

FIRST REVISION OF THE NATIONAL PLANNING FRAMEWORK

SEA Statement

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1 INTRODUCTION

RPS was commissioned by the Department of Housing, Local Government and Heritage (DHLGH) to undertake the Strategic Environmental Assessment (SEA) of the First Revision of the National Planning Framework (hereafter referred to as 'First Revision of the NPF' or '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, recent EU and national legislation 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, every six years after the publication of the NPF. The Government decided on 20th June 2023 to undertake a revision to the NPF for reasons as set out in the Road Map (published by DHLGH in June 2023), 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.

This SEA Statement provides information on the decision-making process and documents how the First Revision of the NPF has been based upon: the above changes since 2018, environmental considerations, the views of consultees / stakeholders and the recommendations of the SEA Environmental Report, the Strategic Flood Risk Assessment (SFRA) Report and the assessment carried out under Article 6 of the Habitats Directive.

The structure of the SEA Statement is as follows:

1. Introduction,
2. Summary of Key Facts,
3. Summary of the SEA Process,
4. Influence of the SEA Process on the First Revision of the NPF,
5. How Consultation Feedback Has Influenced the First Revision of the NPF,
6. Preferred Scenario and Reasons for Choosing the final adopted plan,
7. Measures to Monitor Significant Environmental Effects of the Implementation of the First Revision of the NPF, and
8. Addendum to the SEA Environmental Report.

2 SUMMARY OF KEY FACTS

Title of Plan:	First Revision of the National Planning Framework
Purpose of 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 Revision focuses on the need to update the original NPF, published in 2018, in order to appropriately reflect changes to government policy that have taken place since its initial publication six years ago, such as climate transition, regional development, demographics, digitalisation and investment and prioritisation.
Competent Authority:	The Minister for Housing, Local Government and Heritage (MHLGH).
Period Covered:	The review timeline for the NPF is every six years under Section 20C of the Planning and Development Act 2000 (as amended).
Area Covered:	The NPF is a national level document and is intended to give direction in planning policy to lower-level plans including the Regional, Spatial and Economic Strategies (RSEs), City and County Development Plans and Local Area Plans.
Nature and Content of the First Revision of the NPF:	<p>The NPF includes National Policy Objectives (NPOs) and National Strategic Outcomes (NSOs) for shaping the future growth and development of Ireland out to the year 2040. The revised Framework retains the original NPF focus on a more balanced distribution of growth across all of Ireland's regions. The revised Framework also retains the commitment of the first NPF to balanced regional development, the promotion of city-based population and employment growth with a target of 50% of future population and employment growth to be focused in the existing five cities and their suburbs including ambitious growth targets for the cities of Cork, Limerick, Galway and Waterford. Greater investment and jobs-led growth in the cities will support a stronger urban structure and enhanced economic performance and investment for the respective wider regions.</p> <p>The policy areas addressed in the First Revision to the NPF include the following broad headings:</p> <ul style="list-style-type: none"> • Demographic Change, • New Sustainable Communities, • Balanced Regional Development, • City-Focused Growth, • Compact Growth, • Climate Transition and Environment, • Transport, • Working with our Neighbours, • Investment and Funding, • Implementation.
Main Contact:	National Strategic Planning (NSP), Department of Housing, Local Government and Heritage, Custom House, Custom House Quay, Dublin 1, D01 W6X0.

3 SUMMARY OF SEA PROCESSES

3.1 Introduction

The First Revision of the NPF has been subject to the provisions of relevant EU Environmental Directives including the Strategic Environmental Assessment (SEA) and Habitats (Appropriate Assessment) Directive, in accordance with Section 20C(7) of the Planning and Development Act 2000, as inserted by the Planning and Development (Amendment) Act 2018. This has included the key steps described in the following sections.

3.2 SEA Monitoring Review

In 2023 the DHLGH undertook a review of the monitoring for the first cycle of the NPF. The review revealed that a number of the indicators could be improved in scope for the second cycle of the NPF to reflect the more mature stage of the plan implementation and the changes in policy which have taken place at EU and national level in the intervening years between 2018 and 2023 e.g. climate law and associated targets. Also since the first monitoring programme was proposed in 2018, the EPA has published guidance on monitoring in SEA which has been used to inform the monitoring proposals for the second cycle. Furthermore, since 2018 a number of new and useful data sources has developed as a part of emerging international, EU and national policies including for key topic areas such as climate, land cover and marine planning. The review recommended that 10 of the 14 indicators from the original programme be amended for the next cycle of the plan. The review of monitoring from the first cycle of the plan subsequently informed the scope of the SEA.

3.3 Screening

It was confirmed by the Climate and Environmental Planning Policy (CEPP) (formerly the EU and International Planning Regulation (EUIPR)) Unit of the DHLGH on behalf of the Minister for the HLGH at the outset of the SEA process that the draft First Revision to the NPF would be subject to SEA on a mandatory basis under Article 3(2)(b) of the SEA Directive as it had been determined to require an assessment pursuant to Article 6 or 7 of Directive 92/43/EEC, see Section 3.7 for details. The SEA process for the First Revision of the NPF proceeded straight to the Scoping stage.

3.4 Statutory Scoping and Consultation

Statutory scoping and consultation were carried out to establish the proposed scope and level of detail of the information to be contained in the Environmental Report. To facilitate the scoping consultation, two key approaches were undertaken. In the first instance, a scoping notification and Scoping Report was issued to the statutory environmental authorities for SEA in accordance with the legal requirement. In addition, non-statutory transboundary consultation was undertaken at scoping stage with the relevant SEA authority in Northern Ireland. The consultees contacted at scoping stage are outlined below.

- Environmental Protection Agency (EPA)
- Department of the Environment, Climate and Communications (DECC)
- Department of Agriculture, Food and the Marine (DAFM)
- Department of Housing, Local Government and Heritage (DHLGH)
- Development Applications Unit (including NPWS)
- Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA)

Statutory consultation was carried out for a four-week consultation period from 7th November 2023 to 6th December 2023. A summary of written comments received and how they have been addressed was included in Appendix B of the SEA Environmental Report.

Subsequently, a Scoping Workshop was held at the Custom House in Dublin on 21st November 2023 from 2-5pm. The workshop was intended to bring a nation-wide group of stakeholders together to inform discussions on scope and level of detail for the SEA and to discuss environmental issues relating to the draft First Revision to the NPF. A total of 31 stakeholders attended along with representatives from DHLGH and

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RPS. A full list of attendees, a summary of feedback received and how it was addressed was included in Appendix C of the SEA Environmental Report.

3.5 Environmental Assessment and Environmental Report

3.5.1 Summary of Assessment

Prior to the formal assessment of draft policies, the SEA and AA teams provided advice and guidance to the Plan team on environmental issues / trends / problems identified during compilation of baseline and characterisation data and stakeholder feedback from earlier consultations. This provided a basis for proactive policy development which was responsive to environmental issues.

The approach used for the assessment in the SEA was termed an 'objectives-led assessment'. The draft policies for First Revision of the NPF were assessed against defined Strategic Environmental Objectives (SEO) using the guiding questions as presented in **Table 3-1**. The environmental receptors identified in the SEOs were derived from the SEA environmental receptors set out in Annex 1(f) of the SEA Directive e.g., population, biodiversity, material assets etc. The draft SEOs were included in scoping consultation and updated following that consultation. The SEOs were also reflective of the current understanding of the key environmental issues having regard to the environmental protection objectives outlined in the main Environmental Report. A matrix format was used for the assessment, which permitted a systematic approach and comparison of alternatives. The matrix assessment was supported by text identifying, describing and evaluating the effects.

Table 3-1: SEA Objectives for the Assessment of the Draft First Revision to the NPF Published July 2024

Related to SEA Topic(s)	Strategic Environmental Objective
Population and Human Health (PHH)	<ul style="list-style-type: none"> (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. (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. (iii) Ensure access to suitable housing which includes a mix of tenures to support all sectors in society. (iv) Provide sufficient capacity in healthcare and education to support all sectors in society. (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).
Biodiversity, Flora and Fauna (BFF)	<ul style="list-style-type: none"> (i) Preserve, protect, maintain and where appropriate restore the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species (including transboundary considerations). (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. (iii) Protect and enhance ecological corridors/linkages for the benefit of biodiversity, and also locally act as carbon sinks. (iv) Create/protect ecologically resilient and varied landscapes to help support a wide range of species.
Land and Soil (LS)	<ul style="list-style-type: none"> (i) Prevent pollution which could impact soil quality and lead to degradation of the soil resource. (ii) Minimise land use changes that result in increased carbon emissions from soils. (iii) Maximise opportunities for soil carbon sequestration. (iv) Minimise use of greenfield sites for development.
Water (W)	<ul style="list-style-type: none"> (i) Ensure forward planning and development management achieves compliance with the objectives of the WFD and MSFD for surface waters, groundwaters and marine waters.
Air Quality (AQ)	<ul style="list-style-type: none"> (i) Avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air, including transboundary considerations. (ii) Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency.

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Related to SEA Topic(s)	Strategic Environmental Objective
Climatic Factors (CF)	<ul style="list-style-type: none"> (i) Minimise existing and avoid new emissions of greenhouse gases across the land use sector and through integrated transport and land use planning (ii) Decrease the usage of fossil fuels and increase renewable energy usage. (iii) Preserve, protect and maintain natural carbon sinks (e.g., peatlands/ wetlands/ forests). (iv) Increase resilience of communities to flood risk resulting from climate change. (v) Contribute to achieving the national climate objective to transition to a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050.
Material Assets (MA)	<ul style="list-style-type: none"> (i) Consolidate growth and limit urban sprawl through integrated transport and land use planning (ii) Optimise use of existing infrastructure/ built environment, raw materials and energy (including energy efficiency). (iii) Contribute to circular economy principles, including supporting and promoting the use of waste as a resource. (iv) Contribute to climate change adaptation through ensuring the robustness and resiliency of new infrastructure to the effects of climate change. <p>See also PHH for Wastewater Treatment</p>
Cultural Heritage (CH)	<ul style="list-style-type: none"> (i) Protect and plan for the management of places, features, buildings and landscapes of cultural, historical archaeological or architectural heritage.
Landscape and Seascape (LandS)	<ul style="list-style-type: none"> (i) Protect and maintain landscape character and visual amenity, including designated and unique landscapes. (ii) Recognise and respect the value of wider (non-designated) landscapes and seascapes.

A summary of the assessment of the draft First Revision of the NPF published in July 2024 is outlined in **Table 3-2**. The summary assessment relates to the assessment of the draft First Revision of the NPF which was the subject of statutory consultation from July to September 2024.

Table 3-2: Summary of Assessment of Draft First Revision to the NPF Published July 2024

Environmental Parameters	Summary of Assessment (from the SEA Environment Report July 2024)
Population and Human Health (PHH)	<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. 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 (PM₁₀ and PM_{2.5}). 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>
Biodiversity, Flora and Fauna (BFF)	<p>Development in general may 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</p>

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Environmental Parameters	Summary of Assessment (from the SEA Environment Report July 2024)
Land and Soil (LS)	<p>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). 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> <p>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. 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.</p>
Water (W)	<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. 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>
Air Quality (AQ)	<p>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</p>

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Environmental Parameters	Summary of Assessment (from the SEA Environment Report July 2024)
	<p>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.</p>
Climatic Factors (CF)	<p>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.</p> <p>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.</p>
Material Assets (MA)	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 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_x, SO_x, particulates and GHGs).</p>
Cultural Heritage (CH)	<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>
Landscape and Seascape (LandS)	<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</p>

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Environmental Parameters	Summary of Assessment (from the SEA Environment Report July 2024)
	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.

3.5.2 Preparation of Environmental Report

The Environmental Report identified, described and evaluated the likely significant effects on the environment of implementing the First Revision of the NPF. It included consideration of:

- The relevant aspects of the current state of the environment and its evolution in the absence of the revisions;
- The environmental characteristics of areas likely to be significantly affected and existing environmental problems relevant to the First Revision of the NPF;
- Links between the First Revision of the NPF and other relevant strategies, policies, plans, programmes and environmental protection objectives;
- The likely significant effects of the First Revision of the NPF on the environment (both positive and negative);
- Measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment;
- An evaluation of reasonable alternatives including an outline of the reasons for selecting the alternatives chosen;
- The measures concerning monitoring of the significant environmental effects of implementation of the Plan; and
- Non-technical summary.

3.5.3 Statutory Public Consultation

The draft First Revision of the NPF was published for statutory public consultation by the DHLGH on 10th July 2024 until 12th September 2024 alongside the SEA Environmental Report and the Strategic Flood Risk Assessment (SFRA). There was a separate public consultation process on the draft Natura Impact Statement (NIS), prepared to inform the Appropriate Assessment process, coordinated by the Ecological Assessment Unit (EAU) of the National Parks and Wildlife Service (NPWS) which was held simultaneously with the public consultation process on the draft revised NPF. The public consultation process for the draft NIS was carried out in accordance with Regulation 42A(13)(a) of the 2011 Regulations, and, pursuant to Regulation 42A(13)(b)-(e). All documents were available for inspection and download online. See further details on consultation in **Chapter 5** of this SEA Statement.

3.6 SEA Statement

In accordance with Article 16 of S.I. 435 of 2004, as amended, the Competent Authority is required to prepare a statement (the subject of this report) summarising:

- How environmental considerations have been integrated into the plan or programmes, or modification to a plan or programme.
- How (i) the environmental report, prepared pursuant to Article 12, (ii) submissions and observations made to the competent authority in response to a notice under Article 13 and (iii) any consultations under Article 14 have been taken into account during the preparation of the plan or programme.
- The reasons for choosing the plan or programme, or modification to a plan or programme, in light of other reasonable alternatives dealt with.
- The measures decided upon to monitor, in accordance with Article 17, the significant environmental effects of implementation of the plan or programme.

The main purpose of this SEA Statement is therefore to provide information on the decision-making process for the First Revision of the NPF in order to illustrate how decisions were taken, making the process more transparent. In so doing, the SEA Statement records how the recommendations of the Environmental Report, the Strategic Flood Risk Assessment (SFRA) Report and the Natura Impact Statement (NIS), as well as the views of the statutory consultees and other submissions received from the public during consultation have influenced the preparation of the First Revision of the NPF. The SEA Statement also provides information on the arrangements put in place for monitoring and mitigation.

3.7 Appropriate Assessment

In addition to the SEA, there is a requirement under the EU Habitats Directive (92/43/EEC) as transposed by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and by Part XAB of the Planning and Development Act 2000, to carry out Appropriate Assessment (AA). The requirement for an assessment derives from Article 6 of the Habitats Directive, and in particular Article 6(3) which requires that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

In recognition of this, an AA Screening was undertaken, prior to the SEA process. It was determined by the Ecological Assessment Unit (EAU) of the National Parks and Wildlife Service (NPWS) on 5th July 2023 that an Appropriate Assessment was required under Article 6(3) of the Habitats Directive (92/43/EEC) in accordance with Regulation 42(6) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and by Part XAB of the Planning and Development Act 2000. Therefore, an NIS was prepared to inform the AA. The NIS and the AA Determination made by the EAU is available under separate cover on www.npf.ie. The AA Determination was adopted by the Minister and the Government.

3.8 Strategic Flood Risk Assessment (SFRA)

The objective of the 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 in accordance with the EU Floods Directive (2007/60/EEC). 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 and Circular PL02/2014.¹

¹ The Planning System and Flood Risk Management Guidelines for Planning Authorities, November 2009' [DEHLG (renamed as DHLGH) / OPW] and Circular PL02/2014 (August 2014) referred to hereafter as 'The Guidelines'.

4 INFLUENCE OF THE SEA PROCESS ON THE FIRST REVISION OF THE NPF

4.1 Integration of the SEA Process

4.1.1 Advice and Guidance

To assist the DHLGH plan team in developing objectives which integrated environmental considerations into the plan, the SEA and AA teams provided advice, guidance and feedback on proposed wording of revisions. This included meetings to discuss overall strategy and specific themes. The SEA and AA have, as a result, had a positive influence on the plan evolution. Specifically, both the SEA and AA teams:

- Inputted to a workshop on scoping of environmental issues with the plan team;
- Facilitated a scoping workshop, hosted by the DHLGH, with a wide group of stakeholders to identify issues relevant to the revision;
- Inputted to a development of alternatives and assessment of same;
- Participated in numerous meetings to discuss potential conflicts relevant to environmental matters that might arise in the course of the implementation of the First Revision of the NPF;
- Undertook a review of the early draft revisions and provided ongoing review of evolving draft revision wording;
- Undertook a review of new policy inclusions for the draft First Revision of the NPF and provided mitigation;
- Suggested specific policy areas for inclusion;
- Provided feedback on language to address concerns, e.g. Natura 2000 and AA; and
- Developed additional mitigation measures and recommendations for inclusion in the First Revision of the NPF.

Table 4-1 shows how environmental considerations and the input of the SEA and AA processes have been taken into account in the First Revision of the NPF.

Table 4-1: How Environmental Considerations Have Been Taken into Account in the First Revision of the NPF

Environmental Consideration	Integration into the First Revision of the NPF
Early Discussion on Plan Development	The SEA / AA teams engaged directly with the DHLGH team at an early stage to discuss the format and scope of the First Revision of the NPF, to raise issues and create awareness on key environmental constraints relating to the revisions, as well as alternatives.
Environmental Baseline	The SEA team prepared baseline information on environmental conditions with the focus on SEA environmental topics, including: population, human health, biodiversity, flora and fauna, water, climate, air, land and soil, landscape, cultural heritage, and material assets. This information was used to focus the SEA Strategic Environmental Objectives, inform the alternatives discussions and the assessment, and assess positive and negative impacts associated with the implementation of the Plan. It also influenced the revision of the SEA monitoring programme by identifying data gaps.
Assessment of Alternatives	The environmental baseline and objectives were used to identify key sensitivities and informed the development and assessment of the alternatives. The SEA team and the DHLGH Plan team liaised on possible alternatives during preparation of the SEA scoping document and subsequently during the Environmental Report preparation through meetings and workshops.
Iterative Assessment and Discussion of Emerging Policies	The SEA / AA teams engaged directly with DHLGH throughout the development of the draft First Revision of the NPF providing advice, guidance and feedback on the emerging policy base.

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Environmental Consideration	Integration into the First Revision of the NPF
Recommendation of Mitigation Measures to Address Impacts on the Wider Environment	Mitigation measures were proposed to address significant negative environmental effects identified during the assessment processes carried out on the emerging plan both pre and post consultation. These included proposed amendments to the wording of the National Planning Objectives/National Strategic Outcomes in the draft First Revision of the NPF and recommendations for changes. See Section 4.2 which presents the mitigation measures and recommendations from the SEA, SFRA and AA processes and clarifies how they have influenced the final Plan. Mitigation to address significant negative effects and recommendations to enhance positive outcomes have been addressed in the final plan through a combination of changes to text in NSOs, NPOs and through supporting text.
Required Environmental Monitoring Programme	The DHLGH undertook a monitoring review in 2023 of the existing indicators and the available monitoring outcomes from the first cycle of the NPF SEA Monitoring was also discussed at the SEA Scoping workshop in 2023 and in the context of the Expert Group's report. A report was prepared by the SEA Team for discussions with the DHLGH and the Environmental Assessment Technical Steering Group (EATSG) with recommendations on what indicators might need to be amended as part of the draft revision of the NPF. A revised monitoring programme was presented in the SEA Environmental Report for public consultation. The final monitoring programme takes into account the submissions received during public consultation, including those from environmental authorities, and also reviews by the DHLGH and the RPS SEA team. This is included at Chapter 7 of this SEA Statement.
Consultation	Statutory consultation was undertaken with the environmental authorities for SEA in Ireland in relation to scoping for the SEA Environmental Report. Non- statutory transboundary consultation was also undertaken at that time with SEA environmental authority in Northern Ireland i.e., DAERA. Issues raised were used to inform the overall scope and context of the environmental assessment. Statutory public consultation on the First Revision of the NPF and the associated SEA Environmental Report and SFRA were also undertaken for a period of 9 weeks. A parallel consultation was also undertaken by EAU on the NIS prepared to inform the AA Determination.
Post-consultation	Written submissions received during public consultation have informed the preparation of the final First Revision of the NPF. Changes proposed to NPOs and NSOs on foot of consultation were assessed under the SEA, SFRA and AA processes and provided to the DHLGH to inform finalisation.

4.2 Recommended Mitigation Measures and how they have been addressed in the First Revision of the NPF

4.2.1 Mitigation Identified in the SEA Environmental Report

As part of the assessment of the First Revision of the NPF, the SEA Environmental Report specifically suggested mitigation measures to offset negative impacts identified. Table 4-2 presents the SEA mitigation measures and recommendations and how these measures were or were not incorporated into the Final Plan proposed for adoption. This table has been prepared through collaboration between SEA team and DHLGH.

Table 4-2: SEA Proposed Mitigation and How It has Been Addressed

Draft Plan Policy Section Ref	Proposed Mitigation from Environmental Report (July 2024) (Reference numbering relate to draft Plan)	Updated Reference Numbering Between Draft and Final Plans	How Was This Addressed in the Final Plan (April 2025). (Updated reference numbering shown in blue text relates to final Plan)
Chapter 1 – the Vision	<ul style="list-style-type: none"> NPO 1: The NPO should be expanded to reference Flood Risk Assessment. 	No change to mitigation referencing	NPO 1: The proposed mitigation relating to flood risk assessment has been addressed in NPO 1 .
Chapter 1 – the Vision	<ul style="list-style-type: none"> NPO 1: The previous supporting text should be reinstated with minor amendments as it acknowledges the need for other non-statutory assessments to support environmental and ecological reporting. This is particularly important for ecology as Ecological Impact Assessments (EcIA) inform statutory assessment such as EIA and NIS and other planning decisions which may not require full EIA. <p>At the project level, all applications for development consents for projects emanating from any policies that may give rise to likely significant effects on the environment will need to be accompanied by one or more of the following, as relevant:</p> <ul style="list-style-type: none"> Ecological Impact Assessment Report (EcIA) <i>(including a biodiversity checklist tool or similar, if deemed relevant and proportionate)</i>; Environmental Report <i>if deemed relevant and proportionate</i>; Water Framework Directive (WFD) <i>Assessment of projects if deemed relevant and proportionate</i>; Environmental Impact Assessment Report (EIAR) if deemed necessary under the relevant legislation (statutory document); Natura Impact Statement (NIS) if deemed necessary under the relevant legislation (statutory document). 	No change to mitigation referencing	<p>NPO 1: The proposed mitigation has been addressed in Section 1.7 of the NPF Revision. It is noted that the previous supporting text had been reinstated in the draft Plan as published in July 2024 and this element of the mitigation was therefore included in error (see Chapter 8 Addendum).</p> <p>New text in relation to Environmental Reports and Water Framework Directive (WFD) Assessment was included as mitigation and has now been included within Section 1.7.</p>

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Draft Plan Policy Section Ref	Proposed Mitigation from Environmental Report (July 2024) (Reference numbering relate to draft Plan)	Updated Reference Numbering Between Draft and Final Plans	How Was This Addressed in the Final Plan (April 2025). (Updated reference numbering shown in blue text relates to final Plan)
Chapter 2 – A New Way Forward	<ul style="list-style-type: none"> ALL 1: While respecting the broad principles of the NPF, population growth will initially be targeted and prioritised to locations which have capacity in key services including but not limited to wastewater treatment in order to avoid negative effects on the receiving environment. This prioritisation will allow time for other target areas to address deficiencies and upgrade as necessary. 	No change to mitigation referencing	<p>ALL 1: The proposed mitigation has been addressed.</p> <p>Chapter 10 includes a specific section relating to coordinating land use zoning, infrastructure and services. NPO 43, NPO 100, NPO 101, NPO 102, NPO103, NPO104 and NPO 105 also address this mitigation. Additional supporting text is also included on prioritisation in Chapters 2, 4 and 6.</p>
Chapter 2 – A New Way Forward	<ul style="list-style-type: none"> ALL 2: Support the implementation of the guidance and actions contained in the Reducing Embodied Carbon in Cement and Concrete through Public Procurement in Ireland report from DETE as a NPF policy / supporting text. 	No change to mitigation referencing	<p>ALL 2: The proposed mitigation has been addressed.</p> <p>Section 9.2 (Circular Economy) has been amended to refer to measures to reduce embodied carbon (including a footnote reference to the Reducing Embodied Carbon in Cement and Concrete through Public Procurement in Ireland report) and promoting refurbishment over demolition and dereliction as well as referencing the Green Public Procurement Strategy and Action Plan (2024-2027) which will help drive the implementation of green and circular procurement practices across the public sector.</p>
Chapter 3 – Future Planning and Development, and Place Making Planning Priorities for the three regions	<ul style="list-style-type: none"> EM4: A strategy to link larger commuter towns with smaller areas would benefit a wider cross section and ensure smaller areas are not left behind as a result of lack of investment. 	No change to mitigation referencing	<p>EM4: The proposed mitigation has been responded to through text in Section 1.3, NSOs and further expanded upon within Chapter 10. Specific NPOs that reflect this approach are: NPOs 12 – 15, NPO 26, NPO 32. Additionally, this issue is covered in Sections 1.2, 2.4, 2.7, which set out the Settlement Hierarchy as per the <i>Development Plans Guidelines for Planning Authorities</i>, and Section 3.1 through the Strategic Development of Ireland's Regions.</p>

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			The RSEs and City and County Development Plans provide the means to plan for such linkages, and the implementation of this will be applicable at the appropriate lower-level plan scale within the planning hierarchy.
Chapter 3 – Future Planning and Development, and Place Making Planning Priorities for the three regions	<ul style="list-style-type: none"> EM5 and SR8: This priority should be reinstated. 	No change to mitigation referencing	EM5 and SR8. The 2018 text on the Regeneration and Development initiative was deleted on the basis that in the interim years the Urban Regeneration Development Fund, Rural Regeneration Development Fund and Town Centre First initiative were established. Also, the Land Development Agency was establishment. This 2018 text is out of date and the NPF Revision has been updated to reflect the progressed position.
Chapter 3 – Future Planning and Development, and Place Making Planning Priorities for the three regions	<ul style="list-style-type: none"> EM7, NW8 and SR5: As per mitigation for NPOs 75 and 76, as repeated below. 75: All new wind and solar projects of scale shall incorporate a community benefit scheme to ensure that benefit serves the community in a fair and balanced way. 75: Adoption of the regional targets into the relevant Regional Spatial and Economic Strategy (RSES) will be subject to SEA and AA and any supporting policy base and/or spatial definitions provided in these RSES should be added in full to advise on any further mitigation at regional, local or project level. Similarly, in devising the maximum potential contribution of each local authority within the Region, the Regional Assembly will recognise the existing environmental criteria employed in the geospatial analysis carried out by the SEAI (see Appendix D) and will provide for a similar or enhanced level of environmental protection to that used to 	<ul style="list-style-type: none"> No change to mitigation referencing for EM7, NW8 and SR5. NPO 75 has been renumbered to NPO 74 in final Plan NPO76 has been renumbered to NPO 75 in final Plan. 	EM7, NW8 and SR5: Proposed mitigation has been responded to as per response for NPO 74 and NPO 75 , as repeated below. <ul style="list-style-type: none"> NPO 74: This mitigation has been addressed. A key feature of the Renewable Electricity Support Scheme (RESS) and Offshore Renewable Electricity Support Scheme (ORESS) is that all renewable electricity generation projects must establish a Community Benefit Fund to be used for the wider economic, environmental, social and cultural well-being of the local community. DECC has also published A Good Practice Principles Handbook in relation to community benefit. NPO 74: Proposed mitigation addressed as the RSEs will be subject to SEA and AA in accordance with EU and national legislative requirements, which

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	<p>develop the targets. With regard to the accelerated permitting procedures required to be implemented by Member States under RED III, and in light of the regional renewable target being put forward, the role for regional-level SEA and AA will therefore be crucial.</p> <p>3. 75: The Climate Action Plan sets out an Action to “Publish Regional Renewable Electricity Strategies”. It is unclear if these will be prepared as part of future updates to the RSEs or as standalone strategies. In either case, the Regional Renewable Electricity Strategies will be subject to SEA and AA.</p> <p>4. 75 and 76: Adoption of the local targets developed by the Regional Assemblies into the relevant County and City Development Plans will also be subject to SEA and AA and any supporting policy base and/or spatial definitions provided in these.</p> <p>5. 75: It is recommended that the DHLGH liaise with DECC and the Regional Assemblies on the preparation of the Regional Renewable Electricity Strategies. This will include development of guidance or similar on the consideration of cumulative effects, particularly given the scale of wind and solar PV development proposed in the CAP and the increased pace required to deliver this.</p> <p>6. 75: Areas that are subsequently identified for onshore renewables must be informed by appropriate environmental assessment and consideration of sensitivities in the receiving environment. DHLGH, DECC, and other government stakeholders as relevant shall liaise on the identification process for any go-to/acceleration/designation areas for renewable energy. Discussions shall be informed by, but not limited to, the following: Land Use Review Phase 1 and Phase 2 work,</p>		<p>includes environmental protections. A common methodology is currently being finalised by DECC for regional authorities to apply in the preparation of Regional Renewable Energy Strategies (RRES) with reference to the geospatial analysis. Devising the maximum potential contribution of each local authority within the Region is a matter for the RRES and any supporting National Policy Statement or guidelines developed to further inform the achievement of this objective.</p> <p>3. NPO 74: This mitigation has been addressed through inclusion of supporting text stating that each Regional Assembly will prepare a Regional Renewable Electricity Strategy (RRES), which will be included in the RSEs and will be subject to SEA/AA.</p> <p>4. NPO 74 and 75 : This mitigation has been addressed as this is already a legal requirement for County and City Development Plans. Refer to Section 10 of the Planning and Development Act, 2000 (as amended).</p> <p>5. NPO 74: This mitigation has been addressed. The DHLGH already liaise on this matter with DECC and the Regional Assemblies. EPA has also published good practice guidance on cumulative effects assessment in SEA.</p> <p>6. NPO 74: This mitigation has been addressed. The DHLGH already liaise with relevant government bodies responsible for these matters. A new methodology for LARES will be published shortly by DECC.</p>

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	<p>existing Local Authority Renewable Energy Strategies, the future Regional Renewable Electricity Strategies, and the development of DMAPs.</p> <p>7. 75: Identification of any areas to be designated for renewable electricity and or renewable energy will be supported by a quality site selection and environmental constraints analysis process that addresses environmental criteria such as landscape, cultural heritage, water quality, flood risks and biodiversity, as a minimum.</p> <ul style="list-style-type: none"> 76: It is recommended that the following text is added, as it is presently unclear whether the Regional Renewable Electricity Strategies will be standalone or incorporated as part of the RSEs, and the publication of the latter is a specific action of the Climate Action Plan 2024: <i>“Local Authorities shall plan, through their City/County Development Plans, for the delivery of specified Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy and Regional Renewable Electricity Strategy.”</i> 		<p>7. NPO 74: This mitigation has been responded to through the inclusion of a reference to locations being determined based upon the best available scientific evidence in line with EU and national legislative frameworks. Identification of any areas to be designated for renewable electricity and/or renewable energy is a matter for the Regional Assemblies through the preparation of their statutory RSEs and Local Authorities through the preparation of their statutory City and County Development Plans. This will include the Regional Assemblies and Local Authorities carrying out environmental assessments on their RSEs and City and County Development Plans as per the Planning and Development Act, 2000 (as amended). This mitigation will be appropriately dealt with at the relevant tier of plan making and consenting. NPO 1 also applies to all plans, projects and activities requiring consent arising from the National Planning Framework. This in keeping with the strategic high level nature of a national policy document.</p> <p>NPO 75: This mitigation has been addressed through amended NPO 74 and NPO 75 which address the allocations in the context of the RSEs.</p>
Chapter 3 – Future Growth Enablers for Dublin, Galway, Cork, Waterford and Limerick	<ul style="list-style-type: none"> ALL 1: The supporting text should state that infrastructure and project proposals are subject to the outcomes of the applicable environmental, planning and consenting processes. 	No change to mitigation referencing	ALL 1: The proposed mitigation has been addressed through NPO 1 .

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Chapter 3 – Future Growth Enablers for Dublin, Galway, Cork, Waterford and Limerick	<ul style="list-style-type: none"> ALL 2: The enablers should include the need to incorporate carbon sinks and nature restoration proposals into key development areas. Adaptations that build resilience for sea level rise due to climate change risks should also be referenced when targeting development in coastal locations. 	No change to mitigation referencing	ALL 2: The proposed mitigation has been addressed through additional text including Section 9.3 relating to the National Adaption Framework and nature restoration text and the coastal environment in Section 7.4. The wording of NPO 53 has been revised to include reference to adaptation responses in coastal areas. NPO 88 has been introduced to support protection and restoration of biodiversity in Ireland.
Chapter 3 – Future Growth Enablers for Dublin, Galway, Cork, Waterford and Limerick	<ul style="list-style-type: none"> G3, L6 and W4: It is noted that similar enablers such as D2 for Dublin and C3 for Cork related to sustainable development in greenfield areas have been revised to include 'brownfield areas'. It is recommended that these enablers is revised to include this reference as prioritising infill development into brownfield sites over greenfield sites can offer positive implications for BFF, LS and W. 	L6 has been updated to L7	G3, L7 and W4: The proposed mitigation has been addressed through integration into the NPF Revision and key future growth enablers for Galway, Limerick and Waterford which have been amended to refer to brownfield.
Chapter 3 – Future Growth Enablers for Dublin, Galway, Cork, Waterford and Limerick	<ul style="list-style-type: none"> G7: The enablers should include the need to incorporate carbon sinks and nature restoration proposals into key development areas. Adaptations that build resilience for sea level rise due to climate change risks should also be referenced when targeting development in coastal locations. 	No change to mitigation referencing	G7: The proposed mitigation has been addressed through additional text including Section 9.3 relating to the National Adaption Framework and nature restoration text and the coastal environment in Section 7.4. The wording of NPO 53 has been revised to include reference to adaptation responses in coastal areas. NPO 88 has been introduced to support protection and restoration of biodiversity in Ireland. NPOs 52 – 54 specifically take into account Ireland's coastal resource and the management of the effects of sea level changes. NPO 66 also reflects on the need for the planning system to ensure that ' <i>development occurs within environmental limits</i> '.

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Chapter 3 – Future Growth Enablers for Dublin, Galway, Cork, Waterford and Limerick	<ul style="list-style-type: none"> G8: It should be clarified if the GMATS is the same strategy as the Galway Transport Strategy (GTS). 	No change to mitigation referencing	G8: The proposed mitigation has been addressed by the way of a footnote to provide clarification that GMATS is a strategy currently in development which will replace the GTS.
Chapter 4	<ul style="list-style-type: none"> NPO 16: Proactive planning for recreation and access facilities should be encouraged through all tiers of planning to provide for sustainable communities while also protecting environmental and ecological receptors from harm. 	No change to mitigation referencing	NPO 16: The proposed mitigation has been addressed through additional text which has been added under Tourism in Section 5.4 and the wording of NPO 34 which has been revised to include reference to sustainable management of outdoor recreation sites. This is also addressed through the addition of NPO 88 to plan and manage for integration of biodiversity protection and restoration in future planning and development.
Chapter 4	<ul style="list-style-type: none"> NPO 21: The NPO should include specific reference to environmental protection and sustainable development. It should also reference the opportunity for the development of these public lands to support related government commitments and policy on biodiversity, soils and water quality as a priority, in a manner which supports Ireland's progress in achieving the UN Sustainable Development Goals (SDGs) and the 2030 Agenda for Sustainable Development." 	No change to mitigation referencing	NPO 21: The proposed mitigation has been addressed. This is initially through NPO 1 which applies to all. In addition, the LDA has published a Sustainable Development Strategy 2024-2028 which commits the LDA to promoting environmental protection and sustainable development. The Strategy is aligned with the UN Sustainable Development Goals. The Sustainability Strategic Objectives of the Strategy include: 'Enhance Biodiversity & Climate Resilience', 'Promote Water Stewardship' and 'Reduce Carbon' and actions include the production of "LDA Sustainable Design Guidelines 3: Planning for amenity, biodiversity and nature-based solutions" which will also aim to establish a best practice approach to Biodiversity Net Gain (BNG) assessments. Therefore, the proposed mitigation is already being actioned by the LDA Strategy. A footnote reference to this strategy has been

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			included in section 4.5 Regeneration and Rejuvenation. The LDA is governed by the Land Development Agency Act 2021.
Chapter 5	<ul style="list-style-type: none"> NPO 23: Reference should be included stating successor policies relating to national policy for rural areas and the islands should be screened for SEA and AA. 	No change to mitigation referencing	NPO 23: The proposed mitigation has been addressed through NPO 1 and NPO 23 which together address environmental assessment and successor policies.
Chapter 5	<ul style="list-style-type: none"> NPO 26: The policy should reference the need for environmental assessment and supporting text should be updated to reflect the nature of environmental value provided by heritage assets. 	NPO 26 has been renumbered to NPO 90 and has been relocated in final Plan	NPO 90: The proposed mitigation has been addressed through the text of NPO 90 which specifically references the environmental value of built heritage assets and NPO89 which specifically references the requirement to protect, conserve and enhance the natural, cultural and built heritage of Ireland. NPO1 also applies to all plans, projects and activities requiring consent arising from the NPF. The protection of the environmental value of heritage assets is also enshrined in legislation through the Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023.
Chapter 5	<ul style="list-style-type: none"> NPO 31: This objective should be revised to acknowledge the current evidence base and the need for the rural economy to proactively address these issues as part of a long term sustainable solution. 	NPO 31 has been renumbered to NPO 30 in final Plan	NPO 30: Proposed mitigation has been responded to through text which commits to facilitating <i>'in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism'</i> . Chapter 5 also includes

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			supporting text in sections 5.1 and 5.4. NPOs 32 and 33 also address and support the rural economy in a sustainable manner. However, it is noted that EPA's State of the Environment Report for 2024 would suggest that consistency with environmental protection is a challenge for this sector and targeted actions are needed through agricultural sectoral plans to achieve the long term sustainability.
Chapter 5	<ul style="list-style-type: none"> NPO 34: Support in this policy must be linked to improvements in water quality parameters associated with agriculture and real reductions in GHG emissions associated with agriculture that go beyond offsetting with forestry. 	NPO 34 has been renumbered to NPO 33 in final Plan	NPO 33: The proposed mitigation has been addressed to the extent possible within this high-level strategic national policy document through the final NPO 33 wording which commits to "ensuring progress in achieving targets in the National Climate Action Plan 2024 and the River Basin Management Plan". This is supplemented by NPO 77 which addresses enhancement in water quality. Guidelines for implementation of the Water Framework Directive in the planning system are currently being prepared.
Chapter 5	<ul style="list-style-type: none"> NPO 35: Support for the strategies should be conditional on integration of environmental considerations and outcomes of monitoring of existing facilities. 	NPO 35 has been renumbered to NPO 34 in final Plan	NPO 34: This mitigation has been addressed through amended wording in NPO 34 and the further commitment to monitoring in NPO 108
Chapter 5	<ul style="list-style-type: none"> NPO 35: This NPO would benefit with updated wording ensuring alignment with the relevant NBAP. 	NPO 35 has been renumbered to NPO 34 in final Plan	NPO 34: This mitigation has been addressed through integration into NPO 34 .
Chapter 5	<ul style="list-style-type: none"> ALL 1: As per NPO 1 support for sectoral plans, programmes and strategies should be linked to them being subject on application of SEA / EIA/ FRA / AA as appropriate. 	No change to mitigation referencing	ALL 1: This mitigation is addressed through NPO 1 .
Chapter 5	<ul style="list-style-type: none"> ALL 2: A new NPO addressing light pollution, especially in areas designated as 'Dark Sky' should be considered. 	No change to mitigation referencing	ALL 2: Proposed mitigation has been addressed through addition of supporting text on light pollution in Section 9.4.

