



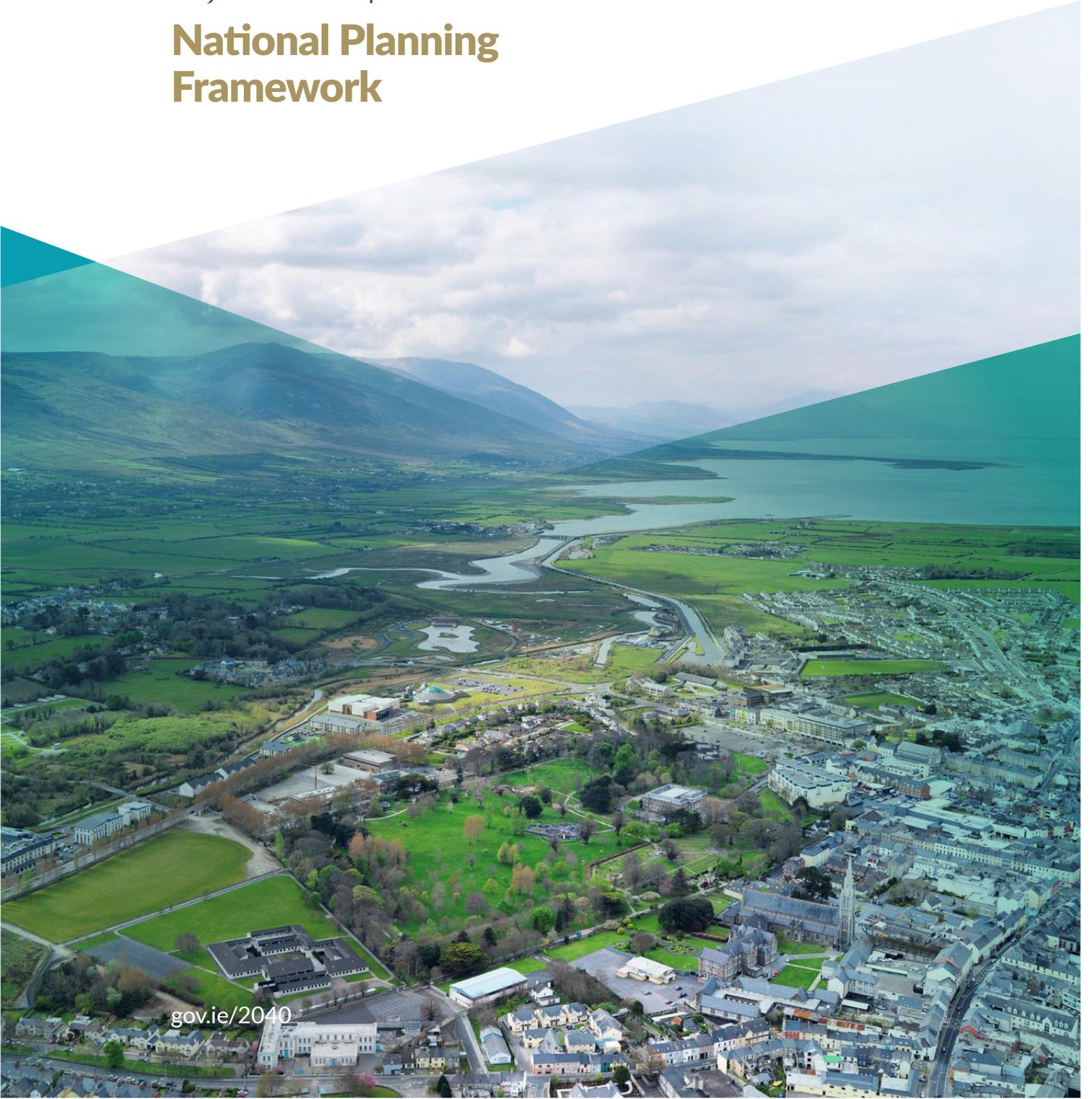
Rialtas na hÉireann
Government of Ireland

RPS

SEA Statement

Project Ireland 2040

National Planning Framework



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1 INTRODUCTION

The Department of Housing, Planning, and Local Government [DHPLG], has prepared a national planning framework called ‘Project Ireland 2040 – the National Planning Framework’ (hereafter referred to as the “NPF”) which will provide context for planning development for the next decade and beyond. The objective of the NPF is to establish a broad national plan for the Government in relation to the strategic planning of urban and rural areas, to secure regional development, and to secure the co-ordination of regional spatial and economic strategies and city and county development plans.

This SEA Statement has been prepared as part of the Strategic Environmental Assessment (SEA) of the NPF in accordance with the relevant national and EU legislation. This document provides information on the decision-making process. It records how environmental considerations have been integrated into the NPF. Furthermore it summarises how the SEA environmental report, submissions and observations made to the competent authority from the public and designated statutory consultees; and any transboundary consultations have been taken into account during the preparation of the NPF.

The NPF and the associated environmental documents have been prepared by the Department of Housing, Planning and Local Government. This SEA Statement has been prepared in accordance with Section 15 *Decision Making*, and Section 16 *Information on the Decision*, of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. No. 435 of 2004) as amended and having regard to Article 8 (Decision Making) of EU Directive 2001/42/EC on Strategic Environmental Assessment and Circular Letter PL 9/2013, Department of Environment, Community and Local Government..

The structure of the SEA Statement is as follows:

- Introduction;
- Summary of key facts;
- Summary of the SEA process;
- Integration of SEA process;
- Preferred scenario and reasons for choosing;
- Screening of Changes to the final plan
- Measures to monitor significant environmental effects of the implementation of the adopted NPF;
- Conclusions and next steps; and
- Addendum to Environmental Report

2 SUMMARY OF KEY FACTS

Title of Plan:	<i>Project Ireland 2040 – the National Planning Framework</i>
Purpose of Plan:	To set a new strategic planning and development context for Ireland and to provide a high level framework for the co-ordination of a range of national, regional and local authority policies and activities, planning and investment.
Competent Authority:	Department of Housing, Planning and Local Government (DHPLG)
Period Covered:	The plan provides context for planning development for the next 20 years and beyond to 2040. However it is acknowledged that the plan will be periodically reviewed and updated approximately every 6 years.
Area Covered:	The NPF covers the Republic of Ireland but also incorporates considerations in relation to potential all-Island and transboundary issues.
Nature and Content of the Plan:	It is intended that the NPF will provide a strong focus to guide and inform spatial planning and set the framework for integrated investment decisions. It will also provide a framework for the development of the new Regional Spatial and Economic Strategies (RSES) by the three Regional Assemblies and the associated enhancement of the economic development focus of local authorities, as per the Local Government Reform Act 2014.
Date Plan Came into Effect:	The plan was discussed and agreed at a special cabinet meeting after which it was launched on 16 th February 2018.
Main Contact:	NPF Team, Forward Planning Section, Department of Housing, Planning and Local Government, Custom House, Dublin 1.

3 SUMMARY OF SEA PROCESS AND WORK TO DATE

The NPF has been subject to a process of Strategic Environmental Assessment (SEA), as required under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011. This has included the key steps described in the following sections.

3.1 SCREENING

The SEA Directive requires that certain plans and programmes, prepared by statutory bodies, which are likely to have a significant impact on the environment, be subject to the SEA process. A screening of the NPF for SEA was undertaken by the DHPLG after which it was determined that the administrative provisions of Article 9(1) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations (S.I. 435 of 2004) had been met and that an SEA was required.

3.2 SCOPING AND STATUTORY CONSULTATION

Scoping was carried out to establish the level of detail appropriate for the Environmental Report. A scoping document was prepared and this was used as the basis for consultations alongside an issues paper which was prepared by the plan team. Both documents were published on 2nd February 2017.

Statutory consultation was undertaken with the statutory consultees for SEA in Ireland as follows:

- Environmental Protection Agency (EPA);
- Department of Communication, Climate Action and Environment (DCCA);
- Department of Housing, Planning, Community and Local Government (DHPCLG);
- Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs (DAHRGA); and
- Department of Agriculture, Food and the Marine.

Also, transboundary consultation was undertaken with the Department of Agriculture, Environment and Rural Affairs (DAERA) Northern Ireland Environment Agency (NIEA).

Further to this statutory consultation, a workshop was held in the Custom House in Dublin on 5th May 2017 and all of the statutory consultees were invited in addition to a range of other participants from other state and semi-state bodies and NGOs including representatives from planning, housing, energy, water, heritage, transport, fisheries, employment and tourism among others.

In addition, non-statutory consultation was undertaken with the wider public. This was achieved by placing both the scoping report and issues paper on general display from 2nd February 2017 to 16th March 2017 and inviting submissions from the public. All documents were also available on <http://npf.ie/>. The plan team also organised information sessions around the country to provide opportunities for input and feedback on the issues paper.

All submissions received from statutory and non-statutory consultation were considered in preparation of the Environmental Report. All of the environmental topics listed in the SEA Directive were considered and all were scoped in for the purposes of the assessment.

3.3 ENVIRONMENTAL ASSESSMENT AND ENVIRONMENTAL REPORT

The preparation of an Environmental Report on the likely significant effects on the environment of implementation of the NPF included consideration of:

- The contents and main objectives of the NPF;
- The current state of the environment and evolution of the environment in the absence of the NPF;
- Links between the NPF and other relevant strategies, policies, plans, programmes and environmental protection objectives;
- Environmental characteristics of the area to be effected by the NPF and key environmental problems;
- The likely significant effects on the environment of implementing the NPF (both positive and negative);
- Measures envisaged for the prevention, reduction and as fully as possible offset any significant adverse effects;
- An outline of the reasons for selecting the alternatives chosen; and
- Measures envisaged concerning monitoring of the significant environmental effects of implementation of the NPF.

3.3.1 Summary of Assessment

The approach used for the assessment in the SEA was termed an “objectives led assessment”. In this case, each of the draft NPF policies were tested against defined SEA Strategic Environmental Objectives (see **Table 3.1**) which covered all SEA environmental topics under the relevant SEA legislation, e.g. population, biodiversity, material assets. These environmental objectives were based on 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.

Table 3.1 – Strategic Environmental Objectives

Environmental Component	Strategic Environmental Objective
Objective 1 - Population and Human Health	<i>To create an environment where every individual and sector of society can play their part in achieving a more healthy Ireland.</i>
Objective 2 - Biodiversity Flora and Fauna	<i>To preserve, protect, maintain and, where appropriate, enhance the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species.</i>
Objective 3 - Soils	<i>Protect soils against pollution, and prevent degradation of the soil resource.</i>
Objective 4 - Water	<i>Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the WFD and MSFD.</i>
Objective 5 - Air Quality	<i>To avoid, prevent or reduce harmful effects on human health and the</i>

Environmental Component	Strategic Environmental Objective
	<i>environmental as a whole resulting from emissions to air. Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency.</i>
Objective 6 - Climatic Factors	<i>To minimise emissions of greenhouse gasses.</i>
Objective 7 - Material Assets	<i>Consolidate growth and limit urban sprawl. Optimise existing infrastructure and provide new infrastructure to match population distribution proposals in the draft NPF.</i>
Objective 8 - Archaeology, Architecture and Cultural Heritage	<i>Protect places, features, buildings and landscapes of cultural, archaeological or architectural heritage.</i>
Objective 9 - Landscape	<i>To provide a consistent framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention.</i>

The focus of the NPF is on sustainable land use planning for the next 20 years. At the broad level, implementation of the NPF is expected to bring environmental improvements, since it tackles specific environmental pressures arising from urban sprawl, one-off housing, land use change etc. The plan has potential for cumulative impacts and as might be anticipated the greatest cumulative benefit is anticipated to be in relation to Population and Human Health, as the objectives proposed emphasise coordinated spatial planning, balanced growth and consolidation/ densification of existing built-up areas, both urban and rural. Consolidation will also bring positive cumulative impacts to air quality and climate from increased sustainable transport access. However, there is also potential for negative impacts in the wider environment as a result of implementation of the NPF policies, particularly where infrastructure cannot keep pace with the growth projected in the cities and towns of Ireland. The potential negative effects relate to loss of habitat and disturbance of species from land use changes, deterioration of air quality and increases in emissions if sufficient public transport options are not in place, deterioration in water quality where adequate treatment is not available in advance or in parallel to proposed growth, loss and deterioration of soil quality among other. The assessment of policies and related policy actions which are set out in the plan are summarised in **Table 3.2**.

Table 3.2 – Summary of Assessment

Chapter Reference	Summary of Measures and Assessment	Mitigation?
A New Way Forward	Policies set out the population and job growth targets for each of the Regional Assembly areas including the five cities and other settlements. Market-led growth in terms of services provision has historically been, and continues to be, an issue particularly in terms of transport and water services where demand was not matched by phased provision. The policies are aimed at achieving a balanced and coordinated approach to development and promote consolidation of development on infill or brownfield within existing urban envelopes.	✓
Making Stronger Urban Places	Broadly positive, particularly for population and material assets, where the emphasis is placed on developing high quality urban environments where proportionally higher growth is encouraged in appropriate areas. Potential negative implications for biodiversity, soils, water, air quality, climate and landscape as emissions to air and water will increase in densified urban areas.	✓

Chapter Reference	Summary of Measures and Assessment	Mitigation?
	<p>Many existing urban areas are already located close to European Sites and urban areas remain sources of diffuse pressures to water.</p> <p>A number of key priorities are also set out for each of five cities identified in the plan – Dublin; Cork; Galway; Limerick and Waterford. These policies are broadly positive for population, material assets, air quality and climate factors owing to the focus on city connectivity via public transport, regeneration, and opportunities for communities. Potential negative impacts arise for biodiversity, water, soils and landscape where there may be legacy contaminated site issues associated with brownfield and docklands/port development.</p>	
Planning for Diverse Rural Places	<p>The policies aim to secure a level of sustainable growth within rural settlements through development of underutilised lands, regeneration and reuse of derelict buildings. These policies are positive for population, material assets and cultural heritage as there is an emphasis on reversing the social and economic decline in rural areas and preserve sense of place. Policies to promote diversification of the rural economy and provision of new infrastructure such as broadband and amenity development has potential for negative impacts on biodiversity, soils, water and landscape depending on the type of activities that are developed.</p>	✓
People, Homes and Communities	<p>The policies are broadly positive as the focus is on housing, health and leisure policies and the requirements of an ageing population. The policies are broadly neutral across the environmental objectives owing to the promotion of sustainable development for communities and their work. As with all infrastructural development, there is potential for both direct and indirect negative impacts on biodiversity, soils, water, cultural heritage and landscape unless proper siting and environmental studies are incorporated into the strategic planning of development, including housing.</p>	✓
Realising our Island and Marine Potential	<p>Ireland's ocean wealth represents enormous potential for current and future growth. The policies include the Regional Authority Regional Spatial and Economic Strategies, Metropolitan Area Plans, and Local Authority Development Plans taking account of maritime spatial planning issues, strategic development of Tier 1 ports and sustainable management of the marine resource in in relation to environmental protection, climate change and renewable energy development.</p>	✓
Working with our Neighbours	<p>The focus of policies is on collaboration and cooperation with Northern Ireland to manage the shared environment. References to enhanced connectivity, services provision and infrastructure development is positive in terms of population and material assets however there are negative implications for the remaining environmental objectives as there is no specific siting laid out. There are uncertainties related to decisions pertaining to Brexit and the implications of levels of environmental compliance.</p>	✓
Realising our Sustainable Future	<p>The policies are broadly positive for the majority of the environmental objectives as the emphasis is placed on the circular economy, sustainable land management, ecosystem services, sustainable modes of transport and renewable energy. These policies are closely related to other plans and will rely on synergies to achieve effective implementation.</p>	✓
Investing in Ireland 2040 - Implementation	<p>The policies are overall indirectly positive for all environmental objectives as they deal with coordinated planning in terms of delivering infrastructure to meet the demands and growth of future populations. There are potential negative impacts for all environmental indicators as housing and infrastructure development of any kind has the potential to impact on the environment through loss of greenfield, regeneration and use of</p>	✓

