AA processes.

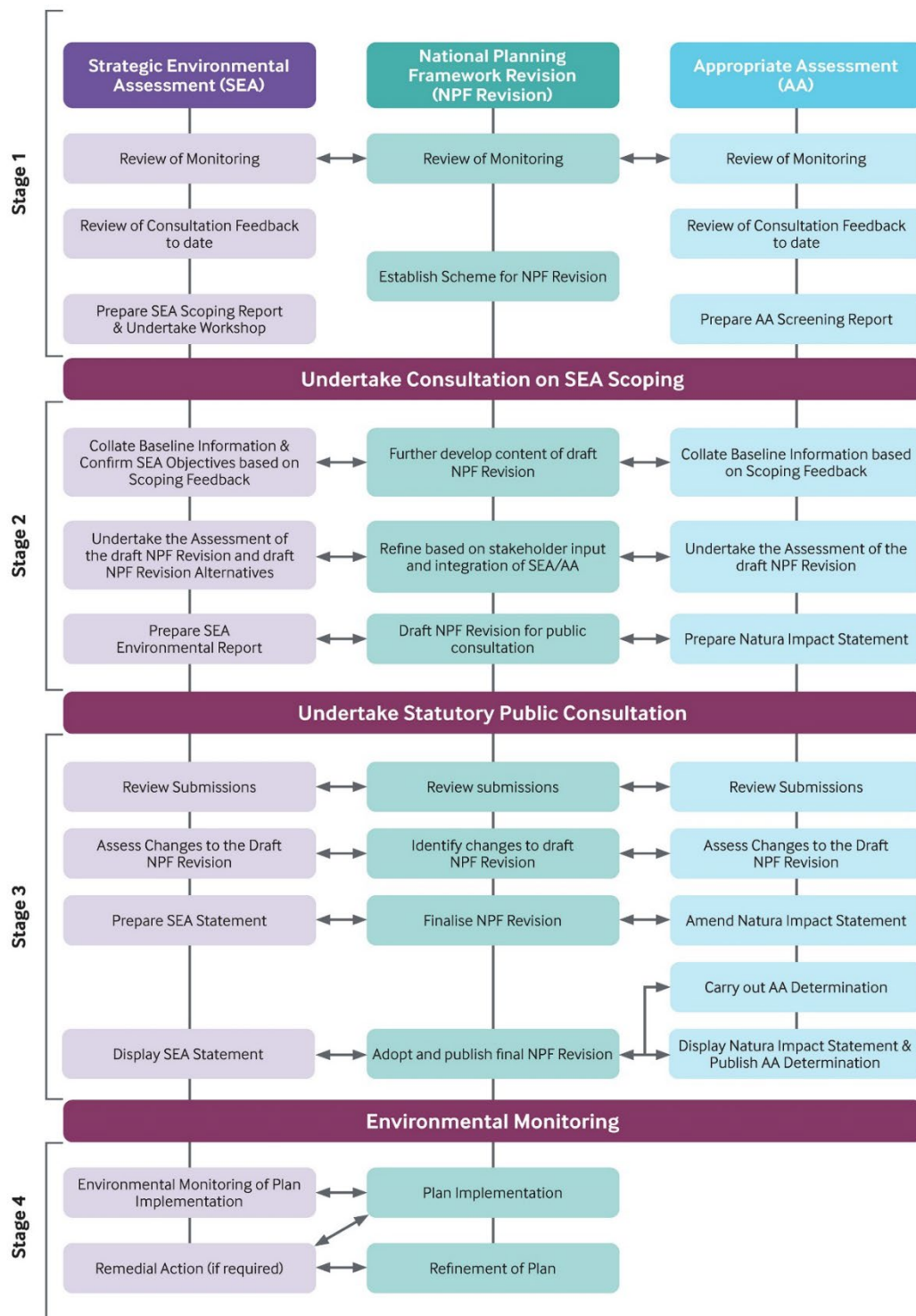


Figure 1: Interactions between SEA, AA and Plan Development Processes

### 3.4 Links to the Strategic Flood Risk Assessment

The objective of the Strategic Flood Risk Assessment (SFRA) is to ensure that flood risk is a key consideration in delivering strategic sustainable land-use planning decisions, particularly with regard to increasing resilience and promoting adaptation of existing and proposed assets, including transport, housing, commercial and service assets. The SFRA provides an assessment of all types of flood risk within a national context to assist DHLGH to make informed strategic planning decisions in respect of the first revision to the NPF in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities. In parallel with the SEA and AA processes, an SFRA is also being undertaken on the draft Plan.

### 3.5 Difficulties Encountered and Data Limitations

The main difficulties and data gaps encountered during the SEA were as follows:

- The National Landcover Map (2023), prepared by Tailte Éireann in partnership with the Environmental Protection Agency (EPA), is not yet publicly available.
- Central Statistics Office (CSO) Place of Work - Census of Anonymised Records (POWCAR) data is not publicly available.
- The SEA for the draft first revision to the NPF was completed against a backdrop of legal challenge to the NPF 2018-2023.<sup>3</sup> A determination on the legal challenge was not available during preparation of this SEA, however direction has been taken from the opinion of Advocate General Kokott published in March 2024.

No other specific data limitations or difficulties were encountered during the SEA process.

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<sup>3</sup> Friends of the Irish Environment CLG v. The Irish Government Case and Others C-727/22

## 4 REVIEW OF RELEVANT PLANS AND PROGRAMMES

The NPF is a national level document which must implement the environmental protection objectives established at European and international levels. The NPF is also intended to give context to lower-level plans and programmes and set the framework under which the lower tier plans and programmes will evolve including the Regional, Spatial and Economic Strategies (RSES), City and County Development Plans (CDPs) and Local Area Plans (LAPs) as shown in **Figure 2**. Therefore, this section has focused on relevant international, European and national to regional plans and programmes and environmental protection objectives.

The consideration of other plans and programmes commenced during the scoping phase when an initial list was included in the Scoping Report. This list was further updated to include plans and programmes suggested by the environmental authorities at the scoping consultation stage. It is not intended to be an exhaustive list but rather is focused on those considered key to the draft Plan.

In order to set a framework for exploring the relationship between the draft Plan and key plans/ programmes the following two questions were borne in mind:

- Does the draft plan contribute to the fulfilment of environmental protection objectives set in other key plans/ programmes?
- To what degree are the environmental protection objectives/ measures set in these other key plans/ programmes impacted by the draft Plan?

The suite of existing plans, policies and programmes which are particularly relevant to the draft Plan include but are not limited to:

### 4.1 Spatial Planning

The **National Planning Framework** itself along with the **National Development Plan 2021-2030** make up **Project Ireland 2040**. These documents are at the top of the spatial planning hierarchy in Ireland and set out land use policies and investment priorities at the national level and shape the national infrastructural decisions. A proposed Planning and Development Bill (2023) is currently in development, which when enacted will introduce a new planning policy hierarchy paving the way for a new national planning policy statement to set policy and provide guidance related to planning matters.

At the regional level, the Project Ireland 2040 informs the **three Regional Spatial and Economic Strategies (RSES's)** which provide the road map for effective regional development UN support the delivery of the National Policy Objectives (NPOs) contained in the NPF and inform lower level planning (County Development Plans, Local Area Plans and City Development Plans). At the strategic level, the RSES's provide a framework for investment to better manage spatial planning and economic development to sustainably grow the three regions to 2031 and beyond.

In Northern Ireland, the **Regional Development Strategy (RDS) 2035** (published in 2012) provides an overarching strategic planning framework influencing spatial development for Northern Ireland. It should be recognised that Northern Ireland accounts for approximately 27% of Ireland's all-island population. The draft first revision to the NPF outlines key areas for practical co-operation between departments and local authorities in both Ireland and Northern Ireland.

The draft first revision to the NPF directly contributes to the fulfilment of the lower tier spatial plans and sets the framework for the environmental protection objectives/measures integrated into these plans. Alignment with the Northern Ireland spatial policy is essential, particularly where there are for instance shared grid systems and natural resources (such as watercourses and marine spaces) (See **Chapter 4** of this report).



Figure 2: Ireland's Planning Policy Hierarchy



## 4.2 Sustainable Development

Ireland has been a signatory to the **United Nations Sustainable Development Goals (SDGs)**, which frame national agendas and policies to 2030. These goals are supported by Europe 2020 and European Regional Development Fund. All 17 goals have some relevance to NPF. The SDG National Implementation Plan 2022-24 continues to strengthen the implementation structures to achieve the sustainable development goals.

The **8th Environmental Action Programme** to 2030 reiterates EU's long term vision to 2050 by building upon the European Green Deal and aiming to speed up the transition to a climate neutral, resource efficient economy recognising that human well-being and prosperity depend on healthy ecosystems and set out six priority objectives which are of direct relevance to draft first revision to the NPF. The **EC Zero Pollution Action Plan for Water, Air and Soil, published in 2021** aims to provide a compass for including pollution prevention in all relevant EU policies and sets out key actions for 2021 to 2024 to complement them and relevant actions in other European initiatives, including the Chemical Strategy for Sustainability (See **Chapter 4** of this report).

## 4.3 Climate and Energy

At an international level, the **Kyoto Protocol** is the main legal instrument in reducing and limiting greenhouse gas (GHG) emissions. The Kyoto Protocol binds industrialised countries and economies to agreed individual targets by establishing a monitoring, review and verification system, as well as a compliance system to ensure transparency and hold Parties to account. The **United Nations Framework Convention on Climate Change (UNFCCC)** under this protocol seeks that countries party to the protocol adopt policies and measures on mitigation and report the progress periodically. The framework aims to stabilise GHG concentrations at a level that will help prevent dangerous human interference with the climate system. The **Conference of the Parties (COP)** is the decision-making body of the UNFCCC. **COP 21** was held in Paris in 2015. It resulted in adoption of the **Paris Agreement** that specifies the long-term temperature goal to keep the rise in mean global temperature to well below 2 °C above pre-industrial levels, and preferably limit the increase to 1.5 °C, recognising that this would substantially reduce the effects of climate change.

At European level, the **European Green Deal** is the main strategy to guide the EU towards climate neutrality by 2050 and put renewable energy at the heart of the energy system. It recognises the cross-cutting nature of climate change and the need to align policies across key areas such as renewable energy, agriculture, industry, infrastructure, and finance if the required gains are to be realised by 2050. Other key plans and programmes of relevance at the European level include the **2030 EU Climate and Energy Framework** (2014), and the **European Climate Law (Regulation (EU) 2021/1119)** which sets a binding EU target of a net domestic reduction in GHG emissions by at least 55% (compared with 1990 levels) by 2030, and undertakes to set a climate target for 2040 within 6 months of the first global stocktaking under the Paris Agreement.