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Chapter 6	<ul style="list-style-type: none"> ALL 1: Housing developments of scale seeking planning permission should demonstrate evidence of existing adequate capacity or committed capacity for the cumulative anticipated population of the area in the following key services prior to delivery of the housing: drinking water, wastewater, early years, primary and secondary school places, health care and elderly care services. 	No change to mitigation referencing	ALL 1: Proposed mitigation addressed through the <i>Development Plan Guidelines for Planning Authorities (2021)</i> . A footnote has been added to link the National Core Principles under Section 6.6 of the revised NPF to the Guidelines and the requirement to address pressures and capacity and prepare a Settlement Capacity Audit.
Chapter 6	<ul style="list-style-type: none"> ALL 2: Housing developments of scale seeking planning permission should consider the impact of recreational pressure from the new population (and cumulatively with existing populations using the areas) on local biodiversity and protected habitats and species. Furthermore, a Recreational Access Management Plan shall be prepared to identify necessary mitigation strategies where significant pressures are identified. 	No change to mitigation referencing	<p>ALL 2 The proposed mitigation has been addressed through the Sustainable Residential Development and Compact Settlement Guidelines (2024) in terms of policy and the SEA monitoring programme for that plan. Further consideration will also be given at the county development plan and local area plan levels of the planning hierarchy as appropriate.</p> <p>Recreational pressure, (particularly on open space and biodiversity) is one of the key pressures identified in the SEA Report and NIS arising from the policy base in the NPF. The Sustainable Residential Development and Compact Settlement Guidelines (2024) have been added to the development management toolkit in 2024 and these Guidelines will contribute to achieving the proposed mitigation. This is alongside the additional text added in the NPF under Tourism in Section 5.4 and the wording of NPO 34 which has been revised to include reference to sustainable management of outdoor recreation sites. Importantly, the addition of NPO 88 addresses the potential pressures through preparation of national guidance which aims to plan and manage for integration of biodiversity protection and</p>

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			restoration in future planning and development etc.
Chapter 6	<ul style="list-style-type: none"> NPO 42: Recognition should be made within NPO 42 that childcare and school delivery associated with increased housing developments should also explicitly support children and young adults with special educational needs to ensure there is capacity within communities for all residents to access education locally. 	NPO 42 has been remumbered to NPO 41 in final Plan.	NPO41: This mitigation has been addressed through integration into supporting text in Section 6.5.
Chapter 6	<ul style="list-style-type: none"> NPO 43: Terminology in relation to the number of homes required should be reviewed and standardised for clarity of the plan [50,000 houses or houses to accommodate 50,000 households]. 	NPO 43 has been remumbered to NPO 42 in final Plan.	NPO42: Proposed mitigation has been addressed. The wording of the NPO has been amended to clarify it refers to 50,000 'homes'.
Chapter 6	<ul style="list-style-type: none"> NPO 43: See also mitigations from Chapter 2, as repeated below: <ul style="list-style-type: none"> While respecting the broad principles of the NPF, population growth will initially be targeted and prioritised to locations which have capacity in key services including but not limited to wastewater treatment in order to avoid negative effects on the receiving environment. This prioritisation will allow time for other target areas to address deficiencies and upgrade as necessary. Support the implementation of the guidance and actions contained in the Reducing Embodied Carbon in Cement and Concrete through Public Procurement in Ireland report from DETE as a NPF policy / supporting text. 	NPO 43 has been remumbered to NPO 42 in final Plan.	<p>NPO 42: The proposed mitigation has been addressed. Chapter 10 includes a specific section relating to coordinating land use zoning, infrastructure and services. NPO 43, NPO 100, NPO 101, NPO 102, NPO103, NPO104 and NPO 105 also address this mitigation. Additional supporting text is also included on prioritisation in Chapters 2, 4 and 6.</p> <p>NPO 42: The proposed mitigation has been addressed. Section 9.2 (Circular Economy) has been amended to refer to measures to reduce embodied carbon (including a footnote reference to the Reducing Embodied Carbon in Cement and Concrete through Public Procurement in Ireland report) and promoting refurbishment over demolition and dereliction as well as referencing the Green Public Procurement Strategy and Action Plan (2024-2027) which will help drive the implementation of green and circular procurement practices across the public sector.</p>

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Chapter 6	<ul style="list-style-type: none"> NPO 46: To avoid compact living remaining a short term solution for people, the life cycle needs of all life-stages of residents need to be incorporated into design principles more tangibly particularly those related to amenity provision for teenagers, young adults and older residents. A study into the recreational and social needs of residents in compact forms of development should be coordinated by the DHLGH and lessons learned from recent compact developments of scale nationally (and international examples where relevant) to inform a future guidance note or similar for LA and developers on designing for all life stages. 	NPO 46 has been renumbered to NPO 45 in final Plan	<p>NPO45: Proposed mitigation addressed.</p> <p>Chapter 6 People, Homes and Communities provides detail on the importance of quality of life and place which is supported through NPOs 36 – 45, particularly NPOs 40, 43 and 44. Supporting text is included referencing The Sustainable Residential Development and Compact Settlement Guidelines 2024 (SRD), which includes a monitoring programme. Compact Growth is a core element of the NPF Strategy and can take many forms of development types as the 2024 SRD Guidelines showcase. Section 4.4 of the Guidelines sets out in detail key indicators of quality design and placemaking.</p> <p>An urban design manual to support these guidelines is currently in preparation which focuses on best practice examples, typology and placemaking for all ages.</p>
Chapter 6	<ul style="list-style-type: none"> NPO 48: Revised NPO to include further aims to specifically address the speed of response once housing need has been established if long term negative effects are to be avoided. 	NPO 48 has been renumbered to NPO 47 in final Plan.	<p>NPO 47: It is noted that as a high-level policy document which sets the policy framework, the matter of implementation and delivery is undertaken through other government policy measures such as Housing for All, and specific schemes such as – Croí Conaithe; Vacant and Derelict Homes, Buy and Renew; Repair and Lease. Private market conditions such as, capacity and productivity also impact delivery rates.</p>
Chapter 7	<ul style="list-style-type: none"> NEW NPO: A new NPO should be included to specifically support the alignment of terrestrial planning with marine planning at regional and local level to provide for the sustainable development of port infrastructure that enables the development of ORE. 	No change to mitigation referencing	<p>NEW NPO: While a new NPO has not been added, this mitigation has been addressed through Section 7.5 and NPOs 50, 51, and 55. In addition, this obligation is legally provided for in the Planning and Development Act, 2000 – Section 12(18)(b)</p>

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			for city and county development plans and section 23(3)(a)(iia) for RSEs.
Chapter 7	<ul style="list-style-type: none"> ALL 1: Supporting text on Ports and Harbours should include an explicit reference to the Guidance document on the implementation of the Birds and Habitats Directive in estuaries and coastal zones with particular attention to port development and dredging, European Commission (2011). 	No change to mitigation referencing	ALL 1: the proposed mitigation has been addressed through the inclusion of NPO1 and supporting text regarding Appropriate Assessment. A footnote reference to European Commission Guidance has been included in Section 7.3.
Chapter 7	<ul style="list-style-type: none"> NPO 51 and 52: These NPOs would benefit from a qualification of support being subject to the application of statutory environmental assessments at plan and project level and the outcome of development permission and / or licensing processes. 	<p>NPO 51 has been renumbered to NPO 50 in final Plan.</p> <p>NPO 52 has been renumbered to NPO 51 in final Plan.</p>	NPO 50 and 51: This mitigation has been addressed through NPO 1 .
Chapter 7	<ul style="list-style-type: none"> ALL 2: The DHLGH and DECC should establish a 'Collaborative Forum' to discuss proposed ORE projects and the enabling infrastructure required to support delivery, notably ports and grid (onshore and offshore elements). The collaborative forum should identify the ports which are suitable for ORE and determine the level of intervention needed to upgrade them in the short to medium term to establish feasibility. 	No change to mitigation referencing	ALL 2: It is confirmed that a collaborative approach currently exists between the two Departments and a high-level Accelerating Renewable Electricity Taskforce is in force since 2023 providing the forum for the relevant Departments and other relevant agencies and bodies to engage on this topic. Furthermore, there is a specific commitment under the South Coast DMAP to a regional collaborative forum which includes collaboration led by DECC.
Chapter 7	<ul style="list-style-type: none"> ALL 3: Masterplans or similar strategies/plans should be prepared for key enabler ports. These Masterplans could guide the planning and development of projects/proposals for expansion of existing port infrastructure, including those which may be within or adjacent to European sites. Examples such as the Dublin Bay Biosphere Biodiversity Conservation and Research Strategy 2022-2026 could be referenced. 	No change to mitigation referencing	<p>ALL 3: the proposed mitigation has been addressed to the extent possible within this high-level strategic national policy document. Section 7.3 of the NPF outlines the strategic importance of Ireland's ports and specifically states:</p> <p><i>"Tier 1 and 2 ports are, in the main, located within close proximity to our cities and the role of these ports will be considered and addressed in tandem with long-term infrastructural requirements as part of the</i></p>

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			<p><i>relevant Regional Spatial and Economic Strategy and plan making processes at local level. Strategic plans for relevant Tier 1 and 2 ports and corresponding city growth strategies should align and be consistent with the broader aims and policies for the effective growth and sustainable development of the city regions.”</i></p> <p>This is further stipulated in NPO 50, which also refers to National Ports Policy. In accordance with the National Ports Policy, 2013, and in line with NPO 50, all Tier 1 (Dublin, Cork, Shannon Foynes) and both Tier 2 ports (Waterford, Rosslare) have completed individual masterplans.</p>
Chapter 7	<ul style="list-style-type: none"> NPO 55: This policy would benefit from inclusion of better integration of the coastal and marine interface, potentially through Integrated Coastal Zone Management (ICZM), particularly in the context of ORE which has a significant inter-related onshore footprint. 	<p>NPO 55 has been remumbered to NPO 54 in final Plan.</p> <p>NPO 56 has been remumbered to NPO 55 in final Plan.</p>	<p>NPO 54 : The proposed mitigation has been responded to through Section 7.4 that includes text on the Report of the Inter-Departmental Group on National Coastal Change Management Strategy which identifies key recommendations for the preparation of an Irish Coastal Change Strategy including the development of Coastal Change Management Plans and the promotion of Nature-Based Solutions .</p> <p>In addition, NPO 55 in the final Plan, addresses the issue of integration of coastal and marine interfaces by supporting “<i>the progressive development of Ireland’s offshore renewable energy potential, the sustainable development of enabling onshore and offshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects</i>”.</p>

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Chapter 7	<ul style="list-style-type: none"> NPO55: A national scale policy for coastal management plans should be supported by a clear guidance framework on responsible bodies and how these should be developed. 	NPO 55 has been renumbered to NPO 54 in final Plan	NPO 54: This mitigation has been addressed. The DHLGH and the OPW have established an Inter-Departmental Group to prepare a scoping report for a National Coastal Change Management Strategy. The purpose of the Group was to scope out an approach for the development of a national co-ordinated and integrated strategy to manage the projected impact of coastal change to our coastal communities. The Inter-Departmental Group was jointly chaired by the DHLGH and the OPW and is supported by a Technical Working Group. The report of the Interdepartmental Group was approved in 2023 by Government and published online: Coastal Change Management Strategy Report (www.gov.ie). Through the 15 recommendations set out in the report which have been accepted by Government, an evidence-based coastal change management strategy facilitating key decisions to be taken to address and manage the impacts of coastal change over the short, medium and longer terms will be put in place.
Chapter 8	<ul style="list-style-type: none"> NPO 62: Ongoing consultation and coordination throughout the planning tiers as relevant should be stipulated. 	NPO 62 has been renumbered to NPO 61 in final Plan	NPO 61: This has been addressed through NPO 56 which promotes collaboration across key areas such as spatial planning, economy and social infrastructure.
Chapter 8	<ul style="list-style-type: none"> NPO 64: Robust site selection is required for any facilities to be developed. 	NPO 64 has been renumbered to NPO 63 in final Plan	NPO 63: Proposed mitigation has been responded to through reference in NPO 85 to avoidance/ minimisation/ restoration/ offset. The NPF is a high-level policy document which sets the policy framework. NPO 63 is a high-level policy that relates to cross-border cooperation. The specifics of

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			consultation, coordination and site selection are more appropriately dealt with at the relevant tier of plan making and consenting. NPO 1 also applies to all plans, projects and activities requiring consent arising from the National Planning Framework. Fáilte Ireland, in cooperation with the NPWS, is publishing guidance on protection of Natura 2000 sites and the environment for tourism access and projects.
Chapter 9	<ul style="list-style-type: none"> NPO 68: A guidance note on reuse of buildings to acknowledge the built and natural heritage potential should be developed by the OPR to alert developers to the potential conflicts and the possible need for an architect and / or ecological survey before works can commence. Retrofit plans/works must consider impacts to other environmental receptors with particular attention paid to bats. Retrofit plans/works shall consider historical setting / landscape character. 	NPO 68 has been renumbered to NPO 67 in final Plan	NPO 67 : This mitigation has been addressed through a footnote reference in Section 9.2 to the DHLGH publication 'Improving Energy Efficiency in Traditional Buildings, Guidance for Specifiers and Installers', 2023, which refers to BFF in traditional buildings.
Chapter 9	<ul style="list-style-type: none"> NPO 71: The policy wording should be amended as follows: "...achieving a zero carbon <i>achieving a zero carbon climate neutral economy</i>". This would reflect the wording of the national climate objective in the 2021 Act, and recognise that there are greenhouse gas emissions other than carbon dioxide which must also be reduced. 	NPO 71 has been renumbered to NPO 70 in final Plan	NPO 70 : This mitigation has been addressed through amended wording in NPO 70 which now refers to a "climate neutral economy".
Chapter 9	<ul style="list-style-type: none"> NPO 74: The proposed wording shall be amended to state: "Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations in line with EU and national commitments." 	NPO 74 has been renumbered to NPO 73 in final Plan.	NPO 73 : This mitigation has been addressed through amended wording in NPO 73 which now includes 'in line with EU and national legislative frameworks'.

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Chapter 9	<ul style="list-style-type: none"> NPO 74: Guidance is required to establish the expected environmental assessment requirements to support applications for renewable electricity projects that fall outside the mandatory requirement for EIA. 	NPO 74 has been renumbered to NPO 73 in final Plan.	NPO 73: The proposed mitigation has been addressed as guidance is currently being prepared by DECC and SEAI in relation to a methodology for regional renewable energy strategies for grid scale on-shore wind and solar. This will include the Regional Assemblies and Local Authorities carrying out environmental assessments on their respective Regional Spatial and Economic Strategies and City and County Development Plans.
Chapter 9	<ul style="list-style-type: none"> NPO 74: Feasibility studies should be conducted at both Regional Authority and subsequently Local Authority level to assess potential areas located in close proximity to larger industrial parks and brownfield areas. Guidance for co-location should be developed for different community settings in Ireland, the guidance will differ between rural and urban settings. 	NPO 74 has been renumbered to NPO 73 in final Plan.	NPO 73: The proposed mitigation has been addressed. The assessment of potential areas for co-location purposes can be informed by evidence at statutory plan making stage at regional and local levels in the preparation of RSEs and county/city development plans. The opportunities for co-location are addressed under Section 9.2 of the NPF. The Department of Enterprise, Trade and Employment are currently undertaking further work in relation to this policy area.
Chapter 9	<ul style="list-style-type: none"> NPO 74: The NPO should clearly link to the need for robust constraints analysis and site / route sections to underpin decision-making on where and what is appropriate. 	NPO 74 has been renumbered to NPO 73 in final Plan.	NPO 73: This mitigation has been addressed through the inclusion of a reference to locations being determined based upon the best available scientific evidence in line with EU and national legislative frameworks.
Chapter 9	<ul style="list-style-type: none"> NPO 75: All new wind and solar projects of scale shall incorporate a community benefit scheme to ensure that benefit serves the community in a fair and balanced way. 	NPO 75 has been renumbered to NPO 74 in final Plan.	NPO 74: This mitigation has been addressed. A key feature of the Renewable Electricity Support Scheme (RESS) and Offshore Renewable Electricity Support Scheme (ORESS) is that all renewable electricity generation projects must establish a Community Benefit Fund to be used for the wider economic, environmental, social and cultural well-being of the local community.

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			DECC have also published A Good Practice Principles Handbook in relation to community benefit.
Chapter 9	<ul style="list-style-type: none"> NPO 75: Adoption of the regional capacity allocations into the relevant Regional Spatial and Economic Strategy (RSES) will be subject to SEA and AA and any supporting policy base and/or spatial definitions provided in these RSES should be added in full to advise on any further mitigation at regional, local or project level. Similarly, in devising the maximum potential contribution of each local authority within the Region, the Regional Assembly will recognise the existing environmental criteria employed in the geospatial analysis carried out by the SEAI (see Appendix D) and will provide for a similar or enhanced level of environmental protection to that used to develop the targets. With regard to the accelerated permitting procedures required to be implemented by Member States under RED III, and in light of the regional capacity allocations being put forward, the role for regional-level SEA and AA will therefore be crucial. 	NPO 75 has been renumbered to NPO 74 in final Plan.	<p>NPO 74: The proposed mitigation has been addressed as a common methodology is currently being finalised by DECC for regional authorities to apply in the preparation of Regional Renewable Energy Strategies (RRES) with reference to the geospatial analysis.</p> <p>Devising the maximum potential contribution of each local authority within the Region is a matter for the RRES and any supporting National Policy Statement or guidelines developed to further inform the achievement of this objective.</p> <p>In addition, the RSESs will be subject to SEA and AA in accordance with EU and national legislative requirements, which includes all environmental protections.</p>
Chapter 9	<ul style="list-style-type: none"> NPO 75: The Climate Action Plan sets out an Action to “Publish Regional Renewable Electricity Strategies”. It is unclear if these will be prepared as part of future updates to the RSESs or as standalone strategies. In either case, the Regional Renewable Electricity Strategies will be subject to SEA and AA. 	NPO 75 has been renumbered to NPO 74 in final Plan.	NPO 74: This mitigation has been addressed through inclusion of supporting text stating that each Regional Assembly will prepare a Regional Renewable Electricity Strategy (RRES), which will be included in the RSESs and will be subject to SEA/AA.
Chapter 9	<ul style="list-style-type: none"> NPO 75 and 76: Adoption of the local targets developed by the Regional Assemblies into the relevant County and City Development Plans will also be subject to SEA and AA and any supporting policy base and/or spatial definitions provided in these. 	<ul style="list-style-type: none"> NPO 75 has been renumbered to NPO 74 in final Plan. NPO 76 has been renumbered to NPO 75 in final Plan. 	NPO 74 and 75: This mitigation has been addressed as this is already a legal requirement for County and City Development Plans. Refer to Section 10 of the Planning and Development Act, 2000 (as amended).

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Chapter 9	<ul style="list-style-type: none"> NPO 75: It is recommended that the DHLGH liaise with DECC and the Regional Assemblies on the preparation of the Regional Renewable Electricity Strategies. This will include development of guidance or similar on the consideration of cumulative effects, particularly given the scale of wind and solar PV development proposed in the CAP and the increased pace required to deliver this. 	NPO 75 has been renumbered to NPO 74 in final Plan.	NPO 74: This mitigation has been addressed. The DHLGH already liaise on this matter with DECC and the Regional Assemblies. EPA has also published good practice guidance on cumulative effects assessment in SEA.
Chapter 9	<ul style="list-style-type: none"> NPO 75: Areas that are subsequently identified for onshore renewables must be informed by appropriate environmental assessment and consideration of sensitivities in the receiving environment. DHLGH, DECC, and other government stakeholders as relevant shall liaise on the identification process for any go-to/acceleration/designation areas for renewable energy. Discussions shall be informed by, but not limited to, the following: Land Use Review Phase 1 and Phase 2 work, existing Local Authority Renewable Energy Strategies, the future Regional Renewable Electricity Strategies, and the development of DMAPs. 	NPO 75 has been renumbered to NPO 74 in final Plan.	NPO 74: This mitigation has been addressed. The DHLGH already liaise with relevant government bodies responsible for these matters. A new methodology for LARES will be published shortly by DECC.
Chapter 9	<ul style="list-style-type: none"> NPO 75: Identification of any areas to be designated for renewable electricity and or renewable energy will be supported by a quality site selection and environmental constraints analysis process that addresses environmental criteria such as landscape, cultural heritage, water quality, flood risks and biodiversity, as a minimum. 	NPO 75 has been renumbered to NPO 74 in final Plan.	NPO 74: This mitigation has been responded to through the inclusion of a reference to locations being determined based upon the best available scientific evidence in line with EU and national legislative frameworks. Identification of any areas to be designated for renewable electricity and/or renewable energy will be addressed by the Regional Assemblies through the preparation of their statutory RSEs and Local Authorities through the preparation of their statutory City and County Development Plans. This will include the Regional Assemblies and Local

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			Authorities carrying out environmental assessments on their RSEs and City and County Development Plans as per the Planning and Development Act, 2000 (as amended). This mitigation will be appropriately dealt with at the relevant tier of plan making and consenting. NPO 1 also applies to all plans, projects and activities requiring consent arising from the National Planning Framework.
Chapter 9	<ul style="list-style-type: none"> NPO 76: It is recommended that the following text is added, as it is presently unclear whether the Regional Renewable Electricity Strategies will be standalone or incorporated as part of the RSEs, and the publication of the latter is a specific action of the Climate Action Plan 2024: <i>“Local Authorities shall plan, through their City/County Development Plans, for the delivery of specified Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy and Regional Renewable Electricity Strategy.”</i> 	NPO 76 has been renumbered to NPO 75 in final Plan.	NPO 75: This mitigation has been addressed through amended NPO 74 and NPO 75 which address the allocations in the context of the RSEs.
Chapter 9	<ul style="list-style-type: none"> NPO 77: It is recommended that the NPO include a specific reference to “resource” and waste management, as this would be more in keeping with current circular economy best practice. 	NPO 77 has been renumbered to NPO 76 in final Plan.	NPO 76: Proposed mitigation addressed through reference to circular economy principles and the infographic included in Section 9.2 which illustrates the elements associated with circular economy.
Chapter 9	<ul style="list-style-type: none"> NPO 79 and NPO 80: This objective could be further improved by including a direct reference to the DHLGH Best Practice Interim Guidance Document: <i>Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.</i> 	No change to mitigation referencing.	NPO 79 and 80: Proposed mitigation addressed. This mitigation has been addressed through inclusion of reference to the national strategy for Nature Based Management of Urban Rainwater and Urban Surface Water Discharges in the supporting text in Section 9.3. Furthermore, the inclusion of reference to water reuse and SuDS in the five city enablers is also acknowledged.

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Chapter 9	<ul style="list-style-type: none"> NPO 79 and NPO 80: These objectives should link to Green and Blue infrastructure provision in NPOs 81, 82 and 90 as additional benefits could be achieved for BFF and W where NbS and SUDs are integrated. 	No change to mitigation referencing.	NPO 79 and 80: The proposed mitigation has been responded to through Section 9.3 of the NPF revision which references <i>Nature Based Management of Urban Rainwater and Urban Surface Water Discharges - A National Strategy</i> , which specifically promotes the integration of green and blue infrastructure into nature based solutions. Furthermore, it is recognised while all NPOs are standalone, they are all linked through the context of the plan. They are all statutory objectives which need to be reflected across government and in lower tier plans and policies.
Chapter 9	<ul style="list-style-type: none"> NPO 79: The requirement to use NbS and SUDs as a principle should be strengthened to more than support as per proposed amendments: <i>Proposals for the management of stormwater, rainwater and surface water flood risk should demonstrate the application, to the extent possible, of nature-based solutions and sustainable drainage systems.</i> 	No change to mitigation referencing.	NPO 79: This mitigation has been responded to through amended wording of the revised NPO 79 which strengthens the NPO by committing to retrofitting existing environments for NbS.
Chapter 9	<ul style="list-style-type: none"> NPO 80: The requirement to use NbS and SUDs as a principle should be strengthened to more than support as per proposed amendments: <i>Proposals for Support the retrofitting of existing environments to cater for surface water run-off through shall demonstrate the use of nature based solutions, including the implementation by Uisce Eireann of Integrated Drainage Plans on a prioritised settlement basis.</i> 	No change to mitigation referencing.	NPO 80: This mitigation has been addressed through inclusion of the new NPO 81 .
Chapter 9	<ul style="list-style-type: none"> NPO 81: Planning for Green Infrastructure benefit further from linking to plans for urban greening. 	NPO 81 has been renumbered to NPO 82 in final Plan.	NPO 82: This mitigation has been addressed. Plans for urban greening come under 'statutory land use plans' as per the NPO text. NPO 82 has also included text on "maintaining ecosystem services and

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			ecosystem functions and conserving and/or restoring biodiversity”.
Chapter 9	<ul style="list-style-type: none"> NPO 82: This objective could be improved further by adding reference to the local level as follows: “Identify and strengthen the value of greenbelts and green and blue spaces at a regional, city and local scale...” 	NPO 82 has been renumbered to NPO 83 in final Plan.	NPO 83: This mitigation has been addressed with reference to local scales included.
Chapter 9	<ul style="list-style-type: none"> NPO 85: It is recommended that they go further to commit to developing guidance to support planners and developers in achieving real effect from this NPO. The expertise for such guidance will require collaborative effort between the DHLGH, NPWS and others. 	NPO 85 has been renumbered to NPO 86 in final Plan.	NPO 86: Proposed mitigation has been addressed with the inclusion of the new NPO 88 which addresses guidance.
Chapter 9	<ul style="list-style-type: none"> NPO 81, NPO 82 and NPO 90 : Green and Blue infrastructure provisions should be enhanced to incorporate biodiversity specific infrastructure provisions also to ensure that this element is proactively protected and planned for in these wider strategies. 	<p>NPO 81 has been renumbered to NPO 82 in final Plan.</p> <p>NPO 82 has been renumbered to NPO 83 in final Plan.</p> <p>NPO 90 has been renumbered to NPO 93 in final Plan.</p>	NPO 82, NPO 83 and NPO 93: This mitigation has been addressed through the addition of new NPO 88 and the greater emphasis on biodiversity in supporting text for biodiversity-specific measures and the amendments to NSO 9 .
Chapter 10	<ul style="list-style-type: none"> NPO 96: National SEA legislation may need to be updated to integrate new Urban Area Plans, Priority Area Plans, and Coordinated Area Plans, if they are to come under S.I. 436 of 2004, as amended. It is noted that town planning remains a category under S.I. 435 of 2004 as amended and would cover these plans in any case. 	NPO 96 has been renumbered to NPO 100 in final Plan	NPO 100: This is being addressed through a review of the existing national SEA legislation, which has commenced in the context of planned updates that are required following the (post-consultation) signing of the Planning Act 2024 into law on 17 October 2024.
NSO	<ul style="list-style-type: none"> Application of NPO 1 to all plans, projects and activities requiring consent arising from the National Planning Framework. Furthermore development whose primary objective is to conserve, enhance or restore biodiversity should be supported in principle. 	No change to mitigation referencing	NSO: The proposed mitigation has been addressed.

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4.2.2 Mitigation Identified in the SFRA

As part of the assessment of the First Revision of the NPF, the SFRA identified mitigation measures to avoid any significant environmental effects due to flood risk resulting from the implementation of the plan. Table 4-3 presents the SFRA mitigation measures and how these were or were not incorporated into the Final Plan proposed for adoption. Reasons for why mitigation measures have not been brought forward have been included in the Table 4-3. This table has been prepared through collaboration between SEA team and DHLGH.

Table 4-3: SFRA Mitigation and How it has been Addressed

Draft Plan Policy Ref.	Proposed Mitigation/Recommendation	How Was This Addressed in the Plan
Overarching Mitigation	<ul style="list-style-type: none"> All developments should be managed sustainably in order to manage flood risks. NPO 78 shall ensure implementation of the Guidelines to ensure that development follows the sequential approach to avoid non appropriate development in flood prone areas. NPOs 78, 79 and 80 shall also ensure that all developments should include SuDS and nature based solutions to ensure runoff is controlled to at least the greenfield runoff rate. These policies shall also ensure that any impacts on flood risks as a result of climate change are also taken into account. Climate change impact on sea level rise and coastal flooding risks need to be considered in the flood protection measures design. NPOs 78, 79 and 80 will ensure the Guidelines be implemented and the potential climate change impacts on flood risk be taken into account in any proposed developments. This will reduce existing flood risks to any developments and their adjacent lands and properties. Consideration should be given to implement the above-mentioned policies on a catchment wide scale rather than on a localised site specific scale. 	<p>It is noted that NPO 78 is renumbered to NPO 77 and a new NPO 78 has been introduced.</p> <p>NPOs 78, 79 and 80 in relation to SuDS: The suite of NPO 77, 78, 79, 80 and 81 in the final Plan addresses the issues raised in the SFRA.</p> <p>NPOs 78, 79 and 80 in relation to climate and flood risk: This mitigation has been addressed by a new dedicated policy objective NPO 78 included in chapter 9.</p>
NPO 1	<ul style="list-style-type: none"> Policy NPO 1 would benefit from the inclusion of reference to SFRA as one of the environmental assessments. 	NPO1: This mitigation has been addressed
Policy enablers for Galway	<ul style="list-style-type: none"> The Galway City Flood Relief Scheme is currently at Stage I (Scheme Development & Design) and is programmed to be completed the construction works by December 2031. This scheme will provide protection to a significant number of flood affected properties located within the scheme area, both from the fluvial and coastal flood risks. Water compatible type developments/infrastructures should be considered in the areas from where flood risks cannot be eliminated completely. 	Policy enablers for Galway: Proposed mitigation is addressed through NPO 78. Consideration of developments within flood risk areas is addressed through the <i>Planning System and Flood Risk Management – Guidelines for Planning Authorities</i> (2009). The co-ordination of strategic planning and development within MASP areas is addressed by the new NPO96.
Policy enablers for Cork	<ul style="list-style-type: none"> Further to this, climate change impact on sea level rise and coastal flooding risks also needs to be considered in the flood protection measures design. Water compatible developments should be implemented at the high flood risk areas, particularly at the City Docks area. 	Policy enablers for Cork: Proposed mitigation addressed through NPO 78 Consideration of developments within flood risk areas is addressed through the <i>Planning System and Flood Risk Management – Guidelines for Planning Authorities</i> (2009). The co-

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Draft Plan Policy Ref.	Proposed Mitigation/Recommendation	How Was This Addressed in the Plan
	<ul style="list-style-type: none"> Construction works for the Lower Lee FRS is expected to commence in mid-2027. Further to this, the Midleton Flood Relief Scheme (Cork City Suburb area) has also been progressed and the construction works for this scheme are expected to be commenced in mid-2026. These schemes will provide protection to a significant number of flood-affected properties, both from the fluvial and coastal flood risks, located within the scheme areas. The updated post scheme flood maps should be used in the County Development Plan SFRAs. 	ordination of strategic planning and development within MASP areas is addressed by the new NPO96.
NPO 49-56	<ul style="list-style-type: none"> All developments in flood zone should have regard to latest national climate policies including Climate Action Plans for 2023 and 2024, second National Adaptation Framework and Flood Risk Management - Climate Change Sectoral Adaptation Plan (2019 - 2024). Supporting the development of coastal management plans to address the likely effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas will reduce the flood and erosion risks at the coastal properties (NPO 55). 	<p>It is noted that NPOs 49-56 are renumbered to 48-55 in the final Plan.</p> <p>NPO 49-56: This mitigation has been addressed by a new dedicated policy objective NPO 78 included in Chapter 9.</p> <p><i>“Promote sustainable development by ensuring flooding and flood risk management informs place-making by:</i></p> <p><i>Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management;</i></p> <p><i>Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.</i></p>
NPO 57-66	<ul style="list-style-type: none"> The cross-border co-operation shall ensure that flood risk on shared catchments (e.g. River Shannon catchment) is reduced and managed. It should also be ensured that all developments on shared catchments are appropriate and follow the principles of the Guidelines and the Northern Ireland Department of Environment Planning Policy Statement, PPS 15 ‘Planning and Flood Risk’. 	<p>It is noted that NPOs 57-66 are renumbered to 56-65 in the final Plan.</p> <p>NPO 57-66: This mitigation has been addressed through NPO 56-65. NPO 64 in particular requires effective management of shared landscapes, heritage, water catchments, habitats, species and transboundary issues in relation to environmental policy.</p>

4.2.3 Mitigation Identified in the NIS

As part of the assessment of the First Revision of the NPF, an NIS was prepared to inform the Appropriate Assessment process being carried out in parallel to the SEA and SFRA processes. Through the iterative process of the preparation of the revised NPF, the NIS mitigation strategy evolved to integrate protection policies and wording into the final plan.

Further to the re-assessment of the post-consultation NPF, including all the amended/additional NPOs, NSOs and supporting text included within the NPF, no remaining adverse effects on the integrity of European Sites have been identified post-consultation through the NIS re-assessment. This is set out in Sections 7.4 to 7.15 and summarised in Appendix K of the post-consultation NIS. All pre-consultation mitigations have been satisfactorily addressed by the post-consultation NPF and no additional mitigations were identified during the post-consultation re-assessment of the NPF; particularly in relation to new or amended policies including within the NPF post-consultation”.

5 HOW CONSULTATION FEEDBACK HAS INFLUENCED THE FIRST REVISION OF THE NPF

5.1 Introduction

Two periods of statutory consultation were undertaken as part of the SEA process for the draft First Revision of the NPF. The first related to SEA Scoping and was undertaken in Q4 2023. A Scoping Report was issued by the DHLGH in November 2023 to the statutory environmental authorities for SEA. A summary of written comments received and how they have been addressed was included in Appendix B of the SEA Environmental Report. Subsequently, a Scoping Workshop was held at the Custom House in Dublin on 21st November 2023 from 2-5pm. The workshop was intended to bring a wider group of stakeholders together to inform discussions on scope and level of detail for the SEA and to discuss environmental issues relating to the draft First Revision to the NPF. A total of 31 stakeholders attended along with representatives from DHLGH and RPS. A full list of attendees, a summary of feedback received and how they have been addressed was included in Appendix C of the SEA Environmental Report. The second was a wider statutory public consultation on the draft First Revision to the NPF alongside the SEA Environmental Report and the SFRA as published on www.gov.ie on 10th July 2024. All documents were available for inspection and download online. A separate public consultation process was carried out by EAU on the draft Natura Impact Statement (NIS), prepared to inform the Appropriate Assessment process. See also Section 3.4 and 3.5 of this SEA Statement for further details.

Written submissions received during the period of public consultations have informed the preparation of the final draft NPF as well as the finalisation of the environmental assessment reports. The SEA, SFRA and AA issues raised in the submissions and feedback are recorded in Section 5.2 below.

5.2 Issues Raised and Submissions from Statutory Public Consultation on the Draft First Revision of the NPF

Submissions and observations on the draft First Revision of the NPF and associated environmental documentation were invited prior to finalisation of draft Plan. The public consultation ran for nine weeks from July 10th to September 12th, 2024. All submissions were reviewed by the Plan team.

During the consultation process, a total of 272 submissions were received by the DHLGH. It is acknowledged that the submissions raised addressed a wide range of issues, however, some key themes emerged as focal points. These include five in particular which were identified as the main themes: balanced regional development, population and housing targets, implementation and infrastructure delivery, compact growth, and climate and the environment.

With respect to balanced regional development, some submissions express concerns about potential negative impacts on Dublin, others support more growth in other regions. It is to be noted that the ESRI projects a population of 6.1 million by 2040, forming the basis for revised housing projections. In terms of population and housing targets, many submissions argue that the target of 50,000 homes per year to 2040 is too low, suggesting 60,000 to 100,000 instead. They highlight the need for more zoned land, especially in the east, and propose increasing zoning headroom due to low activation rates.

The revision process has led to a review of current implementation efforts and identified the need for additional measures to enhance the NPF strategy. This includes ensuring the effective coordination and delivery of essential infrastructure and services to meet future demands. Many submissions highlight the challenges of achieving compact growth targets, particularly on brownfield sites due to higher costs and other difficulties. They suggest the NPF should address these viability issues and consider funding supports. While some argue for a mix of compact and peripheral growth, others call for higher compact growth targets to meet climate goals. The NPF aims to counter urban sprawl and promote sustainable development, but the effectiveness of these targets is still being evaluated.

Many submissions support the updated climate policies in the draft revised NPF, emphasizing the need for climate action integration and adequate funding. Concerns were raised about grid infrastructure and the ability to meet renewable energy targets. Some submissions suggest extending renewable capacity targets to 2040 and ensuring population growth aligns with carbon budgets. The draft NPF includes new policies for renewable energy, flood risk response, and highlights the importance of biodiversity and nature restoration.

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The following sections highlight the relevant issues raised in submissions in relation to the SEA, SFRA and AA processes from designated environmental authorities and other stakeholders.

5.2.1 Submissions Relating to the SEA

The key SEA, related issues raised in these submissions and how they have been addressed are summarised in Table 5-1.