Chapter Reference	Summary of Measures and Assessment	Mitigation?
	brownfield/infill, and where water/wastewater capacity is not delivered in advance of or in tandem with development.	
Assessing Environmental Impact	Includes explicit policies on ensuring environmental considerations are taken into account from any plans, projects and activities requiring consent through a requirement for relevant environmental assessments.	N/A

3.3.2 Statutory Consultation on the Draft Plan and SEA Documentation

The *Ireland 2040 Our Plan Draft National Planning Framework* was published for consultation on the 28th September 2017 alongside the SEA Environmental Report and the Appropriate Assessment (AA) Natura Impact Statement. All documents were available for inspection and for download on <http://npf.ie/draft-of-ireland-2040/>. Submissions and observations on the draft framework and associated environmental reports were invited prior to finalisation of the NPF to inform the final framework to be adopted. The deadline for receipt of submissions was 3rd November 2017 but this was subsequently extended to 10th November 2017. A total of 1081 responses were received from a wide range of stakeholders and interested parties including government departments, waste companies, professional bodies, industry bodies/chambers of commerce, community and voluntary/NGO groups, local government and other interested parties. Further details of the key issues raised are presented in **Chapter 5** of this SEA Statement.

3.4 SEA STATEMENT

In accordance with Article 15 and 16 of S.I. 435 of 2004 as amended, the Competent Authority is required to prepare a statement summarising:

- a) *How environmental considerations have been integrated into the plan or programmes, or modification to a plan or programme;*
- b) *How (i) the environmental report, prepared pursuant to article 12, (ii) submissions and observations made to the planning 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;*
- c) *The reasons for choosing the plan or programme, in light of other reasonable alternatives dealt with, and*
- d) *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 to provide information on the decision-making process in order to illustrate how decisions were taken, making the process more transparent. In so doing, the SEA Statement records how the recommendations of both the Environmental Report and the Natura Impact Statement, as well as the views of the statutory consultees and other submissions received during consultation have influenced the preparation of the final plan. The SEA Statement also

provides information on the arrangements put in place for monitoring and mitigation. The SEA Statement is available to the public, along with the NIS and the adopted NPF.

3.5 APPROPRIATE ASSESSMENT

In addition to the SEA, there is a requirement under the EU Habitats Directive (92/43/EEC) (as transcribed into Irish law) to assess whether the NPF, individually or in combination with other plans or projects, is likely to have significant effect on a European Site, which includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), in view of the site's conservation objectives. The requirement for an assessment derives from Article 6 of the directive, and in particular Article 6(3) which requires that:

“Any plan or project not directly connected with or necessary to the conservation of a 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 recognition of this, an Appropriate Assessment Screening was carried out, in parallel with the SEA process. From this it was determined that AA was required and a Natura Impact Statement was prepared to inform an Appropriate Assessment. The Appropriate Assessment of the NPF has been carried out in the context of the scope and content presented in the NPF.

The Appropriate Assessment took a precautionary approach and assessed the general impacts that would be anticipated from the NPF providing the necessary inclusion of mitigation measures and guiding principles at the strategic level of the plan. As a precautionary approach, the NPF included environmental protection criteria which require avoidance of European Sites in the first instance and reiterated the legislative requirement for AA screening and full AA where potential for effects exists.

Based on the NIS, and with reference to the scope of the NPF, the DHPLG has determined that the NPF is compliant with the requirements of Article 6 of the EU Habitats Directive as transposed into Irish law. This determination will be made available for public information.

3.6 ADOPTION OF PROJECT IRELAND 2040 – THE NATIONAL PLANNING FRAMEWORK

The NPF was agreed by Government and launched on Friday 16th February 2018.

4 INTEGRATION OF SEA PROCESS

4.1 HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN IMPLEMENTED

The SEA and the AA processes have been undertaken in parallel to the preparation of the NPF. Thus, from the outset, considerations of the environmental consequences of the alternatives have been taken into account. The iterative process ensured that the SEA/AA and the preparation of the NPF were integrated in order to meet the environmental objectives and the objectives of the plan. The SEA and AA teams were involved in the:

- Development of the alternatives;
- Evolution of policy actions; and
- Recommendation of mitigation measures to address the potential impacts arising from the alternatives considered.

The SEA and AA processes have ensured that potential environmental impacts (both positive and negative) associated with the NPF have been given due consideration in the finalisation of the NPF. **Table 4.1** shows how environmental considerations and the input of the SEA and AA have been taken into account in the final NPF.

Table 4.1 - How Environmental Considerations Have Been Taken into Account in the NPF

Environmental Consideration	Integration into the NPF Process
Early discussion on policy formation	The SEA team engaged directly with the NPF team at an early stage to raise issues and create awareness on key environmental constraints relating to policy alternatives e.g. potential for pollution from contaminated soils as a result of consolidation policies.
Identification of environmental constraints	The SEA team undertook an audit of baseline environmental conditions with reference to population, human health, climate, air landscape, cultural heritage, biodiversity, flora and fauna, material assets and water. This information was used to focus the SEA objectives, develop alternatives and assess positive and negative impacts associated with the implementation of the proposed NPF. An Environmental Sensitivity Mapping (ESM) exercise was also undertaken to influence alternatives discussions and assessment of policies.
Assessment of alternatives	The environmental baseline and objectives were used to identify key sensitivities and inform development of the alternatives and ultimately the assessment of the preferred alternative. The SEA team and the planning team liaised on possible alternatives during preparation of the SEA scoping document and subsequently as the NPF evolved through meetings and workshops.
Recommendation of mitigation measures to address impacts on the wider environment	Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. These included amendments to the wording of policies in the NPF and inclusion of new policies to reflect protection of the environment and human health such as NPO 75 and much of the text in Chapter 10.
Required environmental monitoring programme	A monitoring programme was presented in this SEA Environmental Report. This has been amended following consultation and will

Environmental Consideration	Integration into the NPF Process
	facilitate the ongoing monitoring of the implementation of the NPF.
Consultation	<p>Statutory consultation was undertaken with the environmental consultees for SEA in Ireland in relation to scoping of the Environmental Report. Issues raised were used to inform the overall scope and context of the environmental assessment. Public consultation was undertaken at the scoping stage and this stakeholder feedback also helped to shape the environmental assessment.</p> <p>Subsequently, the SEA Environmental Report, the Natura Impact Statement (from the Appropriate Assessment Process) and the draft NPF were put on wider display on the NPF website.</p> <p>All changes to policies and actions have been screened by the SEA and AA teams to determine if they would result in significant effects (see Section 6).</p>

4.2 INTEGRATION OF ENVIRONMENTAL REPORT

In addition to the influences outlined in **Section 4.1** above, the SEA Environmental Report and the NIS specifically suggested mitigation measures to offset negative impacts identified during the assessment process for the draft NPF. These included general measures such as additional text clarifying obligations in relation to protection of European Sites, additional clarity on the definitions/wording in policies, greater transparency on stakeholders and their role, particularly for the implementation phase as well as specific recommendations and suggestions on how to improve the effectiveness of the plan going forward. It is noted that some of these suggestions were included in the draft plan as part of the iterative process. Others have subsequently been included in the final plan following further consultation with the wider stakeholder base.

Tables 4.2 to 4.4 present the mitigation measures from the SEA, AA and SFRA processes carried out on the draft NPF and clarify how they have influenced the final NPF as adopted. It is noted that the mitigation measures presented in **Table 4.2 to 4.4**, Column 2, relate to the draft NPO reference numbers while Column 3 relates to the final NPO reference numbering.

Furthermore it is acknowledged that a number of recommendations included in the SEA, AA and SFRA mitigation relate to the RSEs and other policy documents and these references will be addressed through lower tier planning as relevant.

Table 4.2 – Mitigation Measures from SEA Environmental Report

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
A New Way Forward	<i>General Mitigation: As part of the RSES, there will be a requirement to review the land area available to accommodate the additional people in each region ensuring that consideration of environmental sensitivities is incorporated within the review process.</i>	Reference made in Chapter 10 to the challenge for the Regional Assemblies, Local Authorities and other agencies in delivering the NPF.

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
	<p><i>General Mitigation: The EPA-funded Environmental Sensitivity Mapping (ESM) Webtool which has been used in the assessment of the NPF will be applied at the lower tiers of planning to inform planning decisions in terms of zoning and provision of services. Future plans e.g. RSEs and CDPs, should look to investigate the potential application of the Webtool to strategically inform integrated land use management to better address cumulative analysis of impacts on the environment.</i></p>	<p>Requirement has been addressed through RSES.</p>
	<p><i>General Mitigation: The RSEs will develop a regional strategic infrastructure and services map to inform the Actions in Chapter 9 in relation to Coordinating Land Use Zoning, Infrastructure and Services.</i></p>	<p>Reference to be passed to RA.</p>
	<p><i>General Mitigation: The scope and role of the RSEs as part of a tiered planning structure needs to be defined.</i></p>	<p>Additional text has been added to better inform on the roles aligned and responsibilities of the RSEs</p>
	<p><i>NPO1b: It is recognised that NPO66, in Chapter 9 of the NPF outlines that zoned land for development purposes needs to estimate the full cost for delivery of associated services but there is a direct need to have a national policy objective that outlines the recognition that future housing development in Ireland needs to be aligned with the phasing of services, in particular water, wastewater and transport.</i></p>	<p>Chapter 10 includes a specific section relating to coordinating land use zoning, infrastructure and services.</p>
	<p><i>NPO3c: There is a requirement for a specific policy objective that recognises the environmental issues associated with brownfield development and outlines measures to deal with hazardous material.</i></p>	<p>Section 11.4 specifically identifies the potential for impacts as a result of brownfield / infill development.</p>
<p>Effective Regional Development Dublin</p>	<p><i>D1, D2, D3 and D5: Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum. Siting guidelines need to be developed and incorporated within the NPF as a policy objective requirement.</i></p>	<p>Specific reference in Section 2.2 for “the need to integrate environmental considerations into land use planning in a way that responds to the sensitivities and requirements of the wider natural environment” and there is a statement regards “Integrating the Environment into Planning for the Future.”</p> <p>NPO19 requires statutory siting and design criteria for rural housing in statutory guidelines and plans. Also, NPO 59 specifies for the protection of biodiversity, Natura sites, etc.</p>

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
		Also, Section 11.4 includes a statement: "... avoiding the unnecessary impacts is the preferred mitigation strategy for the National Planning Framework", and the department "...will develop updated statutory planning guidelines to assist planning authorities in making sustainable planning decisions which fully integrate the relevant environmental requirements"
	<i>D8: Consideration needs to be given to alternative options allowing for potential delays in the planning system.</i>	No direct reference however such issues should be explored further through the RSES and/or the new Independent Office of the Planning Regulator.
	<i>D11: From the AA perspective, this policy requires a commitment to feasibility and route selection studies for cycleways with a view to identifying and subsequently avoiding high sensitivity feeding or nesting points for birds.</i>	Specific reference to strategic cycleway network with a number of high capacity flagship routes as Key Future Growth Enablers.
	<i>D14: Harbour and port development needs a specific policy that deals with brownfield/contaminated land issues.</i>	NPO40 responds to this by specifying the need for strategic and sustainable development of Ports Section 11.4 makes specific reference to development of Brownfield sites in dockland and port areas
Effective Regional Development Cork	<i>C1: Dock development and Seveso site relocation needs a specific policy that deals with brownfield/contaminated land issues.</i>	Specific reference made to this as a Key Future Growth Enabler for Cork.
	<i>C1, C2 and C3: Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum. Siting guidelines need to be developed and incorporated within the NPF as a policy objective requirement.</i>	Specific reference in Section 2.3 for "the need to integrate environmental considerations into land use planning in a way that responds to the sensitivities and requirements of the wider natural environment." NPO12 specifies a new National Regeneration and Development Agency (NRDA), a national centre of expertise in strategic master planning, to work with Regional Authorities to plan and develop strategic regeneration projects. NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>C9: This policy should consider alternative options to road-based transport, which may</i>	This issue is addressed by a number of National Policy Objectives (e.g.