The **Renewable Energy Directive [RED] (EU 2018/2001) (recast to 2030, RED II)** entered into force in December 2018 and set a target of at least 32% for renewable energy, at EU-wide level, by 2030. A further revision, **RED III (Directive (EU) 2023/2413)**, part of the **Fit for 55 Package**, has increased the target for the EU's renewable energy to 42.5% by 2030; this directive sets specific targets for Member States in the industry, transport, and building sectors. The **revised Energy Efficiency Directive [EED] (EU) 2023/1791**, came into force in October 2023 and makes it binding for EU nations to collectively reduce their final energy consumption by 11.7% by 2030, placing a strong focus on energy poverty, fully decarbonised district heating and cooling, optimisation of energy savings in the industrial sector, and an annual energy savings obligation.

The **EU Green Deal Industrial Plan** was published in 2023 to enhance the competitiveness of Europe's net-zero industry and support the fast transition to climate neutrality with an ambition for EU manufacturing capacity for net-zero technologies to reach at least 40% of expected EU demand by 2030. As a central part of the **Green Deal Industrial Plan**, the **Net-Zero Industry Act** will aim to build a strong manufacturing capacity of clean technologies, to support the creation of green, quality jobs as the EU seeks to reach climate neutrality by 2050.

The other suite of P/Ps include **Fit for 55 Package**, **REPowerEU**, and the **EU Adaptation Strategy 2021** (See **Chapter 4** of this report).

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At national level, the main policy for climate action is the **Climate Action and Low Carbon Development Act 2015**, which facilitates the approval of plans for Ireland in relation to climate change to aid the transition to a low carbon, climate resilient and environmentally sustainable economy by the end of 2050. The **Climate Action and Low Carbon Development (Amendment) Act 2021** further strengthens the governance framework on climate action, and through this Act, Ireland has set economy-wide carbon budgets and sectoral emission ceilings (SECs) for the periods 2021-25 and 2026-30 and has established pathways and the delivery approach to deliver the SECs. The **Long-term Strategy on Greenhouse Gas Emissions Reductions** sets out indicative pathways, beyond 2030, towards achieving carbon neutrality for Ireland by 2050.

The first annual Climate Action Plan of 2019 (CAP19) was formulated on a non-statutory basis. There have since been two updates building on the 2019 plan – the first in 2021 (CAP21) which set out a wide range of policies aimed at decarbonisation in relation to the particular sectors of the economy, and the second in 2022 (CAP23). The **Climate Action Plan 2024 (CAP24)** forms the latest annual update of the CAP, building upon the measures and actions of CAP23. The CAP24 outlines the actions required to 2035 and beyond to achieve the ambition of halving Ireland's GHG emissions by the end of the decade and aiming for carbon neutrality by 2050.

In addition, the **National Adaptation Framework** (first published in 2018 and revised in 2024) contains Ireland's strategy for the application of climate adaptation measures to reduce the vulnerability of the State to the negative effects of climate change, and to seek opportunities for any positive effects that may occur. There are twelve **Sectoral Climate Change Adaptation Plans** which identify the key risks faced across sectors including agriculture, biodiversity, built and archaeological heritage, transport infrastructure, electricity and gas networks, communications, flood risk management, water quality and services infrastructure and health. The plans detail the approach being taken to address these risks and build climate resilience for the future.

Local Authorities are required to prepare **Local Authority Climate Action Plans (LACAPs)** that will help ensure that the national climate objective can be achieved through all levels of the planning hierarchy.

Other key plans and programmes include the **EU Just Transition Fund (EUJTF)** that aims to assist in the transition to a climate neutral economy for territories that are most affected by climate action objectives and the **National Retrofit Plan** setting out how the government will deliver on retrofit targets. Ireland has also prepared a **National Energy and Climate Plan (NECP) 2021-2030** setting out objectives, targets and actions under the five dimensions of the Energy Union, in accordance with the **Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999**; this plan is currently being updated for finalisation and submission to the European Commission in 2024.

**EirGrid Strategy 2020-2025** which acknowledges the need for a transition of the electricity sector to low-carbon, renewable energy generation and transmission, and **EirGrid's Transmission Development Plan (TDP) 2021-2030** looking to the development of the Irish electricity transmission network and interconnection over the next few years. **Energy Security in Ireland to 2030** sets out a strategic approach to ensure a secure transition for Ireland's energy systems in line with its climate and energy objectives (See **Chapter 4** of this report).

## 4.4 Biodiversity

Ireland is a party to the **UN Convention on Biological Diversity** and thus committed to biodiversity conservation. At European level, the corner stones of biodiversity protection are the **EU Habitats Directive (92/43/EEC)** and the **EU Birds Directive (2009/179/EC)** which together sets out the environmental protection objectives for European sites. The **EU Biodiversity Strategy to 2030** aims to put Europe's biodiversity on the path to recovery by 2030 for the benefit of people, climate, and the planet. Following the COVID-19 pandemic, this updated policy aims to build resilience to future threats, including climate change, security of food supplies, forest fires, outbreaks of disease and combating the illegal trade in wildlife.

The **EU Nature Restoration Law** (approved in June 2024) aims to address the severe decline in biodiversity across the EU and to return ecosystems to good conservation condition. The rules set a binding target at EU-level where member states will have to enact restoration measures that cover at least 20% of land and sea areas of the EU by 2030. For those ecosystems that require restoration, measures must be put in place by 2050.

At national level, the vision for biodiversity in 2050 as stated in the **fourth National Biodiversity Action Plan 2023-2030** is one where "*Biodiversity in Ireland is valued, conserved, restored and sustainably used,*

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*maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people*". It sets out five objectives to help tackle issues related to biodiversity in Ireland. Other key influencing plans and programmes include the **National Peatlands Strategy 2015-2025** that sets a cross-governmental approach to managing issues that relate to peatlands, including compliance with relevant national and international environmental legislation, agreements, plans and policies influencing the peatland resource in Ireland. The strategy further informs the **National Raised Bog SAC Management Plan** which outlines the approach to be taken specifically for the conservation and management of the 53 raised bog SAC sites (See **Chapter 4** of this report).

### 4.5 Water

The suite of EU legislation including **Water Framework Directive [WFD] (2000/60/EC)**, **EU Groundwater Directive (2006/118/EC)**, **Urban Waste Water Treatment Directive (91/271/EEC)** and **Sewage Sludge Directive (86/278/EEC)** afford protection to the water resources of the Member States and aim to ensure that high-status of water quality is achieved by implementing appropriate measures. Ireland is currently in the latter stages of preparing the **3rd cycle River Basin Management Plan (RBMP)** for Ireland. The RBMP is required under the WFD for the period 2022-2027. The plan, amongst other requirements, set out the environmental improvements to be delivered during a river basin planning cycle. The plan contains water quality objectives and an **RBMP Programme of Measures** to achieve those objectives. Irish Water (now named Uisce Éireann) published its **Water Services Strategic Plan (WSSP) 2015-2040** in 2015; one of the eight objectives of the plan aims at sustainable delivery of water services, support the objectives of the EU Habitats, Birds and Water Framework Directives, and sustainable management of residual waste. The next iteration of the WSSP is currently out for public consultation. An update to the **National Waste Water Sludge Management Plan (NWSMP)** is also currently being prepared by Uisce Éireann outlining the measures needed to improve the management of wastewater sludge.

The above-mentioned Directives are given effect through some other regulations and plans/programmes in Ireland (See **Chapter 4** of this report).

### 4.6 Marine

The **Marine Strategy Framework Directive [MSFD] (2008/56/EC)** adopted an ecosystem-based approach to protect and manage the marine environment. It requires Member States to develop a strategy to achieve or maintain good environmental status (GES) in their marine waters by 2020. At national level, Ireland has developed an **MSFD Programme of Measures** that aims to meet the targets set in order to achieve or maintain GES. The **European Communities (Environmental Liability) (Amendment) Regulations 2015 (S.I. No. 293 of 2015)** extends the scope of existing environmental liability regulations to cover liability for environmental damage within the area covered by the MSFD.

Ireland's **National Marine Planning Framework (NMPF)** which was published in July 2021 forms a key decision-making tool for regulatory authorities and policy makers into the future.

As a part of Ireland's new maritime consenting regime, **Designated Maritime Area Plans (DMAPs)** will comprise portions of the maritime area that are designated for a specific use. The establishment of DMAPs will take place in line with Section 22 of the **Maritime Area Planning Act 2021**, according to an ecosystem-based approach, with full consideration for the protection of marine environment and biodiversity. The first DMAP proposal for ORE is under consultation. DMAPs for other maritime activities may also be put forward in the future.

The **Offshore Renewable Energy Development Plan (OREDP)** provides a framework for the sustainable development of Ireland's offshore renewable energy resources. Under the OREDP, Ireland is developing a suite of world class test infrastructure to encourage the development of our offshore renewable energy potential. The **OREDP II** will consider advances in technology to assess the offshore renewable energy (ORE) potential in Irish waters. It will seek to map areas most suitable for ORE using the latest data available on a range of themes including other maritime activities and marine biodiversity (See **Chapter 4** of this report).

### 4.7 Flooding

The Office of Public Works (OPW) is responsible for the implementation of the **Floods Directive (2007/60/EC)** through the **Catchment-based Flood Risk Assessment and Management Studies**

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**(CFRAMS) Programme** that help in the identification of areas vulnerable or at risk of flooding. Following the undertaking of Preliminary Flood Risk Assessments, **Flood Risk Management Plans** were developed for areas of existing or potentially significant future flood risk in Ireland, setting objectives for managing risk and a prioritised set of measures. The **Flood Risk Management Climate Change Sectoral Adaptation Plan (2019)** sets out a long-term goal for adaptation in flood risk management, along with a set of objectives and adaptation actions aimed at achieving those objectives (See **Chapter 4** of this report).

### 4.8 Waste

The **Revised Waste Framework Directive (EU) 2018/851** lays down measures to protect the environment and human health by preventing or reducing the adverse impacts due to the generation and management of waste. The **2<sup>nd</sup> EU Circular Economy Plan (CEAP) 2020** is a building block of the European Green Deal and recognises the need to accelerate the circularity transition to the mainstream economy. The CEAP identifies seven key product value chains and proposes six key actions on waste including waste reduction targets; harmonising collections; measures around substances of concern; scoping more EU-wide end-of-waste criteria; and revising shipment rules.

At the national level there are different legislation, plans/programmes that aim to achieve circularity in the waste sector. These include **Critical Raw Materials Act, 2024** that seeks to secure diversified, affordable and sustainable supplies of critical raw materials which are both strategically important and / or have associated supply chain risks; **Circular Economy and Miscellaneous Provisions Act 2022** that seeks to streamline the national processes for End-of-Waste and By-Products Decisions, tackling the delays which can be encountered by industry, and supporting the availability of recycled secondary raw materials in the Irish market; **Waste Action Plan for Circular Economy – Ireland's National Waste Policy 2020-2025** that ensures materials and products remain in use longer by rewarding circularity and discouraging waste; and the **National Waste Management Plan for a Circular Economy 2023-2030** that aims to support and supplement the wider policy base and includes specific targets, policies and actions to enable the waste and resource sector to meet the circular challenge.