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Table 5-1: Issues Raised in Relation to SEA

Stakeholder	Points Raised	How these have been Addressed
Statutory		
Development Applications Unit (DAU), Department of Housing, Local Government and Heritage (DHLGH)	<p>Baseline</p> <ul style="list-style-type: none"> ER Section 5.3.8.1 Overview of Cultural Heritage Protection in Ireland has omitted any reference to National Monuments. Text on World Heritage Sites should be updated: The Tentative List was updated in 2022 and now includes only the following three sites: The Passage Tomb Landscape of County Sligo; Royal Sites of Ireland: Ancient Irish Sites of Royal Inauguration; Transatlantic Cable Ensemble. <p>Assessment</p> <ul style="list-style-type: none"> Section 8.3.1 Chapter 1 – The Vision: Assessment should recognise the equal importance of a Cultural Heritage Impact Assessment (CHIA) in environmental reporting for non-mandatory EIA, and that it should be included in the list of non-statutory assessments that may be appropriate in supporting decision-making. 	<p>Baseline</p> <p>Further detail has been added to the baseline regarding National Monuments and text has been updated regarding the Tentative List of World Heritage Sites in Section 5.3.8.1 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement.</p> <p>Assessment</p> <p>Reference to CHIA has been explicitly included in the assessment in Section 8.3.1 of the SEA ER, refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement.</p>
Department of the Environment, Climate and Communications (DECC)	<p>Mitigation</p> <ul style="list-style-type: none"> DECC recommends the full integration of all proposed mitigation measures, as set out in the SEA Environmental Report and the (Pre-consultation) Natura Impact Statement, into the Draft NPF. <p>Assessment</p> <ul style="list-style-type: none"> The SEA process should take account of both potential positive environmental outcomes arising from the implementation of the Draft NPF, as well as seeking to mitigate potential negative consequences. (particularly important in relation to the positive outcomes arising from climate action, including deployment of renewable energy) and should be reflected as part of the assessment process. Considered that the ER significantly under-reports potential positive effects of renewable energy development (in line with adopted Government policy), in particular the wider climatic and socio-economic effects. Delivering on energy security is broadly positive, as noted in the SEA ER of the final NECP 2021-2030, and should be considered having 	<p>Mitigation</p> <ul style="list-style-type: none"> The mitigation measures from the environmental assessment processes are collated and set out in Chapter 4 of this SEA Statement; these tables set out how the mitigations have / have not been addressed in the plan including explanations as relevant. <p>Assessment</p> <ul style="list-style-type: none"> The positive effects of the NPF proposals have been identified throughout the assessment in Chapter 8 of the SEA Environmental Report and particularly in Section 8.3.9. This clearly identifies the positive effects of renewables for all environmental receptors but in particular PHH, BFF, AQ and CF. Positive aspects related to energy security, as well as risks from loss of supply have also been further drawn out in the baseline updates to Sections 5.3.1.4 and 5.3.7.2 of the ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. As noted in Chapter 4 of the Environmental Report, Energy security is being addressed via the Government's Energy Security in Ireland to 2030, and via Ireland's National Energy and Climate Plan 2021-2030 which has a Dimension which specifically addressed the topic of

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Stakeholder	Points Raised	How these have been Addressed
	<p>regard to addressing energy security in the draft NPF and the SEA ER.</p> <ul style="list-style-type: none"> It is important that the ER and final revised NPF directly support the repowering of existing renewable energy projects. The renewable electricity targets as included in Section 9.2 Resource Efficiency and Transition to a Zero Carbon Economy, should be more appropriately referred to as 'minimum' targets. This should be addressed in the final SEA ER report, by requiring that regional renewable electricity targets should be labelled as "minimum" targets for Regional Assemblies and Local Authorities. <p>Baseline</p> <ul style="list-style-type: none"> ER would benefit from inclusion of additional descriptors of environmental impacts from interruptions in supply of energy, particularly potential impacts on population and human health and socio-economic (with particular regard to competitiveness/ maintaining FDI, to support Ireland's long term sustainable development). <p>Other Plans and Programmes</p> <ul style="list-style-type: none"> ER makes no reference to the existing Community Benefit Fund that is currently in place for all Renewable Electricity Support Scheme projects. 	<p>'Energy Security'. Ireland's annual Climate Action Plan also sets out suites of measures for the electricity sector (including those relating to energy security, interconnection and renewable energy generation). As noted, the NECP, as well as the Climate Action Plan 2024, were subject to their own SEA.</p> <ul style="list-style-type: none"> The NPF does not include NPOs relating to repowering. Reference to the role repowering can play in energy security has been added in Sections 5.3.1.4, 5.3.7.2 and 5.3.7.8 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. The SEA ER has assessed the wording of the NPOs as presented in the Draft First Revision to the NPF for consultation. Regional targets have been derived from early constraints analysis work carried out by SEAI and DECC as part of the Renewable Electricity Spatial Policy development which has used GIS to identify broad areas see Appendix D in the Environmental Report. The Regional Strategies will require further analysis and environmental assessments (including SEA, AA and FRA) under S.I. 436 of 2004 (as amended) to determine appropriate targets within the regions and down to county level which is reflective of the carrying capacity of the environment and existing environmental sensitivities. <p>Baseline</p> <ul style="list-style-type: none"> Further detail has been added to the baseline regarding interruptions in the supply of energy and potential effects on environmental factors. Further references to positive effects have been added to Sections 5.3.1.4 and 5.3.7.8 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. <p>Other Plans and Programmes</p> <ul style="list-style-type: none"> Reference to the Community Benefit Fund has been added to Section 4.3.3 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement.
Department of Agriculture, Food and the Marine (DAFM)	<p>Baseline</p> <ul style="list-style-type: none"> Appears to be a discrepancy between the NPF and the SEA regarding Food Vision. The SEA states that FV drives intensification of agriculture which would continue without the revision of the NPF. However, NSO 3 and NPO 34 appear to support Food Vision to support the agri food sector. It is unclear how the NPF is responsible 	<p>Baseline</p> <ul style="list-style-type: none"> The intention of Table 5-15 (Evolution of the Environment in the absence of the draft Plan) is to acknowledge that other sectoral plans and activities will continue to act on the environment in both a positive and negative way regardless of the implementation of the NPF. This includes the agriculture sector. Table 5-15 incorrectly linked intensification in agriculture to other plans such as Food

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Stakeholder	Points Raised	How these have been Addressed
	<p>for mitigating land use intensification in the agri sector as suggested by text in Table 5-15 of the SEA ER.</p> <ul style="list-style-type: none"> It should be noted that Food Vision 2030 contains no production targets, does not seek to increase output and does not advocate any increased intensification. Food Vision targets “Increased value-addition, and an increase in the value of agri-food exports to €21 billion by 2030, built on sustainable steady value growth”. References to Food Wise 2025 (pages 27 & 279) should be reviewed in the context that it was superseded by Food Vision in 2021. 	<p>Vision. Table 5-15 has been updated to note that, in the absence of the NPF being implemented, agriculture generally and the agri-food sector would continue to operate under other sectoral plans that are being implemented.</p> <ul style="list-style-type: none"> It is acknowledged that Food Vision 2030 does not contain specific targets and does not advocate for intensification. Section 5.3.11 of the SEA ER has been updated as part of the Addendum to the ER set out in Chapter 8 of this SEA Statement to reflect this. References to Food Wise 2025 have been reviewed and updated as appropriate in Section 4.3.11.2 and Appendix E of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement.
Environmental Protection Agency (EPA)	<p>General SEA Comments</p> <ul style="list-style-type: none"> The ER should include an outline of the contents of the NPF and the main objectives of the NPF. EPA acknowledges that the SEA refers to the recommendations and key messages from the EPA’s Ireland’s Environment – An Integrated Assessment (EPA, 2020). The next iteration of this report is due to be completed in autumn 2024. The SEA includes many aspects which reflect ‘good’ practice. This is particularly evident in how alternatives have been considered and how existing environmental problems have been identified. <p>Other Plans and Programmes</p> <ul style="list-style-type: none"> The amended noise regulations SI 663/2021 could also be referred to and considered in the SEA; they cover new assessments for harmful effects covering ‘High Annoyance’, ‘High Sleep Disturbance’ and ‘Ischaemic Heart Disease’ considerations. Welcomes comprehensive discussion of other plans and programmes in Chapter 4. Recommend updating reference to the Nature Restoration Law to refer to its adopted status. <p>Baseline</p> <ul style="list-style-type: none"> Baseline could provide a clearer description of the inter relationships between the environmental aspects, at national scale. This could be addressed by including a schematic showing how the environmental criteria covered by the SEA Directive interact (e.g. water quality 	<p>General SEA Comments</p> <ul style="list-style-type: none"> Chapter 2 of the SEA ER sets out a summary of the contents and main objectives of the draft First Revision to the NPF. Comment is noted on the next iteration of the EPA State of the Environment Report. This has now been published and it has been reviewed by CEPP and the SEA Team. Updates have been made to Section 5.2.1 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. Comments on SEA best practice, existing environmental problems and alternatives are noted and welcomed. <p>Other Plans and Programmes</p> <ul style="list-style-type: none"> Reference to the amended noise regulations has been added to Section 4.3.12.2 and 5.3.1.3 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. It is noted that the feedback received is in relation to Chapter 4 of the SEA ER. All the references in Chapter 4 reflect the adoption of the EU Nature Restoration Law. However, a reference to Nature Restoration Law has been updated in the SEA assessment for NPO 82 in Section 8.3.9 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. <p>Baseline</p> <ul style="list-style-type: none"> Table 5-14 (Inter-relationships between SEA Topics) outlines a matrix showing the interrelationships between the factors of the SEA Directive.

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Stakeholder	Points Raised	How these have been Addressed
	<p>interacts with population and human health, biodiversity, flora and fauna, etc.)</p> <ul style="list-style-type: none"> Section 5.3 (existing environmental pressures/problems with biodiversity, flora and fauna: should refer to the Dáil Éireann's 2019 declaration of the national biodiversity and climate emergency. The ICCA Reports provide comprehensive reporting on climate change and its challenges and should be referenced in the ER. More recent EPA Greenhouse Gas Emissions reports have since been published (May 2024). More recent report on Drinking Water Supplies should be referenced (2024). EPA's Circular economy and waste statistics highlights report 2021 (EPA, 2023) should be taken into account, as appropriate. Reference could be made to the EPA's Good practice guidance on SEA and landscape (EPA, 2023), which could help inform the integration of landscape considerations in the SEA process. The REFRAME EPA funded research project will provide a toolkit for how landscape character assessments can be undertaken in a consistent manner (due for finalisation later this autumn). Definition of landscape should be amended to reflect the definition in the Planning Act, as amended and in the European Landscape Convention. Section 5.3.9.4 Existing Environmental Pressures/ Problems: Landscape and Seascape references the existing National Landscape Strategy, while it later states that the absence of a cohesive national landscape strategy is an issue. This apparent contradiction should be clarified. The NPF and SEA should consider all significant sources of noise pollution; Section 4.3.12.2 on page 26 mainly focuses on transport-related sources and there are other aspects around noise management that should be considered. <p>Alternatives</p> <ul style="list-style-type: none"> Noted and welcome the use of EPA guidance on alternatives and the process of how they have been considered. 	<ul style="list-style-type: none"> Reference to the declaration has been added to Sections 4.3.4 and 5.3.2.3 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. ICCA reports have been reviewed. The most recent EPA GHG Emissions Reports, Drinking Water Supplies Report, and Circular economy and waste statistics report have been reviewed and text has been updated accordingly in Sections 5.3.6.2, 5.3.6.3, 5.3.7.4 and 5.3.7.5 of the SEA ER ; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. In relation to landscape, references to EPA best practice and the REFRAME toolkit (December 2024) have been added to Section 5.3.9.1 of the SEA ER. The definition of 'landscape' has been reviewed and updated in this section; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. Section 5.3.9.4 of the SEA ER has been updated to clarify that there is a gap at the national level in coverage of LCAs and an absence of a cohesive approach to landscape character assessments, as not every local authority has undertaken an LCA and the methodologies and outputs vary between those that have done so; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. Section 4.3.12.2 of the SEA ER has been updated to include additional text on noise sources and relevant plans and programmes; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement. <p>Alternatives</p> <ul style="list-style-type: none"> Chapter 6, of this SEA Statement reflects on the alternatives considered and section 6.4.5 presents information on the preferred alternative. <p>Mitigation</p> <ul style="list-style-type: none"> The baseline for the SEA Environmental Report has identified environmental problems relevant to the NPF. Where trends are evident this has been noted. The mitigation measures from the environmental assessment processes are collated and set out in Chapter 4 of this SEA

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Stakeholder	Points Raised	How these have been Addressed
	<ul style="list-style-type: none"> There is merit in collating the preferred alternatives and showing how these have been reflected in the NPF. Suggests that an overall summary of the preferred approach is provided at the end of Chapter 7 for clarity. <p>Mitigation</p> <ul style="list-style-type: none"> There is merit in comparing the previous baseline used for the first NPF/SEA against the baseline for the review of the NPF. This would help determine which aspects of the environment may require more robust mitigation, stronger policy implementation measures to address declines in environmental quality in the review of the NPF or would benefit from further environmental monitoring. EPA recommends that in finalising the NPF, the recommendations (including mitigation measures) of the environmental assessment processes (SEA and AA) are fully integrated, as appropriate, into the NPF. Where specific SEA and AA recommendations are not fully brought into the final NPF, the reasons for this should be clarified. <p>Monitoring</p> <ul style="list-style-type: none"> Consider amending the environmental monitoring proposals as follows: <ul style="list-style-type: none"> Water: Typographical error in one of the targets: One target should refer to drinking water, rather than urban wastewater, given that the associated indicator refers to “boil notices and water restrictions” Water – level of phosphorous in water bodies: Nutrients in waterbodies (nitrogen and/or phosphorous) are of specific importance in areas that are identified as sensitive areas or catchments to sensitive areas. In the Target column, ensure wastewater discharge authorisation (WWDA) compliance with the UWWT Directive, to ensure that required wastewater discharges are treated to ensure their nutrient levels do not contribute to the pollution of sensitive areas or their catchments. Air Quality: Amend the target text to reflect the commitment to achieve interim WHO targets in 2026 and 2030 and achieve final WHO guideline values by 2040, as set out in the Clean Air Strategy. 	<p>Statement; these tables set out how the mitigations have / have not been addressed in the plan including explanations as relevant.</p> <p>Monitoring</p> <ul style="list-style-type: none"> The final monitoring table, Table 7-1, is included in Chapter 7 of this SEA Statement. It presents a robust programmes which has been devised by the DHLGH and reviewed by the SEA Team. The programme will monitor positive and negative trends which can be used to remedy any unforeseen effects and also inform future iterations of the NPF as they arise by ensuring a comprehensive monitoring output its available. The suggestions made in relation to monitoring from the public consultation process and the recommendations from the environmental assessments have been incorporated into the final NPF monitoring programme in Table 7-1. <p>SEA Statement</p> <ul style="list-style-type: none"> The SEA Statement is the subject of this report and has been prepared in accordance with Article 16 of the SEA Regulations (S.I. No. 435 of 2004, as amended) and has had regard to the EPA Guidance on SEA Statements and Monitoring. The statutory environmental authorities will be notified in due course by the DHLGH in accordance with Article 9 Section 7 (b) of the SEA Regulations (S.I. No. 435 of 2004, as amended)

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Stakeholder	Points Raised	How these have been Addressed
	<ul style="list-style-type: none"> • Additional monitoring as aspects to consider: <ul style="list-style-type: none"> – Water: UWW Compliance entry focuses solely on UWWT Directive compliance, WWDA compliance should also be included; Reduction of incidents reported due to overflows from the WWWs that are not caused by heavy rainfall; Reduction in UÉ notifications to BIM and SFPA regarding discharges that may impact shellfish waters; Increased submission of shellfish assessments required under the WWDAs to ensure all WWDAs that require additional UV treatment (or equivalent) and steps are taken to reduce the microbiological loading in the WWD to protect shellfish waters; Reduction in the bathing water prohibition/restriction notices due to Wastewater works. – Air Quality: Emissions and ambient concentrations (as monitored by the National Ambient Air Quality Monitoring Network) are used interchangeably, the metric should consistently refer to and be based on either emissions or concentrations. Two metrics could also be developed for national emissions and another for ambient concentrations. – Population and Human Health: Consider any relevant data from the Well-being Framework for Ireland (Government of Ireland, 2024). • Suggest that the monitoring table take account of the SEA's SEOs, as these can help clearly identify and link environmental objectives to the necessary monitoring regime needed. • Monitoring of both positive and negative effects should be considered. • The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities where possible. • The monitoring programme should be included in the NPF. • Guidance on SEA-related monitoring, updated in 2023, is available on the EPA website. <p>SEA Statement</p> <p>Once the NPF is adopted, an SEA Statement should be prepared; list of authorities to be notified was provided.</p>	

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Stakeholder	Points Raised	How these have been Addressed
Transboundary		
Northern Ireland Environment Agency (NIEA), Department of Agriculture, Environment and Rural Affairs (DAERA)	<p>General SEA Comments</p> <ul style="list-style-type: none"> SEA Team confirm that the environmental report and the process of consultation follow the SEA Directive Welcomes transboundary consultation with NI, and the recognition given to spatial planning and need for co-operation and alignment with spatial policy in NI. Welcome that designated sites within NI have been considered and included in the ER and the AA. Water Management Unit (WMU) notes the conclusion of the ER that there is potential for transboundary impacts relating to the water environment in NI and welcomes the inclusion of key baselines and NI plan references. <p>Mitigation</p> <ul style="list-style-type: none"> WMU notes mitigation measures proposed relating to the aquatic environment and that it essential that all those measures identified are fully implemented, and should not be considered as definitive but reviewed throughout the life of the Draft First Revision to the NPF to ensure both the effectiveness of those mitigation measures proposed and if additional measures are required. <p>Monitoring</p> <ul style="list-style-type: none"> WMU notes and is broadly supportive of the monitoring regimes proposed in relation to the aquatic environment. Monitoring must be subject to review at each reporting stage to reflect new data obtained. It essential that interventions (including additional mitigation measures or plan revisions where required) are undertaken if any unforeseen or adverse environmental effects to the aquatic environment are identified during the monitoring regime. WMU would be supportive of the identification and reporting of any positive impacts to the aquatic environment identified through monitoring as this may inform future iterations of this or similar plans. 	<p>General SEA Comments</p> <p>The general comments from the SEA Team and the WMU are noted and welcomed.</p> <p>Mitigation</p> <ul style="list-style-type: none"> The mitigation measures from the environmental assessment processes are collated and set out in Chapter 4 of this SEA Statement; these tables set out how the mitigations have / have not been addressed in the plan including explanations as relevant. <p>It should also be noted that separate to the First Revision to the NPF, Ireland has prepared the third cycle River Basin Management Plan (the National Water Plan), which itself has been subject to SEA and AA and for which detailed sectoral plan-level mitigation and monitoring measures apply.</p> <p>Monitoring</p> <p>The SEA monitoring programme has been revised post-consultation and the Final Monitoring Programme is included in Chapter 7 of this SEA Statement. This programme includes monitoring in relation to effects on water quality and will report results, both positive and negative.</p>
Historic Environment Division (HED), Department for	<ul style="list-style-type: none"> HED notes the recognition given to transboundary qualities of heritage in the ER baseline, and recognition of building reuse. 	<ul style="list-style-type: none"> Comments are noted and welcomed. The link has been added to the baseline for the HED online map viewer and a note on wrecks and recorded losses in Section 5.3.8.2

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Stakeholder	Points Raised	How these have been Addressed
Communities (DfC), Northern Ireland	<ul style="list-style-type: none"> Highlights that the full suite of cultural heritage has protections that extend beyond the body of statutorily designated scheduled monuments/ listed buildings and a link is provided to the latest online map viewer and a data source for wrecks and recorded losses. 	of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement.
Other		
Eastern Midlands Regional Assembly (EMRA)	<ul style="list-style-type: none"> The Assembly queried the references in Appendix E of the SEA Environmental Report and sought confirmation that it is taking into account the most recent Regional Spatial and Economic Strategies for the three regional assemblies (published in 2019 and 2020) to ensure clarity and completeness. The Assembly recommends updating Appendix E to include references to the thirty-one City and County Development Plans and that a review of same is undertaken to inform the revised SEA. The SEA Report must include quantitative analysis of greenhouse gas emissions. The current assessment alternative approach, showing +/- lacks value in informing decision-making; the Assembly recommends estimating carbon emissions impacts of the alternatives considered. The SEA should explicitly assess compliance with environmental legal obligations, including the Climate Change and Low Carbon Development Act 2021. The Assembly finds the current approach to indicators and monitoring inadequate and recommends creating an additional NPO to develop coordinated SEA environmental indicators for economic, environmental and climate monitoring across all regions. The Assembly notes that there are no actions in the NPF in relation to the embodied carbon aspects of development. The issue of 'managed retreat' was identified as a reasonable alternative in SEA scoping, but in the SEA report referred to SFRA being prepared which does not cover managed retreats. 	<ul style="list-style-type: none"> DHLGH and the SEA Team confirm that the NPF and its environmental assessments have been prepared with respect to the current RSEs and that this has informed Chapter 4 of the SEA ER. Appendix E has been amended to clarify this. The NPF is top tier of the planning hierarchy and it is recognised that it will influence lower tier plans and projects. These lower tier plans have been considered in the environmental assessments of the NPF in terms of their interactions. All development plans are subjected to standalone environmental assessments as relevant. Appendix E has been amended to clarify this. The climate considerations within the SEA Environmental Report are proportional to the framework nature of the First Revision to the NPF. As detail and location-specific information is developed at lower tiers, greater quantification will be possible and in coordination with local authority Climate Action Plans. It is also noted that the NPF sits within a suite of other Government plans, notably CAP25 which are using best available information to quantify climate action and inform a broader cross sectoral response. The alternatives and associated assessment considers climate as appropriate for this high-level framework. The SEA is not intended to be a compliance check. Legal requirements are in effect and include SEA. The assessment has identified mitigation where conflicts or potential conflicts have been noted in the assessment. A new NPO108 has been included which requires the development and implementation of a programme of monitoring for the implementation of the NPF. Additionally, the SEA monitoring programme has been revised post-consultation and the final Monitoring Programme is included in Table 7-1 of Chapter 7 of this SEA Statement.

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		<ul style="list-style-type: none"> As per Table 4-2 of the SEA Statement, Section 9.2 (Circular Economy) of the NPF has been amended to refer to measures to reduce embodied carbon (including a footnote reference to the Reducing Embodied Carbon in Cement and Concrete through Public Procurement in Ireland report) and promoting refurbishment over demolition and dereliction as well as referencing the Green Public Procurement Strategy and Action Plan (2024-2027) which will help drive the implementation of green and circular procurement practices across the public sector. Managed retreat was considered, alongside other issues raised at the scoping workshop (recorded in the Environmental Report) and helped to shape the alternatives, but was not a defined reasonable alternative. It influenced the subsequent NPOs developed, including those specifically related to flood risk and the application of the flood risk guidelines. Following public consultation on the First Revision to the NPF, NPO 78 now separates out flood risk management and the potential impacts that can arise as a result of climate change. The management of existing flooding has also been considered through the SFRA.
An Taisce	<p>SEA Compliance</p> <ul style="list-style-type: none"> The compliance of the SEA Environmental Report for the Draft Revised NPF with the requirements of the SEA Directive needs to be assessed and validated. <p>Mitigation</p> <ul style="list-style-type: none"> The SEA needs to identify, address and make concrete proposals for mitigation of climate impacts, reversal of biodiversity loss, deterioration in quality of life and general resource management sustainability to meet quality of life and wellbeing objectives. <p>Monitoring</p> <ul style="list-style-type: none"> Monitoring is required under Article 10 of the SEA Directive. An Taisce considers that a proper interpretation of Article 10 requires the SEA monitoring process be based on quantitative, audited data and that qualitative data be provided on an ongoing basis during the lifetime of the plan or programme. 	<p>SEA Compliance</p> <ul style="list-style-type: none"> An SEA has been carried out on the First Revision to the NPF. It is fully compliant with legal requirements. <p>Mitigation</p> <ul style="list-style-type: none"> The SEA ER set out mitigation in relation to climate changes and biodiversity aspects. The mitigation measures from the environmental assessment processes are collated and set out in Chapter 4 of this SEA Statement; these tables set out how the mitigations have / have not been addressed in the plan including explanations as relevant. <p>Monitoring</p> <ul style="list-style-type: none"> The SEA Monitoring Programme has been updated post-consultation. The final SEA Monitoring Programme is included in Chapter 7 of this SEA Statement. The monitoring programme has been updated for the draft First Revision to the NPF with input from the SEA team, a Stakeholder Workshop, and review comments from the public consultation process, the EATSG and the statutory environmental authorities, who have provided suggestions and technical inputs

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	<ul style="list-style-type: none"> If ongoing monitoring was being carried in accordance with the provisions of Article 10, it would contribute to the general availability of environmental and ecological data in Ireland and there would also be significant co-benefits for the EIA, AA and other environmental assessment processes. There is a legal requirement that monitoring be carried out over the lifetime of the plan and that remedial actions be undertaken where there are unforeseen negative impacts identified. Acknowledged and welcomed that the draft monitoring programme proposed in Table 9-4 of the SEA ER is more detailed than the programme in the 2018 NPF SEA. However, most of the targets still remain vague. The specific measures in the SEA monitoring programme are not fit for purpose (e.g. there are no modal share travel targets). The SEA ER should be updated with more clearly identified and timetabled and targeted mitigation measures, effective monitoring proposals in all areas, and a legal implementation regime to take remedial action where adverse effects are identified through monitoring. We note Recommendation 9 from the NPF Expert Review Group's report: "The revision of the NPF should consider the establishment of a dedicated unit which would monitor implementation of the NPF annually. The unit should be mandated to require all relevant Departments and relevant organisations (e.g., Local Authorities and Uisce Éireann) to report progress and report publicly on their performance against clear metrics, both investment (including the NDP) and impact metrics. The monitoring unit should also identify challenges in the implementation process." If such a unit is established, we recommend they also be tasked with ensuring that the required ongoing SEA monitoring and the remediation of unforeseen adverse effects is carried out in accordance with the provisions of Article 10 of the Directive. <p>SEA Objectives, Targets and Indicators</p> <ul style="list-style-type: none"> The SEA Environmental Report for the Draft Revised NPF fails to define adequate objectives, targets and indicators, and the specific measures in the SEA monitoring programme are not fit for purpose (e.g. there are no modal share travel targets). 	<p>based on their competence. The result is a robust monitoring programme which includes targets, timelines and responsibilities to accompany the First Revision of the NPF. See specifically new NPO 108 which addresses monitoring.</p> <p>SEA Objectives, Targets and Indicators</p> <ul style="list-style-type: none"> Chapter 6 of the SEA ER sets out the environmental assessment framework for the alternatives and the preferred plan scenario, including the series of SEA Strategic Environmental Objectives (SEOs). Given the nature and scope of the NPF as a revision to an existing strategic national framework plan, the SEOs are considered appropriate in scope. The SEOs and the associated assessment criteria are the mechanism by which the alternatives and the revised policy base for the draft First Revision to the NPF are assessed. <p>The monitoring programme and its associated objectives, targets and indicators has been revised post-consultation and are set out in Chapter 7 of this SEA Statement</p> <p>Assessment</p> <ul style="list-style-type: none"> The assessment has been undertaken in the context of a planning framework which by its nature sets out high-level national policies and objectives needed to achieve proper planning and sustainable development and guide future development and investment decisions. It sets out the path needed to accommodate the projected population growth in the context of other drivers, notably climate. The inclusion of amended policies and new policies in Chapter 9 of the Plan are specifically to address climate commitments and support the investment and planning decisions needed to deliver on targets. The assessment acknowledges that the increase in population will result in even greater pressure in terms of GHG emissions. It should be noted that the NPF sits as part of a suite of whole of Government national strategic approaches covering various aspects of society. The annual Climate Action Plan is the principal mechanism by which climate action and the energy transition is being implemented by Government and how the carbon budgets are to be met. Additional text has been added to the assessment to clarify further in Section 8.3.2 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement.

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	<p>Assessment</p> <ul style="list-style-type: none"> The SEA does not contain analysis of the carbon emissions associated with the Draft Revised NPF. There is no assessment of these against the legal requirements of the national carbon budgets and sectoral emissions ceilings. We consider that this analysis should underpin the entire NPF and should be provided before the SEA and Revised NPF are finalised. <p>Consultation</p> <ul style="list-style-type: none"> Considered that there is a high likelihood that amendments to the Draft Revised NPF on foot this public consultation will be material and will require material changes to the SEA Environmental Report. This would trigger the requirement under the SEA Directive for a further period of public consultation. 	<ul style="list-style-type: none"> Consultation <p>Noted, however additional revisions provided to the SEA Team have not resulted in material changes to the assessments completed.</p>
Environmental Pillar representative to the Planning Advisory Forum (PAF)	<p>Consultation</p> <ul style="list-style-type: none"> Timing of consultation, as required under the Aarhus Convention and SEA Directive, flagged as occurring over the summer holiday period, compromising the level of public awareness and engagement, and allowance of reasonable timeframes for effective opportunity for engagement. Consideration needs to be given to how the anomaly and issues which have arisen given the exceedance of the statutory timeframe for the revision are to be properly and lawfully addressed, and the implications for decisions made in the intervening period, and to properly allow for public consultation in respect of a) any legislative proposals to accommodate this anomalous issue, and b) what re-emerges to provide for lawful changes on and to the current NPF. Concerns over the adequacy of compliance with obligations for transboundary consultation and any deficiency in transboundary consultation obligations needs to be addressed prior to any advancement of the revision. <p>Assessment and Mitigation</p> <ul style="list-style-type: none"> The Draft NPF revision SEA report fails to engage with greenhouse gas emissions and population increase issues despite over 400,000 extra people envisaged, beyond a level where the EPA was already flagging serious concerns on GHG emissions implications of that a 	<p>Consultation</p> <ul style="list-style-type: none"> The public consultation was for 9 weeks, which exceeds the minimum requirements of not less than 4 weeks under Article 13(1) of the SEA Regulations. There was a communications strategy which included a public awareness campaign through all media channels (press, radio, social, etc.). There was a consultation portal established to enable ease of submissions using digital technology in addition to traditional posting of submissions and email. Stakeholder group was kept informed. Non-statutory consultation also took place with NI authorities. Responses received from NI were taken into account. The Government took a decision to delay the completion of the draft revision to enable the ESRI analysis of the (delayed) national census. This was entirely reasonable, given the delays during Covid resulting in the information from CSO being out of date and not giving the best available evidence to base the scenarios for analysis in the plan and for the environmental assessments to have accurate figures. <p>Assessment and Mitigation</p> <p>The assessment acknowledges that the increase in population will result in even greater pressure in terms of GHG emissions. Chapter 5 and Section 5.3.6 in particular of the SEA ER has repeatedly highlighted the</p>

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	<p>considerably lower level of population with its associated activities, demands and implications.</p> <ul style="list-style-type: none"> In terms of the SEA's assessment of Key impact pathways on Climate Factors (CF) on page 140 [of the ER] the mitigation proposed to deal with this is incomprehensible, organised as it is across the chapters, and is not appropriately aligned to the identified factors and key impact pathways such as Climate Factors. Nothing in the revision of the NPF itself or in the SEA assessment which speaks to the transformative change necessary with regard to GHG emissions, and entrenchment in significant GHG-emitting behaviours and development. Other factors need to change to compensate and accommodate that population growth with the carbon budgets but the NPF fails on this necessary level of ambition. The points on climate factors apply to biodiversity considerations in terms of the pressures of population growth, and that they are not adequately mitigated. <p>Monitoring</p> <ul style="list-style-type: none"> Climatic Factors: The monitoring proposals are inadequate and vaguely specified in respect of how the necessary data will be collected, the frequency of collection particularly where the CSO is involved, the funding and tech for the monitoring will be provided from, and where this data will be made regularly available to the public, and key bodies. It is also unclear where responsibility will lie for addressing exceedances, and how such exceedances will be dealt with. Biodiversity: The current monitoring is expressed as observing effects rather than facilitating active management of mitigation or warning indicators. <p>State of the Environment Report</p> <ul style="list-style-type: none"> There is a failure to meaningfully engage with the serious state of the environment in the SEA report across a range of key environmental indicators, biodiversity, water, air, - all set out in Table 5-1 of the SEA ER and to bring that to bear on the requirements of the revised NPF both in terms of bespoke initiatives to address those issues in a 	<p>negative trends for Ireland, in terms of the challenges of meeting both European and national targets, and the exceedances of the carbon budgets. The implications for climate have been described as relevant throughout the assessments set out in Chapter 8 of the SEA ER.</p> <p>It should be noted that the NPF sits as part of a suite of whole of Government national strategic approaches covering various aspects of society. The annual Climate Action Plan is the principal mechanism by which climate action and the energy transition is being implemented by Government under the Climate Action and Low Carbon Development Act 2021 and how the carbon budgets are to be met. Additional text has been added to the assessment to clarify further in Section 8.3.2 of the SEA ER; refer to the Addendum to the ER set out in Chapter 8 of this SEA Statement.</p> <p>Mitigation measures relevant to climatic factors and biodiversity were set out in the SEA ER to mitigate the likely significant effects of the revisions to the policy base for the First Revision to the NPF. How these have been addressed by the Plan team and in the final NPF are set out in Chapter 4 of this SEA Statement. As land use planning has cross-sectoral implications across environmental factors, including climatic factors and biodiversity aspects, the SEA has set out mitigation relating to these across the relevant chapters of the NPF, particularly Chapter 9 (Climate Transition and Our Environment).</p> <p>Monitoring</p> <ul style="list-style-type: none"> The SEA Monitoring Programme has been updated post-consultation. The final SEA Monitoring Programme is included in Chapter 7 of this SEA Statement. The monitoring programme has been updated for the draft First Revision to the NPF with input from the SEA team, a Stakeholder Workshop, and review comments from the public consultation process, the EATSG and the statutory environmental authorities, who have provided suggestions and technical inputs based on their competence. The result is a robust monitoring programme which includes targets, timelines and responsibilities to accompany the First Revision of the NPF. <p>State of the Environment Report</p> <p>Chapter 5 of the SEA ER examines the relevant significant issues of the current state of the environment in relation to the SEA environmental topics. The characteristics of areas likely to be significantly affected and existing environmental pressures and problems of relevance to the draft</p>

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	<p>meaningful way delivering effective turnarounds to a positive status for key indicators, and as horizontal themes throughout the plan, and as powerful constraints against certain proposals, and as powerful yardsticks against which proposals and alternative are evaluated and dismissed or included.</p> <p>Other Plans and Programmes</p> <ul style="list-style-type: none"> The SEA report lists at length legislation and various plans but fails to engage with their adequacy and simply relies on them which is considered inappropriate given the status of environmental indicators. <p>Alternatives</p> <ul style="list-style-type: none"> There is no proper assessment of alternatives – considered that there should be a comparison of GHG emissions and key indicators for the alternatives, and evaluate their compliance with EU law obligations in order to be able to compare them. Case law case c-727/22, FIE v Government of Ireland and Ors is referenced. 	<p>First Revision to the NPF are also summarised for each SEA topic with Chapter 5. The baseline descriptions informed the SEA assessments in terms of both the alternatives and the revisions to the NPF policy base, and subsequently the mitigations that were set out in the ER to address the environmental implications of the revisions to the NPF. How these mitigation measures have been addressed by the Plan team and in the final NPF are set out in Chapter 4 of this SEA Statement.</p> <p>It is noted that the EPA State of the Environment Report (SOER) 2024 was published on 3 October 2024 - after the consultation process for the NPF was concluded, Section 5.2.1 of the SEA ER has been updated to reflect the outlooks included in the 2024 SOER – see Chapter 8 Addendum in this SEA Statement.</p> <p>The revision process for the NPF post-consultation was informed by the EPA submission and subsequent review of the SOER 2024 (once published).</p> <p>Other Plans and Programmes</p> <ul style="list-style-type: none"> Chapter 4 of the SEA ER sets out a description of other national and regional plans and programmes (P/Ps). The intended purpose of this chapter is to consider the key environmental protection objectives that are set out in other relevant P/Ps to inform the SEA, and the degree to which they may be impacted by the draft First Revision to the NPF. It is not within the scope of an SEA for the NPF to ascertain the adequacy of other P/Ps. <p>The NPF is a national strategic land use plan that sits within a hierarchy of other national Government plans, the majority of which are statutory (e.g. the National Biodiversity Action Plan, the Climate Action Plans) which together form the Government's policy response across different sectors. Many of these other P/Ps have themselves been subject to environmental assessments, i.e., SEA and AA.</p> <p>Alternatives</p> <ul style="list-style-type: none"> The SEA that has been carried out on the First Revision to the NPF is fully compliant with legal requirements, including with respect to consideration of alternatives. <p>The Government's decision to revise the NPF has been the basis for the examination of the alternatives. Therefore, a “do-nothing” approach and a “new NPF” approach were not feasible alternatives for consideration. Furthermore, given that the plan is a revision of the existing NPF, it has limited the range of plan-specific alternatives that</p>

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		<p>have been developed. The SEA ER has highlighted that there is a link between population growth and GHG emissions and other issues in relation to climatic factors.</p> <p>It should be noted that the NPF sits as part of a suite of whole of Government national strategic approaches covering various aspects of society. The annual Climate Action Plan is the principal mechanism by which climate action and the energy transition is being implemented by Government under the Climate Action and Low Carbon Development Act 2021 and how the carbon budgets are to be met.</p>
Environmental Pillar representative to the Planning Advisory Forum (PAF) [Submission on the Draft ToR]	<p>Monitoring</p> <ul style="list-style-type: none"> The core underlying issues which we recommend need to be addressed in the Draft Terms of Reference (ToR) are as follows: <ul style="list-style-type: none"> Provide for greater clarity on the analysis which will be provided to the forum to assist its work, and in particular clarify the extent to which there will be a formalised review of the implementation of the current NPF and key monitoring information including that detailed in section 7 of the SEA Statement (Environmental Report) for the first NPF. Specific environmental monitoring requirements specified further to the SEA for the NPF - these are highlighted without prejudice to our views on the adequacy of the monitoring stipulated in section 7 of the Environmental Report for the SEA of the current NPF. The adequacy of that monitoring should also be considered in any review of the findings from the monitoring undertaken, and the issues arising. <p>Article 10 of the SEA Directive specifies the monitoring obligations. And that Ireland has obligations to undertake this, and provide it. However, no environmental monitoring data is provided on the NPF website nor is there any adequate consideration of these requirements addressed in the Road Map for the revision.</p> <p>Consultation and Timelines</p> <p>The Aarhus Convention and SEA Directive require public consultation. The timing of the consultation over holiday periods of Christmas and New Year is flagged, as well as the volume of complex information being</p>	<p>Monitoring</p> <ul style="list-style-type: none"> The final SEA Monitoring Programme is included in Chapter 7 of this SEA Statement. The SEA Monitoring Programme has been revised for the draft First Revision to the NPF with inputs from the SEA team, a Stakeholder Workshop, and review comments from the EATSG and the statutory environmental authorities, who have provided suggestions and technical inputs based on their competence. The SEA Monitoring Programme has been further revised post-consultation. The result is a robust monitoring programme which includes targets, timelines and responsibilities to inform implementation and future revisions of the First Revision of the NPF. <p>Consultation and Timelines</p> <p>The SEA, SFRA and AA have met statutory timelines under their respective legislations.</p> <ul style="list-style-type: none"> The public consultation was for 9 weeks, which exceeds requirements of not less than 4 weeks under the SEA Regulations. It ran over July to September and not Christmas / New Year as suggested. There was a communications strategy which included a public awareness campaign through all media channels (press, radio, social, etc.). There was a consultation portal established to enable ease of submissions using digital technology in addition to traditional posting of submissions and email. Stakeholder group was kept informed. Non-statutory consultation took place with NI authorities. Responses received from NI taken into account.

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	<p>consulted on, and that this is not conducive to effective public participation.</p> <p>Alternatives</p> <ul style="list-style-type: none"> Given the requirements for examination for reasonable alternatives, the NPF timeline for production of the SEA assessments seems very ambitious. Considered that there is a new for the co-evaluation of reasonable alternatives with key complementary requirements necessary to ensure delivery of objectives: political appetite and willingness to provide for some hard constraints in respect of where development can't go, some positive SPPRs in respect of high quality standards for accommodation for example will need to be evaluated also; a need address the fundamental financial issues driving the problematic development of apartments for rent; and a need to resist pressure to facilitate the wealth interests of property interests in resisting more sustainable patterns of development. 	<p>Alternatives</p> <ul style="list-style-type: none"> The SEA, SFRA and AA have met statutory timelines under their respective legislative requirements
Wild Ireland Defence CLG	<ul style="list-style-type: none"> Of the opinion that the Draft NPF and associated documents (SEA and NIS reports) have not considered the effects on the environment, protected species and water under the Habitats Directive, Birds Directive SEA Directive and WFD nor has it considered decisions of the Europeans Courts and the implementation of same. 	<p>The SEA, SFRA and NIS documents identify, describe and assess the effects of the draft Plan on the environment including protected species and water under the legislative requirements of the EU Habitats Directive, Birds Directive SEA Directive and WFD. The methodologies for assessment in the SEA ER are included in Chapters 3 and 6 and for the NIS in Sections 3 and 6.2 of the NIS. These processes have been undertaken with reference also to EU and national legislative requirements and guidance and current good practices. The assessments have been undertaken in the context that this is a revision to an existing plan which is currently being implemented. Furthermore, it is mindful of the level of the plan i.e. a planning framework to guide future development in the context of population projects. The NPF does not sit in isolation of other government policy but seeks to integrate and dovetail with them including, but not limited to, the NBAP and the CAP 24.</p>
Individual	<p>Assessment</p> <ul style="list-style-type: none"> Inadequate Assessment of Impacts on Protected Species: The NPF and accompanying SEA do not fully address potential impacts on species listed under Annex I of the Birds Directive and Annex II and IV of the Habitats Directive in terms of limited treatment of cumulative impacts and the lack of specific assessments for certain sensitive species, such as migratory birds and marine species affected by 	<p>Assessment</p> <ul style="list-style-type: none"> As a national strategic framework plan, the NPF does not contain location-specific information, nor does it specify where development should be located. The environmental assessments (SEA, AA and SFRA) are strategic in focus and appropriate to the nature and scale of the NPF policy base as presented. The detail suggested and sought for the ORE, for example, is clearly identified and assessed in

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	<p>renewable energy development. Recommend that the SEA and NIS be enhanced by including more detailed cumulative impact analysis, specifically assessing the combined effects of various projects (including wind energy, drainage, wastewater, and urban / port development) on protected species.</p> <ul style="list-style-type: none"> There is no cumulative impacts assessment with wastewater impacts in Ireland and UK or climate change impacts in relation to warming oceans etc. Considered that the SEA and NIS did not provide full assessments of the impacts of renewable energy projects on marine species. There is also a lack of specific mitigation strategies for underwater noise pollution and habitat disturbance caused by offshore wind farms. Recommended to include a more comprehensive assessment of the impacts of offshore renewable energy projects on marine species, with concrete mitigation measures such as effective noise pollution control and restricted construction periods. The current NIS and SEA reports recognise the risks to raised bogs and peatlands, particularly in relation to onshore wind energy and forestry, but fail to provide sufficient mitigation measures to prevent habitat loss, drainage, and fragmentation. Recommend to prohibit wind energy development in Natura 2000 sites and other protected bog habitats, and require comprehensive restoration plans for any affected peatland areas. <p>Alternatives</p> <ul style="list-style-type: none"> The Habitats Directive (Article 6(3)) and Birds Directive require a thorough consideration of alternatives that avoid impacts on protected species and habitats. Considered that there is insufficient analysis of alternative locations and solutions that avoid adverse impacts on protected habitats. While alternatives are mentioned, they are not fully explored in a way that would mitigate impacts on sensitive species and habitats such as raised bogs and peatlands. Recommended to provide a more detailed assessment of alternative approaches, particularly for renewable energy projects, infrastructure development such as LNG and Water/ Wastewater, and urban expansion. These alternatives should focus on avoiding impacts on protected areas such as Natura 2000 sites, RAMSAR Site, raised bogs, and peatlands. 	<p>a tiered manner through the Marine Planning Policy Statement (MPPS), the NPF, Designated Marine Area Plans (DMAP) and finally projects level. To seek to mitigate within the NPF would lead to conflict and confusion through sectoral planning hierarchy. The mitigations included in the SEA, AA and SFRA are considered appropriate for this scale of plan. It is accepted that more detailed mitigation will be required at lower tiers of plan-making and as the project location and detail becomes available. This is recognised in Recital 69 of the SEA Directive. Considerations under Art 5(2) also refer to taking into account the contents and level of detail in the plan, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</p> <p>In this regard, development in the marine environment in Ireland is subject to specific policy and planning obligations, such as those under: the Maritime Area Planning Act 2021, the National Marine Planning Framework (NMFP), the designation of Designated Marine Area Plans for specific activities (such as offshore wind energy), and the establishment of the Marine Area Regulatory Authority. It should be noted the NMFP was subject to its own SEA and AA, and Ireland's first DMAP, the South Coast DMAP, is also being subject to SEA and AA.</p> <p>Alternatives</p> <ul style="list-style-type: none"> The SEA Environmental Report records the alternatives considered for the draft First Revision of the NPF. This reflects inputs from a wide stakeholder group and is reflective of this being a revision of the existing NPF rather than a full review. This decision was made by Government in 2023. The alternatives considered were developed with reference to the EPA Guidance on alternatives in SEA, 2015. An initial long list of alternatives was considered against the framework of "reasonable, realistic, viable and implementable" as described in Chapter 7 of the SEA Report and in Chapter 6 of this SEA Statement. Those achieving the four criteria were brought forward for more detailed consideration and the preferred alternatives then formed the foundation of the amendments to the NPF. The SEA Environmental Report and the NIS for the First Revision of the NPF proposed a robust mitigation strategy for the implementation of this framework plan, that will set the framework for protection of Natura 2000 sites and other sensitive habitats in the context of the NPF.