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
	<i>include enhanced public transport options.</i>	NPO7; NPO27; NPO64)
	<p><i>General Mitigation: Consider including Dublin Policies D8 and D9 for Cork also: Ensuring that water supply and waste-water needs are met by new projects to enhance water supply and increase waste water treatment capacity. Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.</i></p>	<p>D8 and D9 included for Cork and updated to include ‘waste management and resource efficiency’ Specifically addressed as a “Key Future Growth Enabler” for Cork</p> <p>NPO 57 and 58 specifies requirements for water quality and resource management in addition to green infrastructure and ecosystems services</p> <p>NPO63 ensures the efficient and sustainable use and development of water resources and infrastructure.</p>
Effective Regional Development Limerick	<p><i>L2, L3, L4 and L6: Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum. Siting guidelines need to be developed and incorporated within the NPF as a policy objective requirement.</i></p>	<p>Specific reference made in the “Key future planning and development and place-making policy priorities” section.</p> <p>NPO67 provides for MASPs and RSES for the cities and their metropolitan areas. NPO7 specifies that regeneration and development plans will be managed by regional assemblies (i.e. MASPs; RSES)</p> <p>NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate</p>
	<p><i>L3: Dock development needs a specific policy that deals with brownfield/contaminated land issues.</i></p>	<p>NPO40 responds to this by specifying the need for strategic and sustainable development of Ports</p> <p>Section 11.4 makes specific reference to development of brownfield sites in dockland and port areas</p>
	<p><i>L9: From the AA perspective, this policy requires a commitment to feasibility and route selection studies for cycleways with a view to identifying and subsequently avoiding high sensitivity feeding or nesting points for birds.</i></p>	<p>Specific reference to strategic cycleway network with a number of high capacity flagship routes as Key Future Growth Enablers for Limerick</p> <p>NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate</p>
	<p><i>General Mitigation: Consider including Dublin Policies D8 and D9 for Limerick also: Ensuring that water supply and waste-water needs are met by new projects to enhance water supply and increase waste water treatment capacity.</i></p>	<p>D8 and D9 included for Limerick and updated to include ‘waste management and resource efficiency’ Specifically addressed as a “Key Future Growth Enabler.” The provides for detailed planning through</p>

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
	<i>Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.</i>	Regional Assemblies and related structures (i.e. MASPs; RSES) NPO63 ensures the efficient and sustainable use and development of water resources and water services
Effective Regional Development Galway	<i>G1: Harbour/port development needs a specific policy that deals with brownfield/contaminated land issues.</i>	NPO40 responds to this by specifying the need for strategic and sustainable development of Ports Section 11.4 makes specific reference to development of Brownfield sites in dockland and port areas
	<i>G1, G2 and G3: Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum. Siting guidelines need to be developed and incorporated within the NPF as a policy objective requirement.</i>	NPO 67 provides for MASPs to be prepared for the cities and Metropolitan areas and many of these issues will be addressed as part of the RSES NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>G4: This policy would be more sustainable if provision of public transport or sustainable transport methods of transport could be promoted here.</i>	Public Transport is a “Shared Goal” of the NPF and regional connectivity to the northwest is specified in NPO 2C. Specifically, NPO 67 provides for MASPs and RSES to be prepared and sustainable mobility should be addressed therein.
	<i>G8: From the AA perspective, this policy requires a commitment to feasibility and route selection studies for cycleways with a view to identifying and subsequently avoiding high sensitivity feeding or nesting points for birds.</i>	Specific reference to strategic cycleway network with a number of high capacity flagship routes as Key Future Growth Enablers. Also, NPO 67 provides for MASPs to be prepared for the cities and metropolitan areas so these issues will be addressed by Regional Assemblies and related structures (e.g. MASPs; RSES) NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>General Mitigation: Suggest including a new policy: “The continued expansion of the city’s third level institutions and integration with the city and region.”</i>	Addressed as a key future growth enabler for Galway. Further details should be specified by the Regional Assembly as part of the MASP and RSES
	<i>Suggest including Dublin Policies D8 and D9 for Galway also: Ensuring that water supply and wastewater needs are met by new projects to enhance</i>	D8 and D9 included for Galway and updated to include ‘waste management and resource efficiency’ Specifically addressed as a “Key

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
	<p><i>water supply and increase wastewater treatment capacity.</i></p> <p><i>Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.</i></p>	<p>Future Growth Enabler” for Galway. Also, NPO 57 and 58 specifies requirements for water quality and resource management in addition to green infrastructure and ecosystems services</p>
<p>Effective Regional Development</p> <p>Waterford</p>	<p><i>W1: Quays development needs a specific policy that deals with brownfield/contaminated land issues.</i></p>	<p>NPO7 specifies tailored urban development, linked to regeneration for cities like Waterford. NPO40 responds to this issue by specifying the need for strategic and sustainable development of Ports and NPO 67 provides for MASPs to be prepared for the cities so this issue will be addressed by Regional Assemblies and related structures (e.g. MASPs; RSES)</p> <p>Section 11.4 makes specific reference to development of Brownfield sites in dockland and port areas</p>
	<p><i>W1, W2 and W4: Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum. Siting guidelines need to be developed and incorporated within the NPF as a policy objective requirement.</i></p>	<p>NPO 67 provides for MASPs to be prepared for the cities and Metropolitan areas and many of these issues will be addressed by Regional Assemblies and related structures (e.g. MASPs; RSES)</p>
	<p><i>General Mitigation: Consider including Dublin Policies D8 and D9 for Waterford also:</i></p> <p><i>Ensuring that water supply and waste-water needs are met by new projects to enhance water supply and increase waste water treatment capacity.</i></p> <p><i>Improving sustainability in terms of energy, waste and water, to include district heating and water conservation.</i></p>	<p>D8 and D9 included for Waterford and updated to include ‘waste management and resource efficiency’</p> <p>Specifically addressed as a “Key Future Growth Enabler.” This provides for detailed planning through Regional Assemblies and related structures (i.e. MASPs; RSES). Also, these issues are addressed as part of the “Key future planning and development and place-making policy priorities” for the Region</p>
<p>Making Stronger Urban Places</p>	<p><i>NPO 9a and 9b: Consider undertaking a feasibility study to accompany the decision-making with regards to strategic employment growth which acknowledges that different urban areas will be able to accommodate different employment and infrastructure types. The Environmental Sensitivity Mapping Webtool should be utilised to support such a study.</i></p>	<p>Infrastructure, and current employment locations and types are referenced in the section above.</p>
	<p><i>NPO10: Many existing urban areas already located in close proximity to European Sites.</i></p>	<p>Chapter 11 of the NPF addresses integration of environmental</p>

NPF Chapter Reference	<i>Proposed Mitigation Measure (relates to Draft Policy Objectives)</i>	<i>Influence on the Final Plan (relates to Final Policy Objectives)</i>
	<i>Overall while densification of the existing urban space is desirable, any urban growth and development should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum. The Environmental Sensitivity Mapping WebTool should be utilised to support such a study.</i>	considerations into land use planning with particular reference to NPO 75. This is further supported by interrelated objectives throughout the NPF including NPO 59-65.
	<i>NPO12: Should a land management agency be set up, its scope and responsibilities should be clearly outlined.</i>	<i>NPO 12 has been redrafted to provide clarity on the nature of the land management approach to be applied.</i>
	<i>General Mitigation: Regional Assemblies together with Local Authorities shall develop an inventory to identify the quantum of infill/ brownfield lands to facilitate delivery of the Framework as part of a wider contained growth strategy.</i>	Issue is noted in Section 11.4.
Planning for Diverse Rural Places	<i>NPO13: The review of the Action Plan for Rural Development should include screening for SEA and AA and this should be identified in the policy objective.</i>	Remains unchanged (i.e. no reference to SEA and AA). However, it is noted that NPO75 in the final NPF explicitly supports the need to apply SEA and AA.
	<i>NPO14: There is a need to include further explanatory information within either the policy objective or within the NPF document as to how the overall population growth target of 15% for small towns will be applied.</i>	NPO14 has been amended and includes a reference to the Action Plan for Rural Development to support it
	<i>NPO18b: To clarify how planners will apply the criteria of 'economic need' when deciding upon single housing.</i>	NPO 18b no longer refers to "economic need" Instead NPO19 specifies new guidelines for Siting and Design Criteria for Rural Housing that includes consideration of demonstrable economic or social need
	<i>NPO21: Due to the pressure on the natural environment from agriculture, could the word sustainable be incorporated within the policy e.g. 'supporting a sustainable and economically efficient...' In addition whilst it is important to maintain the natural landscape and built heritage it would be important to also protect the environment e.g. 'maintaining the natural environment and landscape and built heritage...'</i>	NPO21 has been modified to include reference to climate change and sustainability. Also, NPO23 specifies supporting "sustainable and economically efficient" development
People, Homes	<i>NPO27: The policy should also recognise the</i>	NPO27 has changed and now refers

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
and Communities	<i>need to deliver efficient wastewater facilities.</i>	to sustainable mobility. Instead NPO33 specifies the provision for the sustainable development of new homes. NPO57 and NPO58 provides for enhanced water quality and resource management, including green infrastructure, SUDS, etc.
	<i>NPO32: Should this policy objective include employment growth as it seems out of context and it is not clear how it is linked to the alignment of schools. In addition while the primary, secondary and third level needs are accounted for, should the needs of our infant and child population also be considered in relation to crèches and pre-school.</i>	NPOs were amended and renumbered; Now NPO 31 refers to population and employment growth and provides for pre-schools and early childhood care.
	<i>NPO34: There is a need to outline how planners make the decision as to what is appropriate scale.</i>	NPOs have been amended and renumbered. NPO33 provides for sustainable development at an appropriate scale of provision relative to location
	<i>NPO39: The Housing Need Demand Assessment (HNDA) will inform land use zoning and as such an understanding of environmental sensitivities must be incorporated within the assessment. This would ensure that areas for future zoning do not conflict with environmental protection policies. The monitoring unit developed to assist the Local Authorities would develop a relevant environmental methodology that could be incorporated within the HNDA.</i>	NPOs have been amended and renumbered. NPO337 provides for a Housing Need Demand Assessment (HNDA) to be undertaken by each local authority
Realising our Island and Marine Potential	<i>NPO42: The development of strategic plans for the ports must be subject to AA.</i>	NPO42 has been redrafted. Instead, NPO 40 specifies strategic development of ports, addressed as part of the RSES, MASPS and other relevant plans. NPO 59 responds to the need for protection of the environment, Natura sites, biodiversity, etc.
Working with our Neighbours	<i>NPO45: Reword to include 'infrastructure provision, environmental protection and management'.</i>	NPO 45 has been moved to Chapter 8. Instead, NPO 41a and NPO41b make provision for the protection and management of Ireland's coastal environment and climate adaptation, including flooding and erosion.
	<i>NPO46 and NPO47: The NPF will be updated on a six year cycle but there is merit in including a policy objective supporting discussions with Northern Ireland on environmental protection and management in light of Brexit.</i>	NPO 46 has been amended to include provision for cross-border co-operations regarding sustainable mobility, blueways, greenways and peatways.

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
		NPO50 specifies cross-border co-operation to ensure effective management of shared habitats, catchments and trans-boundary issues regarding environmental policy
	<i>NPO46: The section needs to take regard for the natural environment ensuring that urban centres such as Letterkenny are consolidated and one off housing is limited. The following text should be included: “The North West Partnership, working with both Governments local communities and the private sector, promotes regional co-operation on planning, environmental protection and management, public services and infrastructural investment including...”</i>	NPO 46 now refers to transport and connectivity. However, NPO45 provides for cross border cooperation to support and develop the North West City Region through collaborative structures and joined-up approach to spatial planning. NPO47 specifies cross-border and all-island energy infrastructure and inter connection capacity
	<i>NPO48: Suggest inclusion in the text under the heading ‘Transport’ that outlines that rail and bus services are included within public transport connectivity.</i>	NPF no longer includes a section on Transport. However, NPO 46 promotes cross-border co-operation for enhanced rail transport. Also, National Strategic Outcome (NSO) 2 promotes re-allocation of inner city road-space in favour of bus-based public transport services; NSO 5 and NSO7 both refer to the NPF commitments to sustainable mobility, specifically rail and bus services. Some of the “Key future planning and development and place-making policy priorities for the Eastern and Midland Region” promote rail and bus services. Section 8.4 specifies increased transport connectivity, including bus and rail services, between the main cities, to the north-west region and along the border region over the life of the NPF.
	<i>NPO52: After habitats, the word ‘species’ should be included.</i>	NPO52 has been changed but specifies that the planning system will be responsive to our national environmental challenges and have regard to requirements of all environmental legislation
Realising our Sustainable Future	<i>NPO54: Inclusion of words to ‘environmental limits, having regard to the requirements of all relevant environmental legislation and promotes’.</i>	NPO 52 now specifies requirements regards development within environmental limits and requires consideration of all relevant legislation
	<i>NPO62: While this policy is positive it is identified that residential noise regulations are currently inadequate for home owners and</i>	NPO amended and renumbered. Now NPO65 promotes pro-active noise management, supports the

NPF Chapter Reference	<i>Proposed Mitigation Measure (relates to Draft Policy Objectives)</i>	<i>Influence on the Final Plan (relates to Final Policy Objectives)</i>
	<i>need to be addressed in light of increased consolidation of residential urban areas. A review is required that presents tangible ways to improve the current regulations.</i>	aims of the Environmental Noise regulations through national planning guidance and Noise Action Plans
	<i>General Mitigation: The NPF should identify the appropriate body or Department that is be responsible for the implementation and reporting of the SEA monitoring programme to ensure that national issues are identified over the 20 period and that revision to the NPF every 6 years can address such issues.</i>	Section 7 of the SEA statement specifies which department is responsible for various components of the SEA Monitoring Programme
Implementing the National Planning Framework	<i>NPO63: Update national SEA and AA related legislation to ensure that it applies to the newly formed City MASP.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>NPO64: Expand the SEA and AA requirements for LAPs to include UAPs.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>General Mitigation: A specific cumulative impact assessment of zoning should be considered as a requirement for statutory development planning.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	General Mitigation: Statutory planning guidance and the standardised approaches to zoning discussed in this section of the NPF include an explicit requirement to consider the impacts of zoning on the receiving environment.	NPO 58 provides for integrated planning for Green Infrastructure and ecosystem services to be incorporated into the preparation of statutory land use plans. Green infrastructure planning will inform the preparation of RSES, MASPs, city and county development plans.
National Strategic Outcomes	<i>NSO2.2: The AEC plan should undergo SEA and AA once there is clarity on a plan. This should include how the plan will protect wild places, natural and cultural heritage and landscape.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>NSO3.1: Official Public Health and Safety Zones should be developed for each of Irelands airports. These zones should adequately address protection of human health in terms of hazard, noise, air emissions etc. with associated restrictions on land use in the areas and should be adopted into the relevant regional and county planning.</i>	This text has not been added to NSO3.1. However, improving the strategic infrastructure required to sustain growth (e.g. airports) will be a key priority as part of the Metropolitan Area Strategic Plan (MASP)
	<i>NSO3.1: The National Aviation Policy should be</i>	NPO 75 Ensures that all plans,

NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Influence on the Final Plan (relates to Final Policy Objectives)
	<i>amended to require all relevant airports to undertake SEA and AA of their masterplans.</i>	projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>NSO3.2: This policy should include consideration of rail alternatives to road based land transport connections at tier 1 and tier 2 ports in Ireland.</i>	NSO3 was amended; now NSO4 - High Quality International Connectivity (e.g. airports; sea ports) specifies improved land transport connections to the major ports
	<i>NSO5: Guidelines should be developed to support an assist the efficient roll out and delivery of national broadband.</i>	NPO 24 ensures support and facilitation of delivery of the National Broadband Plan NSO 6 supports implementing the national broadband plan
	<i>NSO6: The Action Plan for Rural Development has not been subject to SEA and AA and as such this plan should be reviewed.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
	<i>NSO6: In order to better address inter-regional connectivity a parallel NPO which addresses the need to promote use of electric vehicles as a way to tackle connectivity and climate should be considered.</i>	NSO5 has been amended and now promotes electric rail public transport as part of the plan for sustainable mobility. NPO54 promotes reduction of GHG and electric vehicles for public transport are suggested as contributing to Ireland transition to a low carbon energy future
	<i>NSO8: A review of the capacity of the electric charging infrastructure across Ireland to ensure that Ireland's 'ambition that that all new cars and vans sold in this country from 2030 will be zero emission (or zero emission-capable)' is achieved.</i>	No specific reference to electric charging infrastructure. NSO8 provides for the roll-out of the National Smart Grid plan enabling new connections, grid balancing, energy management and micro grid development
	<i>NSO9.2: Specific regard to the mitigation measures included in the three Regional Waste Management Plans (2015) and the National Hazardous Waste Management Plan.</i>	NSO9 suggests that RSES and the core strategies of MASP's and city and county development plans will support national and regional waste policy and efficient use of resources; Development of necessary and appropriate hazardous waste management facilities to avoid the need for treatment elsewhere;