Other plans include the Fourth National Hazardous Waste Management Plan (NHWMP) 2021-2027; Whole of Government Circular Economy Strategy (CES) 2021-2022 and the National Food Waste Prevention Roadmap 2023-2025 (See Chapter 4 of this report).

### 4.9 Transport and Mobility

The suite of transport Plans and Programmes (P/Ps) relevant to NPF include the Transport Infrastructure Ireland (TII) **Climate Adaptation Strategy** that outlines TII's approach to adapting to climate change and extreme weather events that will affect the National Roads network and light rail networks; **National Roads 2040 (NR2040)** that is TII's long-term strategy for planning, operating, and maintaining the National Roads network; the **National Policy Framework on Alternative Fuels Infrastructure for Transport 2017-2030** that communicates the government's longer term national vision for decarbonising transport by 2050; the **National Investment Framework for Transport in Ireland (NIFTI)** from 2021 is framework for prioritising future investment in the land transport network in Ireland to support the delivery of the NPF National Strategic Outcomes (NSOs) and the **National Ports Policy 2013** (currently undergoing revision) that aims to allow a competitive and effective market for maritime transport services.

Other transport related policy instruments of relevance to NPF include Greater Dublin Area Cycle Network Plan, National Sustainable Mobility Policy, Trans-European Transport Network (TEN-T) Policy, Transport Strategy for the Greater Dublin Area 2022-2042, Cork Metropolitan Area Transport Strategy (CMATS) 2040, Limerick Shannon Metropolitan Area Transport Strategy, Waterford Metropolitan Area Transport Strategy, Galway Transport Strategy, NTA's Active Travel Programme and the draft All-Island Strategic Rail Review 2023 (See Chapter 4 of this report).

### 4.10 Cultural Heritage and Landscape/Seascape

The principle national legislation addressing built heritage is the **Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023** that underpins the protection of Ireland's historic heritage. A draft **Strategy for World Heritage in Ireland 2024 – 2034** is out for consultation that commits to reviewing Ireland's approach to World Heritage, putting in place revised procedures for proper protection, conservation, management, interpretation, and presentation of Ireland's World Heritage Properties and Tentative List sites.



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**Heritage Ireland 2030** is a cross-Government strategic policy for heritage that sets out a framework for the protection, conservation, promotion and management of Ireland's heritage for the next decade and beyond.

The **National Landscape Strategy for Ireland (2015-2025)** was produced in line with Ireland's obligations under the European Landscape Convention. The strategy aims to assist with future decision-making processes in Ireland. A number of the actions outlined within the strategy will have a direct influence on lower planning tiers, such as the RSES's. The National Landscape Strategy will undergo review during the next period of the NPF.

Other heritage related policy instruments of relevance to NPF include Culture 2025, Archaeology 2025 Strategy: A Strategic Pathway for Ireland, Places for People – the National Policy on Architecture and Historic Towns Initiative (HTI) 2024 (See Chapter 4 of this report).

### 4.11 Land and Soil

The **Land Use, Land Use Change and Forestry (LULUCF) Regulations (EU) 2018/841** requires all Member States adhere to the 'no-debit' rule over two five- year periods and envisages efforts to increase the LULUCF carbon sink from 2030 onwards. It introduced accounting obligations for all types of land use from 2021 onwards; for wetlands, these obligations arise from 2026 onwards. Currently, there is no EU-wide legislation specifically on soil, however under the EU biodiversity strategy for 2030, the EU Commission have developed **EU Soil Strategy for 2030** with the aim of having all EU soil ecosystems in a healthy condition by 2050 (currently the Commission estimate 60% of soils are in an unhealthy state). To achieve this objective, the Commission has tabled a **Soil Monitoring and Resilience Directive**, laying down measures for monitoring and assessing soil health. The **Indirect Land Use Change (ILUC) Directive (EU) 2015/1513** amends certain provisions of the Renewable Energy Directive and the Fuel Quantity Directive, and introduced rules in 2015 in order to help lower the risk of causing indirect land use changes while also facilitating the greater use of biocrops.

### 4.12 Agriculture, Rural Environment and Forestry

The policy instruments related to agriculture of relevance to NPF include: the **Common Agricultural Policy Strategic Plan (CSP) 2023-2027** that underpins the sustainable development of Ireland's agriculture sector; **AgClimatise – A Roadmap towards Climate Neutrality** that aims develop a climate neutral food system by 2050; **Nitrates Action Programme (NAP)** that intends to help Ireland to meet its climate, biodiversity and water quality targets set at both national and EU level; **Food Wise 2025** that sets out how Ireland and the Irish agri-food sector can grow by refining its focus around these objectives; **Food Vision 2030** that aims to balance economic, social and environmental sustainability under a holistic Food Systems approach; **National Bioeconomy Action Plan 2023-2025** that sets out the vision and objectives to achieve a circular, regenerative and sustainable bioeconomy; and the **National Biomethane Strategy** that sets out the necessary policy and regulatory measures, and provides a roadmap, to developing a biomethane industry of scale in Ireland.

**Our Rural Future: Rural Development Policy 2021-2025** provides the framework to achieve the vision of transforming the quality of life and opportunity for people living in rural areas.

In terms of forestry, **Ireland's Forest Strategy 2023 – 2030** sets out a cross-societal shared national vision for forestry in Ireland. The implementation of this strategy will be achieved through the actions set out in **Forest Strategy Implementation Plan**. This implementation plan also includes the **Forestry Programme 2023 – 2027** which underpins the investment priorities for Irish forestry. Other forestry related plans of relevance to NPF include the **Coillte Strategic Vision (2022)**, **Business Area Unit (BAU) Strategic Forest Plans**, and the **Coillte Forest Estate Strategic Land Use Plan 2023-2050** (See Chapter 4 of this report).

### 4.13 Human Health, Noise and Air Quality

**Healthy Ireland 2015-2025** aims to increase the numbers of people experiencing good health (mental and physical) at all life stages; reduce health inequalities with a focus on social factors; protect the public and increase preparedness for threats to public health; and to encourage every individual and society as a whole to collaboratively engage with its own health and wellbeing. The **National Age Friendly Ireland Programme** sets out a range of policy supports, including the provision of walkable streets, housing and transportation options, providing access to key services as well as opportunities for older people to participate in community activities.

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Regulation of noise comes under the remit of the **Environmental Noise Directive (2002/49/EC) as amended**, which is transposed in Ireland through the **Environmental Noise Regulations 2018 (S.I. No. 549/2018)**. In line with the requirements of this regulation, the Local authorities publish Noise Action Plans on a regular basis.

The **Convention on Long-Range Transboundary Air Pollution (CLRTAP)**<sup>B</sup>, also referred to as the Air Convention that entered into force in 1983, aims to protect the human environment against air pollution and to gradually reduce and prevent air pollution, including long-range transboundary air pollution. It is implemented by the **European Monitoring and Evaluation Programme (EMEP)** in Europe. The **Ambient Air Quality and Cleaner Air for Europe [CAFE] Directive (2008/50/EC)** sets out the requirements for ambient air quality to protect human health and the environment as a whole and is implemented in Ireland through the Air Quality Standards Regulations 2011 (S.I. No. 180/2011), as amended.

At the national level, the **Clean Air Strategy for Ireland (2023)** sets out the detail of the seven strategic frameworks that will be used to ensure that air quality continues to improve. The **National Ambient Air Quality Monitoring Programme (AAMP) 2017-2022** involves a greatly expanded national monitoring network providing enhanced real-time information to the public and enhances local monitoring. The **National Air Pollution Control Programme (NAPCP) (2021)** outlines the pathway Ireland will follow to achieve compliance with its commitments under the **National Emission Ceilings (NEC) Directive (2001/81/EC)** and the **revised NEC Directive (2016/2284/EU)**. In 2021, the four Local Authorities of the Dublin region published the **Dublin Region Air Quality Plan** which sets out 14 measures and associated actions to address the exceedance of the nitrogen dioxide annual limit values in the region.

## 5 RELEVANT ASPECTS OF THE CURRENT STATE OF THE ENVIRONMENT (BASELINE)

The environmental baseline has been compiled using available datasets and indicators developed through scoping and review of relevant supporting documentation. It is noted that the draft Plan is a national plan, and this is mirrored in the level of detail presented for the baseline description in the main Environmental Report.

The baseline descriptions are focused in the first instance on the Republic of Ireland, however given the boundary and common geology with Northern Ireland, there is potential for environmental impact to soils, water, biodiversity, climate etc. As such the environmental baseline includes reference, where relevant, to conditions in Northern Ireland. The characteristics of areas likely to be significantly affected and existing environmental problems are summarised for each topic heading.

In the 7th and most recent state of the environment review, *Ireland's Environment – An Integrated Assessment* (EPA, 2020), the EPA outlines a summary scorecard for the progress being made across key environmental policy areas as well as the general trend/outlook. These are summarised below in **Table 1**.