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Stakeholder	Points Raised	How these have been Addressed
	<ul style="list-style-type: none"> Ensure that all possible alternatives are explored in depth, particularly for energy infrastructure projects, water infrastructure projects (i.e. water supply project alternative to fix the leaking pipes in Dublin, GDD Project alternative to allow INTEL to treat and reuse their own wastewater in house and to fix infiltration of surface water to the Ringsend agglomeration, incineration of sewage sludge) to avoid impacts on Natura 2000 sites and other sensitive habitats. <p>Consultation</p> <ul style="list-style-type: none"> The NIS and SEA report do not adequately outline how public feedback has been integrated into the decision-making process, and draft documents nor is there sufficient information about ongoing consultations with relevant stakeholders. Recommended to enhance public consultation processes by ensuring early and comprehensive stakeholder involvement, including environmental NGOs, and clearly integrate consultation outcomes into the drafts as well as final decisions. <p>Transboundary Impacts</p> <ul style="list-style-type: none"> The SEA documents lack a comprehensive assessment of potential transboundary impacts, especially concerning offshore energy developments that may affect marine species migrating between jurisdictions, and marine habitats. Recommend that transboundary impacts are assessed, and initiate consultations with neighbouring Member States for developments, plans or programmes that may have cross-border environmental consequences, especially in marine environments and boarder habitats. <p>Monitoring</p> <ul style="list-style-type: none"> The SEA monitoring programme is considered to be vague and sets out non-specific monitoring measures. Recommended developing more concrete and enforceable monitoring plans, with specific indicators and thresholds for habitats and species protected under the Habitats and Birds Directives, with clear indicators and thresholds for habitats and species, ensuring early detection of unforeseen impacts and the implementation of corrective measures. <p>Mitigation</p> <ul style="list-style-type: none"> Include more robust mitigation measures to protect species listed under Annex I of the Birds Directive and Annex II of the Habitats 	<p>Consultation</p> <ul style="list-style-type: none"> This SEA Statement is being prepared as a requirement of Section 20C(7) of the Planning and Development Act 2000, as amended and in accordance with Article 16 of the SEA Regulations (S.I. No. 435 of 2004, as amended) and Chapter 5 of this SEA Statement sets out a summary of how consultation has influenced the First Revision to the NPF. This includes a summary of submissions relating to the SEA, AA and SFRA processes and how they have been addressed in the environmental reports (the subject of these tables). All consultation submissions received have been published online at https://www.npf.ie/first-revision-to-the-national-planning-framework/submissions/. <p>Transboundary Impacts</p> <ul style="list-style-type: none"> Non-statutory consultation was undertaken with the Northern Ireland Department of Agriculture, Environment and Rural Affairs (DAERA) which coordinated a number of responses from relevant Government Departments in NI. The DHLGH also sought and received submissions from the Northern Ireland Department for Communities and the Department for Infrastructure. Chapter 5 of this SEA Statement summarises the issues and observations raised on the environmental assessments and processes, which includes points raised in relation to the marine environment, and how they have been addressed. The DHLGH recognises the importance of the continued cooperation and collaboration with NI in regard to the NPF and land use planning. Both Governments are working together through all-island partnerships to enhance the shared island and address common strategic issues. This is expressed in detail within Chapter 8 (Working with Our Neighbours). It is noted that the NPF is a national framework plan with no specific locations or project detail proposed therefore assessment of transboundary sites is reflective of the detail available. NPO 1 acknowledges the need for tiered assessment through the planning hierarchy which will reflect increasing levels of detail on proposals, increased specificity on impact pathways are mitigation measures that are site specific if required. As such, it is not possible in this SEA to describe and mitigate for project-level impacts which can vary widely depending on the nature and scale of development proposals.

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Stakeholder	Points Raised	How these have been Addressed
	<p>Directive, particularly in areas affected by renewable energy development and urban expansion.</p> <p>Water Framework Directive Assessment</p> <ul style="list-style-type: none"> A separate Water Framework Directive Assessment of the Plan in a standalone document should be carried out and be put out for public consultation as part of the next draft of the NPF. 	<p>Monitoring</p> <ul style="list-style-type: none"> The SEA Monitoring Programme has been revised post-consultation. The final SEA Monitoring Programme is included in Chapter 7 of this SEA Statement. The monitoring programme has been updated for the draft First Revision to the NPF with input from the SEA team, a Stakeholder Workshop, and review comments from the EATSG and the statutory environmental authorities, who have provided suggestions and technical inputs based on their competence. The result is a robust monitoring programme which includes targets, timelines and responsibilities to accompany the First Revision of the NPF. The monitoring programme proposed is appropriate to the level of a framework plan and does not preclude assessment at lower planning tiers where geographic and project specificity is known. <p>Mitigation</p> <ul style="list-style-type: none"> The SEA Environmental Report, the SFRA and the NIS for the First Revision of the NPF proposed a robust mitigation strategy for the implementation of this framework plan. If the mitigations proposed are integrated into the final plan, this will set the framework for protection of Natura 2000 sites and other sensitive habitats and species in the context of the NPF. The cascading approach to mitigation allows more specificity to be achieved through the planning tiers as greater detail on location, nature and size of proposals becomes clearer. <p>Water Framework Directive Assessment</p> <ul style="list-style-type: none"> It is noted that the NPF is a national framework plan with no specific locations or project detail proposed therefore consideration of WFD is reflective of the detail available. NPO 1 acknowledges the need for tiered assessment through the planning hierarchy which will reflect increasing levels of detail on proposals, increased specificity on impact pathways are mitigation measures that are site specific if required. <p>The SEA included mitigation to acknowledge the specific need for WFD assessment of plans and projects arising from the NPF where deemed necessary as part of the supporting text for NPO 1. This text was included as mitigation and has now been included within Section 1.7, see Table 4-2.</p>
Individual	Role and Hierarchy of SEA and AA	Role and Hierarchy of SEA and AA

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Stakeholder	Points Raised	How these have been Addressed
	<ul style="list-style-type: none"> The proposal is to produce the strategic plan on energy, housing, and all other proposed plans and programmes as listed. These are therefore plans and programmes initiated by government at national level and as stated in the consultation documentation they will set the framework for regional plans and programmes and further down for actual projects. The proposals here will form the overarching authority for all projects and developments coming under it. It is therefore fitting into the requirements for the SEA Directive. The hierarchy is the SEA environmental report covering the highest government authority for the plan or programme. Following that, the various projects under the EIA Directive are initiated. In this instance, there is also the procedure, whereby central government's SEA will or may set the framework for subordinate regional authorities to carry out a modification to the first SEA which in turn will set the framework for projects under it Examples are provided of lack of SEA for various sectors: <ul style="list-style-type: none"> Had there been public consultation followed by the proper assessments on housing, the faulty mica concrete products might have been identified prior to the commencement of these projects. Had the SEA been done for onshore wind, issues such as the impact on local residents and peat sliding from wind farms would have to be examined. Regarding offshore, there is no SEA since the end of 2020 and no applications can be processed until there is an SEA for offshore wind. If hypothetically, government decided to build two nuclear power stations in Ireland the present situation is that there is no SEA at all and this means that local planners or An Bord Pleanála would be the first time that the plans would be examined. The legal hierarchy for planning is the Strategic Environmental Report compiled with public participation for the plan or programme at the highest level as required. Using that, regional authorities can compile their SEA to suit local conditions. Modifications can then be made. This legal process has been totally ignored by successive Irish governments and it is my fear that they will continue to roll out all this infrastructure using only the EIA process. It may be argued that those applying for planning permission will provide the expertise. Doing so will be outside the scope of their competency except for minor matters 	<p>The SEA Directive and the transposing legislation in Irish law applies to plans and programmes, subject to various applicability criteria and requirements. It is for plan makers to apply the SEA Directive on a plan by plan basis. This SEA has been undertaken at the appropriate level of detail on a revision to the existing NPF, which is a national strategic framework plan, and the updates to the policy base that have been made by the Plan team. It is not within the scope of this SEA to undertake assessments of all other sectoral plans or programmes as they do not form part of the NPF.</p> <p>Many of the Department and Agencies which operate in the sectors highlighted by the NPF have ongoing plans, programmes and projects prepared or in preparation and statutory obligations apply in relation to the undertaking of environmental assessments such as SEA, EIA and AA as relevant.</p>

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Stakeholder	Points Raised	How these have been Addressed
	at local level. Any EIA report conducted in the absence of the SEA environmental report is totally unlawful.	
Individual	<ul style="list-style-type: none"> The Draft NPF environmental assessment includes a number of “reasonable” alternative future spatial visions that are “realistic”, “viable” and “implementable”, all of which take the ESRI projections as an unquestionable starting point. However, if limiting greenhouse gas emissions is the overriding national imperative with a legally binding obligation it is considered this should be the primary control factor for all future planning. 	<ul style="list-style-type: none"> The Government’s decision to revise the NPF has been the basis for the examination of the alternatives. Therefore, a “do-nothing” approach and a “new NPF” approach were not feasible alternatives for consideration. Furthermore, given that the plan is a revision of the existing NPF, it has limited the range of plan-specific alternatives that have been developed. The SEA ER has highlighted that there is a link between population growth and GHG emissions. The NPF is a planning tool for how future growth can be accommodated based on population growth projections, it is not within the scope of the NPF to limit growth. <p>It should be noted that the NPF is part of a suite of national strategic approaches to various aspects of society. The annual Climate Action Plan is the principal mechanism by which climate action and the energy transition is being implemented by Government and how the carbon budgets are to be met.</p>

5.2.2 Submissions Relating to the SFRA

The key SFRA, related issues raised in submissions and how they have been addressed are summarised in **Table 5-2**.

Table 5-2: Issues Raised in Relation to SFRA

Stakeholder	Points Raised	How these have been Addressed
Office of Public Works (OPW)	<ul style="list-style-type: none"> Section 1.4 of the SFRA sets out the best available information for the SFRA, including the PFRA (2012). OPW considers that the indicative datasets produced under the PFRA should not be used in relation to decision-making, and that they have been superseded by the published national indicative fluvial and coastal flood mapping and the groundwater flood mapping produced by the GSI. Suggest that reference to the PFRA mapping be removed from the SFRA. Note that the www.cfram.ie web portal is no longer operational. The ICWWS provides an estimate of extreme water levels around the coast of Ireland for a range of Annual Exceedance Probabilities. The updated coastal flood maps produced with regard to these updated water levels were produced under the National Coastal Flood Hazard Mapping (NCFHM) project. Any references to ICWWS (or ICPSS) 	<ul style="list-style-type: none"> Section 1.4 has been updated to remove the reference to PFRA (2012) in the post-consultation SFRA report. Section 1.4 has been updated to remove the reference to www.cfram.ie in the post-consultation SFRA report. References to ICWWS and ICPSS have been replaced with reference to NCFHM mapping in the relevant sections of the post-consultation SFRA report. Section 1.3.1 has been updated in the post-consultation SFRA report to clarify that DECLG published the 2009 Guidelines and the year EU Floods Directive came into force.

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Stakeholder	Points Raised	How these have been Addressed
	<p>mapping, including in Sections 4.1, 4.1.1, 4.1.4, and 4.3.2, might be updated to instead refer to NCFHM mapping.</p> <ul style="list-style-type: none"> Note that it was the DECLG (as named at the time) that published the 2009 Guidelines, rather than the OPW and that the EU 'Floods' Directive came into force in 2007, rather than 2011 (page 2). Under Section 1.3.2 of the SFRA, note that the CFRAM Studies were not limited to 20 River Basins, and that 29 Flood Risk Management Plans were produced to cover all of Ireland. Section 4 of the SFRA sets out that the government has committed €1.3 billion to the delivery of 150 flood relief schemes across the country over the lifetime of the National Development Plan to 2030. It is stated that <i>"This will thus facilitate to accommodate the above-mentioned development pressures along with combating any predicted climate change impacts on flood risks"</i>. The presence of a completed flood relief scheme may therefore form a key element of the justification for such development. However, it should be noted that flood relief schemes are designed to mitigate the risk of flooding to existing communities and properties only, and not to protect areas of floodplain for the purposes of promoting development. Further, while considerable work is under way with regards to climate change adaptation plans for schemes, and some provision with regards to the potential impacts of climate change have been made in some past flood relief schemes, the schemes are designed primarily to mitigate present day scenario risk and so it should not be stated that climate change impacts will be protected against by schemes in all locations. Therefore, the OPW suggests removing the above mentioned statement from Section 4. 	<ul style="list-style-type: none"> Text has been amended in Section 1.3.2 of the post-consultation SFRA report with respect to CFRAM studies and Flood Risk Management Plans as relevant. Text in Section 4 of the post-consultation SFRA report has been deleted as suggested.

5.2.3 Submissions Relating to the AA

The key issues relevant to AA raised in submissions and how they have been addressed are summarised in **Table 5-3**.

Table 5-3: Issues Relevant to AA

Stakeholder	Points Raised	How these have been Addressed
Statutory		

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Stakeholder	Points Raised	How these have been Addressed
Department of Agriculture, Food and the Marine (DAFM)	<ul style="list-style-type: none"> Pages 117 & 118 – the use of the word intensification is misleading here - Food Vision 2030 contains no production targets, does not seek to increase output and does not advocate any increased intensification. Food Vision targets “Increased value-addition, and an increase in the value of agri-food exports to €21billion by 2030, built on sustainable steady value growth”. Reference to the “to the current Food Wise 2025 plan” is incorrect - it was superseded by Food Vision in 2021. 	<ul style="list-style-type: none"> Reference to intensification has been replaced with relevant text in the post-consultation NIS. Reference to Food Wise 2025 has been removed in the post-consultation NIS.
Environmental Protection Agency (EPA)	<ul style="list-style-type: none"> Reference made to the EPA's Ireland's Environment – An Integrated Assessment (EPA, 2020) report, the next iteration of which is due to be completed in autumn 2024. Would need to take account of this if published prior to finalisation of NIS. 	<ul style="list-style-type: none"> It is noted for clarity that the EPA State of the Environment Report 2024 was published after the consultation process concluded on 12 September 2025. <p>The revision process for the NPF post-consultation was informed by the EPA's submission and subsequent review of the SOER 2024 once published. This has also been reviewed by the AA Team and has influenced the assessment of post-consultation amendments.</p>
Transboundary		
Northern Ireland Environment Agency (NIEA), Department of Agriculture, Environment and Rural Affairs (DAERA)	<ul style="list-style-type: none"> Welcome that relevant sites and receptors within Northern Ireland have been included in the AA. Note that the NPF is a national level plan with no specific locations proposed and so transboundary sites cannot be assessed in significant detail and that AA on lower tier plans will be able to consider transboundary issues in more detail where geographic context can be added. DAERA are content with this conclusion. 	Noted.
Other		
Cork County Council, Ecology Office	<p>Mitigation</p> <ul style="list-style-type: none"> There is an overarching mitigation measure set out in the NIS for the revised NPF which commits to the identification, describing and mapping of ecological corridors and stepping-stones outside of EU sites. The measure relies on account being taken by Planning Authorities of these corridors during plan preparation and project consenting. It is suggested that this mitigation could be achieved through the development of County Biodiversity Action Plans and or Green Infrastructure Strategies, therefore, it is assumed that it is expected that this measure would be implemented at County Level. In order for this mitigation to be successful, and for Local Authorities to remain in compliance with same, the exercise of identifying, mapping and describing ecological corridors outside EU sites, will need to be 	<p>Mitigation</p> <p>The First Revision to the NPF now includes a new NPO 88 which specifically addresses the concerns raised in this submission. NPO 88 states:</p> <p><i>Facilitate the protection and restoration of biodiversity [including in European sites and the habitats and species for which they are selected] through the preparation of national guidance in relation to Planning and Biodiversity to:</i></p> <ul style="list-style-type: none"> <i>Plan and manage for integration of biodiversity protection and restoration in future planning and development;</i>

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Stakeholder	Points Raised	How these have been Addressed
	<p>completed on a timeline which allows it to inform the next round of plan making and land use zoning. We recommend that this measure would be included as an objective within the NPF and that the linkage of this to the AA process be made clear in the plan (cf Objectives 83, 84, 85 and 86). Guidance and resourcing will be required to ensure that this exercise is carried out to a high standard and in a consistent manner across the state. It is recommended that the NPF would include commitments to provide for same.</p> <ul style="list-style-type: none"> There is a commitment in the NIS mitigation measures to the preparation and publication by the Department of a science-based methodology by which no net loss can be demonstrated for Local Authorities land use planning remit. It is stated in the NIS that the mitigation will address viable options/mechanism to address losses where these are identified at a project level. It is desirable that this guidance would be prepared and delivered in advance of the next CDP cycle to ensure Planning Authorities remain in compliance with the mitigation measures specified within the NIS established for the revised NPF. It is recommended that Objective 85 of the plan itself would include this commitment. 	<ul style="list-style-type: none"> <i>Ensure a consistent and strategic approach to biodiversity protection and restoration across planning authorities and administrative boundaries, and</i> <i>Support the implementation of the National Biodiversity Action Plan (2023-2030) and the forthcoming National Restoration Plan.</i> <p>It is intended that this guidance will assist Planning Authorities in delivering on objectives in relation to No Net Loss (NNL) and other key ecological tools. It is recommended in Appendix K of the post-consultation NIS, to avoid consenting risk for projects emerging from the NPF, the guidance clearly provided for through NPO88 includes a clear, science-based, methodology by which no net loss can be demonstrated with respect to projects and that this methodological guidance identifies viable options and/or mechanisms to address losses where these are identified through the application of the methodology at a project-level.</p>
Wild Ireland Defence CLG	<ul style="list-style-type: none"> Of the opinion that the Draft National Planning Framework and associated documents (SEA and NIS reports) have not considered the effects on the environment, protected species and water under the Habitats Directive, Birds Directive SEA Directive and Water Framework Directive nor has it considered decisions of the European Courts and the implementation of same. 	<p>The NIS along with the SEA and SFRA identify, describe and assess the effects of the draft Plan on the environment including protected species and water under the Habitats Directive, Birds Directive SEA Directive and WFD. These processes have been undertaken with reference to EU and national guidance and current good practices. The assessments have been undertaken in the context that this is a revision to an existing plan which is currently being implemented. Furthermore, it is mindful of the level of the plan i.e. a planning framework to guide future development in the context of population projects. The NPF does not sit in isolation of other government policy but seeks to integrate and dovetail with these including but not limited to the NBAP and the CAP 24. The methodologies for assessment in the SEA ER are included at Chapter 3 and Chapter 6 and for the NIS at Chapter 3 and in section 6.2 of the NIS.</p>
Environmental Pillar (Planning Advisory Forum (PAF))	Nothing specific to AA process.	See entry for this stakeholder in Table 5-1 above.
Individual	<p>Assessment</p> <ul style="list-style-type: none"> Inadequate Assessment of Impacts on Protected Species: The NPF and accompanying SEA do not fully address potential impacts on species listed under Annex I of the Birds Directive and Annex II and IV 	<p>Assessment</p> <ul style="list-style-type: none"> As a national strategic framework plan, the NPF does not contain location-specific information, nor does it specify where development should be located. The assessments under the SEA, AA and SFRA

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Stakeholder	Points Raised	How these have been Addressed
	<p>of the Habitats Directive in terms of limited treatment of cumulative impacts and the lack of specific assessments for certain sensitive species, such as migratory birds and marine species affected by renewable energy development. Recommend that the SEA and NIS be enhanced by including more detailed cumulative impact analysis, specifically assessing the combined effects of various projects (including wind energy, drainage, wastewater, and urban / port development) on protected species.</p> <ul style="list-style-type: none"> There is no cumulative impacts assessment with wastewater impacts in Ireland and UK or climate change impacts in relation to warming oceans etc. Considered that the SEA and NIS did not provide full assessments of the impacts of renewable energy projects on marine species. There is also a lack of specific mitigation strategies for underwater noise pollution and habitat disturbance caused by offshore wind farms. Recommended to include a more comprehensive assessment of the impacts of offshore renewable energy projects on marine species, with concrete mitigation measures such as effective noise pollution control and restricted construction periods. The current NIS and SEA reports recognise the risks to raised bogs and peatlands, particularly in relation to onshore wind energy and forestry, but fail to provide sufficient mitigation measures to prevent habitat loss, drainage, and fragmentation. Recommend to prohibit wind energy development in Natura 2000 sites and other protected bog habitats, and require comprehensive restoration plans for any affected peatland areas. <p>Mitigation</p> <ul style="list-style-type: none"> The Birds Directive emphasizes the need for robust mitigation strategies for bird species, especially those listed under Annex I. However, mitigation measures for collision risks from wind energy infrastructure, disturbance during construction, and habitat loss are not sufficiently detailed. Similarly, for other protected species under the Habitats Directive, mitigation measures are insufficiently defined in the NIS. The NPF should adopt stronger, species-specific mitigation measures, such as restricting development during sensitive breeding or migratory periods, and implementing noise reduction technologies to mitigate disturbances. Include more robust mitigation measures to protect species listed under Annex I of the Birds Directive and Annex II of the Habitats 	<p>are strategic in focus appropriate to the nature and scale of the NPF policy base as presented. The detail suggested and sought for the ORE for example is clearly identified and assessed in a tiered manner through the MPPS, the NPF, DMAP and finally projects level. To seek to mitigate in the NPF would lead to conflict and confusion through sectoral planning hierarchy. The mitigations included in the SEA, AA and SFRA are considered appropriate for this scale of plan. It is accepted that more detailed mitigation will be required at lower tiers and as location and project detail becomes available. This is recognised in recital 9 of the SEA Directive. Considerations under Art 5(2) also refer to taking into account the contents and level of detail in the plan, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</p> <p>In this regard development in the marine environment in Ireland is subject to specific policy and planning obligations, such as those under the Maritime Area Planning Act 2021, the National Marine Planning Framework, the designation of Designated Marine Area Plans for specific activities (such as offshore wind energy), and the establishment of the Marine Area Regulatory Authority. It should be noted the NMPF was subject to its own SEA and AA, and Ireland's first DMAP, the South Coast DMAP, is also being subject to SEA and AA.</p> <p>Mitigation</p> <ul style="list-style-type: none"> The SEA Environmental Report, the SFRA and the NIS for the First Revision of the NPF proposed a robust mitigation strategy for the implementation of this framework plan. The mitigations proposed under the AA process are integrated as per Appendix K of the Post-Consultation Natura Impact Statement. This will set the framework for protection of Natura 2000 sites and other sensitive habitats and species in the context of the NPF. The cascading approach to mitigation allows more specificity to be achieved through the planning tiers as greater detail on location, nature and size of proposals becomes clearer. <p>Alternatives</p> <ul style="list-style-type: none"> The SEA Environmental Report records the alternatives considered for the draft First Revision of the NPF. This reflects inputs from a wide stakeholder group and is reflective of this being a revision of the

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Stakeholder	Points Raised	How these have been Addressed
	<p>Directive, particularly in areas affected by renewable energy development and urban expansion.</p> <p>Alternatives</p> <ul style="list-style-type: none"> The Habitats Directive (Article 6(3)) and Birds Directive require a thorough consideration of alternatives that avoid impacts on protected species and habitats. Considered that there is insufficient analysis of alternative locations and solutions that avoid adverse impacts on protected habitats. While alternatives are mentioned, they are not fully explored in a way that would mitigate impacts on sensitive species and habitats such as raised bogs and peatlands. Recommended to provide a more detailed assessment of alternative approaches, particularly for renewable energy projects, infrastructure development such as LNG and Water/ Wastewater, and urban expansion. These alternatives should focus on avoiding impacts on protected areas such as Natura 2000 sites, RAMSAR Site, raised bogs, and peatlands. Ensure that all possible alternatives are explored in depth, particularly for energy infrastructure projects, water infrastructure projects (i.e. water supply project alternative to fix the leaking pipes in Dublin, GDD Project alternative to allow INTEL to treat and reuse their own wastewater in house and to fix infiltration of surface water to the Ringsend agglomeration, incineration of sewage sludge) to avoid impacts on Natura 2000 sites and other sensitive habitats. <p>Consultation</p> <ul style="list-style-type: none"> The NIS and SEA report do not adequately outline how public feedback has been integrated into the decision-making process, and draft documents nor is there sufficient information about ongoing consultations with relevant stakeholders. Recommended to enhance public consultation processes by ensuring early and comprehensive stakeholder involvement, including environmental NGOs, and clearly integrate consultation outcomes into the drafts as well as final decisions. 	<p>existing NPF rather than a full review. This decision was made by Government on 20th June 2023. The alternatives considered were developed with reference to the EPA Guidance on alternatives in SEA, 2015. An initial long list of alternatives was considered against the framework of “reasonable, realistic, viable and implementable” as described in Chapter 7 of the SEA Report. Those achieving the four criteria were brought forward for more detailed consideration and the preferred alternatives then formed the foundation of the amendments to the NPF. The SEA Environmental Report and the NIS for the First Revision of the NPF proposed a robust mitigation strategy for the implementation of this framework plan. The mitigations proposed, and how they have been integrated into the final plan, are fully described in Section 4.2. These mitigation measures set the framework for protection of Natura 2000 sites and other sensitive habitats in the context of the NPF.</p> <p>Consultation</p> <ul style="list-style-type: none"> This SEA Statement is being prepared as a requirement of the SEA Directive and in accordance with Article 16 of the SEA Regulations SI No. 435 of 2004, as amended. Chapter 5 of this SEA Statement sets out a summary of how consultation has influenced the First Revision to the NPF. This includes a summary of submissions relating to the SEA, AA and SFRA processes and how they have been addressed in the environmental reports (the subject of these tables). All consultation submissions received have been published online at https://www.npf.ie/first-revision-to-the-national-planning-framework/submissions/.

5.3 Assessment of Final Changes to the NPF

In response to the submissions received on the draft First Revision of the NPF, further revisions were made to the draft by the DHLGH, including addition of new policy objectives and amendments to ones already included in the draft. In light of these amendments, further assessment under the SEA process was completed to determine if any of the amendments would result in additional significant effects, both positive and negative and is documented in this Section. The explanation of symbology used for this assessment is provided in Table 5-4. Section 5.4.1 assesses new policies added and Section 5.4.2 assesses changes to existing policy objectives. This assessment was undertaken based on the draft plan provided by DHLGH on the 06.12.24 and minor updates issued on 20 December 2024, 10 February 2025 and 18 February 2025.

The following notation is used in the assessment tables:

Table 5-4: Explanation of Symbology Used for SEA

Symbol	Meaning
Plus (+)	Indicates a potential positive environmental impact
Minus (-)	Indicates a potential negative environmental impact
Plus/minus (+/-)	Indicates that both positive and negative environmental impacts are likely
Uncertain (?)	(due to the scale of the Plan) absence of further detail the impact is unclear or cannot be assessed.
Zero (0)	Indicates no significant impact
Key:	PHH: Population & Human Health; BFF: Biodiversity, Flora & Fauna; LS: Land & Soils/Sediments; W: Water; AQ: Air Quality; CF: Climatic Factors; MA: Material Assets; CH: Cultural Heritage; LandS: Landscape and Seascape.

5.3.1 Assessment of Newly Added NPOs (Including City Enablers)

Ref. as of (18.02.25) Adopted NPF	Objective
NPO 78	<i>Promote sustainable development by ensuring flooding and flood risk management informs place-making by:</i> <ul style="list-style-type: none"> <i>Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management;</i> <i>Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation</i>
NPO 81	<i>Support the implementation by Uisce Éireann, Local Authorities and other parties with drainage responsibilities of Integrated Wastewater and Drainage Management Plans on a prioritised risk basis in accordance with the requirements of the RBMP and EU Water Directives.</i>
NPO 88	<i>Facilitate the protection and restoration of biodiversity [including in European sites and the habitats and species for which they are selected] through the preparation of national guidance in relation to Planning and Biodiversity to:</i> <ul style="list-style-type: none"> <i>Plan and manage for integration of biodiversity protection and restoration in future planning and development;</i> <i>Ensure a consistent and strategic approach to biodiversity protection and restoration across planning authorities and administrative boundaries, and</i> <i>Support the implementation of the National Biodiversity Action Plan (2023-2030) and the forthcoming National Restoration Plan.</i>

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Ref. as of (18.02.25) Adopted NPF	Objective
NPO 96	<i>Examine the existing governance arrangements for the MASP areas to scope out potential areas for reform that may be necessary to deliver on the co-ordination of strategic planning and development between all stakeholders.</i>
NPO 108	<i>Develop and implement a new programme of monitoring of the implementation of the National Planning Framework, with a focus on measuring outcomes relative to the key strategic objectives of the NPF including more balanced regional development, city-based growth, compact growth and infrastructure delivery.</i>
G15	<i>Measures to enhance and better link the existing network of green and blue spaces, in line with the County and City Biodiversity Action Plans, subject to carrying out a routing study and any necessary environmental assessments.</i>
C15	<i>Implementation of a comprehensive cycle network for Cork as set out in the Cork Metropolitan Area Transport Strategy.</i>
C16	<i>Measures to enhance and better link the existing network of green and blue spaces, in line with the County and City Biodiversity Action Plans, subject to carrying out a routing study and any necessary environmental assessments.</i>
L16	<i>Measures to enhance and better link the existing network of green and blue spaces, in line with the City and County Biodiversity Action Plan, subject to carrying out a routing study and any necessary environmental assessments</i>

Ref.	PHH	BFF	LS	W	AQ	CF	MA	CH	LandS
NPO 78	+	0	0	+	0	+	+	0	0
NPO 81	+	+	+	+	0	0	+	0	0
NPO 88	+	+	+	+	+	+	+	0	+
NPO 96	?	?	?	?	?	?	?	?	?
NPO 108	+	+	+	+	+	+	+	+	+
G15	+	+	+	+	+	+	+	+	+
C15	+	+	+	+	+	+	+	+	+
C16	+	+	+	+	+	+	+	+	+
L16	+	+	+	+	+	+	+	+	+

Key: **PHH:** Population & Human Health; **BFF:** Biodiversity, Flora & Fauna; **LS:** Land & Soils/Sediments; **W:** Water; **AQ:** Air Quality; **CF:** Climatic Factors; **MA:** Material Assets; **CH:** Cultural Heritage; **LandS:** Land/Seascape.

Assessment and Discussion:

NPO 78: This new policy is derived from NPO 78 of the draft Revised NPF (now renumbered as NPO 77), as a result of the consultation feedback. Feedback indicated that water and flood risk should be separated and given standalone NPOs - given their importance - while still acknowledging their interaction. NPO 78 now separates out flood risk management and the potential impacts that can arise as a result of climate change. This will have indirect positive effects for PHH, W, and MA in terms of ensuring that inappropriate development does not occur in areas where it is not adequately justified in accordance with the Guidelines, to ensure that people and strategic infrastructure are not adversely impacted by flooding. Taking into account the potential impacts of climate change on flooding and flood risk with respect to the effects of sea

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Assessment and Discussion:

level change and coastal flooding and erosion is also considered positive for CF as it will help with the implementation of adaptation responses in vulnerable areas by reducing the flood and erosion risks.

NPO 81 This new policy was inserted as a result of stakeholder feedback in relation to drainage management. Drainage and wastewater management plans (DWMP) set out a long term view on how authorities responsible for water and wastewater management intend to extend, improve and maintain a robust and resilient drainage and wastewater system taking population growth, urban creep and climate change into account. It also affords the opportunity for overlapping agency remits to harness synergies and provide more robust long term solutions. As such, the support for implementation of these plans is considered positive and will have direct and indirect positive effects for W, BFF, LS, MA and PHH, as it will help to plan and manage drainage and wastewater, ensure capital funding is identified for this work in order to achieve or maintain environmental quality.

NPO 88: This new policy was incorporated in the revised NPF in response to the mitigation proposed in the environmental assessments. It relates to the commitment of preparing a national guidance in relation to Planning and Biodiversity that would facilitate the protection and restoration of biodiversity including in European sites. This is considered directly positive for BFF in the short to long term as adequate consideration of biodiversity in planning ensures a more sustainable and resilient environment. Indirect positive impacts are anticipated for PHH and MA in the short to long term as increased access to green spaces contributes to improved mental health and wellbeing. Indirect and long term positive impacts will likely occur for LS and W as a result of: efficient nutrient cycling, reduced nutrient losses and improved water quality due to protection of biodiverse soils and aquatic ecosystems. Protection of local biodiversity including diverse plant species can help tackle air pollution and biodiversity networks can help mitigate effects of climate change by reducing GHG emissions and regulating climate by sequestration over medium to long term. Protection of biodiversity can also help enhance the aesthetic and recreational value of landscapes. The guidance will include approaches which can deliver coordinated responses to No Net Loss and Nature Restoration as appropriate and also address more holistically issues such as recreational pressures from population growth.

NPO 96: While there was reference in the draft Plan to reforms of planning legislation and reforms / actions aimed at enhancing capacity and addressing constraints to NDP delivery, nothing indicating short-comings in governance arrangements for the MASP areas was noted. This new NPO introduces a scoping process for the existing governance of MASPs in order to identify potential areas for reform. No detail is given and as such the impacts cannot be assessed and significant positive or negative effects cannot be ascertained.

NPO 108: The commitment to develop and implement a new programme of monitoring of the implementation of the NPF is considered broadly positive. Monitoring and use of tools such as KPIs will help audit the implementation and effectiveness of policies. Notwithstanding this, the monitoring of implementation is only part of the monitoring programme required. The monitoring programme developed under the SEA is a legal requirement of the SEA Directive, with a focus on monitoring environmental outcomes. This new NPO would be strengthened if a reference to the environmental monitoring programme was also committed to and a link provided within the NPF to the final SEA monitoring programme.

Enablers G15; C16; and L16: The three additional enablers identified all seek to improve connectivity of green and blue spaces. While this might have potential for unintended consequences, the enablers specifically reference the need to align with the City and County Biodiversity Action Plans and to ensure the use of robust route selection which will help avoid unintended consequences. A more robust and resilient green and blue network has the potential to bring benefits for all environmental receptors, noting the need to apply NPO 1 in parallel.

Enabler C15 supports the implementation of a comprehensive cycle network for Cork as set out in the Cork Metropolitan Area Transport Strategy (CMATS). The CMATS was subject to SEA and AA and included mitigation to safeguard the wider environment. The mitigation and recommendations of the SEA and AA were integrated into the final CMAT to offset any significant negative effects. Positive effects in terms of modal shift with benefits for air quality, climate and human health were noted, as were opportunities for improved public realm and heritage assets and opportunities for connectivity for biodiversity. Assuming the

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Assessment and Discussion:

application of the prescribed mitigation from the SEA and AA, no significant negative effects are anticipated and the positive effects identified in the CMATs will be realised.

Recommendation Proposed:

- NPO108: Notwithstanding that the monitoring under SEA is mandatory in accordance with Article 10 of the SEA Directive, this new NPO 108 could also reference and link to the programme for transparency and clarity.
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How Recommendation was Addressed

This recommendation has not been addressed. However, it is acknowledged that the requirement for SEA monitoring is mandatory under Article 10 of the SEA Directive.

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5.3.2 Assessment of Updated NSOs and NPOs (Including Regional Priorities and Enablers)

Table 5-5: Assessment of Final Changes to NSOs and NPOs (Including Regional Priorities and Enablers)

Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
NPO8 (Chapter 2)	<p>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints¹⁸.</p> <p>Footnote 18- On the basis of National Policy Objective 2a, this effectively targets 25% of all new homes nationally within the five cities and their suburbs as defined by the CSO in the Census of Population.</p>	Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.	Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.	<p>The NPO is strengthened with the clarification that the population growth patterns will be done in compact and sequential manner which is in keeping with the compact growth objective of the NPF.</p> <p>No significant negative effects arising from the proposed amendment. No further mitigation is required.</p>
NPO9 (Chapter 2)	<p>Deliver 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 footprints¹⁹.</p> <p>Footnote 19- On the basis of National Policy Objective 2a, this effectively targets 15% of all new homes nationally. Individual or scheme homes delivered outside the CSO defined urban settlement</p>	Deliver 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.	Deliver 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 and ensure compact and sequential patterns of growth.	<p>The NPO is strengthened with the clarification that the population growth patterns will be done in compact and sequential manner which is in keeping with the compact growth objective of the NPF.</p> <p>No significant negative effects arising from the proposed amendment. No further mitigation is required.</p>

² Green bold font = additional/revised wording. Red strikethrough font = deleted wording.

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
	boundary are classed as greenfield.			
NPO10 (Chapter 2)	N/A ³	Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.	Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint area of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.	Minor wording change. The NPO is also strengthened with the clarification that the population growth patterns will be done in compact and sequential manner which is in keeping with the compact growth objective of the NPF. No significant negative effects arising from the proposed amendment. No further mitigation is required.
EM7 (Chapter 3)	<ul style="list-style-type: none"> Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to enable a managed transition of the local economies of such areas in gaining the economic benefits of greener energy. 	Renumbered to EM 6 <ul style="list-style-type: none"> Developing the potential of the region in renewable energy terms, in accordance with the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment, across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to support a managed transition of local economies to greener energy. 	EM 6 in the final Plan <ul style="list-style-type: none"> Developing the potential of the region in renewable energy terms, in accordance with the capacity allocation targets set out in Chapter 9: Climate Transition and Our Environment, across the technological spectrum from wind and solar to biomass and, where applicable, wave energy, focusing in particular on the extensive tracts of publicly owned peat extraction areas in order to support a managed just transition of local economies to greener energy. 	Minor text addition to include the reference to <i>just</i> transition which is positive for PHH and MA. No significant negative effects arising from the proposed amendment. No further mitigation is required.

³ This is a new policy which has been amended between the pre-consultation and post-consultation version.

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
D9 (Chapter 3)	Improving sustainability in terms of energy, waste and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.	D9 has been deleted to avoid repetition as it is covered under D15. See assessment below. No further mitigation is required.
D15 (Chapter 3)	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, and water conservation, water reuse and Sustainable Drainage Systems (SuDS) and the circular economy	Minor text addition to include the reference to water reuse, SuDS and the <i>circular economy</i> which is positive for all environmental receptors. No significant negative effects arising from the proposed amendment. No further mitigation is required.
G3 (Chapter 3)	Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Ardaun	Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Ardaun	Progressing the sustainable development of new brownfield and greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Ardaun	Minor wording amendments to clarify the scope of the policy and include reference to brownfield areas for housing and public transport development, which is positive. No significant negative effects arising from the proposed amendment. No further mitigation is required.
G8 (Chapter 3)	Provision of a Citywide public transport network, with enhanced accessibility between existing and proposed residential areas and the City Centre, third level institutions	Provision of a Citywide public transport network, informed by the development of a Galway Metropolitan Area Transport Strategy (GMATS) with enhanced accessibility between existing and proposed residential areas and the City	Provision of a Citywide public transport network, informed by the development of a Galway Metropolitan Area Transport Strategy (GMATS ¹⁴) with enhanced accessibility between existing and proposed residential areas and the City	Minor addition of a footnote to provide clarification that GMATS is replacing the Galway Transport Strategy (GTS). No significant negative effects arising from the proposed

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
	and the employment areas to the east of the city.	Centre, third level institutions and the employment areas to the east of the city.	Centre, third level institutions and the employment areas to the east of the city.	amendment. No further mitigation is required.
G12 (Chapter 3)	Delivery of the Galway East Main Drainage Waste Water Treatment Plant	Delivery of the Galway City Ring Road; Delivery of the Galway East Main Drainage Scheme as part of the wider Greater Galway Area Drainage Study	Delivery of the Galway City Ring Road; Delivery of the Galway East Main Drainage Scheme as part of the wider Greater Galway Area Drainage Study Galway Wastewater Strategy (GWWS)	Reference to specific projects has been amended to an overall reference to the Galway Wastewater Strategy (GWWS) which is considered more appropriate at this planning scale. The strategy is being advanced by UE and is subject to both SEA and AA. No significant negative effects arising from the proposed amendment. No further mitigation is required.
G14 (Chapter 3)	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, and water conservation, water reuse and Sustainable Drainage Systems (SuDS) and the circular economy	Minor text addition to include the reference to water reuse, SuDS and the circular economy which is positive for all environmental receptors. No significant negative effects arising from the proposed amendment. No further mitigation is required.
C2 (Chapter 3)	The development of a much enhanced Citywide public transport system to incorporate subject to further analysis, proposals for an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link to the Airport;	The development of a much enhanced Citywide public transport system based on the Cork Metropolitan Area Transport Strategy (CMATS), to incorporate an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link to the Airport	The development of a much enhanced Citywide public transport system based on the Cork Metropolitan Area Transport Strategy (CMATS), to incorporating the implementation of BusConnects Cork plus the Cork Area Commuter Rail Programme, and an east-west corridor from Mahon, through the City Centre to Ballincollig and a north-south corridor with a link including enhanced connectivity to the Airport	Amended text to include specific reference to BusConnects Cork and the Cork Area Commuter Rail Programme which were previously part of C3. These programmes will be subject to EIA and planning as per NPO 1 and as such no significant negative effects are anticipated arising from the proposed amendment. No further mitigation is required.