Table 4.3 – Mitigation Measures from NIS

Draft NPO Reference	<i>Proposed Mitigation Measure (relates to Draft Policy Objectives)</i>	<i>Included in Final NPF? (relates to Final Policy Objectives)</i>
NPO3c	<i>A map is to be developed by each local authority, coordinated at the Regional Assembly level, showing potential infill and brownfield opportunities in order to spatially inform decision making on the suitability of these sites for further development or regeneration.</i>	To be addressed by the RSES.
NPO7a	<i>It is recommended that the DHPLG develop a set of Guiding Principles which integrate biodiversity for Smart Growth in Urban and Rural areas to better inform lower level criteria and guide development.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
NPO10	<i>Policy to be reworded to state: That there is a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate standards, achieving targeted growth and subject to the outcome of an Appropriate Assessment.</i>	NPO replaced by NPO11 and text amended as recommended. Also, NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
NPO12	<i>A map is to be developed by each local authority, coordinated at the Regional Assembly level, showing potential infill and brownfield opportunities in order to spatially inform decision making on the suitability of these sites for further development or regeneration.</i>	To be addressed by the RSES.
NPO13	<i>The Action Plan for Rural Development and its subsequent reviews should be subject to AA prior to implementation, if this has not already been completed.</i>	No reference to AA included in NPO 13, however it does make provision for ensuring “the environment is suitably protected” NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
NPO18b	<i>The following text to be added to the policy:...and subject to environmental suitability of the sites.</i>	The issue of the environmental suitability of sites for rural housing will continue to be addressed through the planning application and decision making process. It is noted that the application of existing guidelines and legislation would ensure <i>environmental suitable sites were considered.</i>
NPO21	<i>Policy to be reworded to state: To facilitate the development of the rural economy through supporting an economically efficient and long-term sustainable agricultural</i>	NPO 23 responds to the suggested changes: Facilitate the development of the rural economy through supporting a sustainable and

Draft NPO Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Included in Final NPF? (relates to Final Policy Objectives)
	<i>and food sector, together with forestry, fishing and aquaculture and diversification into alternative on-farm and off-farm activities, whilst at the same time noting the importance of maintaining the natural landscape, and protecting the natural / built heritage which are vital to rural tourism through application of sustainable limits on productivity.</i>	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 the natural landscape and built heritage which are vital to rural tourism.
NPO24	<i>It is recommended that the DHPLG, DRCD and the DAFM liaise with the DCHG to identify a workable approach to identify synergies with national funding instruments to better align national funding with national biodiversity policy. This could be led by the Office of the Planning Regulator which has been proposed in the NPF.</i>	NPO 23 responds to these suggested changes: Facilitate the development of the rural economy 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 the natural landscape and built heritage which are vital to rural tourism.
NPO38	<i>No information is provided on the nature of the guidelines but it is recommended that they reflect the recent case law in relation to Appropriate Assessment and provide practical tools for planning authorities to complete their statutory obligations under the Planning and Development Act and the Birds and Natural habitats Regulations. Furthermore it is recommended that guidelines on site and route selection which identifies where and how European Sites should be considered be developed to support decision making.</i>	NPO74 ensures the secure alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes. NPO 9 provides for Regional Assemblies to implement co-ordinated strategies that ensure alignment with investment in infrastructure and provision of employment, together with supporting amenities and services. The proposed governance and management structures (e.g. Office of Planning Regulator; Reginal Assemblies) will ensure more effective planning and co-ordination processes.
NPO42	<i>The development of strategic plans for the ports must be subject to AA.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
NPO46	<i>The word economic to be replaced by “sustainable” to acknowledge that balance is needed with economics if the environment is to</i>	The recommended change was not made. However sustainability and sustainable development is a core

Draft NPO Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Included in Final NPF? (relates to Final Policy Objectives)
	<i>be fully protected.</i>	focus throughout the final NPF, the National Priority Objectives (NPOs) and National Strategic Outcomes (NSOs)
NPO47	<i>Regional planning will need to consider the cumulative effects of any collaborative structures and the carrying capacity of the environmental receptors in terms of water quality, air quality, human disturbance and land use change and habitat loss.</i>	Regional Authorities will be responsible for developing RSES and MASPs, as appropriate. NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
NPO51	<i>Similar to the Wild Atlantic Way, large tourism initiatives must consider SEA and AA prior to implementation to offset any negative impacts.</i>	NPO22 ensures 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. Also, NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate
National Strategic Outcome 6	<i>Empowered Rural communities: The Action Plan for Rural Development and its subsequent reviews should be subject to AA prior to implementation, if this has not already been completed.</i>	NPO 75 Ensures that all plans, projects and activities requiring consent arising from the NPF are subject to SEA, EIA and AA as appropriate

Table 4.4 – Mitigation Measures from SFRA

Draft NPF Chapter Reference	Proposed Mitigation Measure (relates to Draft Policy Objectives)	Included in Final NPF? (relates to Final Policy Objectives)
NPO 58	<i>NPO 58: Ensure flood risk management informs place making by avoiding inappropriate development in areas at risk of flooding and integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places. Development plans should assess flood risk by implementing the recommendations of The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014).</i>	Reference has been made in NPO 57 to the <i>Planning System and Flood Risk Assessment Guidelines for Local Authorities</i> . It is noted that the correct title of the document is <i>Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009)</i> . No reference is made to <i>Circular PL02/2014</i> .

Draft NPF Chapter Reference	Proposed Mitigation Measure <i>(relates to Draft Policy Objectives)</i>	Included in Final NPF? <i>(relates to Final Policy Objectives)</i>
National Strategic Outcomes	<ul style="list-style-type: none"> ▪ <i>Coordinate the core objectives of the EU Flood Directive and statutory plans across the planning hierarchy, including national guidance on the relationship between the planning system and flood risk management. (DHPLG, OPW, LAs);</i> ▪ <i>Local authorities, DHPLG, OPW and other relevant Departments and agencies will work together to implement the recommendation of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented. (DHPLG, OPW, LA's); and</i> ▪ <i>Prioritising investment to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment.</i> 	<ul style="list-style-type: none"> ▪ NPO57 responds to these issues ▪ NSO 9 - Sustainable Management of Water and other Environmental Resources specifies that the Water Services Strategic Plan by Irish Water will be updated in the light of the policies in the NPF addressing the requirements of future development, while also addressing environmental requirements such as obligations under EU Water Framework Directive mandated River Basin Management Plans ▪ NSO9 provides for the coordination of 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 implement the recommendations of the CFRAM programme will ensure that flood risk management policies and infrastructure are progressively implemented; ▪ NSO9 specifies the need to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment

4.3 INFLUENCE OF SUBMISSIONS AND OBSERVATIONS UNDER ART. 13 AND ART. 14

The Draft National Planning Framework was published for consultation on the 28th September 2017 alongside the SEA Environmental Report and the Appropriate Assessment (AA) Natura Impact Statement. The consultation ran until 10th November 2017 and a total of 1081 responses were received as outlined above in Section 3.2. The key issues raised in the submissions are considered in this section together with how they have influenced the final NPF.

Section 4.3.1 and **Table 4.5** presents the feedback from the statutory consultees for SEA in Ireland. **Section 4.3.2** and **Table 4.6** presents the feedback from transboundary consultation with Northern Ireland. **Section 4.3.3** presents the feedback from the wider statutory public consultation. Following a comprehensive review and consideration of all the submissions, the DHPLG has responded with changes to the final NPF. Significant changes made since the publication of the draft plan have been screened for the requirement for further consideration under both the SEA and AA processes. This screening is recorded in **Chapter 6**.

It is noted that the references in the following sections relate to the draft NPO which was the subject of public consultation.

4.3.1 Submissions from Statutory Consultees

The statutory consultees for SEA in Ireland were notified of the consultation on the draft NPF and related environmental reports. **Tables 4.5 to 4.6** summarise the submissions from each responding consultee.

Table 4.5 - Submissions from Statutory Consultees

Consultee	Comment / Issue Raised in Relation to Draft NPF
EPA General	EPA acknowledges and welcome that the key messages and actions in the State of Environment Report (SoE) have been reflected in the NPF and the SEA ER. EPA also acknowledged that an integrated approach has been adopted and that extensive consultation and engagement with key stakeholders has been undertaken by the NPF and SEA teams throughout the process.
	Suggestion that the plan might be strengthened by a more explicit reference to the key challenges set out in <i>Ireland's Environment 2016</i> and also to the relevant UN Sustainable Development Goals.
	Noted that providing the required supporting critical service infrastructure to meet the population projections represents a very significant challenge and will need to be addressed within the three Regional Spatial and Economic Strategies (RSEs), local authority Development Plans and Irish Water's Capital Investment Plan.
	Recommended that the NPF should recognise and promote the need for sustainable management of waste water in smaller towns, villages and communities, as well as outside the networks served by Irish Water.
	Recommended that the NPF and subsequent lower level plans should seek to ensure that unsustainable settlement patterns are deterred, and economic and population growth is appropriately managed.
	Noted that in implementing the proposed brownfield development, it will be important that these areas, which may have legacy soil contamination issues, are subject to

Consultee	Comment / Issue Raised in Relation to Draft NPF
	<p>appropriate investigations and environmental assessments.</p> <p>Recommended that a schematic (akin to Fig. 10.1) be included showing the links between the NPF and other key relevant national, regional and sectoral plans/programmes/strategies and highlighting which plans/programmes/strategies are (or will be) responsible for progressing particular aspects of the Framework. A similar representation of the links with relevant international, European and national environmental legislation should be included.</p> <p>Recommended that the following key significant plans to be recognised in the NPF: National Mitigation Plan; National Adaptation Framework; Draft River Basin Management Plan; National Landscape Strategy; National Biodiversity Plan; National Peatland Strategy; and National Clean Air Strategy.</p> <p>Other significant plans currently being prepared or due to commence shortly which should also be reflected in the Framework include: the National Bioenergy Plan; National Broadband Plan Intervention Strategy; EirGrid's GRID Implementation Programme; and the revision of the Wind Energy Guidelines. With regards to our marine resources, the preparation of the National Maritime Spatial Plan, Our Ocean Wealth and the Offshore Renewable Energy Development Plan are significant.</p> <p>The requirements of the SEA and AA should be taken into account where new plans or modifications/ amendments to existing plans are required.</p> <p>Given the number of national and regional plans that are prepared by government departments and state agencies, there is merit in considering establishing a centralised government system for recording and tracking marine, terrestrial, nature, water and climate based sector plans.</p> <p>The Foreword should be extended to include relevant government departments, including the Department of Agriculture, Food and the Marine in the context of the importance of the agriculture and food sector to Ireland's economy.</p> <p>Recommended that a NPF Implementation Plan is prepared and published alongside the Framework to set a clear pathway for the implementation and tracking of the NPF in achieving its high-level objectives and vision.</p> <p>Recommended that a High Level Implementation Group be established across the different government departments and Agencies involved in the preparation of the NPF.</p> <p>The timely establishment, resourcing and statutory underpinning of the proposed Office of Planning Regulator is of significant importance to the tracking and implementation of the NPF.</p> <p>Consideration should be given to developing a national SEA guidance document for sectors falling under the scope of SI 435/2004, to ensure the relevant government departments and state agencies are supported and made aware of obligations in this regard.</p> <p>Where modifications to the NPF are proposed, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 1 of the SEA Regulations (S.I. No. 435 of 2004) and should be subject to the same method of assessment applied in the "environmental assessment" of the Draft NPF.</p>
EPA Plan Specific	<p>There is merit in considering including an additional national policy objective that the "growth enablers" identified in Section 3.9 are to be progressed at the regional level.</p> <p>While some reference is made to the role of Agriculture within the NPF, it would be useful to include in the vision, an Ireland with more responsible land use management practices and an integrated catchment management approach to the protection of our national water resource.</p> <p>A separate National Policy should be included related to the National Landscape Strategy and the relevant actions, the support for the preparation of a Landscape</p>

Consultee	Comment / Issue Raised in Relation to Draft NPF
	<p>Character Assessment/Map and the update of the LCA Guidelines would be important.</p> <p><i>National Policy Objective 21</i> – consider rewording “natural landscape and built heritage” to “natural and built heritage”.</p> <p><i>Section 6.4 – Coastal Environment and Planning for Climate Change</i> – might be worth including separate headings for climate mitigation and adaptation. (or under climate action and planning)</p> <p>The NPF could place more emphasis on the role of the National Mitigation Plan and National Adaptation Framework under the Climate Act 2015, in terms of the national effort to address climate change</p> <p>It is useful to consider including a reference to the UN Sustainable Development Goals and its relationship to the NPF.</p> <p>Recognition of the need to target and promote reductions in marine plastic and litter in the NPF, by including a specific objective would be welcome.</p> <p>The NPF should acknowledge the need for increased focus on continued pressures on the Water Framework Directive in relation to the provision of appropriate drinking water and wastewater treatment in terms of increase population and urban sprawl.</p> <p>Planning authorities need to ensure that in considering applications for developments or activities within areas of High Status waters, they are aware of their obligations to protect these sites from activities that can potentially significantly affect the water quality.</p> <p>Stronger controls are recommended in relation to</p> <ol style="list-style-type: none"> 1. Abstraction licences 2. Felling licences and 3. Intensive agricultural activity adjacent to surface waters. <p>In relation to point 3, there is merit in the NPF supporting options for Local Authorities to play a role in the approval of nutrient management plans process. This would ensure that these industries are looked at from cradle to grave (with the appropriate mitigation measures established etc.). This approach works well with Nutrient Management Plans from bio-solids from WWTP’s and would be a positive step in advancing the protection of water resources into the future.</p> <p>We acknowledge that the link between air quality and health is referred to, the benefit and role of other environmental aspects in relation to health include aspects such as urban green spaces etc.</p> <p>Consideration should be given to including a specific policy relating to minerals and quarrying. Where relevant a commitment should be considered for National Guidelines/ Guidance to be prepared in relation to mineral planning.</p>
EPA SEA Specific	<p><i>Chapter 1:</i> Include a graphic showing alignment required between the relevant top level plans with the respective hierarchies.</p> <p><i>Chapter 5:</i> The SEA baseline should be updated to reflect the most recently available baseline data.</p> <p>Include reference to the specific targets within the National Emissions Ceilings Directive and /or where the pinch points are likely to be in terms of compliance.</p> <p>Reference should also be made to important regulations including:</p> <ul style="list-style-type: none"> - Decision 529/2013/EU - the proposed LULUCF Regulations <p>Devising a National Noise Policy or Strategy will be an essential component if Ireland is to adequately address transport-related noise and other environmental noise sources. The focus should include a preventative and management strategy through the provision of alternative, more environmentally friendly options such as public and</p>