**Table 1: Summary assessment and future outlook for selected environmental policy areas from the EPA State of the Environment 2020 Report and relevance to the draft Plan**

Policy Area	Summary Assessment & Outlook	Relationship to the Draft First Revision of the NPF
Climate	<p><b>Assessment:</b> <b>Very poor / significant environmental and/or compliance challenges to address</b></p> <p><b>Outlook:</b> <b>Partially on track to achieving full compliance or measures in place or planned that will improve the situation</b></p> <p>Ireland has made good progress in deploying renewable energy sources and has an ambitious National Energy and Climate Plan, and Climate Action Plan. However, Ireland continues to have a high level of greenhouse gas (GHG) emissions and remains above its EU emission limit, missing the target for 2020. Should all the actions in the Climate Action Plan be fully adopted and implemented, the targets for 2050 could be achieved. However significant challenges remain to reaching these goals.</p>	<p>Within the EPA latest emissions data (EPA, 2023<sup>4</sup>), in 2022, Ireland GHG emissions were estimated to be 60.76 million tonnes carbon dioxide, which is 1.9% lower (or 1.19 Mt CO<sub>2</sub> eq) than emissions in 2021 (61.95 Mt CO<sub>2</sub> eq) and follows a 5.1% increase in emissions reported for 2021.</p> <p>The EPA's GHG Emissions Projections report for the period 2022-2040 (June 2023) acknowledges that if all of the unmodelled policies and measures in CAP23 and the, as yet, unallocated emissions savings are included, the reduction in emissions could equate to 42% by 2030, which is closer to the 51% target for 2050.</p> <p>Notwithstanding that the EPA report from 2020 states that the CAP targets could be achieved, more recent EPA inventory data shows that Ireland is not on track to achieve these targets. The draft first revision to the NPF sets out increased targets for population growth which will impact Ireland's ability to achieve stated and committed targets in 2030 and beyond, particularly where reduced emissions cannot be secured from renewable sources to keep pace with the demands brought about by increased population growth.</p>
Air Quality & Emissions	<p><b>Assessment:</b> <b>Moderate / on track generally / local or occasional challenges</b></p> <p><b>Outlook:</b> <b>Partially on track to achieving full compliance or measures in place or planned that will improve the situation</b></p> <p>Air quality in Ireland is generally very good and consistently meets its EU limit values. There was however an exceedance in 2019 of nitrogen dioxide at a monitoring station in Dublin, and Ireland at times does not meet the more stringent limit values set by the WHO (namely of fine particulate matter). In terms of transboundary emissions, Ireland is failing to meet EU targets on ammonia emissions under</p>	<p>The two main sources of air pollution in Ireland are PM<sub>2.5</sub> from solid fuel burning and NO<sub>2</sub> from traffic emissions from internal combustion engines (i.e. vehicles).</p> <p>As noted for climate, the draft first revision to the NPF sets out increased targets for population growth which will impact Ireland's ability to reduce emissions and improve air quality unless transitioning to electric vehicles and reducing private car dependency via modal shift and public services, and by expanding the home retrofitting scheme, which will reduce dependency on solid fuel burning (such as coal, peat and wood) for space heating can keep pace with the population increases.</p>

<sup>4</sup> EPA (2023), EPA Latest Emissions data. Available at: [Latest emissions data | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/data/publications/emissions/).

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Policy Area	Summary Assessment & Outlook	Relationship to the Draft First Revision of the NPF
	the National Emissions Ceiling (NEC) Directive, of which agriculture is the main source. Progress is mixed progress in terms of reducing emissions from other sectors such as transport and energy. Measures at a national level are required to tackle this and improve the outlook.	
Water	<p><b>Assessment: Poor / environmental and/or compliance challenges to address</b></p> <p><b>Outlook: Partially on track to achieving full compliance or measures in place or planned that will improve the situation</b></p> <p>In general, trends in water quality are mixed; over the past 20 years, there has been a deterioration in the number of the highest quality water bodies, particularly rivers, and mixed progress in waters achieving the environmental objectives under the Water Framework Directive (WFD). Good progress has been made in improving wastewater treatment however issues remain. Nutrient enrichment remains the main significant issue. The outlook is also mixed, and a balance needs to be sought between a growing population and certain sectors such as intensive agriculture.</p>	<p>The majority of groundwater bodies (92%) are at Good chemical status, and nearly all are at Good quantitative status. Surface water bodies are faring less well with 56% achieving at least Good status (EPA, 2023)<sup>5</sup>.</p> <p>The draft first revision to the NPF supports the provision of services such as water and wastewater infrastructure under various capital programmes (such as the Irish Water Capital Investment Programme), which will be needed to keep pace with a growing population. Where service capacity is not developed and phased appropriately, this could lead to pressures on water bodies. Infrastructural development supported by the draft first revision to the NPF can also have environmental effects on water bodies.</p>
Nature	<p><b>Assessment: Very poor / significant environmental and/or compliance challenges to address</b></p> <p><b>Outlook: Largely not on track to meet policy objectives and targets.</b></p> <p>The assessment and outlook are overall very poor. Biodiversity losses and habitat changes continue on an international scale. EU conservation status reporting indicates generally declining trends and unfavourable status for many habitats, with 85% of habitats in Ireland assessed under the Habitats Directive having unfavourable status in 2019. Many species are faring better, but 15% of EU-listed species are in decline in Ireland, mostly freshwater species. Agricultural activities remain the key pressure. The outlook is very poor, with climate change adding to challenges and cumulative impacts.</p>	<p>Under the Climate Action and Low Carbon Development (Amendment) Act 2021<sup>6</sup>, Ireland's national climate objective requires the State to pursue and achieve, by no later than the end of the year 2050, the transition to a climate-resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy</p> <p>The draft first revision to the NPF aims to enhance biodiversity through integration of the Nature Restoration Law including peatlands / wetlands, with positive effect for climate change also.</p> <p>The draft first revision to the NPF also aims to support marine biodiversity through better alignment of developments in planning and consenting regime for the marine environment. There will be an increasing focus on developing offshore renewable energy to provide renewable energy for transport, heating etc. however this cannot be at the expense of biodiversity.</p> <p>It is acknowledged that key pressures on biodiversity also include direct and indirect land use changes resulting from increased development, infrastructure rollout, and natural resource use. A growing population, as projected and being planned for under the draft first revision to the NPF, has the potential to lead to pressures on biodiversity and ecosystem services.</p>
	<b>Assessment: Poor / environmental and/or compliance challenges to address</b>	The principles of the circular economy seek to maximise the efficiency of material use and reduce

<sup>5</sup> EPA (2023). Water Quality in 2022 – An Indicator's Report. Available at: <https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/water-quality-in-2022-.php>

<sup>6</sup> Climate Action and Low Carbon Development (Amendment) Act 2021 <https://www.irishstatutebook.ie/eli/2021/act/32/section/15/enacted/en/html>



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Policy Area	Summary Assessment & Outlook	Relationship to the Draft First Revision of the NPF
Waste & Circular Economy	<p><b>Outlook: Partially on track to achieving full compliance or measures in place or planned that will improve the situation</b></p> <p>Ireland has made excellent progress in meeting its current EU targets. The generation of waste volumes however remains tied to economic activity which has been growing in recent years. Initiatives such as producer liability and waste prevention and recycling programs have also led to improvements and landfill needs have decreased while waste-to-energy capacity has increased. Challenges remain to shift from a linear economy to a circular one, with circular principles remaining low in Ireland.</p>	<p>consumption patterns across society (including of both fossil and renewable fuel types). This will help reduce greenhouse gas (GHG) emissions and pollution to air, water and soils.</p> <p>The draft first revision to the NPF will be to support Ireland's transition to the circular economy. Compact growth and development focused within existing settlement envelopes aims to reduce material demands and pressures on greenfield sites, however there may be an increase in the amount of hazardous waste generated in the coming years where brownfield or previously industrialised sites are targeted for development.</p> <p>An growing population and planning for same also requires increased development such as, for example, social infrastructure, housing, modal options, energy infrastructure etc. There is an ongoing challenge to reduced embodied emissions in the construction sector, to move toward green building practices in the planning system, to make public/commercial and residential buildings more energy efficient and to reduce demand-side energy needs. The draft first revision to the NPF plans for projected population growth. The EPA's Final Greenhouse Gas Emissions 1990-2022 report (EPA, May 2024) states that Ireland's average GHG emission per capita over the last ten years were 12.7 tonnes. With recent CSO 2022 census data showing a population of 5.12 million people and with population projected to increase to 5.5 million in 2030, 5.9 million in 2040 and 6.2 million by 2050, per capita emissions need to reduce significantly in order to meet reduction targets. At current per capita emission levels, the EPA estimates that each additional 500,000 people would contribute an additional 6 million tonnes of CO<sub>2</sub>eq annually.</p>

## 5.1 Summary of Environmental Baseline

It is recognised that health and wellbeing are tied to a good quality environment. The overall quality of the Irish environment is generally good, as there are still environmental trends and issues that require further measures. One of the main drivers and pressures on Ireland's environment is the increasing population and increasing levels of unsustainable production and consumption place, according to the EPA's most recent state of the environment report, *Ireland's Environment – An Integrated Assessment* (EPA, 2020) <sup>7</sup>.

The CSO reports in its latest population and labour force projections that the total population is predicted to grow to between 4.74 and 5.6 million over the period 2017-2051<sup>8</sup>. Population and demographic trends present a number of policy implications for the draft first revision of the NPF. Overall, population growth is slightly ahead of forecasts with strong migration trends, which will have to be considered when modelling the migration scenario for future population growth scenario. The results of the census also show an increasingly aging and diverse population. These changes all place pressure on the provision of adequate services, particularly in the areas of housing, healthcare, and education. This in turn places demand and pressure on space, the provision of services as well as infrastructure. A potential risk to human health comes from

<sup>7</sup> EPA (2020). Ireland's Environment – An Assessment. Available at: <https://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/>

<sup>8</sup> CSO (2018). Population and Labour Force Projections 2017-2051. [Population and Labour Force Projections 2017 - 2051 - CSO - Central Statistics Office](#)

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exposure to air emissions from a range of combustion sources and burning of solid fuels for space heating. There remains an over-reliance on private cars as the main mode of transport in Ireland, and the associated tailpipe emissions.

Globally, the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) reports that the major driver of biodiversity loss and ecosystem services has been land-use change. Economic growth has, in general, not been decoupled from environmental degradation. Worldwide, over 60% of ecosystem services are being degraded or used unsustainably and this affects natural capital, resource use and climate change resiliency. Habitat degradation, climate change, pollution and invasive or alien species threaten an average of 25% of animals and plants worldwide and up to one million species face extinction as a result according to the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES)<sup>9</sup>.

In Ireland, nearly half of Ireland's habitats are assessed as being at inadequate conservation status and a large proportion are at bad status<sup>10</sup>. Aquatic habitats in particular are noted for being at poor conservation status compared to terrestrial habitats. The main pressures to terrestrial and coastal water-dependent habitats are from: pollution; drainage/cutting of peatlands and wetlands; invasive species; recreation; urbanisation; and fishing/aquaculture, among others.

The main pressures affecting Ireland's biodiversity are from: the rapid loss of biodiversity and changes to habitats in general at international level, agricultural activities and land use change, and climate change. The outlook for biodiversity in general is poor, with climate change adding to challenges and cumulative impacts. However, 17% of species in Ireland have shown an improving trend and 55% are assessed as being stable.

Ireland generally has excellent soil quality and the estimated proportion of contaminated land is relatively small. There are pressures impacting on the long-term protection and maintenance of soil and soil quality, particularly from, for example, soil sealing, compaction, erosion and decline of organic matter content. Land is also a critical resource, but is under increasing pressure from various human activities, as well as climate change. The main pressures affecting land and soil are from: future infrastructure land requirements and land use change, potential impacts on soil functions/sequestration potential as a result of land use changes, but there are also opportunities to preserve and protect natural carbon sinks e.g. through peatland rehabilitation, and increasing appropriate forest cover etc.

Overall, around 46% of Ireland's surface water bodies (river, lake, transitional and coastal) are failing to meet their objectives under the WFD<sup>11</sup>. Most of Ireland's coastal water bodies (81%) are of Good ecological status or better. Estuaries have the worst water quality with only 36% at Good or High status. Water quality issues in estuaries is driven mainly by excess nutrients/ eutrophication. The majority of groundwaters (91%) have Good status, and nearly all groundwaters have Good quantitative status; those groundwaters with Poor chemical status are mainly due to historic contamination from industrial and waste sources. Almost all of the negative trends in the water environment are driven by changes in river water quality, with the trends also indicating that water quality is getting worse.