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
C3 (Chapter 3)	Progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Monard.	Delivering BusConnects Cork and the Cork Area Commuter Rail Programme. Progressing the sustainable development of new brownfield and greenfield areas for housing along existing and planned high capacity public transport corridors with a particular focus on large-scale Transport Orientated Development (TOD) opportunities within the metropolitan area	Delivering BusConnects Cork and the Cork Area Commuter Rail Programme. Progressing the sustainable development of new brownfield and greenfield areas for housing along existing and planned high capacity public transport corridors with a particular focus on large-scale Transport Orientated Development (TOD) opportunities within the metropolitan area	Text has been moved to C2. No significant negative effects arising from the proposed amendment. No further mitigation is required.
C13 (Chapter 3)	Ensuring that water supply and waste- water needs are met by new national projects to enhance Corks water supply and increase waste water treatment capacity	Ensuring that water supply and waste- water needs are met by new national projects to enhance Corks water supply and increase waste water treatment capacity	Ensuring that water supply and waste- water needs are met by new national strategic projects to enhance Corks water supply and increase waste water treatment capacity	Minor text amendment changes to the reference from national projects to strategic projects, reflective that they may be regional or local but nonetheless are enablers at a strategic level. No significant negative effects arising from the proposed amendment. No further mitigation is required.
C14 (Chapter 3)	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, and water conservation, water reuse and SuDS and the circular economy	Minor text addition to include the reference to water reuse, SuDS and the circular economy which is positive for all environmental receptors. No significant negative effects arising from the proposed amendment. No further mitigation is required.
L1 (Chapter 3)	Implementation of the Limerick 2030 economic strategy to create modern, city centre office accommodation and a series of transformational city centre public realm projects	Implementation of the updated Limerick 2030 economic strategy to create modern, city centre office accommodation and a series of transformational city centre public realm projects	Implementation of the updated Limerick 2030 economic strategy to create modern, city centre residential, food and beverage, leisure and office accommodation, to reposition the City Centre as the premier regional shopping destination and to deliver a series of	Additional text to include reference to multi-use and multipurpose development as part of the 2030 strategy, not only focussed on office space. A vibrant city space requires multi-use and function. Positive impacts for PHH, MA anticipated and indirect positive effects for

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
			transformational city centre commercial and public realm projects	LandS where quality open space is provided. No further mitigation is required.
L7 (Chapter 3)	Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Mungret	Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Mungret	Progressing the sustainable development of new brownfield and greenfield areas for housing and the development of supporting public transport and infrastructure, such as at Mungret	Minor wording amendments to clarify the scope of the policy and include reference to brownfield areas for housing and public transport development, which is positive. No significant negative effects arising from the proposed amendment. No further mitigation is required.
L12 (Chapter 3)	Enhanced road connectivity to Shannon- Foynes Port, including local by-passes;	Enhanced road connectivity to Shannon- Foynes Port, including local by-passes	Enhanced rail and road connectivity to Shannon- Foynes Port, including local by-passes	Text has been amended to include reference to rail. This is considered positive for PHH, AQ, CF, and MA as it allows for rail to be seen as part of a long term system to reduce dependence on road especially for freight. As with construction and operation of roads, rail as potential or impacts to all environmental receptors as a result of increased noise, land take, visual intrusion, severance etc. robust route and site selection are therefore essential components to avoid negative effects. See also NPO 1. No further mitigation is required.
L13	Enhanced regional connectivity through improved average	Enhanced regional connectivity through improved average journey times by road to Cork and Waterford	Enhanced regional connectivity through improved average journey times by rail and road to Cork and Waterford and	The text has been amended to include reference to rail and to Galway city. The AISRR was subject to SEA, AA and SFRA as part of its

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
(Chapter 3)	journey times by road to Cork and Waterford;		Galway, as identified within the All Island Strategic Rail Review	development. Subject to the implementation of the mitigations identified therein, no additional negative effects are identified. No further mitigation is required.
L14 (Chapter 3)	Ensuring that water supply and waste-water needs are met by new national projects to enhance Limerick's water supply and increase waste water treatment capacity;	Ensuring that water supply and waste-water needs are met by new national projects to enhance Limerick's water supply and increase waste water treatment capacity	Ensuring that water supply and waste-water needs are met by new national strategic projects to enhance Limerick's water supply and increase waste water treatment capacity	Minor text amendment changes the reference from national projects to strategic projects, reflective that they may be regional or local but nonetheless are enablers at a strategic level. No significant negative effects arising from the proposed amendment. No further mitigation is required.
L15 (Chapter 3)	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation.	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, and water conservation, water re-use and SuDS and the circular economy	Minor wording amendment to clarify the scope of the policy and include reference to SuDS and circular economy which is positive. No significant negative effects arising from the proposed amendment. No further mitigation is required.
W4 (Chapter 3)	Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure	Progressing the sustainable development of new greenfield areas for housing and the development of supporting public transport and infrastructure	Progressing the sustainable development of new brownfield and greenfield areas for housing and the development of supporting public transport and infrastructure	Minor wording amendments to clarify the scope of the policy and include reference to brownfield areas for housing and public transport development, which is positive. No significant negative effects arising from the proposed amendment. No further mitigation is required.
W10	Ensuring that water supply and waste-water needs are met by new national projects to	Ensuring that water supply and waste-water needs are met by new national projects to enhance Waterford's water	Ensuring that water supply and waste-water needs are met by new national strategic projects to enhance Waterford's	Minor text amendment changes the reference from national projects to strategic projects, reflective that they

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
(Chapter 3)	enhance Waterford's water supply and increase waste water treatment capacity	supply and increase waste water treatment capacity	water supply and increase waste water treatment capacity	may be regional or local but nonetheless are enablers at a strategic level. No significant negative effects arising from the proposed amendment. No further mitigation is required.
W11 (Chapter 3)	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating, and water conservation, water reuse and Sustainable Drainage Systems (SuDS) and the circular economy	Minor wording amendment to clarify the scope of the policy and include reference to SuDS and circular economy which is positive. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO34 (Chapter 5)	N/A	Support the agri-food industry in promoting Ireland's continued food security in a manner that ensures economic, environmental, and social sustainability while ensuring progress in achieving targets in the National Climate Action Plan and the River Basin Management Plan.	Renumbered to NPO33: Support the agri-food industry in promoting Ireland's continued food security in a manner that ensures economic, environmental, and social sustainability while ensuring progress in achieving targets in the National Climate Action Plan 2024 and the River Basin Management Plan.	Minor wording amendment to update reference to Climate Action Plan 2024. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO35	Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.	Continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy, which prioritises projects on the basis of their environmental sustainability, achieving maximum impact and connectivity at national and regional level while ensuring their development is compliant with the National Biodiversity Action Plan, the	Renumbered to NPO34: Continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy, which prioritises:	Text clarifications to clarify scope of the policy to ensure sustainable management of outdoor recreation sites. This is considered a positive addition to the NPO. No significant negative effects arising from the proposed amendment. No further mitigation is required.

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
		national climate change objective and requirements for environmental assessments.	<ul style="list-style-type: none"> A coordinated approach to the sustainable management of outdoor recreation sites; Projects on the basis of their environmental sustainability, achieving maximum impact and connectivity at national and regional level while ensuring their development is compliant with the National Biodiversity Action Plan, the national climate change objective and requirements for environmental assessments. 	
NPO43 (Chapter 6)		To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.	Renumbered to NPO42: To target the delivery of housing to accommodate approximately 50,000 additional households homes per annum to 2040	Wording amendment to clarify the terminology being used in the NPF – raised by SEA pre-consultation as lacking clarity where houses and households were being used interchangeably. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO51 (Chapter 7)	Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, metropolitan area and city/county development plans , to ensure the effective growth and sustainable development of	Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, State Fishing Harbours and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, and plans at local level to ensure the effective growth and sustainable development of the city regions and regional and rural areas, including, where appropriate, infrastructure to effectively support the	Renumbered to NPO50: Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, State Fishing Harbours and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, and plans at local level to ensure the effective growth and sustainable development of the city regions and regional and rural areas,	It is noted that the National Ports Policy is currently under review and is being subject to SEA and AA. No significant negative effects arising from the proposed amendment subject to the outcome of the SEA and AA processes and the implementation of any necessary mitigations identified to avoid significant adverse effects being

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
	the city regions and regional and rural areas	development and maintenance of off- shore renewable electricity generating developments.	including, where appropriate, infrastructure to effectively support the development and maintenance of off- shore renewable electricity generating developments in accordance with National Ports Policy.	applied. No further mitigation is required.
NPO54 (Chapter 7)	In line with the collective aims of national policy regarding climate adaptation, to address the effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.	In line with the collective aims of national policy regarding climate adaptation, to address the effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.	Renumbered to NPO53: In line with the collective aims of national policy regarding climate adaptation and the associated legislative provisions , to address take account of the effects of sea level changes and coastal flooding and erosion in planning and development management and to support the implementation of adaptation responses to limit risks to communities and coastal ecosystems from the impacts of coastal change in vulnerable areas .	Text clarifications to clarify scope of the policy (noting a new policy has been added specifically for flooding) and the need for planning and development management to play an active role in climate adaptation wherever adaptation responses are required, to limit risks to communities and coastal ecosystems. This is considered a positive addition to the NPO. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO55 (Chapter 7)	N/A ⁴	Support the development of coastal management plans to address the likely effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.	Renumbered to NPO54: Support the development of coastal change management plans to address the likely effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas .	Similar to above text clarifications to clarify scope of the policy (noting a new policy has been added specifically for flooding) and to support adaptation responses wherever they are required, not limited to vulnerable areas.

⁴ This is a new policy which has been amended between the pre-consultation and post-consultation version.

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
				No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO56 (Chapter 7)	To support, within the context of the Offshore Renewable Energy Development Plan (OREDPA) and its successors, the progressive development of Ireland's offshore renewable energy potential, including domestic and international grid connectivity enhancements.	To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.	Renumbered to NPO55: To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore and offshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.	Text clarification to widen scope to include offshore enabling infrastructure as well as onshore infrastructure to support ORE potential. The development of offshore renewable energy is critically dependent on the development of enabling infrastructure, including grid facilities to bring the energy ashore. Under the Maritime Area Planning Act 2021 a new licensing and development management regime has been instructed in the maritime area, including the creation of a new type of consent known as a Maritime Area Consent (MAC), to be administered by the Maritime Area Regulatory Authority (MARA) and planning authorities. A MAC provides a right to occupy the maritime area subject to the necessary consents including planning permission, where required. In line with the Maritime Area Planning Act 2021, future offshore wind developments including offshore supporting infrastructure will be located within Designated Maritime Area Plans (DMAPs) established by Government and these are being subjected to SEA and AA. Projects arising from them will also be subject to

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				development consents allowing a cascade of mitigation to be applied to avoid and mitigate significant negative effects. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO 58 (Chapter 7)	In co-operation with relevant Departments in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility.	In co-operation with relevant Departments and Local Authorities in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility.	Renumbered to NPO57: In co-operation with relevant Departments, Regional Assemblies and Local Authorities in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility.	Minor text clarifications to refer to cooperation with Regional Assemblies is considered positive. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO68 (Chapter 9)	Support the circular and bio economy including in particular through greater efficiency in land management, greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development	Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use of existing buildings and structures while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.	Renumbered to NPO67: Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures, while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.	Minor text clarifications to broaden the scope of the policy to include refurbishment as well as reuse, noting they are both in a similar toolkit of resource efficiencies with similar issues to those already identified for re-use. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO 71 (Chapter 9)	Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards	Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet	Renumbered to NPO70: Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet	Minor text clarifications to align language with national climate objective in the 2021 Act and recognise that there are greenhouse gas emissions other than carbon

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	achieving a low carbon economy by 2050.	national objectives towards achieving a zero carbon economy by 2050.	national objectives towards achieving a zero carbon climate neutral economy by 2050.	dioxide which must also be reduced. No further mitigation is required.
NPO72 (Chapter 9)	N/A ⁵	Support the development and upgrading of the national electricity grid infrastructure, including to support the delivery of renewable electricity generating development.	Renumbered to NPO71: Support the development and upgrading of the national electricity grid infrastructure, including to support supporting the delivery of renewable electricity generating development.	Minor text clarifications to adjust syntax. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO78 (Chapter 9)	Enhance water quality and resource management by: Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. <ul style="list-style-type: none"> Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process. 	Enhance water quality and resource management by preventing or mitigating the risk of flooding by: <ul style="list-style-type: none"> Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. Taking account of the potential impacts of climate change on flooding and flood risk and consideration of the Flood Risk Management Climate Change Sectoral Adaptation Plan. 	Renumbered to NPO77: Enhance water quality and resource management by preventing or mitigating the risk of flooding by: <ul style="list-style-type: none"> Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities. Taking account of the potential impacts of climate change on flooding and flood risk and consideration of the Flood Risk 	The deletion of text arose from the consultation feedback. Flooding and flood risk are considered in a new NPO 78. See table in Section 5.4.1 above for assessment of new policies. No significant negative effects arising from the proposed amendment. No further mitigation is required.

⁵ This is a new policy which has been amended between the pre-consultation and post-consultation version.

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
	<ul style="list-style-type: none"> Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, to create safe places. 	<ul style="list-style-type: none"> Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process. Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places. 	<p>Management Climate Change Sectoral Adaptation Plan.</p> <ul style="list-style-type: none"> Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process. Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places. 	
NPO79 (Chapter 9)	N/A ⁶	Support the management of stormwater, rainwater and surface water flood risk through the use of nature-based solutions and sustainable drainage systems.	Support the management of stormwater, rainwater and surface water flood and pollution risk through the use of nature-based solutions and sustainable drainage systems, including the retrofitting of existing environments to support nature based solutions.	The additional text clarifies the scope includes pollution risk which is considered positive, particularly for PHH, BFF and W. The amendments also add additional commitment to retrofitting of existing environments to support nature based solutions. NBS can provide many benefits, including but not limited to improved air and water quality, climate improvements and improvements for landscape character and as such there are positive effects anticipated for all environmental receptors. Notwithstanding this there will be increased costs associated with retrofitting with potential for negative effects for MA. Alignment with Local Authority green and blue infrastructure strategies and, in due

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
				course with nature restoration strategies may offer efficiencies. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO80 (Chapter 9)	N/A ⁷	Support the retrofitting of existing environments to cater for surface water run-off through the use of nature based solutions, including the implementation by Uisce Éireann of Integrated Drainage Plans on a prioritised settlement basis.	Support the retrofitting of existing environments to cater for surface water runoff through the use of nature based solutions., including the implementation by Uisce Éireann of Integrated Drainage Plans on a prioritised settlement basis.	The deleted text has been incorporated into a new policy NPO 81. See table in Section 5.4.1 above for assessment of new policies. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO83 (Chapter 9)	N/A ⁸	In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation of the National Restoration Plan.	Renumbered to NPO84: In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation and implementation of the National Restoration Plan.	Minor text clarifications to recognise the need to not only prepare a NRP but also to implement it. This is considered a positive addition. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO84 (Chapter 9)	N/A ⁹	In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:	Renumbered to NPO85: In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation (or mitigation of effects on	Minor text clarification to confirm the principles of the mitigation hierarchy, is the intention of the NPO is considered positive.

⁷ This is a new policy which has been amended between the pre-consultation and post-consultation version.

⁸ This is a new policy which has been amended between the pre-consultation and post-consultation version.

⁹ This is a new policy which has been amended between the pre-consultation and post-consultation version.

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
		<ul style="list-style-type: none"> Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts, in statutory land-use plan. Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs. 	<p>biodiversity) and restoration of biodiversity is to be supported by:</p> <ul style="list-style-type: none"> Integrating policies and objectives for the protection and restoration of biodiversity, including the principles of the mitigation hierarchy of - avoid, minimise, restore and offset - avoidance and/or minimisation of potential biodiversity impacts, in statutory land-use plans. Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs. 	No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO87 (Chapter 9)	Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance	Conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.	Renumbered to NPO89: Protect, C onserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.	Text clarifications to acknowledge the need to protect in the first instance. This strengthens the policy with additional positive benefits for CH. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO 26	Enhance, integrate and protect the special physical, social, economic and cultural value of	Enhance, integrate and protect the special physical, environmental, economic and cultural value of built heritage assets,	Renumbered to NPO90 and relocated from Chapter 5 to Chapter 9:	No change proposed except relocation. No further mitigation is required.

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(formerly Chapter 5)	built heritage assets through appropriate and sensitive use now and for future generations.	including streetscapes, vernacular dwellings and other historic buildings and monuments, through appropriate and sensitive investment and conservation.	Enhance, integrate and protect the special physical, environmental, economic and cultural value of built heritage assets, including streetscapes, vernacular dwellings and other historic buildings and monuments, through appropriate and sensitive investment and conservation. ¹⁰	
NPO88 (Chapter 9)	Facilitate landscape protection, management and change through the preparation of a National Landscape Character Map and development of guidance on local landscape character assessments, (including historic landscape characterisation) to ensure a consistent approach to landscape character assessment, particularly across planning and administrative boundaries	Facilitate landscape protection, management and change through the preparation of a National Landscape Character Map and development of guidance on local landscape character assessments, (including historic landscape characterisation) to ensure a consistent approach to landscape character assessment, particularly across planning and administrative boundaries.	Renumbered to NPO91 Facilitate landscape protection, management and change through the preparation of a National Landscape Character Map and development of guidance on local landscape character assessments, (including historic landscape characterisation and including coastal landscapes and seascapes) to ensure a consistent approach to landscape character assessment, particularly across planning and administrative boundaries.	Text clarification to acknowledge scope includes for coastal landscapes and seascapes which is considered positive for LandS, PHH BFF and CH. No significant negative effects arising from the proposed amendment. No further mitigation is required.
NPO92 (Chapter 10)	Provision will be made for Metropolitan Area Strategic Plans to be prepared for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, by the appropriate authorities in tandem with and as part of the	Metropolitan Area Strategic Plans for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, shall be reviewed by the appropriate authorities in tandem with and as part of a review of the relevant Regional Spatial and Economic Strategy.	Renumbered to NPO95 Metropolitan Area Strategic Plans for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, shall be reviewed by the Regional Assemblies in tandem with the appropriate authorities in tandem with	Minor text clarifications to reference the Regional Assemblies specifically and in tandem with the appropriate authorities for this review. No significant negative effects arising from the proposed amendment. No further mitigation is required.

¹⁰ No amendment to policy, rather the policy has been renumbered and relocated within the NPF.

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	relevant Regional Spatial and Economic Strategies.		and as part of a review of the relevant Regional Spatial and Economic Strategy.	
NSO2 (Chapter 10) Enhanced Regional Accessibility- Public Transport	<ul style="list-style-type: none"> To strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland with improved services and reliable journey times 	<ul style="list-style-type: none"> To strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland with improved services and reliable journey times, based on the findings of the Draft All-Island Strategic Rail Review 	<ul style="list-style-type: none"> To strengthen public transport connectivity between cities and large growth towns in Ireland and Northern Ireland, as identified within the All-Island Strategic Rail Review, with improved services and reliable journey times. based on the findings of the Draft All-Island Strategic Rail Review. 	<p>Minor rearrangement of text and acknowledgement that strategic rail review is no longer in draft.</p> <p>No significant negative effects arising from the proposed amendment. No further mitigation is required.</p>
NSO3 (Chapter 10) Strengthened Rural Economies and Communities- Rural Development	<ul style="list-style-type: none"> Invest maintaining regional and local roads and strategic road improvement projects in rural areas to ensure access to critical services such as education, healthcare and employment 	<ul style="list-style-type: none"> Invest maintaining regional and local roads and strategic road improvement projects in rural areas to ensure access to critical services such as education, healthcare and employment 	<ul style="list-style-type: none"> Invest in maintaining regional and local roads and strategic road improvement projects in rural areas to ensure access to critical services such as education, healthcare and employment 	<p>Minor correction in syntax.</p> <p>No significant negative effects arising from the proposed amendment. No further mitigation is required.</p>
NSO4 (Chapter 10) High-Quality International Connectivity - Airport	<ul style="list-style-type: none"> The development of additional runway and terminal facilities such as the second runway for Dublin Airport for which planning permission has been approved. 	<ul style="list-style-type: none"> The development and enhancement of modern, technologically advanced, cost-efficient infrastructure at our State airports to enhance safety and security, to reduce environmental impact, and to maintain and develop international connectivity. 	<p>Airports</p> <ul style="list-style-type: none"> The development and enhancement of modern, technologically advanced, cost efficient infrastructure at our State airports to maintain and enhance international connectivity, maintain the highest standards of enhance safety and security, to and reduce aviation's environmental impact. ,and to maintain and develop international connectivity; 	<p>Rearrangement of text for better clarity, notably change from develop international connectivity to enhance, reflecting the existing connectivity, also maintaining existing safety standards and reducing aviation's environmental impact. No significant negative effects arising from the proposed amendment. No further mitigation is required.</p>

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NSO5 (Chapter 10) Sustainable Mobility	<ul style="list-style-type: none"> Expand attractive public transport alternatives to car transport to reduce congestion and missions and enable the transport sector to cater for the demands associated with longer term population and employment growth in a sustainable manner through the following measures: <ul style="list-style-type: none"> Deliver the key public transport objectives of the Transport Strategy for the Greater Dublin Area 2016-2035 by investing in projects such as New Metro Link, DART Expansion Programme, BusConnects in Dublin and key bus-based projects in the other cities and towns; Provide public transport infrastructure and services to meet the needs of smaller towns, villages and rural areas; and Develop a comprehensive network 	<ul style="list-style-type: none"> Expand attractive public transport alternatives to car transport to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer-term population and employment growth in a sustainable manner through the following measures: <ul style="list-style-type: none"> Deliver key public transport objectives of the Transport Strategy for the Greater Dublin Area 2022-2042 by investing in projects such as MetroLink, DART+, Luas and BusConnects in Dublin and Eastern Region and key rail and bus-based projects identified by the NTA in the other cities and towns; Provide public transport infrastructure and services to meet the needs of regional growth centres, key towns, large towns and smaller towns, villages and rural areas; Develop a comprehensive network of safe cycling routes in metropolitan areas to address travel needs and to provide similar facilities in towns and villages where appropriate, in line with the NTA's CycleConnects plan, due to be published in 2024. Improve connections and walking routes 	<ul style="list-style-type: none"> Expand attractive public transport alternatives to car transport to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer term population and employment growth in a sustainable manner through the following measures: <ul style="list-style-type: none"> Deliver key public transport objectives of the Transport Strategy for the Greater Dublin Area 2022-2042 by investing in projects such as MetroLink, DART+, Luas and BusConnects in Dublin and Eastern Region and key rail and bus-based projects identified by the NTA in the other cities and towns; Provide public transport infrastructure and services to meet the needs of regional growth centres, key towns, large towns and smaller towns, villages and rural areas; Develop a comprehensive network of safe cycling routes in metropolitan areas to address travel needs and to provide similar facilities in towns and villages where appropriate, in line with the NTA's CycleConnects plan, due to be published in 2024; 	<p>The proposed amendments to the NSO cover a range of enhancements. There is additional clarity provided in relation to the alternatives to car use go beyond public transport e.g. reduce unnecessary journeys, walk etc. and the opportunities to contribute to demand management through parking, better delivery and freight management etc. These and the new entry relating to enhance availability of facilities and services for shared cars, bikes and other micro modes is also considered positive for PHH, AQ and CF in particular with positive effects for MA also as a greater range of options is provided for to cater to diverse needs.</p> <p>No significant negative effects arising from the proposed amendment. No further mitigation is required.</p>

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	of safe cycling routes in metropolitan areas to address travel needs and to provide similar facilities in towns and villages where appropriate.	<p>in accordance with the principles of universal design so as to optimise journeys undertaken by foot and enhance pedestrian comfort and safety;</p> <ul style="list-style-type: none"> – Enable more effective traffic management within and around cities and towns through demand management measures including the re-allocation of urban road-space in favour of bus-based public transport services, shared mobility services and walking/cycling facilities; – Deliver Transport Orientated Development at scale at suitable brownfield and greenfield locations in cities and metropolitan areas, along high capacity public transport corridors with a focus on land management, institutional and funding arrangements needed to accelerate this type of development; and – Support delivery of EV charging at a national level in line with Climate Action Plan targets to transition. 	<ul style="list-style-type: none"> – Enhance the availability of facilities and services for shared cars, bikes and other micro modes, thereby helping to expand the range of sustainable travel options on offer and support the principles of just transition in the decarbonisation of transport; – Improve connections and walking routes in accordance with the principles of universal design so as to optimise journeys undertaken by foot and enhance pedestrian comfort and safety; – Enable more effective traffic management, enhanced road safety and better air quality within and around cities and towns through demand management measures including the re-allocation of urban road-space, kerbside management and parking controls in favour of bus-based public transport services, shared mobility services and walking/cycling facilities, as well as measures supporting the efficiency and green transition of freight and delivery services; – Deliver Transport Orientated Development at scale at suitable 	

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			<p>brownfield and greenfield locations in cities and metropolitan areas, along high capacity public transport corridors with a focus on land management, institutional and funding arrangements needed to accelerate this type of development;</p> <ul style="list-style-type: none"> – Support delivery of EV charging at a national level in line with Climate Action Plan targets to transition, and – Maintain the ambition of the National Sustainable Mobility Policy as well as a focus on delivery through current and future Action Plans to 2030, and across the lifetime of the NPF. 	
NSO9 (Chapter 10) Sustainable Management of Water and other Environmental Resources- Water	<ul style="list-style-type: none"> • Coordinate EU Flood Directive and Water Framework Directive implementation and statutory plans across the planning hierarchy, including national guidance on the relationship between the planning system and river basin management. Local authorities, DHPLG, OPW and other relevant Departments and agencies working together to 	<ul style="list-style-type: none"> • Substantial State investment, through Uisce Éireann and the Rural Water Programme, to improve compliance with public health and environmental standards, with particular reference to the River Basin Management Plan for Ireland. • Bringing and maintaining public water and wastewater services to acceptable international benchmarks, verified by independent monitoring and reporting. • Achieving improved outcomes in quality in respect of drinking water and 	Biodiversity <ul style="list-style-type: none"> • Adopting a whole-of-Government, whole-of-society approach to Biodiversity and for proposed actions to include capacity and resource reviews across Government; determining responsibilities for the expanding biodiversity agenda; providing support for communities, citizen scientists and business; • Meeting urgent conservation and restoration needs by building on 	<p>Inclusion of the section on biodiversity is a positive addition to the NSO as it aligns policy objectives and priorities of the Government regarding biodiversity as set out under the 4th National Biodiversity Action Plan as provided for under the Wildlife (Amendment) Act 2023. Direct and indirect positive effects for BFF, W, LS, PHH AQ, CF, CH.</p> <p>Inclusion of reference to Urban Wastewater Treatment Directive and commitment to implementing Greater Dublin Strategic Drainage Study</p>

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	<p>implement the recommendations of the CFRAM programme will ensure that flood risk management policies and infrastructure are progressively implemented;</p> <ul style="list-style-type: none"> • Eliminate untreated discharges from settlements in the short term, while planning strategically for long-term growth; • Development of a new rural settlement investment approach, coordinating Irish Water, local authority, developer and community led solutions to ensuring that sustainable water services solutions are progressively implemented; • A new long-term water supply source for the Eastern and Midland Region, which includes the Dublin Water Supply Area (DWSA), is needed by the mid-2020s, to provide for projected growth up to 2050 and contribute to resilience and security of supply for the region. This requires infrastructure provision to be guided and prioritised in a manner that can benefit the greatest possible 	<p>in wastewater in relation to rural and private water services.</p> <ul style="list-style-type: none"> • Adopting forward planning and risk management approaches to minimise the impact of non-compliances with all relevant EU Directives and to safeguard against future compliance risks. • Embedding conservation at the heart of water policy involves prioritising resource management, abstraction control, source protection, tackling leakage and encouraging behavioural change. • The promotion of water conservation and water resource management is to be reflected in strategic investment planning by Uisce Éireann, to include work programmes around leak detection and repair, network improvements, cost effective metering, public awareness campaigns and funding to fix customer side leaks. • Water conservation will inform the Working Group on the review of rural water services, and investment decisions in this area. • Ensuring that public and private water services investment decisions are aligned with the broad strategic aims of the NPF. 	<p>existing conservation measures. The ambition of the EU Biodiversity Strategy will be considered as part of an evolving work programme across Government.</p> <ul style="list-style-type: none"> • Securing nature's contribution to people by highlighting the relationship between nature and people in Ireland and recognising the tangible and intangible values of biodiversity, promoting nature's importance to our culture and heritage and recognising how biodiversity supports our society and our economy, • Enhancing the evidence base for Action on Biodiversity focusing on biodiversity research needs, as well as the development and strengthening of long-term monitoring programmes that will underpin and strengthen future decision-making. Action is to also focus on collaboration to advance ecosystem accounting that will contribute towards natural capital accounts. ; and • Strengthening Ireland's contribution to International Biodiversity initiatives to encourage collaboration with other countries and across the island of Ireland. 	<p>through enlarging capacity in existing wastewater treatment plants (Ringsend) and providing a new treatment plant in North County Dublin is considered positive for PHH, MA, BFF and W, as this will cumulatively serve to improve treatment and management of wastewater which is a significant pressure in some locations for water quality and biodiversity as well as human health. This will ensure increased wastewater treatment capacity that can cater to increased population and prevent deterioration in environmental quality parameters in Dublin.</p> <p>However, as with any infrastructural development, there is a potential for negative effects and in the case of the referenced Greater Dublin Drainage (GDD) Project in particular this could negatively affect all environmental receptors in the zone of influence of the project during the construction and operational phases e.g. increased dust, noise, travel disruptions; disturbance, loss or fragmentation of habitats; loss of soil resource/soil sealing or hydrogeological effects; pollutant or construction debris run-off; alterations to heritage features/setting or landscape and views from new infrastructural elements. It is noted that both the drainage study and the Greater</p>

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
	<p>number of areas within the country;</p> <ul style="list-style-type: none"> Implement the Greater Dublin Strategic Drainage Study, through enlarging capacity in existing wastewater treatment plants (Ringsend) and providing a new treatment plant in North County Dublin - known as the Greater Dublin Drainage (GDD) Project; Improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment; Increase compliance with the requirements of the Urban WW Directive from 39% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040; Reduce leakage, minimising demand for capital investment. 	<ul style="list-style-type: none"> Adapting water services to withstand the impact of climate change and of such weather-related events. Improving the resilience of rural and private water supplies as part of the review of rural water services currently underway. 	<p>Water</p> <ul style="list-style-type: none"> Substantial State investment, through Uisce Éireann and the Rural Water Programme, to improve compliance with public health and environmental standards, with particular reference to the River Basin Management Plan for Ireland. Bringing and maintaining public water and wastewater services¹¹ to acceptable international benchmarks, verified by independent monitoring and reporting. Achieving improved outcomes in quality in respect of drinking water and in wastewater in relation to rural and private water services. Adopting forward planning and risk management approaches to minimise the impact of non-compliances with all relevant EU Directives and to safeguard against future compliance risks. Embedding conservation at the heart of water policy involves prioritising resource management, abstraction control, source protection, tackling leakage and encouraging behavioural change. 	<p>Dublin Drainage (GDD) Project have been subject to SEA/EIA and AA as appropriate. Subject to the mitigations and planning conditions being implemented no additional significant negative effects are anticipated from including reference to this in NSO 9. No further mitigation is required.</p>

¹¹ Urban Wastewater Treatment Directive <https://www.gov.ie/en/publication/d1861-urban-waste-water-treatment-directive/>

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Reference	2018 NSOs, NPOs, Regional Priorities and Enablers	2024 NSOs, NPOs, Regional Priorities and Enablers	New/Amended 2024 NSOs, NPOs, Regional Priorities and Enablers following Public Consultation ²	Assessment of Post-Consultation Amendments NSOs, NPOs, Regional Priorities and Enablers
			<ul style="list-style-type: none"> • The promotion of water conservation and water resource management is to be reflected in strategic investment planning by Uisce Éireann, to include work programmes around leak detection and repair, network improvements, cost effective metering, public awareness campaigns and funding to fix customer side leaks. • Water conservation will inform the Working Group on the review of rural water services, and investment decisions in this area. • Ensuring that public and private water services investment decisions are aligned with the broad strategic aims of the NPF. • Implement the Greater Dublin Strategic Drainage Study, through enlarging capacity in existing wastewater treatment plants (Ringsend) and providing a new treatment plant in North County Dublin – known as the Greater Dublin Drainage (GDD) Project. • Adapting water services to withstand the impact of climate change and of such weather-related events. • Improving the resilience of rural and private water supplies as part of the review of rural water services currently underway. 	

6 REASONS FOR CHOOSING THE PREFERRED SCENARIO

6.1 Introduction

The consideration of alternatives is a requirement of Article 5(1)¹² of the SEA Directive (2001/42/EC). Article 5(1) of the directive does not prescribe at what stage consideration of alternatives should be undertaken, however, to present a useful input into the plan making process, all guidance points to considering alternatives as early as possible. Guidance also recognises that multiple layers of alternatives may exist, particularly for plans of this nature. Given that the draft plan is a revision of the existing NPF, alternatives were developed in the context of revisions rather than new strategic approaches. It is intended that the First Revision of the NPF will address a number of key drivers including: climate transition, regional development and demographic change in line with Census 2022 results and analysis from the ESRI carried out in 2023-2024. It is intended that the NPF First Revision will update policies, where appropriate and, therefore, the scope of alternatives was constrained.

6.2 Approach to Alternatives for the Draft Plan

Both the Plan team and the SEA team were conscious of the need for iteration with regard to alternatives and, as such, alternatives were first considered during the SEA Scoping stage. The basis for alternatives discussions was the EPA Guidance: Developing & Assessing Alternatives in Strategic Environmental Assessment. This guidance points to achieving four key criteria for identification of alternatives (**Figure 6.1**).



Figure 6.1: Criteria for Alternatives Considered [Source: EPA Guidance, 2015]

In the context of the First Revision to the NPF the criteria considered were:

- **Realistic:** Does the alternative achieve the objectives of national policy and objectives in relation to climate, environmental protection, land use and other inter-related sectors? Does the alternative have the capacity to deliver the required outcomes of the plan? Is the alternative within the legal competence of the plan-making authority?
- **Reasonable:** Do the alternatives consider baselines and trends in environmental quality, do they reflect the legal requirement under inter-related environmental protection legislation such as the EU Habitats Directive and the Climate Action and Low Carbon Development Act 2015, (as amended);

¹² Directive 2001/42/EC On the assessment of effects of certain plans and programmes on the environment, EC 2001

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- **Viable:** Are the alternatives technically possible and feasible on the ground within the timeframe of the plan; and
- **Implementable:** Are the alternatives capable of being put into action, within realistic timeframes, and for which there are adequate resources including supporting infrastructure.

The SEA Scoping Report also included a series of high-level considerations on alternatives for discussion under a range of categories as shown in **Figure 6.2**. The intention of the types of alternatives identified was to stimulate discussion and there was no requirement to identify alternatives under each category, only those relevant to the draft Plan. With reference to criteria and types, the Scoping Report provided an early exploration of outline alternatives that could be relevant to the First Revision to the NPF in order to stimulate discussion at scoping stage. The outline alternatives included in the Scoping Report are re-produced in **Table 6-1**.

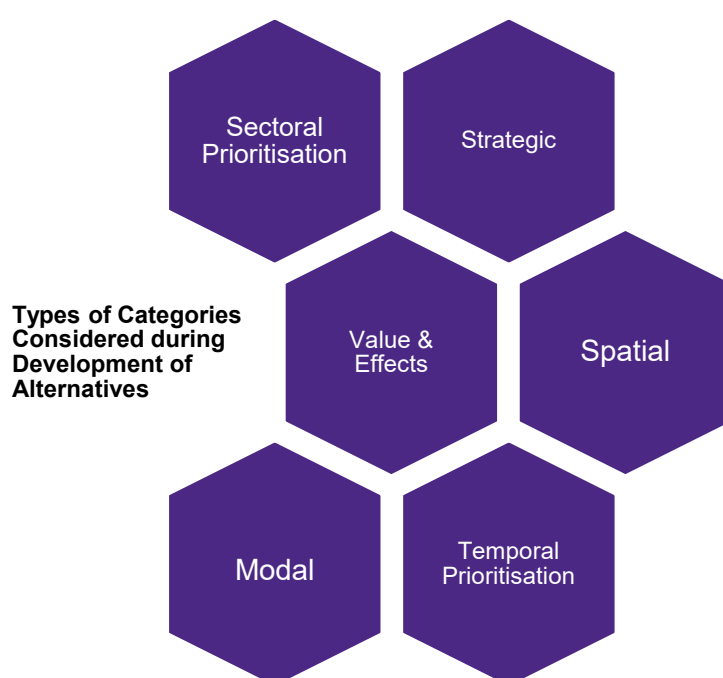


Figure 6.2: Alternatives Categories Considered

Table 6-1: Early Considerations with Respect to Alternatives for the Draft First Revision to the NPF

Alternative Type	Description	Considerations with Respect for the Draft First Revision to the NPF	How has this been integrated into the Alternatives Assessment
Strategic	<i>High-level options that achieve a given objective.</i>	<ul style="list-style-type: none"> • Business as usual (BaU), NPF First Revision, or full NPF review [decision made however the reasons will be recorded for transparency]. 	<ul style="list-style-type: none"> • BaU, replacement and revision options are considered in Table 6-2 below.
		<ul style="list-style-type: none"> • Achieve current targets for compact growth or consider more ambitious ones. 	<ul style="list-style-type: none"> • Considered in Table 6-2 below under Compact Growth Alternatives and assessed in Section 7.5.3 of the Environmental Report.
	<i>Alternatives that address policy priorities, cultural values or</i>	<ul style="list-style-type: none"> • Level of stakeholder engagement required. 	<ul style="list-style-type: none"> • No specific alternatives identified

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Value and Effects Oriented	<p><i>safety issues. Such alternatives are most appropriate for addressing public perceptions, concerns and values.</i></p> <p><i>Alternatives that address issues identified during scoping. Such alternatives are effective at mitigating potential significant effects.</i></p>	<ul style="list-style-type: none"> Ways of harnessing of support for planning and sustainable development in wider stakeholder base. 	<ul style="list-style-type: none"> No specific alternatives identified
		<ul style="list-style-type: none"> Alternative ways of making the Metropolitan Area Strategic Plans more effective in bringing forward NPF priorities. 	<ul style="list-style-type: none"> Considered in Table 6-2 below under City Focussed Development and assessed in Section 7.5.2 of the Environmental Report
		<ul style="list-style-type: none"> Introduce new national strategic objective to manage rural housing or use existing tools / guidelines. 	<ul style="list-style-type: none"> No specific alternatives identified.
		<ul style="list-style-type: none"> Alternative approaches to spatial equity i.e. how public space is made available, used, restricted. 	<ul style="list-style-type: none"> No specific alternatives identified
Modal	<p><i>Different technical/ modal alternatives to achieve the same objective</i></p>	<ul style="list-style-type: none"> Existing model of monitoring effectiveness or new dedicated approach. 	<ul style="list-style-type: none"> No specific alternatives identified however monitoring approach revised based on outcomes of 2018 monitoring – See Chapter 7 of this SEA Statement.
		<ul style="list-style-type: none"> Separate unit for delivery or department responsibility. 	<ul style="list-style-type: none"> No specific alternatives identified.
		<ul style="list-style-type: none"> Alternatives to achieve alignment of NPF and National, Regional and Local Plans, including County Development Plans 	<ul style="list-style-type: none"> No specific alternatives identified.
Sectoral and/ or Temporal Prioritisation	<p><i>Alternatives that look at sectoral feasibility and needs at the strategic level, policies can be formulated to promote one sector versus another.</i></p> <p><i>Alternatives for the timing of implementation of plan/ programme measures.</i></p> <p><i>These are most suitable at the local level for addressing infrastructure development.</i></p>	<ul style="list-style-type: none"> Alternative priorities to remove blocks or plug gaps e.g., broadband roll out, availability of services such as schools. 	<ul style="list-style-type: none"> Renewable energy targets considered in Table 6-2 below and assessed in Section 7.5.4 of the Environmental Report

During the scoping phase, an environmental workshop was held on 21st November 2023, in which over 30 delegates took part. Roundtable discussions were facilitated with delegates being asked to discuss three questions. The second question asked: “*What reasonable alternatives should be considered for the draft NPF First Revision?*”. In the majority of cases, specific alternatives were not identified but rather broader issues were raised which should be considered under alternatives.