Consultee	Comment / Issue Raised in Relation to Draft NPF
	<p>private electric transport, a more attractive means of transport in our major urban locations, and for better routing and design of roads in our more rural locations. Support for achieving this objective in the NPF would be welcome.</p> <p>Consideration could be given to amending the title of 'Section 5.2.2.4' as follows: "<i>Human health and Wellbeing</i>"</p> <p>In 5.3 <i>Environmental Sensitivity Mapping</i>, we welcome the extent to which the Environmental Sensitivity Mapping has been incorporated into the SEA. It provides a consistent approach to examine the potential vulnerabilities of key settlements in a consistent manner. Recommending this approach be considered in the preparation of the RSES would also be welcome.</p> <p><i>Chapter 6: Table 6.1, Objective 2 – Biodiversity, Flora and Fauna.</i> The reference to 'have regard to' in the target could be strengthened. A possible stronger target to consider could be that LAs at a minimum integrate the conservation objectives of nationally and EU designated sites (and protected species) into land use planning decision making.</p> <p><i>Table 6.1, Objective 4 – Water:</i> The inclusion (and use at Regional and Local Authority level) of the EPA's WFD Application as a data source should also be encouraged, and as use as an Indicator for Water Quality monitoring as this will ensure updated information is available during the lifetime of the NPF.</p> <p><i>Table 6.1, Objective 5 Air Quality,</i> the associated target could be improved by adding 'Implementation' to the wording of the reference to the National Air Quality Strategy.</p> <p><i>Table 6.1,</i> There is merit in separating Objective 6 Climatic Factors into ones for Climate Mitigation and Climate Adaptation.</p> <p>Chapter 7: The approach taken to considering alternatives for the NPF is welcomed. It clearly considers key challenges including regional disparity, role of settlements, implications for settlements based on spatial planning / settlement patterns/decision making and infrastructure requirements/challenges.</p> <p>It may be useful to consider taking 'climate change resilience' into account in terms of the assessing the preferred scenario(s) within each Pillar. This would assist in identifying which aspects are more vulnerable to climate change that need to be considered/addressed/resourced by Departments/State Agencies in their respective sectoral plan-making and budgets.</p> <p>Chapter 8: We note the preferred overall approach for the NPF (<i>Regional Effectiveness and Settlement Diversity</i>) across the 4 pillars.</p> <p>The approach in separating out each chapter of the NPF and discussing within the Chapter is welcomed. Identifying the objectives in the NPO and recommending suitable mitigation measures is acknowledged.</p> <p>As a general comment in relation to the text of many proposed recommendation measures where "<i>Identification of sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns such as landscape cultural heritage and biodiversity at a minimum</i>". Acknowledging the need to ensure protection of water quality and consideration of flood risk aspects also should be considered.</p> <p>In relation to <i>Table 8.8 Governance</i>, we note the intention to strengthen SEA/AA related legislation so that it also specifically applies to newly formed City Metropolitan Area Spatial Plans. This is a welcome measure which provides greater certainty in relation to these plans and the need for the relevant environmental assessment requirements.</p>

Consultee	Comment / Issue Raised in Relation to Draft NPF
	<p>In <i>Table 8.14 – National Strategic Outcome: Empowered Rural Communities</i> – we note the proposed SEA mitigation measure for NSO6. We note the recommendation in relation to considering that any review of the Action Plan for Rural Development should consider applicability of the SEA and Habitats Directives requirements.</p> <p><i>Chapter 9: In Table 9.1 – Proposed SEA Mitigation Measures Relating to the Assessment of Policies</i>, the reference to <i>Chapter 2 – A New Way Forward</i>, could include an additional general mitigation measure relating to the establishment of the Office of the Planning Regulator.</p> <p><i>Table 9.4 – Environmental Monitoring Programme</i>, in relation to <i>Objective 6 Climate Factors</i>, reference could be made DCCAIE’s proposed Policies and Measures (PAMS) portal for implementation of the National Mitigation Plan and coordinating/implementing, at a national and sectoral level, achievement of the necessary mitigation measures to fulfil our national and international greenhouse gas emissions reduction commitments.</p>
DRCD	<p><i>Approach taken in NPF is broadly welcomed and it is noted that several objectives align strongly with the work of DRCD and the action plan for rural development.</i></p> <p><i>An increased emphasis is needed on how regionally important settlements can drive the growth of each region as a whole and a more balanced national growth path. For example, achieving growth in Sligo is a critical objective in the NPF but it is implied rather than clearly stated.</i></p> <p><i>Clarity is needed on how the NPF will be implemented on the ground through the RSES</i></p> <p><i>Specific detail is needed on how the RSES will be developed and the issues to be addressed in the strategy documents</i></p> <p><i>Further consideration is needed on the role for local democracy in the NPF and informing development of the RSES.</i></p> <p><i>The role of the AEC needs to be strengthened in the NPF</i></p> <p><i>The final NPF should identify settlements within the population thresholds identified.</i></p> <p><i>The plan should address the links between stronger urban places and diverse rural places.</i></p>
DCHG (NPWS)	<p>The Department welcomes the recognition in the NIS that the current UK guidance distance of 15km as Zone of Influence to be considered during AA is not appropriate in all cases and particularly given the sensitivities of European Sites (SACs/SPAs).</p> <p>In the NIS, it is considered there would be greater benefit in setting out the generalities of site specific conservation objectives (SSCOs), rather than of generic conservation objectives, noting that the aim of this Department is to produce SSCOs for all European sites. Among other things, SSCOs specify whether the objective is to maintain or to restore favourable conservation condition of the habitat or species, and they set out attributes and targets that define the objectives.</p> <p>It should also be noted that the existing conservation condition of certain habitats and species is unfavourable at present in certain cases and for various reasons, including because of exceedance in environmental quality parameters.</p> <p>References in the NIS to carrying out screening for AA of the NPF should indicate the availability of the screening determination.</p> <p>Section 3.4 of the NIS refers to information sources consulted for background environmental information. The Department notes that two valuable sources – Corine and Forest Service data – are not included here.</p> <p>Section 4.1 states that there are currently 165 SPAs designated. This should be amended to 154. The list of SPAs in Appendix C should be accordingly updated. Please see www.npws.ie</p> <p>In view of the series of negative impacts identified in Table 6.1 (column 3) of the NIS, it is unclear how the many direct, indirect and long-term negative outcomes are resolved</p>

Consultee	Comment / Issue Raised in Relation to Draft NPF
	<p>to give rise to the ultimate positive findings of the NIS.</p> <p>The requirement for future plan and project statutory and non-statutory ecological and environmental assessments, where necessary, is noted.</p> <p>These, together with some changes in wording, comprise the general scope of mitigation measures that are specified. Other commitments made with regard to the carrying out of feasibility and route selection studies for cycleways with a view to identifying and subsequently avoiding adverse effects on ecological receptors (not only birds) do not appear to be listed as mitigation in the NIS. A similar issue arises with particular projects that are identified, such as the extension of the DART network and improved road access to Dublin Port.</p> <p>There is potential for likely significant effects to European Sites as these National Policy Objectives relating to development in existing built up areas. In city areas, in particular, but also larger towns, it is anticipated that this will include use of infill and brownfield sites.</p> <p>It is noted that no mapping identifying potential infill or brownfield areas is available and as such the spatial distribution in relation to influence on the Natura 2000 network is not possible. However it is considered that nationally some such sites will be within a zone of influence of a Natura 2000 site. Of particular concern with regard to this policy, is the potential to encounter contamination at brownfield sites, in particular, and the potential for regeneration of these areas to give rise to contaminated runoff which could impact surface water or ground water connections through to SACs / SPAs.</p> <p>It is therefore proposed that a map is developed by each local authority, coordinated at the Regional Assembly level, showing potential infill and brownfield opportunities in order to spatially inform decision making on the suitability of these sites for further development or regeneration.</p> <p>Having regard to NPO15, 17b, 25 and 43b, it is unclear how 'no potential for likely significant effects to European are anticipated' without including mitigation.</p> <p>NPO23: Facilitate the development of a National Greenways/Blueways Strategy which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level. It is recommended that consideration is given to re-phrasing the term 'maximum impact' as this could be understood to have adverse environmental impact.</p> <p>In relation to the National Strategic Objective (NSO) 9.1 – implementation of the recommendations of the CFRAM programme, and NSO5 – delivery of the National Broadband Plan –</p> <p>it is unclear how it has been determined that there will be no likely significant negative impacts on European Sites (it is known that future projects that will arise in the implementation of these plans may have potential to have significant effects on European sites and will require screening for AA and, in some cases, AA).</p> <p>Chapter 10 of the NPF (NPO 70) and Section 6.2 of the NIS set out that '<i>All investigative and feasibility studies to be carried out to support decision making in relation to this Framework should also include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network.</i>'</p> <p>The Department advises that Construction Environmental Management Plans to guide construction works may be required in certain instances where significant impacts or risks to the environment are identified as part of mitigation measures.</p> <p>The conclusion of the NIS for the draft NPF is that, subject to the mitigation proposed</p>

Consultee	Comment / Issue Raised in Relation to Draft NPF
	in the NIS being incorporated, there will be no adverse effects on the integrity of any European Sites as a result of implementation of the NPF. This may be excessively limiting in preventing future IROPI cases being made.

4.3.2 Submissions from Transboundary Consultation

Transboundary consultation was specifically undertaken with the Department of Agriculture, Rural and Environmental Affairs in Northern Ireland as the statutory consultee for SEA in NI. Arising from this a number of submissions were received from Northern Ireland and these have been grouped and addressed in **Table 4.6**.

Table 4.6 – Summary of Transboundary Submissions

Consultee	Comment / Issue Raised
Department for Infrastructure	The DoI broadly welcomes the recognition to Northern Ireland in the framework and the strong emphasis in Chapter 7 on both administrations working together to ensure functional relationships between settlements and interactions at local and regional level can be encouraged.
	Important that the focus on growth for Dublin and the southern half of the island is offset against the need for balanced growth across the island as a whole.
	To strengthen the framework in relation to transboundary issues it would be positive if a reference to the need for flood risk to be considered on a transboundary basis given that there are two shared international river basin districts.
	There may be merit in an agreement to continue the requirement to consult on such issues when the UK has left the EU.
	NPO 45 should explicitly recognise the need to integrate spatial and transport planning.
	There are proposals in preparation for a Regional Infrastructure Delivery Plan for Northern Ireland which will provide an opportunity to consider targeting infrastructure investment and to consider how investment can link to the NPO. Coordination will be needed between the two jurisdictions.
Loughs Agency	The Loughs Agency broadly supports NPO40-NPO45 and welcomes the opportunity to build on existing co-operations.
	In relation to NPO45 and NPO51-53 the agency would welcome the opportunity to engage further given its remit in relation to the cross border area.
Causeway coast and Glens Borough Council	It is noted that the overarching national strategic outcome highlights that cooperation and joint development of cross-border areas will be important post Brexit to maximise the potential for the island economy.
	CCG has been involved in a number of workshops and cross border meeting with Derry City and Strabane District council and Donegal CC which highlight the benefit of collaborative and joined up working and this should continue. Common issues include education, employment, retailing, tourism transport, marine/coastal and environmental protection.
	The following national policy objectives are considered to directly relate or have potential to impact on CCG: NPO45- NPO53; and NPO70. Given the common issues identified, the potential impact on the CCG borough (not just Derry city and Strabane District) should be explicitly identified in the plan.
Newry, Mourne and Down District	There is acknowledgement that the NPF recognises the special relationship between Ireland and Northern Ireland and NMDDC accepts and agrees with the NPO45-52. It was further noted that NMDDC shares a border with both the EMR and the NWR.

Consultee	Comment / Issue Raised
Council	Coordination and joint development of cross border areas need to be strengthened now to ensure they are resilient and maintained post Brexit.
	The final NPF should include a graphic of the Dublin / Belfast Corridor showing the economic corridor aligned with the linear road and rail network and the larger towns of Drogheda and Newry / Dundalk.
	Specifically in relation to NPO45 – the NPF should also refer to the MoU that exists between NMDDC and Louth CC as it underlines the pivotal role of the greater Newry region.
	The NPF should include an NPO specifically relating to: regional co-operation arrangement; joint initiatives; and co-ordinated spatial planning, as these are identified as three key areas of focus in the NPF.
	In addition to referring to the three major airports relevant to the Dublin – Belfast Economic Corridor, the NPF should also refer to the major sea ports including Warrenpoint.

4.3.3 Submissions from Statutory Public Consultation

Public consultation, as outlined in **Section 3.2** gave rise to over 1000 submissions from a range of stakeholders. All submission have been reviewed and considered by the team prior to finalising the NPF. Throughout the submissions a number of key issues were identified across a number of themes. The key issues / themes raised are discussed in the following section.

4.3.3.1 Scope of the Plan

Issue Raised: Scope and Remit of the Plan

The remit and scope of the NPF was a significant source of commentary in submissions received indicating the NPF should include specific policies for a wide range of issue including but not limited to: land use and land use planning, employment, climate mitigation and adaptation, transport, obesity, wellness, renewable energy, marine planning and Brexit. Other issues within submissions indicate the plan should be flexible enough to take into account the development of new technologies and socio-economic development in towns and cities.

Influence on the Final NPF

The NPF is a framework that supports the aims of other national plans on a wide range of issues that fall within the remit of spatial planning and the wider planning system.

Additional text has been added to Chapter 1 to clarify the scope of the NPF. Section 1.1 and 1.2 of the NPF has been revised to clarify the vision and how the vision will be realised. This includes clarity around the development of new regional focused strategies (e.g. RSES), links to the National Development Plan, use of State lands for certain strategic purposes and a more environmentally focussed approach to planning.

The NPF is presented in the context of other national planning and policy documents which specifically address climate mitigation and adaptation, sustainable transport, water management renewable energy, alternative fuels etc. These existing plans and programmes address specific measure and actions associated with those themes.

NPO 6 has also been amended to better reflect how the plan can be flexible enough to take into

account the development of new technologies and socio-economic development.