The key pressures on surface water bodies continues to be agriculture, followed by hydromorphological issues, anthropogenic pressures (unspecified/ unknown sources), urban wastewater discharges, urban run-off, forestry, as well as other pressures. In the marine space, the key drivers of pressures and impacts arise from anthropogenic sources such as litter, climate change, noise and pollution events. Increased flows in rivers could also facilitate increased nutrient transport to the marine environment, combined with climate change, are expected to increase the risk of algal blooms.

In general, Ireland has good air quality and generally meets its EU emissions limit values. However, monitoring indicates that some pollutants are exceeding the stricter World Health Organization (WHO) guideline values e.g. fine particulates and ground-level ozone, indicating that air quality problems may be more widespread in Ireland than previously thought. In Ireland, it is estimated that there are approximately 1,300 premature deaths per year, attributed to air pollution, mainly related to PM<sub>2.5</sub>, the main sources of

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<sup>9</sup> IPBES (2019) Summary for policymakers of the global assessment report on biodiversity and ecosystem services. Available at: <https://zenodo.org/records/3553579>

<sup>10</sup> The Status of EU Protected Habitats and Species in Ireland, NPWS 2007 (Vol 1-3), 2013 (Vol 1 -3) and 2019 (Vol 1-3).

<sup>11</sup> EPA (2022). Water Quality in Ireland 2016 – 2021. Available at: <https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/water-quality-in-ireland-2016--2021-.php>

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which are road transport in cities and biomass burning in villages and towns<sup>12</sup>. In terms of transboundary emissions, Ireland is failing to meet its EU targets on ammonia emissions, of which agriculture is the main source. In addition, non-methane volatile organic compounds are projected to be just over the 2030 emission ceiling limit.

In Ireland, and in line with global patterns, annual average temperatures are now approximately 0.9°C higher than they were in the 1900s. The planned phasing out of fossil fuels and deployment of renewable energy resources will require large-scale public and private investment in energy infrastructure, energy efficiency and innovative management systems. The most recent EPA GHG emissions inventory and projection reports published in 2024 have highlighted the challenges that Ireland faces in achieving the scale and pace of GHG emissions reductions required to stay within the first two carbon budgets and reduce emissions by 51% relative to the 2018 baseline reference year. The EPA GHG inventory for 2022<sup>13</sup> shows that total national emissions in 2022 (including from LULUCF) were just 2.7% below the 2018 reference year. Of Ireland's carbon budget for 2021-2025, 47% has been used up in the first two years. If Ireland is to stay within the first carbon budget, a challenging annual reduction of 11% is now required for 2024 and 2025<sup>14</sup>.

The projected growth in the population out to 2051 will place pressure on material assets in terms of delivering sufficient services and infrastructure, as well as increased demands on energy for heat, transport and electricity. The planned phasing out of fossil fuels and deployment of renewable energy resources will require large-scale public and private investment in energy infrastructure, energy efficiency and innovative management systems. Enabling better energy efficiency in buildings would help to reduce the pressure on energy resources, coupled with the need for demand-side reductions in electricity demands also.

In order to secure transition to high levels of renewable energy over the coming decades for Ireland and Northern Ireland, further new electricity generation will be required. A balanced portfolio of new capacity is required such as the need for new cleaner gas fired generation plant for when solar and wind generation is low. While significant progress has been made in recent years to increase the proportion of renewable energy generated, Ireland continues to remain heavily reliant on fossil fuels, which accounted for 85.8% of all energy used in Ireland in 2022.

In terms of the State's circularity rate i.e. the ability to keep materials in use and avoid continued extraction of primary raw materials, Ireland is currently performing poorly, and Ireland's circular material use rate was 1.8% as of 2020, compared to an EU average of 12.8%<sup>15</sup>.

Development activities resulting from the implementation of the policies in the draft Plan may place pressure on sites or features of cultural importance or landscape and seascape with scenic and/or amenity value. Existing pressures on heritage includes unsustainable development of areas and impacts of climate change that may result in structural damage to monuments and historic buildings, structures being impacted by coastal erosion, exposure and erosion of archaeological sites and flooding of historic urban areas. Existing pressures on landscape and visual resources are primarily related to impacts to sensitive views and landscapes resulting from the secondary impacts from the siting of development.

## 5.2 Existing Environmental Problems Relevant to Draft Plan

Having regard to the information collated regarding the environmental baseline, the key environmental problems with relevance to the draft Plan include but are not limited to:

- Insufficient capacities in water, wastewater and other services.

<sup>12</sup> EPA (2023). EPA Air Quality in Ireland 2022. Available at: [Monitoring & Assessment: Air Publications | Environmental Protection Agency \(epa.ie\)](#)

<sup>13</sup> EPA (2024) – Latest Emissions Data [Latest emissions data | Environmental Protection Agency \(epa.ie\)](#) Note: The Latest Emissions Data page presents final 1990-2022 Inventory data

<sup>14</sup> SEAI (May 2024) Highlights from the Interim National Energy Balance 2023. Available at: [SEAI Key Publications | National Energy Balance](#). Note: The full 2023 National Energy Balance 2023 is scheduled for publication in September 2024.

<sup>15</sup> EPA (2022) National Waste Statistics Summary Report for 2020. Available at: <https://www.epa.ie/publications/monitoring--assessment/waste/national-waste-statistics/national-waste-statistics-summary-report-2020.php>

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- A gradual erosion of habitats, disturbance and loss of species, interruption of migration routes and deterioration in environmental quality such as air and water quality.
- Pollution of soils, disturbance of contaminated sites/lands, and loss of greenfield sites.
- Pollution of water bodies through nutrient enrichment, chemical pollution, increases in suspended solids especially during construction, changes in hydromorphology and barriers to species movements.
- Deterioration of air quality from generation of dust e.g. arising from development and infrastructure construction and operation activities, as well as generation of fine particulate matter e.g. from tailpipe emissions solid fuel burning, as well as release of polluting substances such as nitrogen oxides.
- Loss of carbon sinks for development land, emissions of greenhouse gases from construction and operational activities (building material, transport, processes) and increasing risk of flooding (both from climate change and from inappropriate siting of development/infrastructure).
- Loss of greenfield lands for development, unsustainable use of natural resources, low circularity rates and generation and export of waste.
- Loss of and/or disturbance to known and unknown archaeology and built heritage, or effects on historic setting due to siting of development/ infrastructure.
- Visual intrusion on sensitive receptors and changes in landscape character as a result of the location, nature and scape of development.

### 5.3 Inter-relationships between the Environmental Factors

In accordance with the SEA Directive, the interrelationship between the SEA environmental topics have been considered in the SEA assessment. Examples may be obvious such as the inter-relationship between water and biodiversity through water dependant ecosystems, but it may also be more obtuse e.g. cultural heritage and biodiversity. Many heritage assets provide areas of key habitat in themselves or secondarily through their influence on surrounding landscape character. In the riverine, or canalised environment bridges, banks and historical wreckage can provide discrete areas of special habitat.



## 5.4 Evolution of the Baseline in the absence of the Draft Plan

The SEA legislation requires that consideration is given to the likely evolution of the current baseline where implementation of the draft first revision to the NPF does not take place. **Table 2** summarises the key points.

**Table 2: Likely Evolution of the Baseline without Implementation of the Draft First Revision to the NPF**

Environmental Discussion on the Evolution of the Baseline in the Absence of the draft Plan Area	
<b>Population and Human Health</b>	<p>Recent CSO 2022 census data indicates Ireland has a population of 5.12 million people, with the population projected to increase to 5.5 million in 2030, 5.9 million in 2040 and 6.2 million by 2050. The draft first revision to the NPF estimates that Ireland will be home to an additional one million people by 2040. These projected population increases will continue to increase pressure on land use, water/ wastewater and transport services, as well as social services such as education and healthcare provision. In the absence of the draft first revision to the NPF, this increased pressure will not be accounted for in terms of integration with evolving policy, giving rise to pressure on existing infrastructure and inadequate provision for future changes.</p> <p>The draft first revision to the NPF offers the opportunity to take stock of what has worked and not worked over the intervening years since the adoption of the first NPF in 2018. In the absence of the revision, there would be a lack of updated response to consider population distributions, demographic growth/changes and the balance of same. Legacy development patterns, such as peripheral growth in and around settlements, would continue unchecked in the absence of revisiting the national policy in relation to compact growth and a reconsideration of strategic 'how much and where' that is being outlined under the draft first revision to the NPF.</p> <p>Ireland's green and blue spaces, which include urban parks, coasts, lakes, rivers, forest and bogs, also contribute to overall health and wellbeing. The draft first revision to the NPF offers the opportunity to mainstream consideration of blue and green infrastructure and Nature-based Solutions into the planning policy hierarchy which will then influence the regional and county/local planning tiers.</p>
<b>Biodiversity, Flora and Fauna</b>	<p>In the absence of the draft first revision to the NPF, the fourth National Biodiversity Action Plan 2023-2027 would continue to be implemented. However, biodiversity loss is recognised as part of the 'triple planetary crises' which includes pollution and climate change. The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) in its report, Regional Assessment Report on Biodiversity and Ecosystem Services for Europe and Central Asia (IPBES, 2018) states that the major driver of the loss of biodiversity and ecosystem services to date has been land-use change, coupled with the impacts of climate change, and that economic growth in general has not yet been decoupled from environmental degradation. The UN Environment Programme (UNEP) also reports that the intensity of the global food system is the primary driver of biodiversity loss worldwide. The National Biodiversity Data Centre (NBDC) also highlights the serious deterioration in the health of Ireland's ecosystems, with the majority of protected habitats in poor or inadequate condition, and with 14% of species considered to be endangered.</p> <p>Without the draft first revision to the NPF, the pressure on aquatic and terrestrial flora, fauna and habitats is likely to continue with key drivers from development and land-use changes in addition to intensification of agriculture through initiatives such as Food Vision 2030. This is likely to lead to habitat loss and/ or fragmentation. In addition, there are changes expected to occur through climate change that may alter species and habitat ranges, with potential for range expansion of some invasive alien species which are an increasing concern. In the absence of the draft first revision to the NPF, measures to address these pressures may not be coordinated or focussed in relation to the most sensitive habitats and species leading to permanent loss of key species.</p>
<b>Land and Soils</b>	<p>In the absence of the draft first revision to the NPF, the soils, geology and hydrogeology environments would continue to exist in much the same pattern. Ireland generally has excellent soil quality and the estimated proportion of contaminated land is relatively small; the EPA State of the Environment Report 2020 states that nationally soil quality is not significantly impacted by contamination issues. To date, there is no legislative or regulatory framework at EU or national level for the protection of soils specifically. At EU level, soils do not have the same level of legal protection as air quality, water quality, or biodiversity. However the EU has proposed to introduce a Soil Monitoring Law.</p> <p>Without the implementation of the draft first revision to the NPF, other legislation and national level plans and programmes will continue to be implemented. This will include for instance the Forestry Programme 2023-2027, Coillte Strategic Vision, Common Agricultural Policy Strategic Plan 2023-</p>

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**Environmental Discussion on the Evolution of the Baseline in the Absence of the draft Plan Area**

2027, Nitrates Regulation and Nitrates Action Programmes, National Peatlands Strategy and Bord na Móna Bog Rehabilitation Scheme, among others. Ireland is also implementing the revision to the Land Use, Land Use Change and Forestry (LULUCF) Regulation (EU) 2018/841, which aims to address greenhouse gas (GHG) emissions and removals from the LULUCF sector.