Following the scoping phase, the early consideration of alternatives was developed further based on the statutory scoping feedback, wider public non-statutory feedback from the workshop and through focused discussions with the DHLGH. Based on this input, a list of possible draft Plan specific alternatives was generated which could be assessed. In the first instance, the long list of alternatives was assessed to determine if they met all the criteria outlined in Figure 6.1. This initial assessment in relation to the core criteria is summarised in Table 6-2. Those meeting the criteria were then brought forward for further detailed assessment.

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Table 6-2: Long List of Alternatives Considered

Alternative Consideration	Realistic	Reasonable	Viable	Implementable	Outcome
Strategic Alternatives Considered (Decision preceded SEA commencement)					
Business as Usual	X	X	X	X	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, every six years after the publication of the NPF. A number of significant changes have occurred since 2018 that render a Business as Usual approach not viable. These changes include new population projections, new environmental policy and legislation, changes in baseline environmental trends along with the effects of external drivers such as COVID and the war in Ukraine. A Business as Usual alternative was not brought forward for assessment as the Government decided in June 2023 to undertake a revision to the NPF. This preceded the SEA process and was mandated under a legal process that did not include SEA.
Replace the NPF	X	X	✓	✓	The NPF strategy is at an early stage of implementation, currently in the fifth year of a twenty year strategy. Consequently, while a complete replacement is viable and implementable, it was not considered reasonable or realistic at this stage as it would prevent or delay achieving national policy objectives across a range of sectors including climate and biodiversity. A replacement alternative was not brought forward for assessment as the Government decided in June 2023 to undertake a revision to the NPF.
Revise 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 while acknowledging the current stage at which the NPF is at within a wider 20-year timeframe. As the Government decided in June 2023 to undertake a revision to the NPF, this became the approach.
Balanced Regional Development					
Distribution of additional projected population to 2030 on a pro-rata basis	✓	✓	✓	✓	The principle of balanced regional development applied in 2018 remains a core tenant of the NPF however, population projections indicate that there will be additional population growth which needs to be accommodated up to 2030. This could be applied on a pro-rata basis in an effort to achieve equity across the three regions. Such an alternative was considered to meet all four criteria of reasonable, realistic, viable and implementable as it would achieve national policy objectives and the required outcomes of the NPF within the required timeframes and within the established framework. Some mitigations would be required. A pro-rata alternative was brought forward for assessment – see summary below.

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Alternative Consideration	Realistic	Reasonable	Viable	Implementable	Outcome
Distribution of additional projected population to 2030 on a pro-rata modified basis	✓	✓	✓	✓	As above, the principle of balanced regional development applied in 2018 remains a core tenant of the NPF however, population projections indicate that there will be additional population growth which needs to be accommodated up to 2030. This could be applied on a modified basis to reflect shorter term demand and opportunity. Such alternative scenarios would be realistic in terms of achieving national policy objectives and achieving the required outcomes of the NPF and would also be reasonable as they could reflect regional trends in environmental and social albeit with some mitigation. A modified basis alternative was brought forward for assessment – see summary below.
City Focussed Development					
Business as Usual	X	X	X	X	Under this scenario, the city-based population growth target of 50% growth to 2040 for the five cities of Dublin, Cork, Limerick, Galway and Waterford remain unchanged from the NPF of 2018. Census 2022 shows a very mixed performance for the regional cities with only Waterford (+12%) and Limerick (+8%) achieving a growth rate above the national average of 8%. Both Galway and Cork grew at a rate below the national average. To achieve the ambitious NPF growth targets to 2040, each of these cities would need to see growth rates in excess of 10% each intercensal period. The business as usual approach is therefore not considered reasonable, realistic viable or implementable as it cannot deliver the required national policy objectives. A Business as Usual alternative was not brought forward for assessment.
Prioritisation of Cities	✓	✓	✓	✓	The NPF Objective of targeting 50% of growth to 2040 would be adjusted to direct a greater proportion of national growth to the five cities – c. 65% in the short term and allow for growth at scale while providing appropriate employment, education and health opportunities. The provision of investment would be aligned to this approach. Where investment and infrastructure can be aligned this alternative would be considered reasonable, realistic, viable and implementable in the context of the NPF as it offers the capacity to deliver the required outcomes of the plan, in the context of the new population growth projections and is building on the existing policy in terms of implementation. Some mitigation would be needed to ensure environmental protection. A prioritisation of cities alternative was brought forward for assessment – see summary below.
Prioritisation of Cities Modified	✓	✓	✓	✓	As per above however the approach would focus initially on emphasising growth in cities where there is existing capacity in services such as wastewater, affording other locations the time to enhance services to deal with additional population pressures. Wastewater capacity has implications for PHH in terms of recreational use of water as well as health implications from contaminated water. Inadequate public transport can result in unnecessary private car journeys with implications for AQ and CF. Insufficient health and education capacity can have negative

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Alternative Consideration	Realistic	Reasonable	Viable	Implementable	Outcome
					effects for PHH and MA and may also require additional transport outside the catchment area. An alternative that responds to this is therefore considered realistic, reasonable and viable, and implementable. Focus away from areas with significant environmental issues and sensitivities would limit risk to the receiving environment in the short to medium term, allowing time for mitigation strategies to be put in place to prevent impacts rather than to mitigate them. A modified prioritisation of cities alternative was brought forward for assessment – see summary below.
Compact Growth					
Increase compact growth targets for all settlements	✓	✓	✓	✓	Under this scenario, compact growth targets are increased for all settlements to 60% in the cities and 40% in the towns, to provide an overall target of 50% of all growth to occur in a more compact form. Where investment and infrastructure can be aligned this alternative would be considered reasonable, realistic, viable and implementable in the context of the NPF as it offers the capacity to deliver the required outcomes of the plan, in the context of the new population growth projections and is building on existing policy. An increased targets for all settlements alternative was brought forward for assessment – see summary below.
Increase compact growth targets for Towns	✓	✓	✓	✓	Under this scenario, the compact growth target for towns (30%) is increased to 50% to match the target for cities, giving a national target overall of 50% of all growth to occur in a more compact form. Where investment and infrastructure can be aligned this alternative would be considered reasonable, realistic, viable and implementable in the context of the NPF as it offers the capacity to deliver the required outcomes of the plan, in the context of the new population growth projections and is building on the existing policy in terms of implementation. Some mitigation would be needed to ensure environmental protection. An increased targets for towns alternative was brought forward for assessment – see summary below.
Leave the compact growth targets unchanged	X	X	✓	✓	Under this scenario, the compact targets remain unchanged from the NPF, save for the use of the new census 'built up area' boundary which replaces the previously used settlement boundary from census 2016. Given the outcomes of the first cycle of the NPF and the updated population projections this alternative is not considered reasonable or realistic as it cannot deliver the compact growth required. A no change alternative was not brought forward for assessment.
Renewable Energy Alternatives					
Do-Nothing / Business as Usual	X	X	✓	✓	The onshore renewable energy sector continues to develop in the absence of specific policy direction to enable the translation of the national targets as set out in the Climate Action Plan to regional and local levels for onshore wind and solar PV development. Delivery of wind projects

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Alternative Consideration	Realistic	Reasonable	Viable	Implementable	Outcome
					unlikely to proceed successfully, or only after protracted delays. No possibility of reaching 2030 CAP targets exists. Solar projects might proceed more quickly initially. This is a relatively new sector in Ireland, and the level of public opposition may increase, consequently resulting in increased planning delays. Current developer-led spatial patterns to continue. This alternative does not consider the requirements of RED III (e.g., mapping of Renewable Acceleration Areas). Therefore, at this stage this alternative is not considered realistic or reasonable and was not brought forward for assessment. A business as usual approach for renewable energy was not brought forward for assessment.
Do Something – Apply only a national target in the revised NPF.	X	X	✓	✓	Retain the Strategic renewable electricity targets for onshore wind and solar PV established by CAP at a national level only. Include the national target allocations as set out in CAP 23 within the NPF revision by the inclusion of an additional National Policy Objective indicating the same. Similar to the previous option, delivery or capacity is likely to be difficult and slow, and would not be realistic or reasonable in light of CAP objectives. Regional disparities in policy implementation are likely to continue. Applying a national target alternative was not brought forward for assessment.
Do Something – Apply regional targets in the revised NPF	✓	✓	✓	✓	Given specific policy direction to translate the national target in the Climate Action Plan to regional and local levels for onshore wind and solar PV. This approach provides opportunity to develop a more coherent planning policy framework (national, regional, county level), meaning a better likelihood of reaching national targets more efficiently. It also provides a better opportunity to balance social, economic and environmental factors in the plan-led context. Good compliance with CAP objectives. Applying regional targets alternative was brought forward for assessment – see summary below.

6.3 Assessment Parameters

The approach used for assessing alternatives for the draft Plan was an objectives-led assessment. Each alternative was assessed against a set of strategic environmental assessment objectives. The assessment compared the likely impacts in terms of the Strategic Environmental Objectives to see how alternatives performed in relation to the stated environmental objectives.

6.4 Alternatives Considered

6.4.1 Balanced Regional Development

The following 2 scenarios were considered:

Balanced Regional Development Scenarios

- **Scenario 1: ‘Pro rata’ Growth.** It is proposed to target, on a pro-rata basis throughout Ireland, additional projected population growth to 2030, in line with the NPF strategy. This will effectively mean more targeted growth everywhere to 2030, including for the four regional cities. Any increase in overall population/housing targets will be broadly consistent with the 50:50 regional scenario developed in the National Planning Framework. This represents a “business-as-usual” type approach, albeit accommodating increased growth projections.
- **Scenario 2; ‘Modified Pro rata’ Growth.** Given that there is significant ongoing population growth and consequent demand for housing in the Dublin and Mid-East Region which must be urgently addressed to ensure national competitiveness, and as significant investment in public transport infrastructure is planned for the Dublin Metropolitan Region, is proposed in this scenario to identify a proportion of post-2030 growth which can be aligned with major public transport investment in and around Dublin, with the remainder of the projected increase in population allocated on a pro-rata basis in line with the NPF strategy approach. This additional element of population growth would be applied to Dublin (four local authorities) and the Mid-East local authorities (Kildare, Louth, Meath and Wicklow). This would enable strategic planning for large-scale sustainable development to commence. This is important given the longer lead-in time required to achieve master-planning and infrastructural investment to support the delivery of housing, supported by necessary associated enabling infrastructure, including social and community infrastructure to meet the needs of expanding new communities, in and adjoining the Dublin Metropolitan Region.

In this scenario, it is proposed to leverage existing and planned public transport investment and to focus on large-scale Transport Orientated Development (TOD) opportunities on both brownfield and greenfield sites, that have already been identified, or can come forward for development in the period. This could include lands adjoining:

- Drogheda and the railway line south (DART+ Coastal North);
- The Metrolink line to Swords;
- The railway line to Dunboyne/Pace (DART+ West);
- The railway line to Maynooth and west (DART+ West);
- The railway line to Hazelhatch (DART+ South-west);
- The City Edge lands on the Luas Red Line.

Under this alternative, the overall allocation of population/housing targets remains broadly consistent with the 50:50 regional scenario developed in the National Planning Framework.

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Preferred Environmental Alternative and Reason for Choosing:

Both scenarios continue the core principle of balanced regional development and both offer advantages albeit in different ways. In the shorter term, Scenario 2 would be the preferred environmental scenario as it puts a focus on integrated land use and transport corridors in the short to medium term where greatest demand is required and this prioritisation of corridors for development would not only deliver more housing in the short to medium terms but would also encourage modal shift, reducing car dependency and subsequent vehicular emissions. It does however come at the cost of a focus on more greenfield development and significant land use change. Conscientious and sensitive landscape planting to replace and / or enhance urban biodiversity and landscape quality along these corridors could improve outcomes relating to BFF, W and LandS in particular and this should accompany this option. It is acknowledged that large-scale public transport infrastructure in Dublin is planned and will go ahead regardless of Scenario 2 being adopted and they are likely to be a focus for residential development in any case. The advantage of Scenario 2 is that some of the developments could be brought forward through Strategic Development Zone routes (or similar) allowing the advanced planning of support services to be addressed and assessed through SEA. This would provide more certainty in planning terms.

However, in the longer term, **Scenario 1** would be the preferred environmental scenario as it remains more faithful to the underpinning principle of balanced regional development. It offers greater opportunity to build on gains made since 2018 in achieving more balanced regional growth where a wider cross section of communities can play their part in achieving a healthier, sustainable, and climate-neutral Ireland with jobs and opportunities spread more proportionately. This requires a specific policy base to bring economic certainty for investment which is needed to generate sustainable communities across all three regions. Indirect benefits would also be achieved where there is reduced need for travel as more vibrant communities could flourish outside the Dublin region with services and products available closer to home. The advantage of Scenario 1 is that it provides the policy counterbalance needed to address the historic regional imbalance and this is clearly still required for the next cycle of the NPF if the imbalances are to be reduced in the longer term. Shifting focus to the Eastern and Midlands region, even in the short term is likely to reverse progress made to date on regional balance.

6.4.2 City Focused Development Scenarios

The following 2 scenarios were considered:

City Focused Development Scenarios

- **Scenario 1– Prioritisation of Cities.** Census 2022 shows that the proportion of national population growth achieved in the five cities was 124,543 persons or just 32% of overall growth. In order to achieve the overall increase in city-based population growth, the NPF sets ambitious growth targets to enable the four cities of Cork, Limerick, Galway and Waterford to each grow by at least 50% to 2040. Census 2022 shows a very mixed performance for these regional cities—only Waterford (+12%) and Limerick (+8%) had a growth rate above the national average of 8%. Both Galway and Cork grew at a rate below the national average. To achieve the ambitious NPF growth targets to 2040, each of these cities would need to see growth rates in excess of 10% each intercensal period.

In this scenario, in the short term a greater proportion of national growth is prioritised to all five cities to strengthen ambition for city-based growth and enable a greater level of planning and development activity. The NPF Objective of targeting 50% over 2016 levels to 2040 (c.475,000 people), would be adjusted to direct a greater proportion of national growth to the five cities – c.600,000 or 65% in the short term and allow for growth at scale while providing appropriate employment, educational and health opportunities. The provision of investment would be aligned to this approach.

- **Scenario 2– Modified Prioritisation of Cities.** This scenario is as per Scenario 1 above however prioritisation would be to the cities and areas within cities where there are less short-term issues with capacity and / or conflict with environmental sensitivities.

Preferred Environmental Alternative and Reason for Choosing

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Scenario 2 is the preferred environmental option. While both options will deliver the increased targets in the cities, the prioritisation would be to the cities and areas within cities where there are less short term issues with capacity and / or conflict with environmental sensitivities offers the best potential to avoid negative consequences on the receiving environment. Suitable selection criteria will be required to ensure a standardised approach at regional scale which can then inform the MASPs.

6.4.3 Compact Growth Scenarios

The following 2 scenarios were considered:

Compact Growth Scenarios

- **Scenario 1: Increase compact growth targets for all settlements.** Under this scenario, compact growth targets are increased for all settlements to 60% in the cities and 40% in the towns, to provide an overall target of 50% of all growth to occur in a more compact form.
 - **Scenario 2: Increase compact growth targets for towns, to match the target for cities.** Under this scenario, the compact growth target for towns (30%) is increased to 50% to match the target for cities, giving a national target overall of 50% of all growth to occur in a more compact form.
-

Preferred Environmental Alternative and Reason for Choosing

Scenario 1 is the preferred environmental alternative. The compact growth targets have only recently become embedded in county and city development plans. This represented a new approach for most LAs and the effectiveness of the targets have yet to be fully confirmed. This should be established before increasing the targets to ensure it represents a sustainable approach.

Mitigation: Ensure social infrastructure is considered in RSES and CDPs which addresses provisions for all life stages as part of a commitment to sustainable communities.

6.4.4 Renewable Energy Targets

6.4.4.1 National versus Regional Scale

The following 2 scenarios were considered:

Renewable Energy Target Scenarios

- **RET 1:** The revised NPF provides national policy and a national target and in addition defines regional targets to be applied by the regional authorities.
 - **RET 2:** The revised NPF provides national policy and a national target and in addition includes a specific NPO directing the Regional Authorities to develop regional and county level targets.
-

Preferred Environmental Alternative and Reason for Choosing

RET 1 is the preferred alternative. The implementation of a coherent plan led approach to planning for onshore renewables has the greatest potential to improve the environmental outcomes across all indicators

Mitigation: The regional assemblies need to apply robust methodologies with environmental protection at their core when planning for delivery on regional targets. Consistency across the regions is required. This will enable the required renewable electricity capacity (climate mitigation) to be installed while minimising environmental impacts.

6.4.4.2 Spatial Allocations

Following on from the above preferred alternative to allocate regional RET, consideration was given to how this could reasonably be achieved. The comparison of scenarios included the following interconnected considerations: Timely Deliverability; Just transition (achieving regional balance); Grid connection availability; Matching generation with location of energy demand; and environmental protection. Five possible scenarios to regional allocations were considered as follows:

Spatial Allocations Scenarios

- **Spatial 1 Maintain Current Pattern** - Allocate regional target to reflect current patterns of wind farms and emerging pattern of solar farms. Assume regional share to remain steady as overall capacity grows.
- **Spatial 2 Geospatial** - Allocate regional capacity based on theoretical availability of land area (i.e. lands with fewer environmental constraints and sensitivities).
- **Spatial 3 Grid-led** - Allocate regional capacity based on where projects can be most quickly connected in alignment with grid availability (which relates to both grid strength and energy demand among other factors).
- **Spatial 4 - Even Growth Approach** The gap between current level of renewable electricity deployment and the capacity required by 2030 is filled equally by each of the three planning regions.
- **Spatial 5 Balanced Approach** (Combination of Spatial Alternative 2, 3 and 4) - Balancing of the above alternatives Spatial 2, 3 and 4 by applying a judgement of what represents the most achievable, equitable, and environmentally acceptable allocation that will meet CAP 2023 requirements for 2030.

Preferred Environmental Alternative and Reason for Choosing

Spatial Alternative 5 (Balanced Approach) is selected as the preferred alternative. It reflects a balancing of the above factors (Spatial 2, 3 and 4) and applying a judgement of what represents the most achievable, equitable, and environmentally acceptable allocation that will meet CAP 2023 requirements.

The overarching global environmental goal of climate mitigation is what is driving the CAP process. The approaches that improve deliverability will lead to faster reduction in GHG emissions. This needs to be balanced with protection of local environmental attributes. The geospatial approach involves using Geographical Information Systems (GIS) to combine available information on settlement patterns, geographical features, environmental sensitivities and infrastructure (including existing renewable projects). While conducted at a high level, this approach illustrates the relative availability of land in the three regions for additional wind and solar projects, taking into account environmental parameters.

It is notable that Spatial 2 (Geospatial) and Spatial 3 (Grid-led) both result in a similar distribution of future growth in wind energy. This alignment points towards co-benefits of efficient grid connections and delivery of projects on lands that create fewer conflicts with sensitive environmental areas. This is a more rational and plan-led approach compared with Spatial 4 (even growth).

Under Spatial 5, wind allocation is weighted towards Eastern and Midland region; the assessment of grid capacity and land availability support this approach. This represents a more plan-led approach than would have applied up to now. For the other two regions, the proportional allocation represents a compromise between the factors of grid planning, geospatial and 'even growth' approaches.

Applying the allocations for growth as per the draft NPF, the final wind generation capacity across the three regions in 2030 does approach a more balanced spatial arrangement, albeit still skewed to southern and northern and western regions. The solar capacity is largely delivered in Eastern & Midlands and Southern regions, with a c. 11% contribution from the Northern and Western areas.

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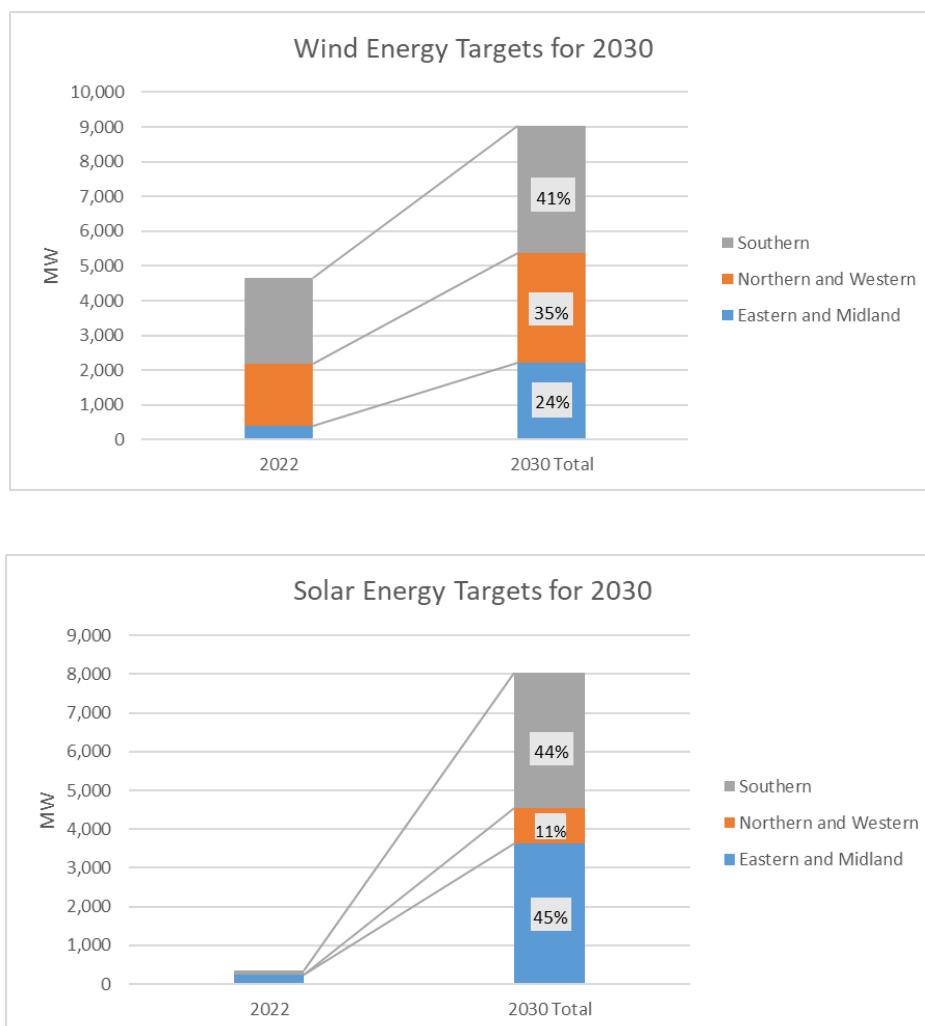


Figure 6.3: Allocation of Wind and Solar Renewable Energy Regional Targets over 2024-2030 (Source: Graphs based on information in Renewable Electricity Spatial Policy Framework White Paper (Draft) Onshore Wind and Solar 2023)

Figure 6.3 above illustrates the trajectory for overall allocation of renewable energy generation capacity in the period from 2024 to 2030. This illustrates the significant scale of growth envisaged under the NPF. The perspective for wind energy is to achieve better regional balance, whereas the regional balance for solar energy is less even.

6.4.5 Summary of Overall Preferred Alternative

The preferred alternative for the First Revision of the NPF is as follows:

- Continued growth in the Eastern and Midland Regional Assembly area, but with substantial growth also occurring in the Southern Regional Assembly and Northern and Western Regional Assembly areas.
- Prioritisation of a greater proportion of national growth in all five cities to strengthen ambition for city-based growth and enable a greater level of planning and development activity. Increased compact growth targets for all settlements in the cities and towns to provide an overall target of 50% of all growth to occur in a more compact form.
- Provide national policy and a national target and, in addition, define capacity allocations to be applied by the regional authorities in relation to onshore renewable energy supported by a multi-criteria analysis of geospatial constraints, grid availability and strength and a balanced regional approach.

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The preferred alternative, therefore, retains the original NPF's focus on a more balanced distribution of growth across all of Ireland's regions. It also retains the original NPF's commitment to the promotion of city-based population and employment growth with a target of 50% of future population and employment growth to be focused in the existing five cities and their suburbs including ambitious growth targets for the cities of Cork, Limerick, Galway and Waterford. Greater investment and jobs-led growth in the cities will support a stronger urban structure and enhanced economic performance and investment for the respective wider regions.

7 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE FIRST REVISION OF THE NPF

7.1 Introduction

Article 10 of the [SEA Directive](#) requires that monitoring be carried out in order to identify, at an early stage, any unforeseen adverse effects due to implementation of a Plan or Programme, and to be able to take remedial action. Monitoring is carried out by reporting on a set of indicators, which enable positive and negative impacts on the environment to be considered. Monitoring is focussed on aspects of the environment that are likely to be significantly impacted by the implementation of the First Revision to the NPF. Where possible, indicators have been suggested based on the availability of the necessary information and the degree to which the data would allow the target to be linked directly with the implementation of the First Revision to the NPF.

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.

Two key pieces of guidance were considered in on approach and best practice for monitoring has been taken into account in developing the proposed monitoring programme for the First Revision to the NPF, notably Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring (2023), EPA, and Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment (2003) by the European Commission.

7.1.1 Revisions to the Monitoring Programme for the 2018 NPF

In 2023 the DHLGH undertook a review of the monitoring for the first cycle of the NPF, assisted by the SEA Team. The review revealed that a number of the indicators could be improved in scope for the second cycle of the NPF to reflect the more mature stage of the plan implementation and the changes in policy which have taken place at EU and national level in the intervening years between 2018 and 2023. The review recommended that 10 of the 14 indicators from the original programme be amended for the next cycle of the plan.

A further review was undertaken after the SEA Scoping Workshop where specific information and recommendations was sought and provided from a range of stakeholders.

In parallel to the plan making process, the DHLGH also met with the EATSG where further recommendations and information was provided in relation to improvements in the type and range of data that are available from various State agencies e.g., the National Landcover Map.

DHLGH, in response to the review process, developed new monitoring indicators which were reviewed with EATSG and subject to public consultation. The final monitoring takes into account the submissions, including from environmental authorities, and reviews by DHLGH and the SEA Team.

The SEA Team would note the DHLGH for their proactive engagement in the development of the monitoring programme. The DHLGH has provided the explanation of the final monitoring proposals in Section 7.1.2.

7.1.2 Explanation to Accompany Final Monitoring Table

Indicators selected are relevant to the matters to be addressed in the NPF in Section 20C of the Planning and Development 2000, as inserted by the Planning and Development (Amendment) Act 2018 and the significant and likely environmental effects of so doing. SEA monitoring aims to add value to the plan review process and to inform the Second Revision cycle.

The significant environmental effects identified/predicted within the SEA process have been linked with the indicators selected to monitor the likely environmental effects. The indicators are selected and the programme developed on the basis that:

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- They are relevant to the Strategic Environmental Objectives (SEOs) of the plan;
- Each SEA topic is provided for with at least one indicator;
- There are data available for this on a consistent basis for monitoring to 2040;
- They are measurable using validated scientific data produced by Government or the European Commission and its agencies;
- They include strategic indicators for national-level plans and programmes recommended for Ireland by the EPA;¹³
- They take into account submissions made during the public consultation process for the plan.

The SEA monitoring indicators give a contextual basis for the plan and assist in providing a means to examine trends and changes over time in relation to early identification of unforeseen environmental effects.

The detail within the monitoring programme reflects the severity and likelihood of the predicted environmental effects. To establish if the monitoring findings are highlighting adverse unforeseen effects, assessment findings may have to be revisited¹⁴. Monitoring reviews will also include the identification of any positive impacts identified through monitoring also being reported, as this will assist in determining successful environmental actions and, therefore, may be of use in informing future iterations of this or other similar plans.

Many of the indicators are based upon monitoring programmes already in place for other national relevant plans, thus avoiding duplication and reducing the resources required for monitoring, in line with guidance from the European Commission¹⁵. Where possible, joint monitoring programmes at the national level will be utilised.

Since the original NPF was published in 2018, the data available have been improved in terms of their relevance, resolution and utility. The SEA monitoring programme has been updated and expanded in response to these developments, see Table 7-1. Furthermore, it may be that the indicators for certain SEA topics will be elaborated upon or revised to reflect future improvements to data quality and availability. For example, the indicators for Cultural Heritage may be developed in response to progress on Objectives 4 and 10 under Theme 2 of Heritage Ireland 2030¹⁶. The indicators for Biodiversity, Flora & Fauna will be informed by the data to be gathered in this cycle under the monitoring for the Nature Restoration Regulation. Such data will be useful to the next plan review and to inform future data collection.

The thresholds relate to the scale of the national and high level of the NPF. They are devised to indicate both potential positive and negative effects of the plan.

As the plan-making authority, the DHLGH will be responsible for monitoring the effects of the plan and for taking appropriate remedial action, if required. Monitoring results will be made publicly accessible in line with DHLGH guidance¹⁷. As per this guidance, this may also allow for future analysis for other purposes, such as environmental impact assessment of projects and strategic environmental assessment of other plans and programmes. The indicators selected may be further informed by being used for the monitoring of lower level plans through the process of tiering¹⁸.

¹³ EPA (2023) *Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring*. Wexford: EPA.

¹⁴ Scottish Government (2013) *Strategic Environmental Assessment: guidance*. Edinburgh: Environment and Forestry Directorate, Scottish Government. pp. 46-47. <https://www.gov.scot/publications/strategic-environmental-assessment-guidance/pages/3/> Viewed 22 October 2024.

¹⁵ European Commission, Directorate-General for Environment, (2003) *Implementation of directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment*. Brussels: Publications Office.

¹⁶ DHLGH (2022a) *Heritage Ireland 2030 - A Framework for Heritage*. Dublin: DHLGH. p. 47.

¹⁷ DHLGH (2022b) *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities*. Dublin: DHLGH. pp. 63-68.

¹⁸ EPA (2023) *Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring*. Wexford: EPA.

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The timing of monitoring reviews will be based upon legal requirements and the availability of datasets. The programme includes a reference to the frequency of data collection to inform future reviews. Monitoring review reports are intended for 2027 and 2029. This is to give effect to the NPF revision timelines being bound for completion within two years of the national Census under the Planning Act 2024 (to be enacted) and to enable a revision of the NPF for 2030. There may be supplementary reviews of certain indicators as necessary. It will be necessary to have at least two reviews to establish trends that are occurring. Further information on significant trends/issues will be obtained from existing monitoring programmes (e.g., using the EPA's State of the Environment Report in 2028 and, if appropriate, United Nations SDG monitoring data to identify environmental changes and trends at national/regional level between plan/programme periods), as appropriate, in line with national guidance¹⁹.

The NPF has been revised following the public consultation process to include a specific commitment for environmental monitoring and reporting, in the form of National Policy Objective 108 in line with national guidance²⁰.

The final monitoring programme is outlined in **Table 7-1**. Yellow rows represent new indicators. Light-blue rows represent those included in the draft for consultation in July 2024. Purple rows represent those included in the draft for consultation in July 2024 which have been modified and refined based on submissions received. Green rows represent those taken forward as per the original NPF (2018).

¹⁹ EPA (2023) *Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring*. Wexford: EPA.

²⁰ EPA (2023) *Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring*. Wexford: EPA.

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Table 7-1: Monitoring Programme for the First Revision to the NPF (2024-2030)

SEA Topic	Indicator	Target	Threshold for Remediation	Rationale	Data Source & Frequency	Relevant SEOs
Population and Human Health	Delivery of new homes aligns with the NPF percentage allocations.	Percentage of Housing delivery aligns with NPOs 7, 8 and 9.	Housing delivery not keeping pace with the targeted pattern of delivery to 2040 set out in the NPF.	Monitor implementation of compact growth targets.	CSO: Census of Ireland - every 5 years with next due 2027 Housing Delivery Tracker	PHH(i)(ii)(iii) MA(i)(ii)(iii)(iv)
Population and Human Health	Proportion of one-off housing in rural areas	Increased trend of housing development in line with compact growth	Housing development trends not in line with compact growth.	To evaluate NPOs	CSO: Census of Ireland -every 5 years with next due 2027	PHH(i)(ii)(iii) MA(i)(ii)(iii)(iv)
Population and Human Health	Access to green and blue space by the overall population	Increasing percentage of the population with access to green and blue spaces with a particular focus on urban areas	Decreasing percentage of the population with access to green and blue spaces	Alignment with HSE policy & EU Biodiversity Strategy	CSO: Census of Ireland -every 5 years with next due 2027; EEA: Urban Atlas Land Cover/ Land Use - every 6 years next due 2024	PHH(i) BFF (ii)(iii)
Population and Human Health	The average distance (km) of residential dwellings to everyday services ²¹ by percentage of population by urban, rural and State	To promote compact residential development	An increase in the average distance (km) of residential dwellings to everyday services for urban, rural and State areas	Monitoring Report suggested linking the health indicator to a single source of monitoring such as the census. Revised based on EPA Submission	CSO: Well-being Information Hub by CSO – every 5 years (last was 2019)	PHH(i)(ii)(iv) AQ(i) CF(i) MA (i)
Biodiversity, Flora & Fauna	The (i) total number and (ii) condition of European Sites reported nationally as impacted as a result of conversion of land uses to housing or construction or	(i) Decreased total number and (ii) An increasing trend in the condition	(i) Additional European sites reported as impacted ² (ii) Deterioration in the condition of European sites currently impacted ² .	Art 17 monitoring recommended by EPA Monitoring Guidance. One of the Regional Development Monitor indicators.	NPWS: Status of EU Protected Habitats and Species in Ireland Reports under Article 12 (Birds Directive) & Article 17 (Habitats	BFF(i)(ii)(iii)(iv) LS(i)(iv) CF(iii)

²¹ Such as primary schools, pharmacy, GP, swimming pools, outdoor sports facilities and public libraries. As defined by the CSO Well-being Information Hub - <https://www.cso.ie/en/releasesandpublications/hubs/p-wbhub/well-beinginformationhub/housingandbuiltenvironment/averagedistancetoeveradayservices/>

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SEA Topic	Indicator	Target	Threshold for Remediation	Rationale	Data Source & Frequency	Relevant SEOs
	modification in existing settlements.	of European sites impacted ²² .		NPF Monitoring Report recommended indicator to clarify how land use plans ensure implementation of required targets in relation to European sites & protected species conservation. Tied back to relevant Art 17 threat/ pressure codes.	Directive) -6 yearly reporting, next due 2025	
Biodiversity, Flora & Fauna	Area of green and blue infrastructure nationally (square metres).	To increase in the overall provision of GBI	Decrease in the overall provision of GBI	Amendment of original Indicator to move towards monitoring implementation rather than inclusion in plans. This could also be used as a proxy under PHH in terms of access to green/blue spaces.	EEA:CORINE Project - every 6 years with next due 2024 EEA: Urban Atlas Land Cover/ Land Use - every 6 years with next due 2024 Tailte Éireann: National Land Cover Map: - every 5 years with next due 2028	PHH(i) BFF(ii)(iii)
Biodiversity, Flora & Fauna	Maintenance of connectivity of European Sites	Maintain and restore connectivity of European Sites	Connectivity of European Sites is not maintained or restored	SEA Monitoring Review Report recommended an indicator to clarify how the land use plans ensure the implementation of the required targets in relation to European sites conservation.	Tailte Éireann: National Land Cover Map - every 5 years with next due 2028 NPWS Article 17 reports - 6 yearly reporting, next due 2025	BFF(i)(ii)(iii)(iv) LS(i)(ii)(iii)(iv) LandS(i)(ii)

²² This refers only to the European sites that are reported by NPWS to the European Commission as part of monitoring required under Article 17 of the EU Habitats Directive as impacted with specific reference to Pressure/Threat Category Code 'F -Development, construction and use of residential, commercial, industrial and recreational infrastructure and areas'.

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SEA Topic	Indicator	Target	Threshold for Remediation	Rationale	Data Source & Frequency	Relevant SEOs
Soil	The area of soil that is sealed or artificialised by total national land area: i. by percentage; and ii. in square km	a) To limit the rate of increase from 2018 of land that is sealed or artificialised per year; and b) To promote the reversal of this in suitable areas ²³ .	Increasing trend over time in the percentage average increase in soil sealing relative to country area. No decrease in the area of soil that is sealed or artificialised in suitable areas.	Previous NPF Soil target related to maintaining built surface cover nationally to below the EU average of 4%. The updated monitoring refers more to soil sealing and artificialisation.	EEA: Copernicus aggregated Imperviousness change information ²⁴ . EEA: CORINE Project - every 6 years with next due 2024 EEA: Urban Atlas Land Cover/ Land Use - every 6 years with next due 2024 Tailte Éireann: National Land Cover Map - every 5 years with next due 2028	BFF(i)(ii)(iii)(iv) LS(i)(ii)(iii)(iv) MA(i)(ii)(iii)(iv)
Water	Proportion of rivers with high or good ambient water quality by year	To support measures to maintain high or good water quality for rivers in accordance with the latest River Basin Management Plan and POM.	Trends showing a decrease in the percentage of rivers with high or good ambient water quality as set out in the RBMP.	Water Quality Monitoring is recommended in EPA SEA Monitoring Guidance. One of the Regional Development Monitor indicators (Ecological Status of Water Body, WFD 2016-2021)	EPA: Water Quality in Ireland reports – Annual CSO: Well-being Information Hub by CSO – every 5 years (last was 2019)	SEO: BFF(i)(iii)(iv) W(i) CF(iii)
Water	Indicators for descriptors as reported for the MSFD are achieved or maintained.	Indicators for descriptors as reported for the MSFD are achieved or maintained	Indicators for descriptors as reported for the MSFD are deteriorating	Included based on previous NPF monitoring. NPF Monitoring Report recommended that it is taken forward.	DECC: Ireland's Marine Strategy Framework Directive (MSFD) Monitoring Programmes - 6 yearly reporting	BFF(i)(iii)(iv) W(i)

²³ Suitable areas may include areas at risk of flooding (as determined by OPW), high density areas, Local Authority Decarbonising Zones or future areas defined under the National Restoration Plan.