Issue Raised: National Policy Objectives (NPO's) and National Strategic Outcomes (NSO's)

Greater clarity was sought around the goals of the NPF (NPOs and NSO'S) regarding policy and spatial priority needs and the status and outcomes of the NPOs and NSO's. Some respondents suggested that the existing goals of the NPF should be more clearly laid out and should be framed as outcomes. Also, it was suggested that existing NPO's should be strengthened with regard to a range of issues including: sustainability; landscape; biodiversity; tourism, etc. Some respondents recommended adding NPO's regarding specific issues including but not limited to waste management.

Influence on the Final NPF

A number of NPOs have been amended to provide additional clarity; a limited number of new NPOs have been added to reflect policy gaps as raised within submissions. Examples include:

- NPO 3a, b and c, and NPO 6, 11, 19, 32 have been simplified
- NPO 7 has been condensed
- NPO 10, 12, 21 have been provided with further minor clarifications.
 - NPO 22, 25, 29, 41, 58, 60, 62 have been strengthened though small modifications in text e.g. the addition of the word sustainable.
- NPO 9 has been added to clarify the application of the strategy and growth rates at a regional level.
- NPO 14 has been replaced and NPO 15 which expressly supports the sustainable development of rural areas.
- Previous NPO 35 has been replaced by a new policy under NPO 36 which requires new statutory guidelines.
- NPO 44 has been amended to strengthen the development of the economic potential of the corridor
- NPO 46 has been amended to strengthen reference to cross border greenways, blueways and peatways.
- NPO 57 has been strengthened to include reference to the River Basin Management Plan.
- A new NPO has been added regarding the sustainable management of waste (NPO 56), Biodiversity (NPO 59), landscape (NPO 61).
- A specific section in relation to effective waste management is presented in Chapter 10, responding to issues raised in submissions.

A small number of NSOs have also been modified to better reflect the cross government approach to the NPF and the requirement of other departments in aiding delivery of the NSOs.

- NSO 6 has been amended to better reflect the broader economic outcomes as indicated in the NPOs including, innovation and skills.
- NSO 7 has been expanded to include reference to Heritage.

See Section 6 of this statement for screening of these changes.

Issue Raised: Role of RSES and MASPS

The need for clarity on the role of the RSES was specifically noted (i.e. how the policies and objectives of the NPF will be translated in practice and at a local level). Planning out to 2040 was considered compromised by a lack of implementation of existing legislation by other agencies including those associated with landscape, water, farming, forestry, planning and agriculture.

- Coherent RSES were recognised as key to the successful implementation of the NPF, however, clarification was called for regarding regional governance structures including:
 - Role/impact of regional assemblies;
 - Clarity on the role of RSES and MASPs and their role in developing city regions;
 - Commitment to regular reviews of existing policies, structures and resources to ensure alignment with objectives of NPF; and
 - Need for Local Gaeltacht plans to be considered in local/regional planning structures.
- Support for a specific commitment to developing Gaeltacht regions (e.g. connectivity; ICT)

Suggestion that specific policies and guidance should be included in development plans regarding commercial (e.g. out-of-town shopping, petrol stations, etc.) and industrial developments (i.e. optimise existing/ new opportunities).

Influence on the Final NPF

RSESs and MASPs: It is agreed that further clarity is required regarding the role of MASPs however the actual plans will be determined at a regional level as part of the preparation of the RSESs. The RSESs are required to ensure consistency with the NPF and will be subject to a monitoring programme as per legislative requirements of the planning and development act as amended. Section 10. 2 provides additional clarity regarding Metropolitan Area Strategic Planning

Development Plans: The NPF is a high level national framework and as such specific policies and guidance for development plans will be included as relevant in respective city and county development plans. Existing planning legislation and section 28 Guidelines also provide details regarding the information to be contained within a development plan.

Local Gaeltacht plans: It is agreed that Local Gaeltacht plans should be referenced; references to developing Gaeltacht regions (e.g. connectivity; ICT) are already provided for in the NPF. NPO 29 has been amended to include reference to language plans in Gaeltacht Language Planning Areas.

In addition, NPO 36 includes for new statutory guidelines, supported by wider methodologies and data sources to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels.

4.3.3.2 Governance

Issue Raised: Governance of the Plan

A number of submissions suggested that the governance structure proposed in the NPF was too weak and needed greater detail and accountability. Some of the key issues raised include that:

- The Regional Assemblies were not elected and as such this would dilute their powers in terms of mandate and accountability. In the absence of information on the scale, timelines and detail of structures e.g. proposed smart fund, it would not be possible to encourage innovation at the local authority level.

- There may be a need for a planning regulator to: (i) champion environmental issues and human health and well-being, and (ii) protect public participation as set out in both the Aarhus Convention and other relevant national/international legislation and (iii) more detail is needed regards the powers, remit and resourcing of the Planning Regulator.
- The government needs to prepare realistic, achievable economic, financial and fiscal plans to underpin the National Planning Framework 2040. The document needs to contain commitments to create the legislative and funding framework necessary to achieve the outcomes sought.
- The Regional Assemblies and local authorities must be adequately resourced to enable the proper implementation of the NPF. There was support for developing and implementing innovative funding mechanisms to support infrastructure delivery.

A new authority, similar to the UK National Infrastructure Commission, should be established to bring together the multiple institutions and policy instruments currently involved in infrastructure planning to ensure an integrated, efficient and sustainable approach.

Influence on the Final NPF

Section 10 of the final NPF deals with governance issues. Additional text has been added to this section to better describe and explain the approach to areas such as the proposed Metropolitan Areas. Addition clarity has also been brought to governance structures and additional text has been added to better clarify the links between Public Capital Investment – The National Development Plan and National Strategic Outcomes of the NPF.

The National Planning Framework is to be given full legislative support within the planning system, including regular review and update, to reflect changing circumstances and make adjustments where necessary. The planning legislation underpinning the National Planning Framework will also lead to the creation of a new independent Office of the Planning Regulator (OPR), which will be responsible for monitoring implementation of the NPF.

The monitoring programme presented in the Environmental Report has been revisited with the plan team reflect concerns raised during consultation. The final NPF does not include the monitoring programme from the SEA, however it anticipated that a separate monitoring programme will be established.

Issue Raised: Implementation of the Plan

A number of submissions highlighted the need for clarity on how the policy objectives in the NPF will be implemented, particularly the cross-sectoral engagement that will be required. Many supported identified the lack of an NPF implementation plan, including explicit metrics/targets and clear policy on measuring/reporting as a key weakness because it prevents any meaningful monitoring on progress or impact. It was suggested that annual reports should be provided by the plan team to track progress and these should be audited by an independent body.

Influence on the Final NPF

In order to facilitate monitoring and review, phased regional population targets to 2026 and 2031 are set out in Table 10.1. By 2027, these may be reviewed, taking account of implementation of this Framework to 2026, based on updated Census data, to inform the next full ten-year cycle of the National Development Plan. The National Planning Framework is to be given full legislative support within the planning system, including regular review and update, to reflect changing circumstances and make adjustments where necessary. The planning legislation underpinning the National Planning Framework will also lead to the creation of a new independent Office of the Planning

Regulator (OPR), which will be responsible for monitoring implementation of the NPF.

Issue Raised: Cross border Issues / Brexit

The importance of Ireland's commitments under the ESPOO Convention to prevent, reduce and control the adverse transboundary impact of certain activities on the environment were highlighted. Also, it was noted that the challenge of Brexit provides an opportunity for a cross-sectoral approach to strategic infrastructure and investment decisions that have a cross-border dimension. Such decisions could be co-ordinated to include mutually beneficial ways to address common environmental challenges across shared catchments. It was noted that explicit emphasis should be placed on planning and infrastructural measures which could help to mitigate the effects of Brexit on Irish society, economy and environment

It was suggested that the plan does not contain policy objectives to strengthen links to anywhere other than Northern Ireland with a suggestion that investigation should be carried out in relation to the capacity of Irish ports to support alternative trade routes.

Influence on the Final NPF

Text in the final NPF has been strengthened to address this issue. Chapter 8 is entitled "Working With Our Neighbours" and it includes specific policies in relation to Working Together for Economic Advantage (e.g. Dublin-Belfast Economic Corridor; Central Border Area), Co-ordination of Investment in Infrastructure (e.g. Mobility; Energy; Tourism) and Managing our Shared Environment Responsibly.

4.3.3.3 Sustainable Development

Issue Raised: Sustainable Development Goals

Many submissions proposed that the overarching objective of NPF should be to create a framework for sustainable growth and development (i.e. economic, social and environmental sustainability). They suggested a reference to the United Nations Sustainable Development goals (UN SDGs) be included. Many submissions supported adding a definition of sustainable development. Greater emphasis on moving to a low carbon, climate resilient economy with sustainable community development for a circular economy was also highlighted. Green Infrastructure (GI) was considered an important part of sustainable development.

Some specific draft NPOs were identified for comment including draft NPO25. This was welcomed but it was noted it would require a redirection of funds back into the community and voluntary sectors if it is to be achieved. Suggested amendments included a definition of sustainable community development or reference to relevant policy. NPO21 was also commented on. IT was suggested it should include explicit reference to renewable energy generation and economic value to rural economy; noting also that national guidelines are needed for renewable energy options (e.g. solar PV, Wind)

Further submissions reflecting the issue of sustainable development included:

- Lack of commitment to undertaking Strategic Land Availability Assessments to determine the availability, suitability and economic viability of land, including state

owned lands;

- Needs to address an all-island approach to waste management; renewable energy (e.g. waste to energy; district heating) and climate change;
- The re-use of brownfield sites as a catalyst for regeneration of a local area noting the NPF should go further to encourage the redevelopment of these sites. There is a need for a national strategy for brownfield land assessment and management;
- Land use planning and transport should be integrated and optimised in order to achieve sustainable development. Reduction of citizens' need to travel should be prioritised.

Sustainable urban systems should be prompted; reduce the target of locating 50-70% of new residential development on green field sites.

Influence on the Final NPF

A new section has been added to Section 1 of the NPF to integrate the principles of sustainable development clearly into the NPF and to relate the NPF to the UN Sustainable Development Goals

The provision of a national strategy for brownfield land assessment and management is considered to be outside the scope of the NPF however issues regarding the potential impacts and nature and scale of challenges in developing brownfield development are acknowledged. It is noted that the SEA proposed mitigation in relation to mapping brownfield sites to determine their suitability for development with reference to potential contamination risks. This mitigation was not included in the final NPF. However it is noted that at a regional level, it may be appropriate to carry out such an exercise to inform lower level planning decisions.

Issue Raised: Integration with Other Policy

The potential for the NPF to be a *"unifying spine"* for other national policy was raised. It was observed by some respondents that there was not enough integration of other related national policy with the NPF. Specifically water quality and flooding were mentioned, as was climate mitigation and adaptation and biodiversity including natural capital / assets, social value, flood prevention. It was noted that there were only general comment on some of these issues and no explicit commitment within the plan. Further to this, specific suggestions on text and policies for inclusion in the NPF were made with regard to resources such as the proposed Policies and Measures (PAMS) portal for implementation of the National Mitigation Plan in terms of the monitoring programme for the NPF.

Some submissions identified the lack of information within the NPF in relation to the marine consenting process and how it will be integrated with the land and marine planning systems. Further clarity on Figure 6.2 in the draft was requested. It was recommended that the NPF should ensure consistency with Regional, City and County planning policies. City and County growth strategies should align and be consistent with the broader aims and policies of the City and County plans and policies such as Smarter Travel and ports policy should be mentioned.

Other submissions highlighted the need for early engagement with Irish Water and other utilities to better align their investment strategies with RSES plans.

Influence on the Final NPF

Additional policy objectives and supporting text has been added to the final NPF to better reflect and integrate related policy. This is particularly evident throughout Chapter 9 – *Realising our Sustainable*

Future. Examples of NPOs which reflect other policy initiatives include:

- NPO 57 specifically addresses the issue of flooding and river basin management planning
- NPO 58 addresses *Green Infrastructure and ecosystem services*
- *NPO 59 addresses protected areas and species*
- *NPO 63 relating to the sustainable use of water*

The National Strategic Outcomes also set a framework for integration with other related policy on:

- Compact Growth
- Enhanced Regional Accessibility
- Strengthened Rural Economies and Communities
- High-Quality International Connectivity
- Sustainable Mobility
- Enterprise, Innovation and Skills
- Enhanced Amenities and Heritage
- Transition to a Low Carbon and Climate Resilient Society: The National Climate Policy Position establishes the national objective of achieving transition to a competitive
- Sustainable Management of Water, Waste and other Environmental Resources
- Access to Quality Childcare, Education and Health Services

Issue Raised: Circular Economy, Waste and Resource Management

A number of consultation responses noted there should be increased commitment towards a circular economy.

It was recommended that an NPO is needed to address future investment and development in waste management and waste infrastructure. The NPF does not address the provision of waste and resource management infrastructure; it should include provision of recycling facilities, reprocessing facilities, transfer stations, materials recovery facilities (MRF), refuse derived fuel (SRF/RDF) production plants, composting plants, biogas plants (anaerobic digestion), thermal treatment plants (waste to energy) and landfills.

There are EU obligations with regard to packaging waste, end-of-life vehicles, waste tyres, waste electrical and electronic equipment, batteries, farm plastics, et that should be addressed by the NPF. Other waste-related concerns included:

- Ireland should develop new technologies for waste management and resource recovery.
- Organic waste needs to be more efficiently dealt with through diversion from waste streams to aerobic and anaerobic digestion facilities to produce compost and biogas
- More waste should be converted to energy through the development of a larger number of waste to energy facilities
- New landfill facilities may need to be developed despite the move towards recycling and recovery.

Influence on the Final NPF

New text has been included in the NPF relating to waste management in Section 9.2. In addition NSO 56 now specifically addresses sustainable waste management.

4.3.3.4 Growth Strategy for the NPF

Issue Raised: Growth Aspirations of the NPF

Some submissions suggested the growth ambitions of the NPF are too low. A number of respondents referred to the growth ambitions of specific places and suggested local authorities should have minimum as well as maximum population densities for certain areas.

The growth of Dublin was the subject of mixed commentary with some submission suggesting it should not be hindered because it is a driver for national economic growth while others felt it should be limited to afford other locations opportunity to grow.

Others acknowledged that the framework is broader than a sector specific plan but felt it needed to be bolder and more focussed. Issues were raised regarding information/data sources to inform growth projections in the NPF and that the document should be more map-based and spatial in format.

Influence on the Final NPF

The ESRI were commissioned to carry out demographic and econometric research to inform the NPF. The ESRI Report is entitled '*Prospects for Irish Regions and Counties, Scenarios and Implications*', which has been published by the DHPLG and the ESRI in advance of the finalisation of the NPF and under separate cover (available at www.npf.ie). The Regional and Sub-Regional population data in the ESRI research has been used as a baseline that has informed the NPF.