In terms of land use planning, all development activities require a land footprint and/or some form of land use change to accommodate development, whether for transport, energy or social services infrastructure. Demands on the land resource will increase over time in tandem with infrastructure services demands and general resource consumption patterns. Any greenfield development will lead to some loss of the soil/land resource via effects such as soil sealing, which the EPA recognises is a key pressure on the national soil resource.

However the implementation of the draft first revision to the NPF offers the strategic national policy basis to address urban sprawl, which would continue in a more uncontrolled fashion in the absence of NPF policies and targets on compact growth in particular.

**Water**

In the absence of the draft first revision to the NPF, water quality in Ireland will continue to be addressed in line with efforts being made by the River Basin Management Plan and its Programme of Measures throughout Ireland, though the general trend for water quality in Ireland is of decline. The top sources of significant pressures affecting water bodies at risk of achieving their WFD objectives are agriculture, followed by hydromorphological issues, anthropogenic pressures, urban wastewater, urban run-off and forestry, among others. While agriculture remains the main driver of issues, other top drivers of pressures on the water environment are urban-type pressures and anthropogenic pressures can include nutrient, organic and sediment pollution as well as chemical and microbiological issues.

These aspects are relevant for the draft first revision to the NPF as its policy base supports a wide range of sectoral activities. Water bodies impacted by diverse pressure sources means there is less resiliency for the water environment in general to absorb additional pressures. Such pressures are also made more difficult to address in the face of changing environmental conditions such as climate change impacts (increased water temperatures, changing pH, droughts and low river/lake levels etc.). Pressures also arise from the demands placed on the water environment to serve a growing population e.g. the need for new water sources to supply sufficient headroom for the existing population, as well as catering for growth demands. A number of urban areas also continue to not meet the full requirements of the EU Urban Waste Water Treatment Directive, and a number of agglomerations continue to discharge raw sewage into receiving waters.

In the absence of the draft first revision to the NPF, there would be less opportunity and coordinated action to consider the growth needs of the country and to set out national policy that affirms the need for the required levels of investment in water supply and wastewater services infrastructure in particular, not just for current population levels, but for the projected growth.

**Air Quality**

Air quality in Ireland is of a good standard generally across the country when examined from a national level, meeting most EU air quality standards. However some pollutants are consistently above the stricter WHO limits, such as particulate matter, nitrogen dioxides and ozone. Localised air quality issues remain, particularly in built-up areas, where burning of solid fuel (such as wood, peat and coal) as well as tailpipe emissions from vehicles are key sources of air pollution.

Existing programmes such as the National Clean Air strategy and the implementation of the National Air Quality Monitoring Programme, as well as the EU's move to adopt the stricter WHO air quality guideline values are expected to lead to air quality improvements.

As compact growth is a key aspect of the NPF, air quality issues may compound as more people are concentrated into built-up areas, particularly where the implementation of other wider policy measures are not occurring at the same pace, such as modal shift (to public transport, active travel or electric vehicle rollout), and rollout of renewable energy and shift towards electrification for power generation and heating, particularly in the built environment.

However the implementation of the draft first revision to the NPF allows for these important considerations in national land use planning policy.

**Climatic Factors**

As a result of anthropogenic greenhouse gas (GHG) emissions, climate change is predicted to occur in the future regardless of action. The UN Intergovernmental Panel on Climate Change predicts sea level rise, changes in rainfall patterns and temperatures as well as changes in the frequency of droughts and extreme weather events, such as increased flooding. The potential impacts from sea level increases, increased flooding, summer droughts, etc. may impact on the resiliency of infrastructure and the environment more generally. The scale and pace of change needed to realise Ireland's national and EU targets is highly challenging. The sectoral emissions ceilings and carbon budgets have also been placed on a statutory basis, and they constrain total fossil fuel energy use.

In the absence of the draft first revision to the NPF, other national level plans would continue to be implemented such as the annual Climate Action Plans (CAPs), which have been placed on a

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### Environmental Discussion on the Evolution of the Baseline in the Absence of the draft Plan Area

statutory basis since 2021, and the national Long Term Strategy on Greenhouse Gas Emissions Reductions (July 2023), which looks beyond 2030 to the pathways for climate neutrality by 2050. The CAPs are 'umbrella' plans which collate various sectoral policies, actions and measures together as Ireland's overall strategy for achieving the national climate objectives.

However, in the absence of the draft Plan, there would be lack of land use planning policy that is being coordinated at national level. The implementation of the NPF provides the national-level policy backing to support and encourage the development of large-scale renewable energy solutions (namely wind and solar, among other aspects), which will help to direct and drive policy at the lower planning levels, and particularly at the regional level. For instance, a key update in the draft first revision to the NPF is the assignment of regional renewable electricity allocations to the three Regional Authorities via a new NPO, with a requirement in another new NPO for local authorities to also plan for the delivery of power capacity allocations that is consistent with the regional allocations. With such new policy developments in places, there is greater opportunity for large-scale decarbonisation to be realised in the coming years.

#### Material Assets

In the absence of the draft first revision to the NPF, the Uisce Éireann Investment Programme and asset maintenance works would take place independently resulting in upgrades to wastewater treatment plants. The Water Services Strategic Plan would also continue to be implemented, along with the suite of sectoral climate change adaptation plans published for various sectors. Other government strategies such as the Whole of Government Circular Economy Strategy and the National Waste Management Plan for a Circular Economy 2024-2030 would continue to be implemented. Driving circular economy principles in line with the waste hierarchy.

In the absence of the draft first revision to the NPF, the suite of programmes and plans associated with transport such as the various Metropolitan Area Transport Strategies, National Investment Framework for Transport in Ireland and various active travel programme etc. would also continue to be implemented. The population in Ireland will however continue to grow, with the associated demand for infrastructure as well as municipal, community, and social services.

With the implantation of the draft first revision to the NPF, there is more coordinated activity in order to achieve modal shift, as well as driving reduced materials consumption in both the circular economy and other sectors (Nearly Zero Emissions Buildings (NZEB) under the built environment sector), as both circular economy and transport sectors are included within the draft first revision to the NPF.

In the absence of the draft first revision to the NPF, the suite of EirGrid and SONI Capacity Statements, Implementation Plans and National Development Portfolio would continue to be produced and grid and transmission systems upgraded and invested in. Likewise the ESB Networks for Net Zero Strategy and the GNI Network Development Plan and Ten-year Capacity Statements will be implemented. Renewable energy resources, specifically renewable electricity from solar and wind power have the potential to provide a stable, sustainable, and low carbon renewable electricity source. This energy source can therefore contribute to increased renewables deployment and the range of options available to support the move to low carbon alternatives, help meet renewable electricity targets and assist in the transition to a climate neutral economy. In the absence of the draft first revision to the NPF, renewable energy development would continue however, it would lack national land use planning support and direction, which is being provided via the inclusion of regional renewable electricity allocations.

Without the draft first revision to the NPF, these various scenarios would continue to be managed in a less coordinated manner, thus the cumulative and synergistic impacts on the environment would continue. Critically without the draft NPF there would remain an uncoordinated approach to assigning resources and targeting those resources to the greatest need.

According to the Expert Group Report, prepared in 2023, while Ireland has made some progress in recent years, delays in the financing, planning and delivery of key infrastructure developments have negatively affected Ireland's competitiveness over the past decade, and the benefits of greater sustainability in how people live and work will be key to ensuring competitiveness into the future. The implementation of the draft first revision to the NPF has the potential to enhance certainty in the environment faced by businesses which have to compete in markets, both national and international, by providing greater clarity on how we are developing more sustainable physical infrastructure. The NPF offers a framework for the planning of public investment in infrastructure, including housing, to be strategically prioritised and sequenced.

#### Cultural Heritage

In the absence of the draft first revision to the NPF, cultural heritage concerns would continue to be dealt with as part of the planning processes and related environmental assessments at lower planning tiers and at the project level. However, potential synergies with other sectors, such as reuse of the existing built building stock, which includes heritage features, as well as coordinated targets for retrofitting, would have a less coordinated approach and a lack of such measures reflected in a statutory plan in the absence of the draft first revision to the NPF.

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**Environmental Discussion on the Evolution of the Baseline in the Absence of the draft Plan Area**

<b>Landscape</b>	In the absence of the draft first revision to the NPF, the uncoordinated approach to planning measures could result in unnecessary impacts to protected or sensitive landscape and seascape. These landscape and visual concerns would continue to be dealt with as part of the planning processes and related environmental assessments at lower planning tiers and at the project level.
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## 6 FRAMEWORK FOR ASSESSMENT

The assessment is an objectives-led assessment which involves comparing the proposed alternatives against defined SEA Environmental Objectives for each of the identified issue areas. The selected SEOs for this SEA are set out in **Table 3**. These environmental objectives are based on the current understanding of the key environmental issues having regard to the environmental protection objectives outlined in **Chapter 6** of the main Environmental Report.