²⁴ As reported by EEA [Annual average increase in soil sealing for the three time periods, relative to country area | European Environment Agency's home page \(europa.eu\)](https://europeanenvironmentagency.europa.eu/en/annual-average-increase-in-soil-sealing-for-the-three-time-periods-relative-to-country-area)

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SEA Topic	Indicator	Target	Threshold for Remediation	Rationale	Data Source & Frequency	Relevant SEOs
Water	Number of public water supplies on the EPAs Remedial Action List on a national basis	Decrease in the population affected by the public water supplies on the Remedial Action List	Increase in the population affected by the public water supplies on the Remedial Action List	Monitoring drinking water quality is recommended in EPA SEA Monitoring Guidance.	EPA and River Basin Districts: Remedial Action List - Twice a year WWTPS. catchments.ie https://wfd.edenireland.ie/	W(i)
Water	Level of phosphorous in water bodies that are identified as sensitive areas or catchments to sensitive areas	To ensure wastewater discharge authorisation (WWDA) compliance with the UWWT Directive. To ensure that required wastewater discharges are treated to ensure their nutrient levels do not contribute to the pollution of sensitive areas or their catchments.	Increase in the percentage of water bodies identified as sensitive areas or catchments to sensitive areas impacted by elevated phosphorus levels	Water Quality Monitoring is recommended in EPA SEA Monitoring Guidance. Limited to phosphorus as more appropriate to wastewater pollution. One of the Regional Development Monitor indicators (Ecological Status of Water Body, WFD 2016/2021) Revised based on EPA submission	EPA: Water Quality in Ireland reports - Annual	BFF(i)(iii) W(i) CF(iii)
Air Quality	National air quality values for PM2.5 and NOx in the Residential, commercial and industrial sector	To reduce adverse air pollution impacts of development in the residential, commercial and industrial sector on health and the economy to reflect the commitment to achieve interim WHO targets in 2026 and 2030 and achieve final WHO guideline values by 2040. as set out in the Clean Air Strategy.	Trends showing an increase numbers of monitoring stations where exceedances are detected for NOx and PM2.5	Air quality monitoring recommended by the EPA Guidance for all national-level plans. The pollutants chosen align with relevant sectors as well as those listed as key issues under the Clean Air Strategy Monitoring recommended in NPF Monitoring Report. Revised based on EPA submission.	EPA: Air Quality in Ireland Report- Annual Real time at EPA National Air Quality Monitoring Network	BFF(ii) LS(ii)(iii)(iv) AQ(i)(ii) CF(i)(ii)(iii)(iv)(v) MA(i)(ii)(iii)

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SEA Topic	Indicator	Target	Threshold for Remediation	Rationale	Data Source & Frequency	Relevant SEOs
Air Quality	Levels of National Air Pollution Emissions	To reduce emissions of the five main air pollutants in line with the National Emissions Reduction Commitments Directive	Reporting showing an increase in the emissions of the five main air pollutants.	EPA submission recommends including indicators for both air quality national emissions and ambient concentrations. Revised based on EPA submission.	EPA: National Emission Reduction Commitments Directive Reporting	BFF(ii) LS(ii)(iii)(iv) AQ(i)(ii) CF(i)(ii)(iii)(iv)(v) MA(i)(ii)(iii)
Climate/ Climatic Factors	National emission values for greenhouse gases (GHGs) in the residential and commercial, energy and transport sectors	A net annual decrease in GHG emissions for relevant sectors	A net annual increase in GHG emissions for relevant sectors	GHG Emissions monitoring is recommended in EPA SEA Guidance. One of the Regional Development Monitor indicators	EPA Annual National GHG Emissions Inventory reporting EEA National GHG Inventory - Annual	BFF(ii) LS(ii)(iii)(iv) AQ(ii)(ii) CF(i)(ii)(iii)(iv)(v) MA(i)(ii)(iii)
Climate/ Climatic Factors	Commuting travel patterns a) nationally and b) within MASPs according to Census data.	Increase in proportion of people (as a percentage) living nationally and within MASPs commuting using sustainable and active travel since Census 2022.	Increase in proportion of people (as a percentage) nationally and within MASPs commuting using private vehicles instead of sustainable and active travel since Census 2022.	One of the Regional Development Monitor indicators (Mode of Travel to Work/ Education (Census 2016))	CSO: Census of Ireland -every 5 years with next due 2027	PHH(i)(ii) AQ(i)(ii) CF(i)(ii)(v) MA(i)
Climate/ Climatic Factors	RSEs have planned for the delivery of the regional renewable electricity capacity allocations as outlined in NPO 74	The delivery of regional renewable electricity capacity allocations is planned for the next revision of all RSEs.	The delivery of regional renewable electricity capacity allocations is not planned for in the next revision of all RSEs.	Alignment with the CAP	RSEs	PHH(ii) LS(i)(ii)(iii)(iv) AQ(ii) CF(i)(ii)(iii)(v) MA(ii)
Material Assets	Proportion of new development nationally occurring on:	To promote the circular economy by reuse of land and buildings.	Decreasing proportion of new development nationally occurring on:	NPF Monitoring Report recommended a new indicator to monitor whether brownfield sites are	OSI Prime2 Mapping Layers - 'Artificial Surfaces' EEA:CORINE Project - every 6 years with next	BFF(i)(ii)(iii)(iv) LS(i)(ii)(iii)(iv) MA(i)(ii)(iii)(iv)

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SEA Topic	Indicator	Target	Threshold for Remediation	Rationale	Data Source & Frequency	Relevant SEOs
	i) infill ²⁵ ii) brownfield ²⁶ iii) greenfield by way of: a) percentage; and b) area (km ²).		i) infill ²⁷ ii) brownfield ²⁸ iii) greenfield by way of: a) percentage; and b) area (km ²)	being developed in preference to greenfield in order to indicate if compact growth targets were being achieved.	due 2024 EEA: Urban Atlas Land Cover/ Land Use - every 6 years with next due 2024 Tailte Éireann: National Land Cover Map - every 5 years with next due 2028	
Material Assets	Wastewater treatment plant (WWTP) capacity nationally as indicated by: (i) Number of WWTPs operating at and/or above capacity. (ii) Number of incidents reported due to overflows from the WWTPs that are not caused by heavy rainfall	(i) No increase in the number of WWTPs that are listed as 'Amber' or 'Red' nationally. (ii) Reduced number of incidents reported due to overflows that are not caused by heavy rainfall	(i) Decrease in number of wastewater treatment capacity listed as 'Green' nationally. (ii) Trends show an increase in number of incidents reported	Revised based on UÉ and EPA submissions	UÉ: Waste water treatment capacity registers – Annual EPA – Annual Urban-Waste-Water-Treatment-in-2022-Report	PHH(v) BFF(i) LS(i) W(i)
Material Assets	Available treatment capacity for drinking water for development	No increase in the number of settlements with a water capacity listed as 'Potential Capacity Available' or 'Capital Investment Required'.	Decrease in number of settlements with a water capacity listed as 'Capacity Available'	Inclusion based on UÉ submission	UÉ: Water capacity registers – Annual	PHH (v) W(i)

²⁵ As defined in the Sustainable Residential Development and Compact Settlement Guidelines SRDCSG Appendix A.

²⁶ As defined in the Sustainable Residential Development and Compact Settlement Guidelines SRDCSG Appendix A.

²⁷ As defined in the Sustainable Residential Development and Compact Settlement Guidelines SRDCSG Appendix A.

²⁸ As defined in the Sustainable Residential Development and Compact Settlement Guidelines SRDCSG Appendix A.

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SEA Topic	Indicator	Target	Threshold for Remediation	Rationale	Data Source & Frequency	Relevant SEOs
Material Assets	Progress on implementation of the National Broadband Ireland Plan	To improve connectivity in a manner which supports regional development	Completion and distribution of regional exchanges. Percentage of households/ premises/ schools/ businesses connected on a regional basis.	Carried forward based on recommendations in the NPF Monitoring Review. One of the Regional Development Monitor indicators.	DECC - Annual	PHH(i)(ii) MA(i)(ii)(iii)
Material Assets	Number of Urban Waste Water Priority Areas	Decrease in Urban Waste Water Priority Areas	Increase in Urban Waste Water Priority Areas	Alignment with EPA recommendations.	EPA: Urban Waste Water Treatment Reports - Annual	PHH(v) BFF(i) LS(i) W(i)
Cultural Heritage	For historic buildings re-surveyed by the NIAH: i. Rates of vacancy and dereliction ii. Number of structures demolished iii. Changes in building condition	To reduce rates of vacancy/dereliction To minimise numbers of structures demolished To encourage regeneration and investment in historic fabric	Increasing rates of vacancy/dereliction Increasing number of demolitions	To protect the built heritage asset. To protect and regenerate town centres in line with Town Centre First	DHLGH: NIAH Built Heritage Stock-Take Surveys – annual and rotating sample basis (from 2024-2040)	BFF(i)(ii)(iii)(iv) CH(i) LS(i)(ii)(iii)(iv) MA(i)(ii)(iii)(iv) LandS(i)(ii)
Landscape	Landscape Character Assessments (LCAs) completed nationally	Completion of national Landscape Character Assessment (LCA)	LCA not completed.	Alignment with National Landscape Strategy	DHLGH – Annual progress	CH(i) LandS(i)(ii)
Landscape	National breakdown of land cover categories as a proportion (%) of the total area of each category (using NUTS3 classification)	To achieve greater national balance in distribution of land use categories as per the National Land Use Review to maintain ecosystem services.	Percentage of specified land use categories (including infrastructure land) on a national basis over time.	Recommendation of the third synthesis report from the EPA of the National Land Use Review	EEA:CORINE Project - every 6 years with next due 2024 Tailte Éireann: National Land Cover Map: - every 5 years with next due 2028 and EUROSTAT - use Figure 1.3 and Table 1.1 of Synthesis Report for baseline	LS(i)(ii)(iii)(iv) LandS(i)(ii)

8 ADDENDUM TO THE ENVIRONMENTAL REPORT

This is the addendum to the Environmental Report. This chapter serves two purposes:

1. To provide clarification and/or additional information following comments in the submissions received during the consultation period on the draft Plan and Environmental Report; and.
2. To identify where the Environmental Report has been updated following consideration of comments received in submissions during the public consultation period.

It should be noted that this document supplements and should be read in conjunction with the original Environmental Report. The clarifications and additional information contained herein (shown in italicised blue text) have been provided in order to increase the usefulness of the document for the public and decision makers. Significant deletions (such as dates for report publications or incorrect baseline text) are denoted with a strikethrough. The post-consultation amendments however are not of such an extent that changes to the content or outcome of the assessment contained within the Environmental Report were required.

8.1 Amendments by Chapter

Chapter 1- Introduction

No further amendments.

Chapter 2- Contents and Main Objectives of the Draft First Revision to the NPF

No further amendments.

Chapter 3- Strategic Environmental Assessment Methodology

No further amendments.

Chapter 4: Relevant Plans and Programmes

Section 4.3.3- Climate and Energy

Feedback: *The ER makes no reference to the existing Community Benefit Fund that is currently in place for all Renewable Electricity Support Scheme projects.*

Amendment: The following text has been added to the ER at Section 4.3.3 - Climate and Energy in relation to Community Benefit Fund:

*A significant aspect of the Renewable Electricity Support Scheme (RESS) is the requirement for all renewable electricity generation projects to create a **Community Benefit Fund**. This fund is intended to support the broader economic, environmental, social, and cultural well-being of the local community. As reported by SEAI²⁹, the contribution rate is set at €2 per Megawatt hour of electricity generated by the RESS Project. This ensures that tangible and measurable funds are made available annually for the local community's benefit. The Fund is designed to encourage investment in local renewable energy, energy efficiency measures, and climate action initiatives. Under RESS-1, the community benefit funds will provide approximately €4.5 million annually to sustainable community initiatives, particularly benefiting those living near the RESS-1 Projects.*

²⁹ [RESS | Community Benefit Fund | SEAI](#)

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Section 4.3.4- Biodiversity

Feedback: Section 5.3 (existing environmental pressures/problems with biodiversity, flora and fauna: should refer to the Dáil Éireann's 2019 declaration of the national biodiversity and climate emergency. The ICCA Reports provide comprehensive reporting on climate change and its challenges and should be referenced in the ER.

Amendment: The following text has been added to Section 4.3.4-Biodiversity. See also additional entry in Chapter 5:

Further, in May 2019, Dáil Éireann voted on and declared a national biodiversity and climate emergency³⁰. The recognition of a biodiversity emergency places Ireland alongside the UK as a small handful of countries which have done so, recognising the duality of the crisis facing Ireland and countries in general.

Section 4.3.11.2- Agriculture and Rural Environment

Feedback: References to Food Wise 2025 (pages 27 & 279) should be reviewed in the context that it was superseded by Food Vision in 2021.

Amendment: Noted. The following text in Section 4.3.11.2-Agriculture and Rural Environment has been deleted as it was not relevant in the context when reviewed:

~~Food Wise 2025 sets out how Ireland and the Irish agri-food sector can grow by refining its focus around these objectives. It recognises the importance of the industry committing to processes that are sustainable – economically, socially and environmentally. It identifies significant growth opportunities across all sub-sectors of the Irish agri-food industry and outlines key actions to maximise the sector's contribution to agricultural growth and exports.~~

Section 4.3.12.2- Noise

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

The NPF and SEA should consider all significant sources of noise pollution; Section 4.3.12.2 on page 26 mainly focuses on transport-related sources and there are other aspects around noise management that should be considered.

Amendment: Section 4.3.12.2- Noise has been amended as follows:

The EPA describe Environmental noise as 'unwanted sound' arising from all areas of human activity³¹. These activities include but not limited to road, rail and air traffic, sites of industry and, in an urban context, from daytime and nighttime economies. Excessive noise is now understood to have negative impacts on health and wellbeing including mental health and can affect people's daily lives.

Regulation of noise primarily comes under the remit of the Environmental Noise Directive (END) (2002/49/EC), with the requirement for Member States to produce noise maps and compile noise action plans based on those maps. The END was amended by Directive (EU) 2015/996 establishing common noise assessment methods and replacing Annex II of the 2002 END. The END is transposed in Ireland through the Environmental Noise Regulations 2018 S.I. No. 549/2018, as amended by S.I 663 of 2021. Local authorities (LAs) are required under SI No 549 of 2018 to report progress each year on the implementation of their Noise Action Plans (NAPs). S.I 663 of 2021 has established a common framework to avoid, prevent or reduce, on a prioritised basis, the harmful effects of exposure to environmental noise. It has permitted the establishment of dose-effect relations to be introduced and established common noise assessment methods

³⁰ Report entitled 'Climate Change: A Cross-Party Consensus on Climate Action': Motion – Dáil Éireann (32nd Dáil) – Thursday, 9 May 2019 – Houses of the Oireachtas

³¹ Noise | Environmental Protection Agency

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which consider harmful effects covering High Annoyance, High Sleep Disturbance and Ischaemic Heart Disease.

In 2018, the WHO published guidance for policymakers on noise levels above which it considers that adverse effects on health and sleep occur. These WHO guidance levels are below the Environmental Noise Directive (END) mandatory noise level reporting thresholds of 55 dB (Lden) and 50 dB (Lnight). The WHO Guidelines provide exposure response functions for health outcomes, including annoyance and sleep disturbance, as well as risk ratios for cardiovascular health outcomes. These provide the basis for quantifying the number of people suffering from specific health effects due to noise.

The EU's Zero Pollution Action Plan is also relevant. It includes a target to reduce by 30% the share of people chronically disturbed by transport noise.

Furthermore, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DHLGH 2024) include the consideration of noise assessments to accompany planning applications for residential development within close proximity to noise generating activities, citing examples of major transport infrastructure such as airports, ports, arterial streets/roads and railways and activities associated with the night-time economy.

~~Regulation of noise comes under the remit of the **Environmental Noise Directive (2002/49/EC)**, with the requirement for member states to produce noise maps and compile noise action plans based on those maps. It was amended by **Directive (EU) 2015/996** establishing common noise assessment methods and replacing Annex II of the 2002 END. END is transposed in Ireland through the **Environmental Noise Regulations 2018 (S.I. No. 549/2018)**. Local authorities publish Noise Action Plans on a regular basis. Environmental noise is unwanted or harmful outdoor sound created by human activities, including noise emitted by means of transport (road, rail and air traffic), and from sites of industrial activity including the categories of activities specified in Annex I to the IED. Nuisance noise is dealt with under the **Environmental Protection Agency Act 1992, as amended**.~~

~~Noise emissions can be generated from various sources and activities. Given Ireland's relative lack of heavy industries compared to the rest of Europe, the main sources of noise arise from road, rail and airports.~~

Chapter 5: Relevant Aspects of the Current State of the Environment (Baseline)

Section 5.2.1 Republic of Ireland

Feedback: EPA acknowledges that the SEA refers to the recommendations and key messages from the EPA’s Ireland’s Environment – An Integrated Assessment (EPA, 2020). The next iteration of this report is due to be completed in autumn 2024

Amendment: The following updated text has been added to section 5.2.1.

Ireland’s natural environment represents one of the country’s most essential national assets (EPA, 2012, 2016, 2020 and 2024³²³³³⁴). However, it is acknowledged that under increasing pressure, the quality of the environment is not considered to be good. In the 8th, and most recent, state of the environment review *Ireland’s State of the Environment Report 2024* (SOER, 2024)³⁵, the EPA outlines a summary scorecard for the progress being made across key environmental policy areas as well as the general trend/outlook. The scorecard shows that the improvements being made are not of appropriate scale and are therefore insufficient to meet the national long-term environment protection objectives and targets. The relevant topics are summarised below in Table 5-1.

Table 5-1: Summary assessment and future outlook for selected environmental policy areas from the EPA State of the Environment 2024 Report relevance to the draft Plan

Policy Area	Summary Assessment & Outlook	Relationship to the Draft First Revision to the NPF
Climate	<p>Assessment: Poor – environmental and/or compliance challenges to address</p> <p>Outlook: Largely not on track to meet policy objectives and targets. Significant challenges to achieving full compliance remain. Systemic and transformative change needed</p> <p>While there has been progress in terms of beginning to reduce greenhouse gas emissions and in strengthening adaptation governance structures and support services, overall current assessment for climate is ‘poor’ (a slight improvement from ‘very poor’ in 2020). Full implementation of actions set out in the Climate Action Plan and additional actions are needed if Ireland is to meet its 2030 and 2050 climate targets.</p>	<p>Within the EPA latest emissions data (EPA, 2023³⁶), in 2022, Ireland GHG emissions were estimated to be 60.76 million tonnes carbon dioxide, which is 1.9% lower (or 1.19 Mt CO₂ eq) than emissions in 2021 (61.95 Mt CO₂ 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 unmodeled 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</p>

³² [Ireland’s Environment 2012 - An Assessment | Environmental Protection Agency](#)

³³ [Ireland’s Environment 2016 - An Assessment | Environmental Protection Agency](#)

³⁴ [Ireland’s Environment 2020 - An Assessment - Report | Environmental Protection Agency](#)

³⁵ EPA (2024) Ireland’s State of the Environment Report 2024. Available at: <https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/irelands-state-of-the-environment-report-2024.php>

³⁶ EPA (2023), EPA Latest Emissions data. Available at: [Latest emissions data | Environmental Protection Agency \(epa.ie\)](#).

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Policy Area	Summary Assessment & Outlook	Relationship to the Draft First Revision to the NPF
		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.
Air Quality & Emissions	<p>Assessment: Moderate / on track generally / local or occasional challenges</p> <p>Outlook: Partially on track to achieving full compliance or measures in place or planned that will improve the situation. Outlook is dependent on existing and planned actions, measures and plans being fully implemented and effective</p> <p>The overall current assessment for air is 'moderate' (the same as in 2020). Ireland is compliant with current air quality standards for many air pollutants. However, Ireland is not meeting the guidelines set by WHO for multiple pollutants, including PM_{2.5}, and Ireland is non-compliant with the EU reduction target for ammonia. Achieving the ambitions of the Clean Air Strategy and complying with the limit values of the proposed EU Air Quality Directive from 2030 onwards will be challenging but will have a significant and positive impact on health.</p>	<p>The two main sources of air pollution in Ireland are PM_{2.5} from solid fuel burning and NO₂ 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>
Water	<p>Assessment: Poor – environmental and/or compliance challenges to address</p> <p>Outlook: Partially on track to achieving full compliance or measures in place or planned that will improve the situation. Outlook is dependent on existing and planned actions, measures and plans being fully implemented and effective</p> <p>Overall current assessment for water is 'poor' (the same as in 2020). Trends remain mixed, with no net improvement in river or lake water quality in recent years, a sharp decline in the number of monitored estuaries in satisfactory ecological condition and continued direct discharges of raw or inadequately treated sewage to water from 19 agglomerations. Significant challenges remain for achieving full compliance with relevant EU obligations and national policy objectives.</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)³⁷.</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>

³⁷ 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>

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Policy Area	Summary Assessment & Outlook	Relationship to the Draft First Revision to the NPF
Nature	<p>Assessment: Very poor / significant environmental and/or compliance challenges to address</p> <p>Outlook: Largely not on track to meet policy objectives and targets. Significant challenges to achieving full compliance remain. Systemic and transformative change needed</p> <p>The overall current assessment for nature is 'very poor' (the same as in 2020). Deteriorating trends dominate, especially for protected habitats and bird populations, and Ireland is not on track to achieve policy objectives for nature. While the recent expansion of Marine Protected Areas is welcome, additional far-reaching measures are needed to address the declines in nature and biodiversity.</p>	<p>Under the Climate Action and Low Carbon Development (Amendment) Act 2021³⁸, 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>
Waste & Circular Economy	<p>Assessment: Poor – environmental and/or compliance challenges to address</p> <p>Outlook: Partially on track to achieving full compliance or measures in place or planned that will improve the situation. Outlook is dependent on existing and planned actions, measures and plans being fully implemented and effective</p> <p>The overall current assessment for the circular economy and waste is poor (the same as in 2020) but progress is being made in a number of areas to improve performance. Waste generation continues to grow, in absolute and per capita terms, and Ireland remains overly reliant on export markets for recycling and for treating municipal residual waste. Recycling rates for municipal and plastic packaging waste streams are at risk and need to increase urgently to</p>	<p>The principles of the circular economy seek to maximise the efficiency of material use and reduce 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>A growing population and planning for same also requires increased development such as, for example, social infrastructure, housing, modal options,</p>

³⁸ Climate Action and Low Carbon Development (Amendment) Act 2021. Available at: <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 to the NPF
	achieve 2025 targets. Recent interventions, such as the Deposit Return Scheme, statutory roll-out of the organic waste collection service, recovery levy and national end-of waste and by-product decisions, are positive developments but the effects of these remain to be seen. The circular material use rates remains very low by comparison to the European average and Ireland needs to address specific sectoral challenges to accelerate moving from a linear to a circular economy.	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 ₂ eq annually.

Section 5.3.1.3 - Human Health

Feedback: *The NPF and SEA should consider all significant sources of noise pollution; Section 4.3.12.2 on page 26 mainly focuses on transport-related sources and there are other aspects around noise management that should be considered.*

Amendment: In addition to new text added to Section 4.2.12.2 above on noise, the following text has also been added to Section 5.3.1.3-Human Health in relation to harmful effects associated with noise exposure.

In the latest State of the Environment Report from the EPA, 2024, it is reported that long term exposure to environmental noise is an important public health issue. The graphic below, taken from the report shows the range of health issues associated with noise. It is recognised that environmental noise can come from a variety of sources, especially in an urban setting but “the most widespread sources of noise pollution and exposure in Ireland are various forms of transport.”

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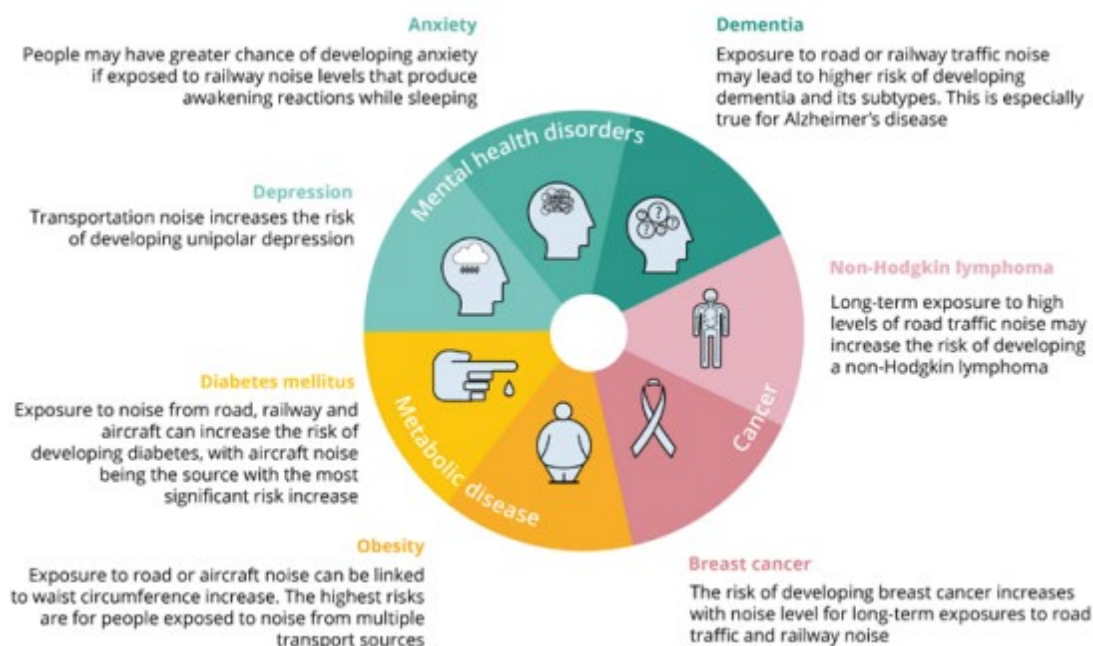


Figure 5-3 [NEW]: The range of health issues associated with noise

Source: Ireland's State of the Environment Report EPA, 2024³⁹, based on EEA 2022⁴⁰.

The report records that noise modelling for round 4 mapping showed just over 1.03 million (Lden). people in the areas modelled exposed to noise levels above the mandatory reporting thresholds for road traffic set in the EU regulations including 885,000 people in Cork, Dublin and Limerick and an additional 441,000 people outside these cities. The report restates the need to advance national planning guidance for noise as articulated in NPO91 in the 2018 NPF. This has been retained as NPO94 in the First Revision of the NPF.

Section 5.3.1.4- Existing Environmental Pressures/ Problems: Population and Human Health

Feedback: Considered that the ER significantly under-reports potential positive effects of renewable energy development (in line with adopted Government policy), in particular the wider climatic and socio-economic effects.

Amendment: The following text has been added to Section 5.3.1.4:

- Potential for climate mitigation and adaptation co-benefits (across Air, Water, Population and Human Health, etc.) e.g., climate action is urgently needed and can realise co-benefits arising from reducing solid fuel bringing and modal shift, with consequent improvements for air quality and human health.

The socio economic benefits are acknowledged to arise from implementing climate action as this will help increase energy security and reduce import dependency, having benefits to the Irish economy. It also reduces risks to the national and EU political stability and has benefits in terms of reducing the environmental effects of fossil fuel production in those countries that Ireland currently imports fossil fuels from.

Feedback: ER would benefit from inclusion of additional descriptors of environmental impacts from interruptions in supply of energy, particularly potential impacts on population and human health and socio-

³⁹ Ireland's State of the Environment Report 2024 | Environmental Protection Agency

⁴⁰ Noise European Environment Agency

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economic (with particular regard to competitiveness/ maintaining FDI, to support Ireland's long term sustainable development).

Amendment: The following text has been added in relation to energy security.

Energy security is an aspect which has significant impacts affecting populations and health. As has been seen in Ireland in recent years, imported fossil fuels can be at risk from external geopolitical shocks leading to increases in energy costs. This can result in higher energy prices and lead to energy poverty for more vulnerable sectors of society. In most recent budgets, the Irish Government has provided energy credits to offset this to some extent. Increased energy costs can also impact on industry with knock on effects on the cost of goods and services including basics such as food and hygiene. These pressures have negative outcomes for health and wellbeing.

Section 5.3.2.3- Existing Environmental Pressures/ Problems: Biodiversity

Feedback: *Section 5.3 (existing environmental pressures/problems with biodiversity, flora and fauna: should refer to the Dáil Éireann's 2019 declaration of the national biodiversity and climate emergency.*

Amendment: The following text has been added to Section 5.3.2.3-Biodiversity in relation to declaration of climate and biodiversity emergency by Dáil Éireann:

Further, in May 2019, Dáil Éireann voted on and declared a national biodiversity and climate emergency.

Section 5.3.6.2- National Context

Feedback: *The ICCA Reports provide comprehensive reporting on climate change and its challenges and should be referenced in the ER.*

Amendment: The following text has been added to Section 5.3.6.2- National Context

The Summary for Policymakers (SPM) provides key insights from Volume 1 of Ireland's Climate Change Assessment: Climate Science – Ireland in a Changing World⁴¹. The report states the following:

A. Ireland's climate is changing

- a. **A.1** *There has been a rapid rise in atmospheric greenhouse gas concentrations, measured at numerous sites around the world, including Mace Head, since the Industrial Revolution without precedent in millions of years. Concentrations of methane and nitrous oxide are higher now than in over 800,000 years, and for carbon dioxide, for which longer-term reconstructions are possible, concentrations are higher than for millions of years. The increases in greenhouse gas concentrations since 1850 are due to global human activities, principally through fossil fuel combustion and land use change.*
- b. **A.2** *Changes in the concentrations of these three major greenhouse gases since 1750 exceed those between successive glacial and interglacial cycles of the past 800,000 years for carbon dioxide and methane. For nitrous oxide the changes in concentration are of comparable magnitude to these successive glacial and interglacial cycles. These past changes in concentrations of all three gases were much slower, occurring over thousands of years.*
- c. **A.3** *Globally, widespread and rapid changes in the atmosphere, ocean, land, cryosphere and biosphere have occurred. The scale of recent changes across the climate system as a whole – and the present state of many aspects of the climate system – are unprecedented over many centuries to many thousands of years.*

⁴¹ EPA 2023. Ireland's Climate Change Assessment (ICCA). Volume 1: Climate Science – Ireland in a Changing World. Available at: <https://www.epa.ie/publications/monitoring--assessment/climate-change/irelands-climate-change-assessment-volume-1.php> Accessed: April 2024.

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- d. **A.4** Global surface temperatures have risen by 1.15°C [1.00-1.25°C] between 1850–1900 and the most recent decade, 2013–2022. This most recent decade was likely warmer than any sustained period in at least the past 100,000 years.
- e. **A.5** In Ireland annual average temperatures are now approximately 1.0°C higher than they were in the early 20th century. Sixteen of the top twenty warmest years since 1900 have occurred since 1990, with 2022 being the warmest year to date. Centennial timescale changes in Ireland are broadly consistent with global changes owing to our geographical situation between Europe (which is warming considerably faster than the global mean) and the North Atlantic (which is warming at a slower rate).
- f. **A.6** Globally averaged precipitation over land has likely increased since 1950, with a faster rate of increase since the 1980s. The frequency and intensity of extreme precipitation events has increased almost everywhere, particularly so in already wetter regions in the northern hemisphere, and a greater proportion of total precipitation is falling in extreme precipitation events across most of the globe.
- g. **A.7** Over Ireland median annual precipitation was 7% higher in the period 1991–2020, compared to the 30-year period 1961–1990. Regions where trends in precipitation since 1950 are significant have generally experienced overall annual increases. Analysis of local observations does not reveal evidence of a clear climate change signal in extreme precipitation indices due to natural variability. Overall, when aggregated, there has been an increase in heavy precipitation extremes across a range of indicators.
- h. **A.8** The rate of warming of the global ocean was likely faster in the past century than for any century since the last deglaciation event 11,000 years ago. Global sea level increased by approximately 0.20m between 1901 and 2018, and the rate of global sea level rise is accelerating. Consistent with global open ocean changes, Irish marine waters have experienced long-term acidification due to uptake of anthropogenic atmospheric carbon dioxide.
- i. **A.9** Recent studies have highlighted higher rates of sea level rise since the late 20th century in Cork and Dublin than the global average. Reasons for this are unclear and currently under investigation. There are a range of processes that can lead to local sea level changes diverging to a certain extent from global changes over a broad range of timescales.
- j. **A.10** Globally, over the last century there have been poleward and upslope movements of many terrestrial species in response to climate changes. There have also been changes in the timing of life cycle events, such as birds migrating and plants flowering in all mid-latitude regions. Changes in the marine biosphere are consistent with large-scale warming and changes in ocean geochemistry. The ranges of many marine organisms are shifting towards the poles and towards greater depths, but a minority of organisms are shifting in the opposite directions.
- k. **A.11** The main impacts of climate change on Irish terrestrial species and habitats observed to date have been changes in species abundance and distribution, lifecycle events, community composition, and habitat structure and ecosystem processes. These changes are in addition to much larger changes arising from other human interventions. In Irish waters, there have been substantial changes in marine ecosystems, including changes in seasonality and abundance of many species, including phytoplankton and zooplankton at the base of the food web. Many of these changes are consistent with a changing climate.
- l. **A.12** Global climate changes have been modified over Ireland by proximity to the North Atlantic and by internal climate system variability, mainly, but not exclusively, related to variations driven by the North Atlantic. Most notably, the Atlantic Multi-decadal Variability explains successive multi-decadal periods when Ireland has warmed or cooled relative to global trends."

C. Future global emissions will determine our future climate

- m. **C.5** Projections of Irish temperature changes consistently show warming, with the magnitude of this warming increasing with delays in global mitigation action. Under Early action, the temperature increase averaged across the island of Ireland relative to the recent past (1976–2005) would reach 0.91°C [0.44–1.10°C] by mid-century before falling back to 0.80°C [0.34–1.07°C] at the end of the century. Whereas under Late action, by the end of the century it is projected that the temperature increases could be 2.77°C [2.02–3.49°C]. Warming also generally increases with the climate sensitivity of the ESMs used for a given mitigation pathway (see Box SPM.1). Heat extremes will become more frequent and more severe and cold extremes will become less frequent and less severe with further warming.

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- n. **C.6** In Ireland, intense precipitation extremes are projected to become more frequent and extreme with further warming in most locations. Projected changes in precipitation accumulations are more uncertain than those for temperature. While winters tend to get wetter and summers tend to get drier, this signal is not consistently found across all global ESMs. There is also substantial sensitivity to the choice of ESM used to drive the national simulations. Changes averaged across the island of Ireland show a slight increase of < 10% in annual mean accumulated precipitation amounts.
- o. **C.8** Global sea level increases will be modified locally around the island of Ireland by ongoing isostatic rebound – the north-east of the island is slowly rising and the south-west slowly sinking (<0.2mm per year in most regions); multi-decadal ocean basin variability (order of several centimetres in a decade); and the relative contributions to sea level change arising from the Greenland and Antarctic Ice Sheets over time. Larger relative contributions from Greenland would result in smaller increases for Ireland and vice versa due to the gravitational effects of the two ice sheets.
- p. **C.9** Storm surges and extreme waves pose an ever-increasing threat to Ireland as sea levels continue to rise, including for many coastal cities such as Cork, Dublin, Galway and Limerick, and to critical infrastructure. Particularly at risk are soft sediment shorelines. Projections of changes in storminess are highly uncertain and translate into large uncertainties in future frequency and intensity of extreme waves.
- q. **C.10** Compound events are combinations of multiple climate impact drivers that occur at the same time, in the same area or both. The likelihood of both concurrent heatwave and drought conditions and storm surges with heavy precipitation have been observed to increase to date in Europe and are projected to further increase with additional warming.
- r. **C.12** Ireland will continue to experience seasonal to multi-decadal variability arising from natural internal variations in the climate system. These will serve to modulate aspects such as temperature, precipitation and storminess on seasonal to multi-decadal scales and, in doing so, periodically may reduce or enhance long-term global climate trends arising from human activities.
- s. **C.13** Current atmospheric carbon dioxide levels are higher than at any time since the Middle Miocene (14 to 16 million years ago), according to the latest consensus atmospheric carbon dioxide record from a global consortium of scientists who study past atmospheric composition using proxies. Paleo-temperature estimates for the North Atlantic Ocean off Ireland indicate sea surface temperatures 10 to 13°C warmer than present-day during the Middle Miocene. Early action would keep global mean surface temperature rise within the bounds of our and our ancestors' (genus Homo dates back 3 million years) past experience."

D. High-impact outcomes, although unlikely, cannot be ruled out

- t. **"D.4** For Ireland, the Atlantic Meridional Overturning Circulation (AMOC) is the most immediately important potential tipping point, given the importance of the North Atlantic in determining our climate and agricultural productivity. The AMOC will almost certainly weaken over the 21st century, and a full collapse cannot be ruled out. If there were to be a collapse in the AMOC, as has occurred repeatedly in the past during rapid climate transitions of past glacial phases, winters would become considerably colder and summers warmer, and there would likely be an increase in storminess and potential implications for sea level. These would have very profound implications for the Irish climate and society."

The EPA research report, Research 386: The Status of Ireland's Climate, 2020 (EPA, 2021)⁴⁷ provides a synthesis of the key climate-related changes recorded for the atmosphere, ocean and terrestrial aspects of Ireland's environment. The report states the following:

Atmosphere

- "Measurements of the main greenhouse gases – carbon dioxide, methane and nitrous oxide – at Mace Head, Co. Galway, show continued increases in levels, and those measured in 2019 are the highest observed since measurements began.
- Background carbon dioxide concentrations are now at 413 ppm [parts per million], which is estimated to be 50% higher than those of the pre-industrial era, while those of methane are at 1940ppb, representing

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an approximately 170% increase compared with pre-industrial levels. Nitrous oxide concentrations are now above 330 ppb [parts per billion], which is a 20% increase compared with pre-industrial levels.

- *Concentrations of chlorofluorocarbons (CFCs) have been dropping since 2004, following the implementation of the Montreal Protocol in 1989, banning the production and use of CFCs.*
- *The annual average surface air temperature in Ireland has increased by approximately 0.9°C over the last 120 years, with a rise in temperatures being observed in all seasons. This compares with a global average temperature estimated to be 1.1°C above pre-industrial levels.*
- *The number of warm spell days has increased slightly over the last 60 years, with very little change in cold spell duration. This is in line with what has been observed in many regions of the world.*
- *Annual precipitation was 6% higher in the period 1989–2018, compared with the 30-year period 1961–1990, and the decade 2006–2015 has been the wettest on record. An overall increase in precipitation has been observed across northern hemisphere mid-latitude land areas during the last 70 years.*
- *Analysis of wet and dry spells demonstrates an increase in the length of wet spell days across the country. No trend is apparent in dry spell days.*
- *Atmospheric sulphur levels show an approximately 80% reduction over a 35-year period (1980–2015), highlighting the success of regulation and technological advances. Nitrogen oxide emissions decreased by more than 38% between 1990 and 2018, due primarily to improvements in the Moneypoint power plant.*
- *Other materials, including organic matter and black carbon/soot, now dominate the background aerosol composition.”*

Ocean

- *“Satellite observations indicate that the sea level around Ireland has risen by approximately 2–3mm per year since the early 1990s, and analysis of sea level data from Dublin Bay show a rise of approximately 1.7mm per year since 1938, consistent with global average rates.*
- *The average sea surface temperature measured at Malin Head was 0.47°C higher over the last 10 years compared with the period 1981–2010.*
- *Measurements in the surface waters to the west of Ireland between 1991 and 2013 indicate an increase in ocean acidity that is comparable to the rate of change in other global ocean time series.*
- *Observations of some potentially harmful phytoplankton species since 1990 show an expansion of their growth season, with their presence being observed in almost all winter months since 2010.”*

Terrestrial

- *“River flows are generally increasing, although, when more recent data for a shorter period have been analysed, there are indications that flows may be decreasing in the south and east of the country.*
- *Land cover observations since 1990 show increases in the areas covered by artificial surfaces and forest, while there is a decrease in wetland areas. The volume of growing stock in forests increased by 38% over the period 2006–2017, thereby increasing the amount of carbon sequestered in forests. Long-term carbon storage in forests will be determined by the dynamic balance between growth and harvesting rates.”*

Section 5.3.6.3- Ireland’s Greenhouse Gas Emissions

Feedback: *More recent EPA Greenhouse Gas Emissions reports have since been published (May 2024).*

Amendment: Subsection on Greenhouse Gas Emissions Overview is reviewed and updated to reflect that the EPA has published a more recent report on GHG emissions (July 2024), as follows:

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The EPA in its report, Ireland's Final Greenhouse Gas Emissions 1990-2022 (May 2024)⁴² sets out Ireland's GHG latest emissions data. Ireland's national emission reduction objectives as set in the Climate Action and Low Carbon Development (Amendment) Act 2021, are to achieve a 51% emissions reduction (including LULUCF) by 2030 compared to 2018 and achieve a climate neutral economy by no later than the end of 2050. There are also annual binding emission allocations over the 2021-2030 period to meet that target. The EPA reported that for 2022, total national GHG emissions (excluding LULUCF) are estimated to have decreased by 1.9% on 2021 levels to 60.60 million tonnes carbon dioxide equivalent (Mt CO₂eq).

Agriculture is the largest contributor to the overall emissions at 38.5% of the total (excluding LULUCF). *Transport* and *Energy Industries* are the second and third largest contributors at 19.4% and 16.6% respectively. *Residential* and *Manufacturing Combustion* emissions account for 9.5% and 7.1% respectively. These five sectors accounted for 91.2% of national total emissions in 2022. The remainder is made up by the *Industrial Processes* sector at 3.8%, *F-Gases* at 1.2%, *Commercial Services* at 1.3%, *Public Services* at 1.1% and *Waste* at 1.4%.

The EPA's Ireland's Provisional Greenhouse Gas Emissions 1990-2023 report published in July 2024 sets out Ireland's GHG latest emissions data⁴³. In 2023, the total national GHG emissions (excluding LULUCF) are estimated to have decreased by 6.8% on 2022 levels, from 60.60 million tonnes carbon dioxide equivalent (Mt CO₂eq) in 2022 to 55.01 Mt CO₂eq in 2023⁴³.

The report states that overall emissions from the *Energy Industries* sector decreased by 21.6% in 2023, down 2.2 Mt CO₂eq on last year; this was due to a 12-fold increase in the amount of imported electricity (9.5% of electricity supply in 2023), in combination with an increase in the share of renewable energy to 40.7% in 2023.

Agriculture emissions decreased by 4.6% or 1.0 Mt CO₂eq in 2023. This was primarily due to an 18% reduction in fertiliser nitrogen use, leading to -0.43 Mt CO₂eq less emissions from agricultural soils. A 26.6% decrease in liming and a 2.1% reduction in methane from livestock in combination represent -0.46 Mt CO₂eq.