A key factor in any population projection for Ireland is the pattern of migration, which has historically varied as a result of alternating periods of emigration or immigration, influenced by underlying economic conditions. It is clear that an increase in net in-migration to Ireland could have a positive impact on future population growth. While the reverse also applies, the ESRI projected outlook, which is a *mid-range* scenario, is based on sustained in-migration and economic growth to 2040.

To account for the possibility of higher net in-migration over the period to 2040, an allowance is made in the NPF to enable ambition and flexibility in planning for future growth. This means that full achievement of the targets set out in this Framework would accommodate around 1.1 million additional people in Ireland to 2040, which is approximately 25% more than the ESRI baseline projection. Progress towards these targets will be subject to review and further detail on phasing is set out in Chapter 10 of the NPF.

In setting overall targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers. From a long-term, national perspective, the targeted location, relative scale and proportionality of growth will assist in monitoring and assessing delivery and performance.

Chapter 11 of the final NPF sets out the six 'macro-spatial' options considered as potential directions for the development of the NPF and each option was assessed. The preferred option chosen was considered to be Option 2 – Regional Effectiveness & Settlement Diversity. This alternative was considered likely to achieve the maximum overall gain in relation to the Strategic Environmental Objectives (SEOs) in terms of maximising use of public transport thereby reducing transport related emissions, in tandem with facilitating higher densities in city areas, and focused, managed growth in supporting settlements, thereby improving regional connectivity and services outside of the cities. The preferred option acknowledges the economic importance of Dublin, while ensuring growth

across the regions and in other urban centres. It will help ensure that there are no constraints on the growth of the cities, allowing regional centres to develop and prosper. It will also contribute to preserving a sense of place and improving regional connectivity and services outside of the cities.

The NPF strategy map and regional map have been amended to better reflect the text.

Issue Raised: Regional Development / Balanced Growth

Balanced social, economic and demographic development was a significant concern for many submissions with many indicating that various places, including Dublin, should be recognised within the NPF as important drivers for national and regional growth.

Many submissions called for the NPF to support development of the Dublin-Belfast economic corridor and Atlantic Economic Corridor (AEC). There was support for explicit commitments to development in Midlands and North West regions (e.g. Sligo; Athlone; Donegal). A number of responses identified a need to enhance public transport links between regional towns and the five cities identified as foci of future growth. There was also support for including Drogheda as a target area for regional development in the plan. The potential for increased measures to develop Limerick and Cork was also raised. Also, many commented on the apparent lack of support in the NPF for Waterford/ South East Region; in particular there is strong support for a Technological University, improved road connectivity and improved rail links.

The role of towns and the inter-regional role played by larger towns needs was flagged as needing to be addressed in addition to addressing town centre renewal/ regeneration in sizeable regional towns. It was suggested the proposed new category of town (i.e. population >10,000) will put the Mid-West region at a disadvantage. Also, it was suggested that there should be more focus on residential development within the existing footprint of large towns and the CEDRA Report (2014) should be considered by NPF.

Influence on the Final NPF

A new section has been incorporated into the NPF entitled: *Effective Regional Development*. It recognises that regional governance and regional development are essential cogs for translating and delivering national policy at a local scale and that each of the Regional Assemblies has a leadership role to play in identifying regional policies and coordinating initiatives that support the delivery and implementation of national planning policy through the preparation and implementation of Regional Spatial and Economic Strategies. Further clarity regarding the challenges facing the three regions recognising that high level planning and place-making enablers can help shape the strategic development of our regions is also provided.

The regional section acknowledges the role of towns (to take in areas outside the sphere of influence of cities) the inter-regional role played by larger towns by recognising the existing role and functions of towns and highlights the need for more coordinated approaches to place making such as the need to prepare co-ordinated strategies for Dundalk and Drogheda as key centres on the Dublin to Belfast Cross-border Corridor, the need for more effective strategic planning and co-ordination of the future development of strategic locations at points that straddle boundaries between neighbouring regions, as in the example of Athlone and the role of large towns such as Sligo, which serves a large hinterland that extends beyond County into surrounding counties. The NPF does not attribute any specific designation to these areas as this will be determined as part of the preparation of the RSEs and statutory development plans, which are required to be consistent

with the NPF national policy objectives and delivery of the NSO's.

NPO 9 has also been included to further clarify regional growth for settlements.

4.3.3.5 Sectoral Perspectives

Issue Raised: Housing

The issue of housing need was a clear focus in submissions received from the NGO and housing support sector. Suggestions were made in relation to the need for a stated commitment to good design and quality of development and encouragement of innovation/flexibility in the way homes are designed. This extended to a suggestion that universal design principles should underpin the NPF to ensure an inclusive approach to proactively address and enable planning and design with regard to all citizens regardless of their age, size, ability or disability.

It was recommended that the NPF should include clear objectives in relation to housing (provision of social housing; sustainable design; SuDS) provision. There was support for high-quality, high density housing in towns and for building a critical mass in regions to support service provision and employment.

Some submissions suggested the NPF lacks any commitment to providing housing and related services for the ageing population. There was support for adding a specific percentage of housing zoned for ageing populations, in areas with access to facilities, public transport, etc. Also there should be an explicit commitment is needed regards use of existing housing stock.

Influence on the Final NPF

Text has been amended in Chapter 4, *Making Stronger Urban Places* and Chapter 5, *Planning for Diverse Rural Places* to address many of the issues raised regards housing.

Chapter 6 *People, Homes and Communities* includes NPOs relating to integration of ageing populations and overall social inclusivity. NPO 30 has been amended to have a stronger commitment in relation to the need to address housing for ageing populations:

Issue Raised: Tourism

A number of submissions were received which directly or indirectly related to tourism. It was raised in some of the submissions that a greater level of priority and emphasis needed to be assigned to tourism and this should be supported by the setting of specific national and regional tourism objectives. Specific aspects of tourism raised included: greenways, blueways; peatways; and dark skies.

Influence on the Final NPF

Significant additional text has been included in Section 5 on Tourism. This addresses the opportunities associated with the development of greenways, blueways and peatways as a unique alternative means for tourists and visitors to access and enjoy rural Ireland and the development of a strategic national network is now a priority. It is felt such a network would allow for greater access to more remote parts of the country and presents opportunities for associated tourism development

to take place in rural areas.

The concept of Dark Skies is also addressed in Chapter 5. There are currently two Internationally recognised Dark Sky areas in Ireland, a Park located in County Mayo and a Reserve located in County Kerry and the role of 'Dark Sky' Parks and Reserves as an example for how potential of all areas can be harnessed has been recognised.

Issue Raised: Energy Developments

Submissions suggested that the Plan should focus on the reduction in energy consumption and promote policies to support a low-carbon, climate-resilient economy. Greater detail regards future energy infrastructure development was also raised as was the need for commitment to a diversity of renewable energy options, rebates and incentives for home owners, etc.

Some submissions identified that the plan lacked reference to the EU requirement for all new houses to be nearly zero energy by 2020. There was some support for an end to further development of wind farms, but a significant number of submissions also advocated for a more diverse range of energy supply options (e.g. solar PV; waste to energy; agri-biogas) For example, there is significant potential for agri-based anaerobic digestion to form part of Ireland's strategic energy resources and contribute to the circular and bio-economy. Some specific NPOs identified included:

- Suggestions that draft NPO 44 requires a shift in decision-making around developments in order to ensure genuine community participation.
- Suggestions that NPO 49 should be expanded to include gas. Some submissions supported the use of farm wastes to produce biogas as a way of addressing GHG emissions and potentially create employment in rural areas. Also, Compressed Natural Gas (CNG) should be considered for use in transport vehicles (e.g. buses; commercial fleets).
- Suggestions that NPO57 necessitates direct engagement with communities around potential locations for renewable energy

Influence on the Final NPF

Text has been amended (e.g. Chapter 6, 8) to respond to the issues raised in submissions regarding energy consumption and commitment to utilising a wide range of renewable energy options.

Issue Raised: Transport

Submissions highlighted a need for significantly improved regional connectivity to ensure balance growth and development. It was suggested that there are objectives to enhance public transport within cities but none address improved rural connectivity. Regional connectivity should be supported by optimised services (e.g. increased frequency; shorter journey times; better co-ordination between bus and rail (incl. LUAS, DART)).

Many submissions noted the lack of commitment to decarbonise or address the use of fossil fuels for transport; many submissions supported transitioning to an electric fleet for public transport (e.g. rail, bus) pointing out that there should be an explicit commitment to reducing car dependency and active transport (e.g. cycling) options should be prompted. Others highlighted the need for sustainable transport needs to be integrated and co-ordinated with the implementation of other critical policy objectives. The strategic importance of EU TEN-T network was also addressed by many

submissions and the need to identify/prioritise transport networks for maintenance, renewal and investment.

The importance of the national road network and the need to improve regional connectivity in parallel with urban growth strategies (e.g. upgrade N24; N62; N5) was raised. In particular there was a lot of support for prioritising/addressing the congestion around urban centres like Dublin, Cork and Galway (e.g. Leinster Outer Orbital Route to on the M50). It was suggested that the NPF needs greater commitment to upgrading national secondary routes to the midlands, southwest and northwest regions.

There was a lot of support for extending the LUAS and DART lines, increasing the availability of park and ride facilities and integrated public transport services. This would support a modal shift away from the private cars and more sustainable 'Smarter Travel'

Other transport issues raised included the lack of commitments to high quality international connectivity and infrastructure routes leading to/from Tier One ports, airports, etc. Improved rail links are crucial to international connectivity (e.g. rail link to Dublin Airport) and supporting freight transit, particularly access to ports (Dublin, Cork and Foynes)

Influence on the Final NPF

Text and National Priority Objectives have been amended to address to concerns raised regarding sustainable transport.

Issue Raised: Marine

The following issues were raised in relation to the marine environment:

- Lack of integrated planning for coastal zones needs to be addressed (i.e. NPO 40 should be stronger). Current foreshore consenting process is not aligned with the planning process and conditions imposed under the two processes may not be mutually compatible nor complementary. An integrated process for foreshore permitting, in parallel with the land based planning process, would be beneficial for risk mitigation and project timeline certainty. Improved and increased accessibility to coastal and island areas will be an important consideration for land-based spatial planning, particularly in relation to community and tourism development.
- Stronger and clearer policies should be put in place to enable the regeneration and sustainable development of ports. Regional strategic importance of the port extension development to Galway Port should be referenced and Greenore Port should be identified as a Tier 2 port. It is important that the NPF recognises that Dublin and Cork Ports are designated as European Core ports and are part of the Core TEN-T Network.
- No reference is made in the NPF to mainline rail or rail freight.
- Regeneration of Drogheda Port to facilitate its expansion and growth.

Influence on the Final NPF

Chapter 7, *Realising our Island and Marine Potential* addresses a wide range of marine-related issues and the text has been amended to incorporate some of the issues raised in the submissions

Issue Raised: Education

The role of education as a catalyst for both regional and national sustainability was raised by the education sector. Although it was acknowledged that the NPF did address education, it was suggested that more specific detail was needed such as naming of potential Technical Universities and the role they might play for the West, Northwest, South and Southeast.

It was noted that the future growth enablers for Dublin did not include for the continued expansion of and integration with the City's third level institutions despite this being included for the other four cities. It was noted that recent national focus on the need for primary and second level places needs to be matched for third level.

It was suggested that graphic 2.2 should be amended to take account of more than just universities, it should reference Higher Education Institutions.

Many institutions have dispersed campuses. The intent of the reference to consolidation in NPO 32 is unclear in this regard and should be clarified.

It was suggested that the reference to scale in draft NSO 10 should be revisited as it does not take account of smaller areas that serve a wider population such as Higher Level Institutions.

Influence on the Final NPF

New text has been added that responds to the issues raised regarding education and its role in supporting regional development.

4.3.3.6 Infrastructure**Issue Raised: Strategic Planning**

There was a lot of support for promoting a regional and strategic approach to planning to identify key opportunities and gaps in existing plans and frameworks. Also, population densities should be planned at a sufficiently high density to allow for ease of public service provision and decrease the need to travel.

Many submissions identified the need for an implementation plan which prioritises key enabling infrastructure. It should identify key locations for strategic infrastructure (e.g. wind farms; solar farms, etc.). Greater clarity is needed regarding what strategies and policies were considered in developing the NPF response to future energy demands. It was noted that the NPF makes specific mention of some projects; all strategic projects should be referenced, or non-specific absences noted were the Limerick Distributor road and the Cork Limerick Motorway, etc.

The NPF should support amending zoning criteria to allow zoning of upper floors separately (i.e. allow commercial/retail uses at ground floor and residential uses above).

More support is needed for Blue-Green Infrastructure and more focus on opportunities for Sustainable. The NPF should require Urban Drainage Design (SUDs) within developments and in the public realm.

NPO14 should ensure that the targeted growth in the North and Western region includes the whole region and not just Galway.

There was strong support for deployment of secure digital communications and services infrastructure (e.g. broadband) to facilitate balanced regional growth, economic development and health/well-being (e.g. tele-medicine; long distance learning), etc.

Influence on the Final NPF

The text in Chapter 3, Effective Regional Development has been amended in response to commitments for developing regional infrastructure. Also, the text has been strengthened in Chapter 4 *Making Stronger Urban Places* and in Chapter 5, *Planning for Diverse Rural Places*, in light of the concerns raised by many submissions in relation to (strategic) infrastructure.

Issue Raised: Green Infrastructure

The role of green infrastructure and its importance in terms of benefits to humans and sustainable development needs to be addressed in the NPF. In particular, the NPF should be committed to implementing appropriate infrastructure for flood prevention and mitigation. Also, the plan should identify locations/corridors/ zones for strategic infrastructure (e.g. energy)

There were a significant number of submissions in support of developing a strategic network of Greenways around the country. They are viewed as a potential catalyst for rural/regional development and regeneration, and could be a resource for the economic and social benefit locally and nationally. NPF should have a policy of utilising existing railway routes with parallel greenways.

Influence on the Final NPF

Text has been amended in Section 5 to address the issues raised regarding greenways.

4.3.3.7 Environmental Challenge**Issue Raised: Climate Adaptation and Mitigation**

Many submissions addressed the lack of a specific policy to address the consequences of climate change. It was suggested that the plan fails to address the need to reduce dependency on fossil fuels. Numerous submissions supported a greater commitment throughout NPF regarding climate change and developing a low carbon/ carbon resilient society.

Clear benchmarks should be provided in relation to the environmental objectives (Chapter 8). Specific concerns included: (i) avoid building on Peatland (i.e. carbon sinks); (ii) light pollution, particularly blue rich LED light, impacts biodiversity, energy cost, well-being and natural heritage.