**Table 3: Strategic Environmental Objectives for the Assessment of the Draft Plan**

SEA Topic	SEA Environmental Objective(s)
<b>Population and Human Health (PHH) Objectives</b>	<ul style="list-style-type: none"> <li>(i) To create an environment where every individual and sector of society can play their part in achieving a more healthy, sustainable and climate-neutral Ireland.</li> <li>(ii) Ensure a just transition for workers and communities, in terms of jobs and opportunities in the transformation toward a sustainable and climate-neutral Ireland.</li> <li>(iii) Ensure access to suitable housing which includes a mix of tenures to support all sectors in society.</li> <li>(iv) Provide sufficient capacity in healthcare and education to support all sectors in society.</li> <li>(v) Ensure that wastewater treatment is adequate for the populations proposed, including seasonal fluctuations and is compliant with relevant EU standards (Note: also relevant in the context of Material Assets).</li> </ul>
<b>Biodiversity, Flora and Fauna (BFF) Objectives</b>	<ul style="list-style-type: none"> <li>(i) Preserve, protect, maintain and where appropriate restore the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species (including transboundary considerations).</li> <li>(ii) Protect biodiversity from the impacts of climate change and recognise the role of ecosystems and ecosystem services to increase the adaptive capacity of people and biodiversity, while also contributing to climate change mitigation.</li> <li>(iii) Protect and enhance ecological corridors/linkages for the benefit of biodiversity, and also locally act as carbon sinks.</li> <li>(iv) Create/protect ecologically resilient and varied landscapes to help support a wide range of species.</li> </ul>
<b>Land and Soil (LS) Objectives</b>	<ul style="list-style-type: none"> <li>(i) Prevent pollution which could impact soil quality and lead to degradation of the soil resource.</li> <li>(ii) Minimise land use changes that result in increased carbon emissions from soils.</li> <li>(iii) Maximise opportunities for soil carbon sequestration.</li> <li>(iv) Minimise use of greenfield sites for development.</li> </ul>
<b>Water (W) Objectives</b>	Ensure forward planning and development management achieves compliance with the objectives of the WFD and MSFD for surface waters, groundwaters and marine waters.
<b>Air Quality (AQ) Objectives</b>	<ul style="list-style-type: none"> <li>(i) Avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air, including transboundary considerations.</li> <li>(ii) Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency.</li> </ul>
<b>Climatic Factors (C) Objectives</b>	<ul style="list-style-type: none"> <li>(i) Minimise existing and avoid new emissions of greenhouse gases across the land use sector and through integrated transport and land use planning</li> <li>(ii) Decrease the usage of fossil fuels and increase renewable energy usage.</li> <li>(iii) Preserve, protect and maintain natural carbon sinks (e.g., peatlands/ wetlands/ forests).</li> <li>(iv) Increase resilience of communities to flood risk resulting from climate change.</li> <li>(v) Contribute to achieving the national climate objective to transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.</li> </ul>
<b>Material Assets (MA) Objectives</b>	<ul style="list-style-type: none"> <li>(i) Consolidate growth and limit urban sprawl through integrated transport and land use planning</li> <li>(ii) Optimise use of existing infrastructure/ built environment, raw materials and energy (including energy efficiency).</li> <li>(iii) Contribute to circular economy principles, including supporting and promoting the use of waste as a resource.</li> <li>(iv) Contribute to climate change adaptation through ensuring the robustness and resiliency of new infrastructure to the effects of climate change.</li> </ul> <p><i>See also PHH for Wastewater Treatment</i></p>
<b>Cultural Heritage (CH) Objective</b>	Protect and plan for the management of places, features, buildings and landscapes of cultural, historical archaeological or architectural heritage.

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SEA Topic	SEA Environmental Objective(s)
<b>Landscape (LandS) Objectives</b>	<ul style="list-style-type: none"> <li>(i) Protect and maintain landscape character and visual amenity, including designated and unique landscapes.</li> <li>(ii) Recognise and respect the value of wider (non-designated) landscapes and seascapes.</li> </ul>

## 7 CONSIDERATION OF ALTERNATIVES

One of the critical roles of the SEA is to facilitate an evaluation of the likely environmental consequences of range of alternatives. These alternative scenarios should meet the criteria outlined in **Figure 3**. Given that the draft Plan is of national scale plan and is strategic in nature, alternatives identified are reflective of this. The main alternatives meeting the criteria in **Figure 3** and brought forward for further assessment are presented in **Table 4**.



Figure 3: Criteria for Alternatives Considered [Source: EPA Guidance, 2015]

Table 4: Alternatives Considered

Type	Alternatives Considered
Strategic	<ul style="list-style-type: none"> <li>Revise the NPF</li> </ul>
Balanced Regional Development	<ul style="list-style-type: none"> <li>Distribution of additional projected population to 2030 on a pro-rata basis</li> <li>Distribution of additional projected population to 2030 on a pro-rata modified basis</li> </ul>
City-focused Development	<ul style="list-style-type: none"> <li>Prioritisation of Cities</li> <li>Prioritisation of Cities – Modified</li> </ul>
Compact Growth	<ul style="list-style-type: none"> <li>Increase compact growth targets for all settlements</li> <li>Increase compact growth targets for Towns</li> </ul>
Renewable Energy	<ul style="list-style-type: none"> <li>Do Something – Apply regional targets in the revised NPF</li> </ul>

### 7.1 Preferred Scenario

The preferred scenario for which a policy base was subsequently brought forward reflects a revision to the first NPF approach, and which takes account of a number of key trends and developments. This has included consideration of recent data on population growth and demographics, including both the most recent CSO Census 2022 results, as well as work undertaken by the Economic and Social Research Institute (ESRI) for DHLGH in terms of projections looking forward to 2030 and 2040. The draft Plan has also been revised in light of the analysis of the 2023 Expert Working Group's high-level review of the 2018 NPF. It also takes into account other policy and legal drivers, particularly in relation to health and wellbeing, biodiversity, climate and circular economy.

The revised policy base for the draft Plan therefore covers the following areas:

- The Vision
- A New Way Forward
- Effective Regional Development
- Making Stronger Urban Places
- Planning for Diverse and Rural Places

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- Peoples, Homes and Community
- Realising Our Island and Marine Potential
- Working With Our Neighbours
- Climate Transition and Our Environment
- Implementing the National Planning Framework
- National Strategic Outcomes



## 8 ASSESSMENT OF THE PREFERRED SCENARIO

This section evaluates as far as possible the likely significant effects on the environment and to set out measures envisaged to prevent, reduce and as far as possible offset any significant adverse effects of implementing the draft Plan. **Table 5** presents an overview of the environmental assessment of the policy objectives.

**Table 5: Summary of Assessment**

Environmental Parameters	Summary of Assessment
<b>Population and Human Health (PHH)</b>	<p>The draft Plan aims to ensure there is balanced regional development, compact growth across settlements, and improved health and recreational services, while prioritising areas with large-scale transport development opportunities. It also aims to promote renewable energy development at appropriate locations amongst other measures to achieve a climate neutral economy, support industry of agri-food and tourism, enhance marine potential of Ireland, and continue collaborating with Northern Ireland for sustainable development of relevant infrastructure and tourism.</p> <p>Positive impacts are anticipated for PHH as a result of sustainable integration of housing infrastructure development in compact settlements with existing/planned large-scale transport projects to accommodate the increased population growth. However, the projected increase in the population growth across Ireland is likely to aggravate the pressures on existing service infrastructure. The provision of housing in areas with inadequate capacities in water supply, wastewater treatment and other services will negatively impact the overall wellbeing of the population by exacerbating living conditions. There are issues with ensuring there is sufficient access to adequate healthcare, education and other social services across the three regions which would need to be addressed in tandem. Ensuring there is overall sufficient wastewater capacity has implications for PHH in terms of recreational use of water as well as the health implications from discharges that can lead to polluted water. A holistic approach is required at the strategic planning level to ensure that cumulative impacts on resources such as land and water is taken into account.</p> <p>Any infrastructural development arising from the implementation of the draft Plan is also anticipated to have direct and indirect impacts for HH where the construction and operation activities deteriorate local air quality from generation of dust and other particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). Positive operational impacts however can also be realised via the provision of essential and necessary social, transport and energy infrastructure and services over the longer term.</p>
<b>Biodiversity, Flora and Fauna (BFF)</b>	<p>The draft Plan aims to focus the housing development in both brownfield and greenfield areas. Compact growth as a concept can have broadly positive effects for BFF by directing growth to existing built-up and urbanised areas and reducing the development pressure on greenfield areas. Increased population and development may increase pressures from human activities, resulting from housing provision, infrastructure development and demands on water supply and wastewater treatment, leading to the potential for direct and indirect negative impacts on BFF.</p> <p>Development in general may therefore have direct and indirect negative impacts for BFF as a result of loss/fragmentation of habitats and ecological stepping stones, disturbance and loss of species, disruption to migration routes and indirect impacts on habitats and species from deterioration in environmental quality, including for AQ and W. There is also potential for impact on the natural environment should services, such as water/ wastewater and transport not be phased to match projected demand. The key potential negative impacts from a lack of services will be on W and BFF through non-compliance with the requirements of legislation, such as the Water Framework Directive and the Urban Waste Water Treatment Directive. Greater reuse of existing buildings also has the potential to disturb species which are using vacant and derelict buildings, or via disruption or loss of niche habitats. Policies aimed at achieving compact growth in built-up areas has the potential to result in loss, fragmentation or degradation of mature trees/hedgerows, loss of greenfield sites and open/green spaces, fragmentation of linear ecological corridors in order to consolidate urban centres. Such impacts may also arise via policies aiming to facilitate linear links and connections between built-up areas (e.g. via development of new roads and other modes such as cycleways and greenways).</p> <p>Recreational pressure has potential to negatively impact on wider BFF as a result. This may act in combination with deterioration in environmental quality in other parameters from the increased intensity of use also and where services such as wastewater treatment are over capacity or not in operation, leading to chemical and or nutrient pollution of soils and water and non-compliance with the requirements of legislation such as the Water Framework Directive and Urban Wastewater Treatment Directive and in turn negatively impacting water dependant habitats and species.</p> <p>Any infrastructural development arising from the implementation of the draft Plan therefore has potential to result in direct and indirect impacts for BFF, as well as interrelated factors such as W and LS.</p>