Emissions from the *Transport* sector increased by 0.3% or 0.03 Mt CO₂eq in 2023, having already increased by 6% in both 2021 and 2022. Emissions in 2023 are 4.3% below 2019 pre-COVID levels. In 2023 the increased use of biofuels and electric vehicles slowed growth in emissions in this sector due to increases in the national fleet and a growing workforce.

Emissions from the *Residential* sector declined substantially for a second year running (-7.1% or 0.4 Mt CO₂eq), with 2023 being a low point in emissions since 1990. A milder weather contributed to reduced fossil fuel use, as coal, natural gas and peat use declined by 22.1%, 13.9 and 13.0% respectively. Over 25,000 heat-pumps were installed in Irish homes in 2023 bringing the total to 120,000 with renewable ambient heat increasing by almost 25%.

Manufacturing Combustion and *Industrial Processes* decreased by 5.1% to 6.3 Mt CO₂eq in 2023 due to declines in fossil fuel usage. Total emissions (combustion and process) from the cement sector decreased by 6.2% to 2.7 Mt CO₂eq in line with a reduction in clinker production.

Agriculture is the largest contributor to overall emissions at 37.8% of the total (excluding LULUCF). *Transport* and *Energy Industries* are the second and third largest contributors at 21.4% and 14.3% respectively. *Residential* and *Manufacturing Combustion* emissions account for 9.7% and 6.8% respectively. These five sectors accounted for 90.7% of national total emissions in 2023. The remainder is made up by the *Industrial Processes* sector at 3.9%, *F-Gases* at 1.2%, *Commercial Services* at 1.3%, *Public Services* at 1.2% and *Waste* at 1.5%.

Figure 5.14 presents the inter-annual change in total GHG emissions; 1990 is the historical base year used by most countries in relation to UNFCCC reporting. Sectoral shares of emissions are presented in **Figure 5.15** show the GHG emissions by sector. Ireland's emissions profile has changed considerably since 1990, with the contribution from transport more than doubling and the share from agriculture reducing since 1998.

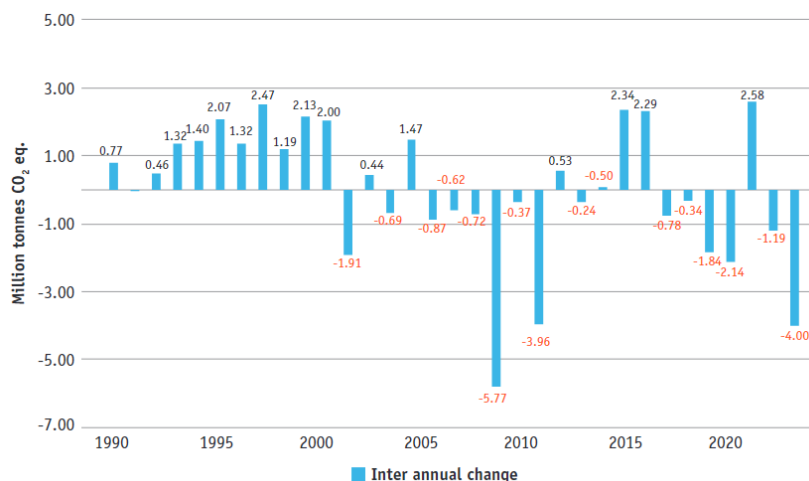
⁴² EPA (May 2024) Ireland's Final Greenhouse Gas Emissions 1990-2022. Available at: <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/Ireland's-final-greenhouse-gas-emissions-1990-2022.php>

⁴³ EPA (July 2024). Ireland's Provisional Greenhouse Gas Emissions 1990-2023. Available at: <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-Provisional-GHG-Report-Jul24-v6.pdf>

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However, since 2011, emissions have trended upwards again with an overall peak in emissions reported in 2021. Between 1990 and 2022, *Transport* shows the greatest overall increase of GHG emissions at 128.5%, with road transport increasing by 132.6%.

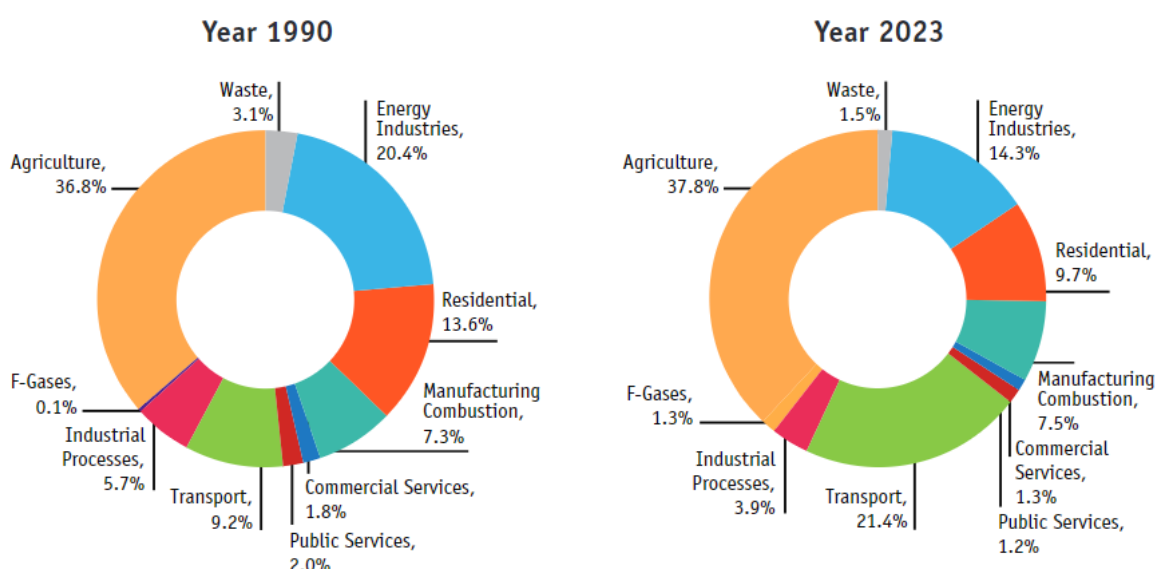
Figure from previous EPA report is replaced with the figure below from the most recent EPA Report (July 2024):



Source: EPA (May/July 2024). Figure 1 from Ireland's Final Greenhouse Gas Emissions 1990-2022 2023. Available at: <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/Ireland's-final-greenhouse-gas-emissions-1990-2022.php>
<https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-Provisional-GHG-Report-Jul24-v6.pdf>

Figure 5-14: Inter-annual changes in GHG emissions 1990-2022

Figure from previous EPA report is replaced with the figure below from the most recent EPA Report (July 2024):



Source: EPA (May/July 2024). Figure 2 from Ireland's Final Greenhouse Gas Emissions 1990-2022 2023. Available at: <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/Ireland's-final-greenhouse-gas-emissions-1990-2022.php>
<https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-Provisional-GHG-Report-Jul24-v6.pdf>

Figure 5-15: Comparison of GHG Emissions Share by Sector (excl. LULUCF), 1990 versus 2022

The following text and table is also updated to reflect the latest published EPA report (July 2024) as follows:

Decreases in emissions were observed in all sectors except for *Transport* and *LULUCF*, with increases in emissions of +0.3% and +40.9% respectively. *Waste* and *Commercial Services*, with increases in emissions

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of +6.0% and +6.6% respectively, while ~~Commercial Services~~ remained unchanged at 0.0%; refer to table 5-10.

Table 5-10: Ireland's National GHG Emissions Changes 2021—2022 2022 vs. 2023

Sector, Mt CO ₂ eq	2021	2022	% Change
Agriculture	23.436	23.357	-0.3%
Transport	11.089	11.751	+6.0%
Energy Industries	10.262	10.078	-1.8%
Residential	6.879	5.787	-15.9%
Manufacturing Combustion	4.614	4.302	-6.8%
Industrial Processes	2.472	2.288	-7.4%
F-Gases	0.745	0.741	-0.5%
Commercial Services	0.765	0.765	0.0%
Public Services	0.672	0.657	-2.2%
Waste	0.823	0.878	+6.6%
LULUCF	4.628	3.983	-13.9%
Total excluding LULUCF	61.755	60.605	-1.9%
Total including LULUCF	66.383	64.588	-2.7%

Mt CO ₂ eq	2022	2023	% Change
Agriculture	21.795	20.782	-4.6%
Transport	11.760	11.791	0.3%
Energy Industries	10.003	7.845	-21.6%
Residential	5.753	5.346	-7.1%
Manufacturing Combustion	4.334	4.133	-4.6%
Industrial Processes	2.288	2.155	-5.8%
F-Gases	0.741	0.699	-5.7%
Commercial Services	0.751	0.732	-2.5%
Public Services	0.696	0.677	-2.7%
Waste	0.881	0.846	-4.0%
LULUCF	3.983	5.614	40.9%
Total excluding LULUCF	59.003	55.007	-6.8%
Total including LULUCF	62.986	60.620	-3.8%

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Source: EPA – Latest Emissions Data [Latest emissions data | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/Ireland's-final-greenhouse-gas-emissions-1990-2022.php) Note: The Latest Emissions Data page presents final the provisional 1990–2022 2023 Inventory data (updated May July 2024) and the EPA's latest 2023–2030 projections estimates (updated May 2024)

Feedback: More recent EPA Greenhouse Gas Emissions reports have since been published (May 2024).

Amendment: Subsection on European Targets under the Effort Sharing Regulation is reviewed and updated to reflect the most recent EPA data that has since been published for 2023, as follows:

The EPA reports in Ireland's Final ~~Provisional~~ Greenhouse Gas Emissions 1990–2022 2023 (EPA, 2024) that Ireland's Effort Sharing Regulation (ESR) GHG emissions annual limit for 2022 is 42.36 Mt CO₂eq (i.e., for the sectors covered by the annual Climate Action Plans). Ireland's final 2022 GHG ESR emissions are 45.90 Mt CO₂eq (3.54 Mt CO₂eq more than the annual limit for 2022). This value is the national total emissions minus emissions generated by stationary combustion (i.e., power plants, cement plants, and domestic aviation operations that are within the EU's ETS). This indicates that Ireland is not in compliance with its 2022 ESR annual limit, exceeding the allocation by 1.63 Mt CO₂eq after using the ETS flexibility, and by 0.81 Mt CO₂eq after utilising both the ETS and LULUCF flexibilities. under the EU's Effort Sharing Regulation (ESR), Ireland also has a target to deliver a 42% reduction of emissions to 2005 levels by 2030. The ESR includes sectors outside the scope of the EU Emissions Trading System (EU-ETS) such as *Agriculture, Transport, Residential, Public/Commercial Services and Waste* and is also referred to as a 'non-ETS'. ESR emissions are therefore the national total emissions minus the emissions generated by stationary combustion and aviation operators, which fall under the ETS. The provisional 2023 estimates of GHG emissions indicate that Ireland exceeded its 2023 annual emission limit, without the use of flexibilities, by 2.27 Mt CO₂eq. However using the ETS flexibility, Ireland can meet compliance with the ESR for 2021–2023 (EPA, 2024).

It should be noted that the final quantity of LULUCF flexibility available to Ireland will be finalised in 2032. The Agriculture and Transport sectors accounted for 76.4% of total ESR emissions in 2022; refer to **Table 5-11**.

Table 5-11: Ireland's Compliance with EU Effort Sharing Regulation Targets 2021–2025

Figure from previous EPA report is replaced with the following figure from the updated report.

	2021	2022	2023	2024	2025
Total greenhouse gas emissions without LULUCF	60,191	59,003	55,007		
– Total verified emissions from stationary installations under Directive 2003/87/EC	15,320	14,686	12,189		
– CO ₂ emissions from domestic aviation	20	21	31		
Total ESR emissions	44,852	44,295	42,787		
EU ESR Targets†	43,479	42,357	40,520	38,683	36,845
Gross distance to target	-1,372	-1,938	-2,267		
+ annualised ETS flexibility †	1,908	1,908	1,908	1,908	1,908
Net distance to target	536	-30	-359		

Source: Table 3 from EPA (May July 2024) Ireland's ~~Final~~ ~~Provisional~~ Greenhouse Gas Emissions 1990–2022 2023. Available at: <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/Ireland's-final-greenhouse-gas-emissions-1990-2022.php> <https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/EPA-Provisional-GHG-Report-Jul24-v6.pdf>

Note: The EPA has rounded all numbers in the table to the nearest kt CO₂eq.

* Flexibility projected under the EPA's "With Existing Measures" scenario

† Set out in Annex II and Annex III of Commission Implementing Decision (EU) 2020/2126

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Section 5.3.7.2- Energy in Ireland

Feedback: *Delivering on energy security is broadly positive, as noted in the SEA ER of the final NECP 2021-2030, and should be considered having regard to addressing energy security in the draft NPF and the SEA ER.*

Amendment: The following text has been added in relation to Energy Security.

Energy Security

Energy Security is defined as having sufficient levels of energy to meet demands and providing uninterrupted availability of energy at affordable pricing. Energy security is a vital aspect where it has effects onto the provisions of basic human needs. Moreover, energy security is an aspect which has significant impacts effecting a nation's economic growth, political stability, and overall development and security of other sectors such as agriculture and manufacturing. There is a rapid expansion for energy demand due to population growth, economic improvement and transition toward energy uses (e.g. renewable energy) has potential to impede on Ireland's energy security.

Indigenous energy is considered to be more secure compared with imported energy. According to the SEAI's report on Energy Security in Ireland (SEAI, 2020)⁴⁴ import dependencies on energy imports had decreased from 89% between 2001 and 2015 to 67% in 2018. This trend reversed however, with 77% and 82% of Ireland's energy supply imported in 2021 and 2022 respectively⁴⁵. Ireland would be considered one of the most energy import dependant nations in the European Union particularly for oil which makes up 73% of all imports as of 2018. Over the period of 2005 to 2018, it was noted there was an overall improvement in Ireland's energy security according to the supply/demand index. This energy security is likely to continue to improve due to the improved utilisation of indigenous renewable energy supplies which will displace the use of imported oil and gasses. There is a possibility that Ireland's reliance on oil and gas (accounting for 80% of Ireland's primary energy) may have a negative effect on energy security due to the depletion of Europe's resource. DECC's Energy Security in Ireland to 2030 (Energy Security Package) published in January 2024 outlines a need to move away from an oil, peat, coal and gas based energy system to an electricity based system which increases use of indigenous renewable energy sources; refer to **Figure 5.28**.

Since the last NPF was published the risk environment regarding security of Ireland's gas supplies has changed, with significant damage to subsea gas interconnectors experienced in the Baltic Sea and to Nord Stream pipelines in recent years. Ireland is currently dependent on c.80% of its gas supplies being imported via two sub-sea pipelines with the UK. This gas currently generates c.50% of Ireland's electricity per year. This changing risk profile is recognised in the published National Risk Assessment 2023 and the Energy Security Package 2023. Given the changing geo-political system, risks of sabotage or threats to undersea infrastructure have become more material.

The National Risk Assessment (NRA) for Ireland forms part of the state's risk management strategy. The NRA identifies key risks with the potential to trigger emergencies requiring national level coordination, managed by the lead government department as chair of a National Emergency Coordination Group. It provides a basis on which risk management, including mitigation measures, planning and preparedness can be prioritised.

In this regard, it is noted that the SEA Environmental Report of the Government's National Energy and Climate Plan 2021-2030, states that delivering on energy security is broadly positive over the short, medium and long term, for the SEO assessment criteria of the NECP.

Delivering on energy security is, therefore, not only required but broadly positive over the short, medium and long term, particularly for the SEOs PPH (i) 'to create an environment where every individual and sector of society can play their part in achieving a healthier, sustainable and climate-neutral Ireland' and CF (v) contribute to achieving the national climate objective to transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050'.

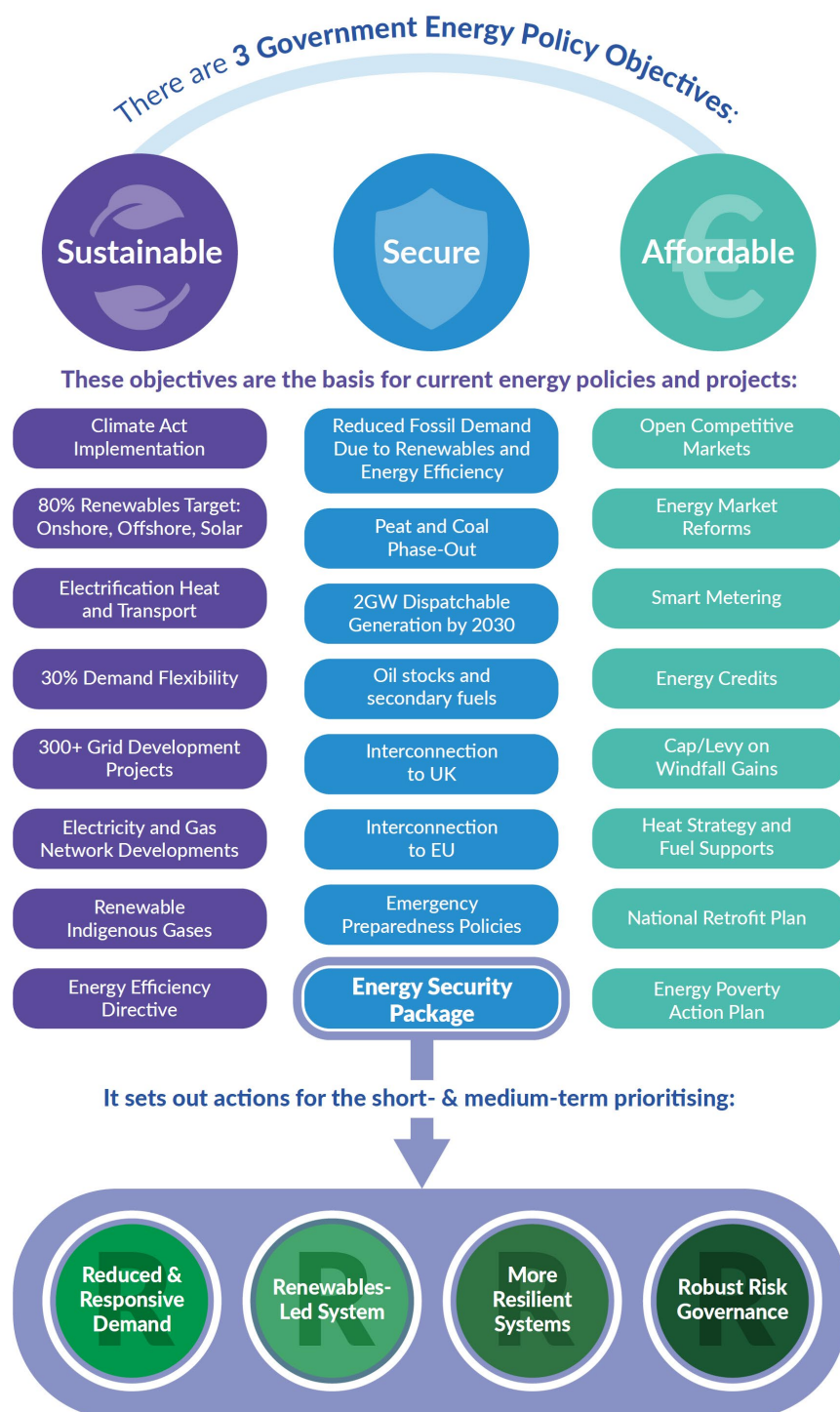
⁴⁴ SEAI (2020) Energy Security in Ireland 2020 Report.

⁴⁵ SEAI (September 2023) National Energy Balance. Available at: [National Energy Balance | Key Publications | SEAI](#)

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There are some risks associated with potentially losing installed capacity from existing renewable energy projects in Ireland and the associated related population and human health and socio-economic impacts, with particular regard to energy security and electricity generation adequacy, required emissions reductions, international economic competitiveness and lower wholesale energy prices.

Roadmap to **Energy Security** in Ireland



Source: Figure 5, *Energy Security In Ireland to 2030* (Government of Ireland, 2023). Available at: <https://www.gov.ie/en/publication/5c499-energy-security-in-ireland-to-2030/>

Figure 5-28: Roadmap to Energy Security in Ireland

Section 5.3.7.4- Water Supplies and Wastewater Treatment

Feedback: *More recent report on Drinking Water Supplies should be referenced (2024).*

Amendment: The following section is updated following the more recent publication of the EPA Drinking Water Quality in Public Supplies 2023 report (EPA, 2024), as follows:

The EPA Drinking Water Quality in Public Supplies Report published in 2022 ~~2024~~, reported that over 99.7% of public water supplies complied with bacterial and chemical limits but 481,000 ~~561,000~~ people were served by “at-risk” supplies on the EPA’s Remedial Action List (RAL), up from 374,000 ~~481,000~~ people in 2021 ~~2022~~; ~~this increase was mainly due to the presence of~~ ~~It was further reported that persistent trihalomethane (a byproduct of water treatment processes) failures were detected at supplies serving 235,000 people, doubling the population affected since 2021.~~ The latest version of the RAL was published in Q4 ~~Q2 2023-2024~~⁴⁶; 57 ~~50~~ drinking water supplies across the country require some form of remedial action/ treatment improvement related to e.g., inadequate disinfection, inadequate treatment for *Cryptosporidium*, elevated trihalomethanes, elevated pesticides, turbidity etc. The counties with a water supply or supplies currently on the RAL are: Carlow, Clare, Cork, Donegal, Galway, Kerry, Kildare, Kilkenny, Limerick, Longford, Louth, Mayo, Meath, Monaghan, Offaly, Roscommon, Tipperary, Waterford, ~~and Wexford and Wicklow.~~

Section 5.3.7.5- Circular Economy and Waste Management

Feedback: *EPA’s Circular economy and waste statistics highlights report 2021 (EPA, 2023) should be taken into account, as appropriate.*

Amendment: The following text has been added in relation to

The EPA report, Circular Economy and Waste Statistics Highlights Report 2021 (EPA, 2023) reports that while there are relatively steady trends in the generation of municipal, managed household, packaging, hazardous and WEEE wastes, that construction and demolition waste generation has seen a large increase in volumes since 2014, jumping again since 2018. The EPA reports that in order to meet 2025 recycling targets, efforts need to be focused on reducing waste generation in the first instance and improving source segregation. The EPA reports that the latest waste characterisation report shows households and businesses are not segregating wastes correctly and many do not have a separate organic waste bin.

Section 5.3.7.8- Existing Environmental Pressures/Problems: Material Assets

Feedback: *ER would benefit from inclusion of additional descriptors of environmental impacts from interruptions in supply of energy, particularly potential impacts on population and human health and socio-economic (with particular regard to competitiveness/ maintaining FDI, to support Ireland’s long term sustainable development).*

It is important that the ER and final revised NPF directly support the repowering of existing renewable energy projects.

Amendment: The following text has been added in relation to energy security.

Energy security is an aspect which has significant impacts effecting a nation’s economic growth, political stability, and overall sustainable development and security. . There has been an increase in energy demand due to population growth and economic development which is taking place alongside a transition away from dependence on imported fossil fuels toward indigenous renewable energy sources. An over- reliance on imported fuels may have a negative effect on social and economic stability of Ireland especially in the current geopolitical climate. Recent international conflict has impacted on Irelands energy supply in the last number of years leading to increased energy costs with knock on effects throughout the economy. This in turn can

⁴⁶ EPA (2023 ~~2024~~) Drinking Water Supply Remedial Action List Q4-2023 ~~Q2 2024~~. Available at: <https://www.epa.ie/publications/compliance-enforcement/drinking-water/annual-drinking-water-reports/epa-drinking-water-remedial-action-list-q4-of-2023.php> <https://www.epa.ie/publications/compliance-enforcement/drinking-water/annual-drinking-water-reports/epa-drinking-water-remedial-action-list-q2-of-2024.php>

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negatively impact on FDI and international competitiveness. A December 2024 paper⁴⁷ commissioned by Friends of the Irish Environment reported that despite the increase in energy demand from data centres has used up much of the deployment of renewable energy in Ireland since 2017. In the short term at least this may compromise Ireland's ability to meet climate targets and improve its energy security.

Ensuring energy security has positive effects in terms of security of indigenous energy supply (particularly through the rollout of renewable energy generation) as well as aspects such as interconnection and strengthening of energy markets across jurisdictions.

- Potential for the role of repowering existing renewable energy projects in terms of maintaining installed capacity subject to the outcomes of environmental assessments.

Section 5.3.8.1- Overview of Cultural Heritage Protection in Ireland

Feedback: *ER Section 5.3.8.1 Overview of Cultural Heritage Protection in Ireland has omitted any reference to National Monuments.*

Amendment: The following section has been added to include a description of National Monuments, as follows:

National Monuments

The term “national monument,” as outlined in Section 2 of the National Monuments Act (1930), refers to a monument whose preservation is of national significance due to its historical, architectural, traditional, artistic, or archaeological value. There are over 1,000 individual monuments at 760 locations, that have been taken into ownership or guardianship by the State. These are monuments the preservation of which is a matter of national importance by reason of the archaeological, architectural, historical, traditional or artistic interest attaching to it. These sites are legally protected under the National Monuments Acts. The Consent of the Minister is required for interference with such National Monuments or ground disturbance around or in proximity to them. There are over 1,000 individual monuments at 760 locations in ownership or guardianship of the Minister and those subject to a Preservation Order and a list of these Monuments is published on our website www.archaeology.ie.

Feedback: *Text on World Heritage Sites should be updated: The Tentative List was updated in 2022 and now includes only the following three sites: The Passage Tomb Landscape of County Sligo; Royal Sites of Ireland: Ancient Irish Sites of Royal Inauguration; Transatlantic Cable Ensemble.*

Amendment: The Tentative List was updated in 2022 and now includes only the following three sites:

~~Early Medieval Monastic Sites of Clonmacnoise, Durrow, Glendalough, Inis Cealtra, Kells and Monasterboice;~~

~~The Burren;~~

~~Cóide Fields and North West Mayo Boglands;~~

~~The Historic City of Dublin;~~

~~The Monastic City of Clonmacnoise and its Cultural Landscape;~~

~~The Royal Sites of Ireland: Cashel, Dún Ailinne, Hill of Uisneach, Rathcroghan Complex and Tara Complex;~~

~~The Western Stone Forts;~~

The Passage Tomb Landscape of County Sligo;

Royal Sites of Ireland: Ancient Irish Sites of Royal Inauguration; and

Transatlantic Cable Ensemble

⁴⁷ [Report-data centres-FoE2024-HDaly - final](#)

Section 5.3.8.2- Other Heritage

Feedback: *Highlights that the full suite of cultural heritage has protections that extend beyond the body of statutorily designated scheduled monuments/ listed buildings and a link is provided to the latest online map viewer and a data source for wrecks and recorded losses.*

Amendment: A note has been added on the availability of GIS datasets for Northern Ireland, as follows:

It is noted that a large number of heritage assets predate the border with Northern Ireland. Such features, including bridges and mill races for instance, traverse the border. Some wrecks occur in shared bays and coastal areas such as Carlingford Lough and There are associated transboundary qualities of these features which includes the inter-relationships of sites, buildings and places and their heritage setting. [GIS datasets for Northern Ireland's wrecks and recorded losses can be obtained on request through the Department for Communities Historic Environment Division \(HED\) \(HED Map Viewer 2024\).](#)

Section 5.3.9.1- Landscape Assessment in Ireland

Feedback: *Definition of landscape should be amended to reflect the definition in the Planning Act, as amended and in the European Landscape Convention.*

Amendment: In the absence of national or regional guidance and assessments, local authorities currently conserve and protect scenic value as areas of high amenity, high sensitivity, areas of outstanding natural beauty, protected views and similar designations, but the approach is uncoordinated and can lead to different prioritisations in neighbouring counties. Each local authority is responsible for the designation of these within their individual jurisdictions, with each development plan providing objectives to protect such scenic values. It is noted the National Landscape Strategy [includes the definition for landscape as provided in the European Landscape Convention done at Florence on 20 October 2000 \(Landscape Convention\):](#)

'an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.'

However, it does not specifically mention 'seascape'. The Landscape Convention however states ~~but is included as part of the Landscape Convention:~~ *'The Convention covers natural, urban, peri-urban and rural areas, encompassing land, inland water, coastal and marine areas.'*

Feedback: *Reference could be made to the EPA's Good practice guidance on SEA and landscape (EPA, 2023), which could help inform the integration of landscape considerations in the SEA process. The*

REFRAME EPA funded research project will provide a toolkit for how landscape character assessments can be undertaken in a consistent manner (due for finalisation later this autumn).

Amendment: The following text has been added

[In December 2023, EPA published a Good practice guidance on Strategic Environmental Assessment \(SEA\) and Landscape that aims to ensure that landscape considerations are integrated as part of the SEA of plans, policies and programmes in Ireland. The REFRAME project, funded by the EPA, has developed a robust LCA Toolkit designed for agricultural contexts, targeting agri-environmental and rural development schemes. The Toolkit aims to have broader applications, including forward planning, strategic environmental assessment, and other land use sectors such as forestry, tourism, and renewable energy. The main aim of this Toolkit is to reposition landscape character as a fundamental environmental element in land use planning and management.](#)

Section 5.3.9.4- Existing Environmental Pressures/Problems: Landscape and Seascape

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

Amendment: The following paragraph has been amended as follows:

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Development activities resulting may place pressure on sites or features of scenic or amenity value. 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. While it is acknowledged that a number of local authorities have undertaken LCA, not every authority has done so, and the absence of a cohesive national landscape character assessment strategy which seeks to preserve and /or protect such historical and cultural landscapes, landscapes of amenity and social value and features of scenic value places much of the emphasis on local authorities, and the approaches taken are often not consistent. However the publication of a regional seascape character assessment in 2020 has bridged some the gap in relation to a consistent approach to seascapes.

Section 5.3.11- Evolution of the Baseline in the absence of the Draft NPF First Revision

Feedback: *Appears to be a discrepancy between the NPF and the SEA regarding Food Vision. The SEA states that FV drives intensification of agriculture which would continue without the revision of the NPF. However, NSO 3 and NPO 34 appear to support Food Vision to support the agri food sector. It is unclear how the NPF is responsible for mitigating land use intensification in the agri sector as suggested by text in Table 5-15 of the SEA ER.*

Amendment: Text in Table 5-15 for Biodiversity, Flora and Fauna has been amended as follows:

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 agricultural activities and agri-food sector operating under various sectoral plans that are being implemented. 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.

Chapter 6- Framework for Assessment

No further amendments.

Chapter 7- Consideration of Alternatives

No further amendments.

Chapter 8- Assessment of the Draft First Revision to the NPF

8.3: Assessment of Preferred Scenario

8.3.1 Chapter 1 – The Vision

Assessment and Discussion

Feedback: *Section 8.3.1 Chapter 1 – The Vision: Assessment should recognise the equal importance of a Cultural Heritage Impact Assessment (CHIA) in environmental reporting for non-mandatory EIA, and that it should be included in the list of non-statutory assessments that may be appropriate in supporting decision-making.*

Amendment: The following text has been added to the assessment and discussion of NPO1:

The supporting text for this NPO is also considered important as it includes a wider consideration than purely statutory reporting. This is particularly important where planning applications do not require mandatory EIA. In these cases, there is still potential for environmental and ecological effects which need to be addressed in order to achieve proper planning and sustainable development outcomes. It may be the case that planning applications for projects falling outside not requiring EIA may require to include supporting environmental reporting to cover key project issues, such as the preparation of Environmental Reports, Ecological Impact Assessments (EclA) and Cultural Heritage Impact Assessment (CHIA) Reports for certain projects with relevant and proportionate information to help inform decision making. These and other similar tools can be used by planning authorities to assist in development consenting. In Northern Ireland, for example a Biodiversity Checklist¹²² approach is used for any projects seeking planning consent and it is considered that a similar approach could be helpful for Ireland also.

Mitigation Proposed

~~NPO 1: The previous supporting text should include reference to be reinstated with minor amendments as it acknowledges the need for other non-statutory assessments to support environmental and ecological reporting. This is particularly important for ecology as Ecological Impact Assessments (EclA) inform statutory assessment such as EIA and NIS and other planning decisions which may not require full EIA. This mitigation has now been partially integrated into the final draft NPO.~~

The supporting text should also include reference to Environmental Reports and Water Framework Directive (WFD) Assessment, as follows:

At the project level, all applications for development consents for projects emanating from any policies that may give rise to likely significant effects on the environment will need to be accompanied by one or more of the following, as relevant:

- Ecological Impact Assessment Report (EclA) (including a biodiversity checklist tool or similar, if deemed relevant and proportionate);
- *Environmental Report if deemed relevant and proportionate;*
- *Water Framework Directive (WFD) Assessment of projects if deemed relevant and proportionate;*
- Environmental Impact Assessment Report (EIAR) if deemed necessary under the relevant legislation (statutory document); and
- Natura Impact Statement (NIS) if deemed necessary under the relevant legislation (statutory document).

8.3.2 Chapter 2 – A New Way Forward

Feedback: *Nothing in the revision of the NPF itself or in the SEA assessment which speaks to the transformative change necessary with regard to GHG emissions, and entrenchment in significant GHG-emitting behaviours and development.*

The SEA does not contain analysis of the carbon emissions associated with the Draft Revised NPF. There is no assessment of these against the legal requirements of the national carbon budgets and sectoral

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emissions ceilings. We consider that this analysis should underpin the entire NPF and should be provided before the SEA and Revised NPF are finalised.

Amendment: The following text has been added to the assessments supporting Chapter 2 – A New Way Forward.

From a national policy perspective, the National Planning Framework (NPF) provides an established means to implement and integrate climate change objectives, including adaptation, at local level and the transition to a climate neutral and climate resilient society. There has been significant development in national climate policy since the adoption of the NPF in 2018 through updated National Adaptation Framework 2024 and this is reflected in new and enhanced policy approaches proposed as part of the NPF First Revision. New policies in relation to renewable energy development, district heating, biodiversity, green and blue infrastructure and nature based solutions are proposed in the Revision.

The overall vision in the National Planning Framework is one of compact growth, sustainable mobility and transition to a low carbon and climate resilient society and the objectives supporting these outcomes are critical to the framework. By focussing on consolidated growth in five key cities and a number of large towns, there are opportunities to achieve the critical mass needed for vibrant and vital public transport options. This in turn is supported by opportunities for new energy systems and transmission grids to provide a more distributed, renewables-focused energy generation system, harnessing both on-shore and off-shore potential from energy sources such as wind, wave and solar and connecting the richest sources of that energy to the major sources of demand.

The population projections in this First Revision to the NPF must be seen in the context of this overall vision and furthermore in the context of a suite of other inter-related national policy contributing to meeting the national transition objectives towards a low carbon economy by 2050. The Government has committed to achieving targets underpinned by the adoption of a series of carbon budgets and national Climate Action Plans over the period to 2050, informed by UN and EU policy. In addition to legally binding targets agreed at EU level, the national climate objective under Section 3(1) of the Climate Action and Low Carbon Development (Amendment) Act 2021 for Ireland to transition to be a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy no later than 2050.

The annual Climate Action Plan is the principal mechanism by which climate action is being implemented by Government and how the carbon budgets are to be met. This looks holistically at the cross-sectoral actions needed. The annual nature of the plan reflects the Governments understanding of the need for dynamic responses as situations evolve. It is clear from the latest State of the Environment Report (EPA 2024) that more actions will be needed and with faster implementation.

8.3.3 Chapter 3 – Effective Regional Development

Correction of enabler reference numbering as follows in blue text:

8.3.3.4 Key Future Growth Enablers for Galway

Mitigation Proposed

G3: Although this enabler is unchanged, it is noted that similar enablers such as D2 for Dublin and C2³ for Cork related to sustainable development in greenfield areas have been revised to include 'brownfield areas'. It is recommended that G3 is revised to include this reference as prioritising infill development into brownfield sites over greenfield sites can offer positive implications for BFF, LS and W.

8.3.3.7 Key Future Growth Enablers for Limerick

Mitigation Proposed

L6⁷: It is noted that similar enablers related to sustainable development in greenfield areas have been revised to include 'brownfield areas' such as D2 for Dublin and C2³ for Cork. It is therefore recommended that this enabler is revised to include this reference as prioritising infill development into brownfield sites over greenfield sites can offer positive implications for BFF, LS and W.

8.3.3.8 Key Future Growth Enablers for Waterford

Mitigation Proposed

W4: It is noted that similar enablers related to sustainable development in greenfield areas have been revised to include 'brownfield areas' such as D2 for Dublin and C2³ for Cork. However, it is recommended that this enabler is revised to include this reference as prioritising infill development into brownfield sites over greenfield sites can offer positive implications for BFF, LS and W.

8.3.9 Chapter 9 – Climate Transition and our Environment

Feedback: *Welcomes comprehensive discussion of other plans and programmes in Chapter 4. Recommend updating refer to the Nature Restoration Law to refer to its adopted status.*

Amendment: It is noted that the feedback received is in relation to Chapter 4 of the SEA ER. All the references in Chapter 4 reflect the adoption of the EU Nature Restoration Law. However, a reference to Nature Restoration Law has been updated in the SEA assessment for NPO 82 of the draft Revised NPF as follows:

NPO 82 recognises the value of blue and green spaces at both regional and city scale. The proposed additions to the NPO aim to promote and support increased provision of green/blue spaces as well as increase tree canopy cover in the settlements, which is broadly positive across the SEOs. The tree cover element reflects one of the key objectives of the ~~new proposal for an~~ EU Nature Restoration Law, which proposes that that Member States shall ensure a minimum 10% tree cover in all cities and in towns and suburbs.

Appendices to Environmental Report

The Appendix was missing its reference which caused the naming of the appendices to be out of place. The correct naming of the appendices in the SEA Environmental Report are as follows:

- Appendix A- SEA Guidance and Circulars Used in Preparation
- Appendix B- Summary of Scoping Responses and How They Have Been Addressed
- Appendix C- Summary of SEA Scoping Workshop
- Appendix D- RESPF GIS Methodology
- Appendix E- Relevant Plans and Programmes

Appendix E- Plans and Programmes

Feedback: *References to Food Wise 2025 (page 279) should be reviewed in the context that it was superseded by Food Vision in 2021.*

Amendment: Noted. The following row has been deleted from Appendix E as it was not relevant in the context when reviewed:

Food Wise 2025- Food Wise is sets out the strategic plan for the development of the Irish agri-food sector over the next decade. Growth projections include increasing the value added in the agri-food, fisheries and wood products sector by 70% to in excess of €13 billion. Sustainable production at its core setting out a range of specific recommendations aimed at managing the projected growth in a sustainable way. There is a strong commitment to the measurement and monitoring of the sustainability credentials of the sector as the strategy rolls out.

Feedback: *The Assembly queried the references in Appendix E of the SEA Environmental Report and sought confirmation that it is taking into account the most recent Regional Spatial and Economic Strategies for the three regional assemblies (published in 2019 and 2020) to ensure clarity and completeness.*

Amendment: The following row for Regional Spatial and Economic Strategies has been updated as follows:

SEA Statement

~~Regional Spatial and Economic Strategies (RSES) are intended to replace the current Regional Planning Guidelines. The RSEs are expected to cover the period 2016-2022. Regional structures and functions are currently being revised and strengthened; the existing eight regional authorities and two assemblies are being replaced by three new Regional Assemblies to perform an updated range of strategic functions. In addition to formulating RSEs, the main functions of the new Regional Assemblies will also include strategic functions under relevant legislation, functions that relate to EU funding programmes as well as oversight of local authority performance and the implementation of national policy.~~ The Regional Spatial and Economic Strategies (RSES) are a strategic plans which identify regional assets, opportunities and pressures and provide appropriate policy responses in the form of Regional Policy Objectives. The country is divided into three regions for the purpose of regional planning and each region has prepared a RSES: Eastern and Midland Region 2019-2031; Southern Region 2020-2032 and Northern and Western Region 2020-2032. These strategies will be updated in line with the changes to the Revised NPF in due course.

Feedback: *The Assembly recommends updating Appendix E to include references to the thirty-one City and County Development Plans and that a review of same is undertaken to inform the revised SEA.*

Amendment: The following row for County Development Plans has been updated as follows:

~~This City and County Development Plan is the county's principle strategic planning policy document. Detailed land use zoning maps for the main settlements of the county are contained in the Electoral Area Local Area Plans and the Special Local Area Plans.~~

~~It is a six year development plan for the County that attempts to set out, as concisely as possible the County's current thinking on planning policy.~~ County and City Development Plans are the key delivery mechanisms for sustainable development at the local scale. The plans must be consistent with the NPF and their relevant Regional, Spatial and Economic Strategy in a well established hierarchy of tiered planning. The development plans express through their written statement and their land use zoning maps and objectives, also sets out the overall planning and sustainable development strategy for the county in line with the upper tier planning documents, which must be consistent with the National Spatial Strategy 2002-2020 and the Regional Planning Guidelines 2010-2022.