## Strategic Environmental Assessment Non- Technical Summary

### Environmental Summary of Assessment Parameters

<b>Land and Soil (LS)</b>	<p>Compact growth as a concept can have broadly positive effects for PHH, MA, LS, BFF, AQ, CF, CH and LandS by directing growth to existing urbanised areas, reducing the pressure on greenfield areas and allowing economies of scale to support key transport and social infrastructure, attracting investment and creating viable communities. Avoiding dispersed settlement patterns reduces the decline of central parts of cities and towns, regenerating and revitalising these areas which creates more liveable environments. Compact growth can lead to reuse of existing building stock which will improve the historic character and setting of heritage assets in city centres and towns.</p> <p>However, development on greenfield sites as proposed in the draft Plan will have negative effects in the form of loss of the soil resource through soil sealing or extraction in the short to long term. Pollution of the soil resource during construction activities will also have negative impact on LS in the short to long term. Development on brownfield sites will be prioritised during the implement of the draft Plan, however, it can result in greater risk of encountering contaminated soils or land and this has to be dealt with in accordance with waste management legislation which may require export for treatment and disposal if indigenous capacity is not available.</p> <p>Other negative effects for LS from land use changes including deployment of renewable energy infrastructure as proposed in the draft Plan include changes to drainage patterns, loss of agriculturally rich lands and other sensitive lands e.g., carbon sequestration or carbon storage soils. It is recognised that all sectors of society require some form of land footprint or land use change in order to enable the continued development of the State via land use planning, and to realise varied aspects such as implementing climate action measures, grid and renewable energy infrastructure development, housing developments, public transport projects (greenways, cycleways, railways), water and wastewater services, forestry, agriculture and rural economy development, areas for food production etc.</p>
<b>Water (W)</b>	<p>Positive effects are possible for W where infill development is prioritised over the development of greenfield sites and further urban sprawl outward into open space areas. Where growth within the cities does not align to capacity in services in the short to medium term, this is anticipated to result in cumulative negative effects for W, as further consolidation is achieved. The necessary infrastructure including public transport could also put pressure on flood zone areas and increase the flood risk. Construction activities related to provision of housing and supporting services has the potential for negative impacts on W in the short to long term resulting from increased pollution of water bodies through fuel spillage, point source pollution and release of suspended solids.</p> <p>The proposed growth in the cities must be cognisant of the capacity of these urban areas to absorb the development needed to underpin such growth figures. The recreation and leisure associated with the proposed growth has the potential for negative effects for W with increased pressures on waterbodies.</p> <p>Policy support for improvement in terms of provision of water supplies is considered to be positive for W as it will ensure safe drinking water is available for all. Wastewater treatment facilities which operate over capacity may impact negatively on water dependant habitats and species (marine, estuarine and freshwater) from nutrient enrichment. Development of suitable serviced sites will have direct positive effects for W if these are in place prior to it ensures energy, waste, water and wastewater provisions will support these developments. Indirect positive effects are also anticipated for BFF, LS and W where services are provided which reduce the risks associated with one off housing and domestic waste water treatment systems. Policy support for ensuring sufficient headroom and capacity for a growing population is also important for interrelated factors, such as CF in the context of climate change and changing environmental conditions.</p> <p>Agriculture is also identified as the key pressure for water quality and Irelands compliance with the WFD objectives. Impacts are from high levels of nutrients (particularly phosphorus and nitrogen) with increased use of chemical fertilisers, improper management of livestock manure; altered river morphology associated with livestock access and land drainage practices and also sediment runoff which has direct negative implications for W.</p> <p>The water demands of certain developments can put strain on local water resources and create ecological change. Of particular concern are developments that are placed in or near to areas recognised for their conservation significance, including sensitive breeding areas, important species migration routes, and other protected areas. Developments that are incompatible with the objectives or the conservation outcomes of a protected area containing a high-status water body must be avoided.</p> <p>The accommodation of the proposed growth also have potential for negative effects for all environmental receptors associated with increased housing and other related facilities in the form of increased dust, noise, traffic; air emissions, disturbance, loss or fragmentation of habitats; soil sealing, hydrogeological effects; run-off; changes to heritage features/setting or landscape and views. The recreation and leisure associated with the proposed growth also has potential for negative effects, not only for PHH but also for BFF and W. A lack of such facilities can lead to anti-</p>

## Strategic Environmental Assessment Non- Technical Summary

### Environmental Summary of Assessment Parameters

social behaviour and deterioration in overall wellbeing of communities. It is also identified as an existing threat and pressure to BFF including in those cities where the planned population and employment growth will be targeted.

#### Air Quality (AQ)

Any infrastructural development arising from the implementation of the draft Plan can lead to deterioration of air quality from generation of dust and other particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) from construction and operation activities, release of polluting substances such as NO<sub>x</sub> and SO<sub>x</sub>. These can result in direct impacts on AQ.

Ireland continues to rely heavily on private car usage, as well as heavy reliance on fossil usage, along with a high energy import dependency. This impacts negatively on AQ and CF, as well as PHH and BFF. However the draft Plan's support for policies relating to progressive electrification of the energy and transport sectors and continued uptake of renewable energy generation have positive cumulative impacts for AQ and CF, provided the increased demand on the transport and electricity generating sectors is offset by sufficient uptake of energy generated from renewable sources. Related to this, compact growth and focused development in built up areas can also lead to degraded air quality in the presence of private vehicle usage and use of solid fuels for space heating, as pollutants become concentrated where population density is greatest. However these impacts can be offset in the medium and longer term where national planning policy supports modal shift and active travel is realised in built-up areas, in tandem with support for decarbonisation measures being rolled out across sectors.

#### Climatic Factors

The draft Plan is likely to have direct and indirect positive impacts for CF in the long term where the implementation of policies and enablers will contribute towards the reduction of GHG emissions through improved public transport facilities, increased renewable energy generation, alignment of NPF with Ireland's climate targets and objectives, development of the economy in a manner that is consistent with the national climate objective, improvement of indigenous capacity for waste recovery and improving circularity rates, and acknowledgement of ecosystem services. Co-benefits from supporting the implementation of climate action will also be realised where land use planning measures related to modal shift and reducing private vehicle kilometres travelled, along with a reduction in fossil fuel combustion for heating, will together have cumulative positive impacts for CF, as well as for AQ and PHH.

However, infrastructural developments anticipated with the implementation of the draft Plan can result in indirect negative effects for CF in the short to long term. These can occur due to loss of carbon sinks from development of land, unsustainable or intensification of use of the land resource, GHG emissions from construction and operational activities (e.g. from creation and import of building material, transport, processes), and increasing risk to flooding in areas that are already under pressure, resulting in decreased resilience to the effects of climate change.

#### Material Assets (MA)

Provision of housing and supporting infrastructure and integrated land use and transport planning is overall positive for MA by ensuring communities have access to quality infrastructure to support long term sustainability of these communities and their mobility. Directing population growth to areas where consolidated growth can be accommodated and where integrated services can be directed, optimising existing infrastructure and infill opportunities, is directly positive for MA in the medium to long term.

Strategic support for the increased renewable energy development to contribute towards the achievement of national climate objective is directly positive for MA as it will lead to increased security of supply of indigenous generating capacity and greater resilience in the economy.

Notwithstanding the positive impacts on MA, development for compact growth and improved connectivity can lead to loss of greenfield sites, unsustainable use of natural resources (increase in existing pressures) and generation of waste impacting negatively on MA. Development on brownfield sites can also result in greater risk of encountering contaminated land and this has to be dealt with in accordance with waste management legislation which may require export for treatment and disposal if indigenous capacity is not available.

However while a growing population and additional households up to 2040 and beyond is broadly positive for PHH, if the infrastructure that will help deliver supporting services such as those related to health, education, recreation, public transportation, waste management and wastewater treatment are not developed in tandem, this will have significant negative impacts on MA in the short to long term. Associated infrastructure and services will have to be developed at strategic, regional and local levels to ensure that environmental protection and enhancement policies are adhered to and to reduce cumulative impacts on the natural environment.

Support for smart growth support and investment has the potential for significant positive cumulative impacts for both private and commercial stakeholders, via the potential to attract inward investment with knock-on positive effects for PHH and MA.

However it is noted that provision of any type of infrastructure, whether transport links, energy and grid infrastructure, water and wastewater services, housing etc. all have potential for negative

## Strategic Environmental Assessment Non- Technical Summary

Environmental Parameters	Summary of Assessment
<b>Cultural Heritage (CH)</b>	<p>impacts at both the local level (site-specific issues and temporary construction impacts) and also at a wider regional and national scale e.g. transport-related emissions (particularly NO<sub>x</sub>, SO<sub>x</sub>, particulates and GHGs).</p> <p>The draft Plan aims to accommodate the increased population targets, particularly in Dublin and the four regional cities. This may necessitate higher density developments in areas with built heritage interests and can result in permanent and long term negative impacts on the setting and character of such areas. there is potential for the loss and disturbance of known and unknown archaeology and built heritage as well, as a result of development supporting increased population and denser, compact growth, if not undertaken sustainably.</p>
<b>Landscape (LandS)</b>	<p>Infrastructural developments related to for instance housing, transport, water services and renewable energy etc. arising from the implementation of the draft Plan are likely to result in permanent negative impacts in sensitive landscapes as a result of visual intrusion on sensitive receptors. Changes to landscape character is also considered to have negative impacts for LandS, however the degree of impact will be dependent on the location, nature and scale of the development.</p>



## 9 MITIGATION

The draft Plan promotes key concepts of compact growth, balanced regional development and prioritisation of investment, all underpinned by climate and housing drivers in particular. The policy base broadly addresses many of the pathways for impact on the environment but additional mitigations have been proposed to improve the overall environmental outcomes of the draft Plan. Key among these are greater emphasis on protection of wider biodiversity as it has an important role to play in both health and wellbeing and also climate. The alignment of services has also been a key feature of the mitigation strategy, requiring not only phasing of development to align with growth but also prioritisation of areas with capacity in the short term. The assessments note the importance of robust route and site selection and the active implementation of the mitigation hierarchy to avoid impacts in the first instance. The NPF also influences lower tier planning via the integration of its targets and consideration of its policy base via key regional and county/local planning, principally through the three Regional Spatial and Economic Strategies, and via the City and County Development Plans and Local Area Plans.

Overarching environmental mitigation has been proposed as part of the environmental assessment processes on the draft Plan. The mitigation proposed under the SEA, AA and SFRA undertaken on the first 2018 NPF still applies, and there is now various new guidance and legislation which will support and supplement the NPO policy base; these have been variously referenced in the mitigation strategy for this draft Plan.

Some of the key drivers for consideration from implementing the draft Plan include population growth and demographic changes, the need for phased development of infrastructure and services, climate change and climate action, nature restoration, among others; consideration of these aspects are also reflected in the mitigation strategy. Specific mitigation and recommendations have also been proposed for specific objectives and to address specific issues.

## 10 MONITORING

Member States are required to monitor the significant environmental effects of the implementation of plans so that any unforeseen adverse effects can be identified, and appropriate action taken. A monitoring programme is developed based on the indicators selected to track progress towards reaching the targets paired with each SEO, thereby enabling positive and negative impacts on the environment to be measured.

Coordination of monitoring of the NPF is the responsibility of the Department of Housing, Local Government and Heritage as the competent authority for the NPF. It is acknowledged that, as a whole of government plan, other Government departments and agencies also gather and host relevant information which is required for NPF monitoring purposes. These other sources will be reviewed in reporting on monitoring outcomes. Chapter 9 of this Environmental Report presents the proposed Environmental Monitoring Programme.

## 11 NEXT STEPS

Written submissions or observations on the draft First Revision to the National Planning Framework and associated environmental documents can now be made. Details of the consultation timelines and links to documentation are available on [www.gov.ie](http://www.gov.ie).

These submissions/ observations will be taken into consideration before the revised NPF is made final. Early responses would be appreciated to allow more time to clarify and resolve issues that may arise.

It should be noted that in the interests of transparency, all written submissions received will be made publicly available on the Department's website. Receipt of submissions will be acknowledged but it will not be possible to issue individual responses.

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Local Government and Heritage



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