Influence on the Final NPF

Chapter 9, Realising our Sustainable Future addresses resource efficiency, protection and conservation of natural capital and creating a cleaner, healthier society. Chapter 11 addresses assessment of environmental impacts and text has been amended to strengthen commitments to environmental protection and conservation in light of the concerns raised in submissions from the public consultation.

Issue Raised: Human Health and Wellbeing

Concern was expressed at the impact of long commuting patterns on human health, welfare and quality of life

Communities should have the ability to adapt to meet the needs of an aging population without older persons having to relocate outside of their lifetime community. Emphasis should be on creating a fairer, age-friendly society; add explicit reference to Healthy Ireland statement “where everyone can enjoy health and well-being to their full potential”

Many submissions outlined the need for healthcare provision, specifically building regional, state-of-the-art hospitals for acute care and need for tele-medicine

Influence on the Final NPF

The text in Chapter 4 - Making Stronger Urban Places, and Chapter 6 - People, Homes and Communities has been strengthened to respond to the issues raised regarding human health and well-being.

Issue Raised: Water Quality and Flood Management

It was suggested there was limited detail regarding the sustainable management of the quality of water resources to support and deliver the growth strategy for Ireland 2040 and insufficient water provision for the levels of demand.

Many submissions expressed concern regarding the apparent lack of consideration of commitments to the WFD and RBMP.

Flooding, flood risk assessment and prevention and mitigation measures were also highlighted as a priority for spatial planning and population growth in sensitive regions (e.g. Midlands, Cork).

Influence on the Final NPF

The text in Chapter 8, *Working with our Neighbours* and Chapter 9, *Realising our Sustainable Future* has been strengthened to address the issues that were raised regards commitments to River Basin Management Plans and protection on Water resources.

Issue Raised: Other Environmental Issues

It was suggested that a framework such as One Planet Living (sustainability framework) should be adopted to ensure that all development carried out under the NPF is socially, environmentally and economically sustainable.

A requirement for reports on societal impact as part of wider environmental considerations was highlighted with reference to draft NPO 70. Such reports should include qualitative research with communities likely to be affected by developments and mechanisms for community participation in decision-making.

Protection and enhancement of water quality, landscape, and biodiversity were considered a cornerstone of the plan. It was suggested the objective to protect vulnerable landscapes should be expanded to protect all landscapes. Other issues raised included protection of bogs and peatlands and consideration of lands in state ownership should regarding potential development.

It was felt by some that there should be a clear link between the NPF, Noise Action Plans and Development Plans (residential developments); noise mapping contours should be required as part of a noise impact assessment within the planning application process.

Influence on the Final NPF

Chapter 9, *Realising our Sustainable Future* addresses resource efficiency, protection and conservation of natural capital and creating a cleaner, healthier society. Chapter 11 addresses assessment of environmental impacts and text has been amend to strengthen commitments to environmental protection and conservation in light of the concerns raised in submissions from the public consultation.

Issue Raised: Quarries, Mines and Extractive industries

Some submissions suggested that the NPF requires a commitment to the quarry, mining and extraction industries.

Influence on the Final NPF

New text on Aggregates and Minerals has been included in Section 5.4.

4.3.3.8 Environmental Assessment Processes**Issue Raised: SEA Compliance**

A number of submissions raised the issue of compliance of the SEA with the relevant SEA legislation. It was suggested that the SEA failed to identify the correct environmental targets which should be met and failed to produce any quantitative assessment of the impact of the Framework. Specific reference was made to adequacy of mitigation and monitoring measures proposed.

Influence on the Final NPF

The SEA of the National Planning Framework was carried out under S.I. 435 of 2004 as amended which transposes the SEA Directive 2001/42/EC into Irish law. The requirements for information to be contained in the environmental report are laid out in Schedule 2 of the regulations. The requirements are reproduced in Table 3.3 of the Environmental Report: *“Requirements of the SEA Directive and Relevant Section in Environmental Report”*. This presents 10 requirements with relevant chapter headings 2 to 9 in the Environmental Report where the information can be found.

Chapter 5 presents the relevant baseline information and specifically includes information on current pressures. Chapter 8 deals with the assessment of the national policy objectives contained within the NPF and identifies impacts, both positive and negative associated with them. Given the strategic level of the framework, the majority of objectives did not include any locational dimension and as such have limited scope for detailed assessment. Those objectives that did contain quantitative targets have been considered in the context of the overall framework provisions which seek to consolidate growth into five main cities and a number of larger towns with the express purpose of reducing dependency on private car use and ensuring the critical mass to support public transport can be achieved.

The distribution of the population targets will be appropriately addressed with locational context at the RSES and MASP levels of planning where SEA and AA will again be applied with more focussed context. At that point more quantitative assessment is anticipated and this will continue down to county and local area levels as issues are addressed in more detail.

It is further noted that the integration with existing inter-related policy has been highlighted throughout the development of the NPF. The NPF and associated assessments do not attempt to redo the work already completed through for the Regional Waste Plans, River Basin Management Plan, National Mitigation Plan among others. These sector specific plans will be reviewed in the context of the proposals for the NPF and will be subject to SEA and AA as appropriate.

Issue Raised: Issues to be included in the Environmental Report

Several submissions included suggestions for additional information in the SEA Environmental Report. These included but not limited to;

- UN Sustainability Guidelines;
- Current status of Ireland's Red and Amber listed Birds of conservation concern
- Birdwatch Irelands Group Species Action Plans
- Birdwatch Irelands Bird Wind Sensitivity Mapping Tool
- *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, Landscape Institute and Institute of Environmental Management and Assessment*
- landscape ecology, landscape level management and Green Infrastructure should be considered in the landscape SEO
- Sites listed on the Tentative List of World cultural heritage to include Inis Cealtra, Lough Derg, County Clare
- Measureable targets
- Mitigation for climate impacts, reversal of biodiversity loss, deterioration in quality of life and general resource management sustainability to meet quality of life and wellbeing objectives.

Influence on the Final NPF

An addendum to the SEA Environmental Report has been prepared to reflect relevant changes.

5 PREFERRED SCENARIO AND REASON FOR CHOOSING

5.1 INTRODUCTION

The consideration of alternatives is a requirement of the SEA Directive (2001/42/EC). It states under Article 5(1) that:

Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.

Annex 1 (h) of the Directive clarifies that the information to be provided on alternatives under Article 5(1) is *inter alia* an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. Article 9 of the Directive requires that a statement shall be prepared providing information on the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.

Annex 1 (f) details the environmental topics to be considered in the evaluation of the alternatives, which is the same as that addressed in the assessment of the plan itself: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

In summary, the Directive emphasises that the SEA process must consider alternatives that are “reasonable”, and take into account “the objectives” of the plan, and “the geographical scope of the plan”.

5.2 APPROACH TO ALTERNATIVES FOR THE DRAFT NPF

In advance of preparing strategic alternatives, research was carried out by the Economic and Social Research Institute (ESRI) examining population growth, employment and job growth projections to the horizon year of 2040. The research indicates that by 2040, there will be approximately 1 million additional people in Ireland, 550,000 additional homes and 660,000 more jobs. Of this, most growth would likely occur in the Dublin region and four surrounding counties as well as Cork and Galway. Almost 40% of the projected jobs are predicted to occur in Dublin alone under a *Business as Usual* approach.

A key challenge was to explore macro spatial alternatives that could accommodate the projected growth in the most optimal and sustainable manner that would achieve Ireland’s economic, social and environmental requirements. It was also important to focus on options that were strategic in nature to reflect the purpose of the NPF. When developing the potential strategy alternatives it was also important to outline options that reside with the legal competence of the plan-making authority, in this instance the DHPLG, but also assisted and supported across government. In addition, a key consideration has been to determine if the options or combination of options would

be realistic (i.e. able to achieve the NPF's objectives), reasonable (i.e. based on socio-economic evidence), viable (technically and financially feasible) and implementable (realisable within the NPF's timeframe and resources).

5.2.1 Macro Spatial Growth Alternatives

In developing macro spatial growth alternatives, a key consideration was to ensure a planning framework that will plan for changes which Ireland is likely to experience over the next 20-25 years in a way that is proactive, avoids adverse effects and supports a better quality of life for the population. The key challenges include:

- Regional disparity;
- Role of settlements;
- Hollowing out of settlements; and
- Infrastructure deficits.

To address the challenges of accommodating and planning for this growth and driving it in a sustainable way, a number of macro spatial alternatives were examined which are considered to be reasonable, realistic, viable, and implementable. These have been developed around four 'pillars', as shown in **Figure 5.1** and include:

- **Pillar 1 - Regional Distribution Scenarios;**
- **Pillar 2 - Concentration-Dispersal Scenarios;**
- **Pillar 3 - Compact-Sprawl Scenarios;** and
- **Pillar 4 - Temporal Infrastructure Scenarios.**

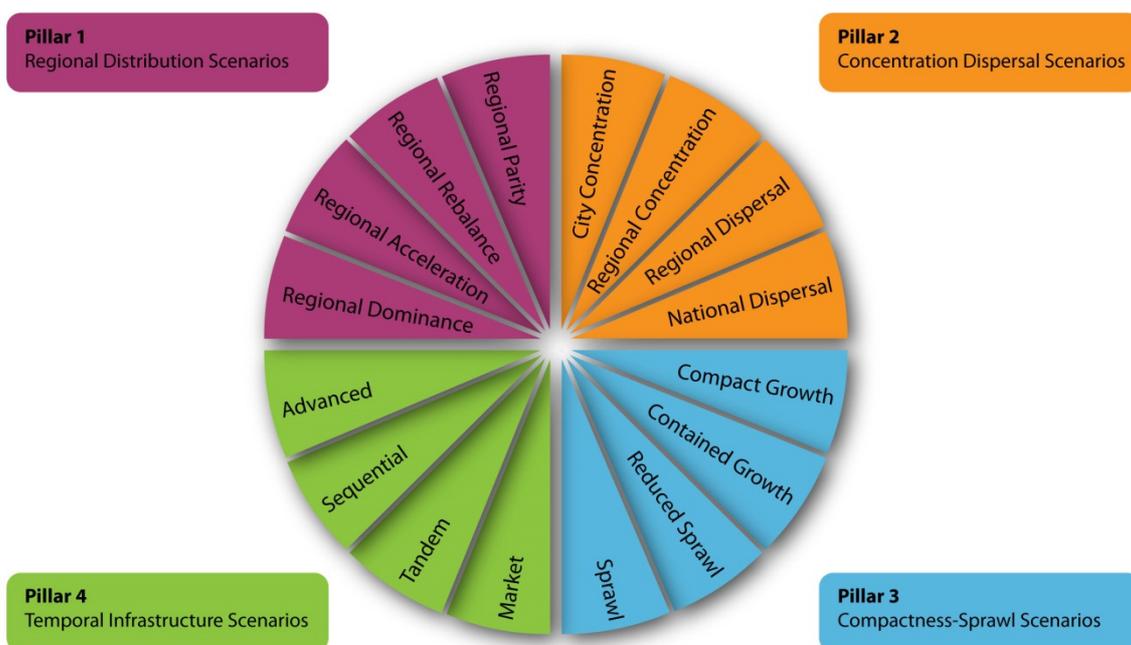


Figure 5.1 – Macro Spatial Options

In developing these alternatives a workshop was held with the SEA statutory bodies and key stakeholders (including business, community, environmental, services, and land use planning experts/ providers) to ascertain their views. This workshop also included members of the environmental steering group overseeing the SEA/ AA/ SFRA process. The workshop was a first step to examine the range of high level options that are available as part of a long-term growth strategy for the NPF, with a view to developing a number of growth options and potential viable combinations for evaluation.

5.2.1.1 Pillar 1 Regional Distribution Scenarios

This macro spatial scenario seeks to explore the options for regional growth that will ensure effective regional development (also referred to as balanced regional development) as required under national planning policy and per statutory requirements to address the challenge of regional disparity. Under Pillar 1, four Regional Distribution Options were explored:

1. **Regional Parity;**
2. **Regional Rebalance;**
3. **Regional Acceleration;**
4. **Regional Dominance.**

In examining the four options, it was considered that Regional Rebalance and Regional Acceleration would not be realistic given the scale and influence of the capital city on national growth and the existing dominance of the EMRA. The scale of the embedded and projected growth trajectory of the EMRA combined with the absence of a mechanism to redirect the majority of growth to the two other regions combined means that the Regional Acceleration and Regional Dominance approaches are neither realistic nor implementable. Seeking to grow the NWRA and SRA significantly more than the EMRA would demand some level of artificial constraint on the growth and development of Dublin. This, together with the comparatively much smaller size of regional cities, could result in diminishing the scale of overall national development. As part of a progressive policy approach, Regional Parity is therefore considered to be a more reasonable and viable scenario, whereby the growth of the NWRA and SRA areas together would exceed that projected under a business as usual approach and would broadly equate to that of the EMRA.

Preferred Solution and Reason for Choosing: Regional Parity. This scenario would contribute to national objectives regarding regional development.

5.2.1.2 Pillar 2 Concentration-Dispersal Scenarios

This macro spatial scenario seeks to address the challenges posed by the dispersed nature of growth, the weak settlement patterns and therefore explore the options for a settlement structure to sustainably support an additional 1 million people and 500,000 jobs. Under Pillar 2, four Concentration-Dispersal Options were explored:

1. **City Concentration;**
2. **Regional Concentration;**
3. **Regional Dispersal; and**
4. **National Dispersal.**

In considering options, two important variables were the scale of concentration of activity and the relative distance, or ease of accessibility, to centres of scale. An approach focused on growth in and around Dublin and to some extent the regional cities would have negative consequences as it would not address the north-west which does not have the same scale of urban centres, outside of Galway City. Such a trajectory is likely to add to further growth pressures in the wider Dublin Region and inhibit more peripheral parts of Ireland from realising their full potential.

Preferred Solution and Reason for Choosing: While City Concentration is viable, the preferred scenario is Regional Concentration as it would contribute more to national objectives regarding regional development. In picking Regional Concentration as the preferred macro spatial option, it was considered important that while the majority of growth should be focussed in the cities and a number of regionally important centres, the rate of growth in comparison to the national rate of growth was a key determinant.

5.2.1.3 Pillar 3 Compactness-Sprawl Scenario

It has been established that getting the physical form and location of future development correct offers the best prospects to unlocking regional potential. Currently, the fastest growing areas are at the edges of, and outside of, our cities and towns. This results in a constant process of infrastructure and services catch-up, city centres becoming run-down and sprawl that extends the physical footprint of our urban areas. This pattern of development at greenfield locations suggests that in the long term, meeting Ireland's development needs in housing, employment, services and amenities will cost at least twice that of a compact/ smart growth-based approach. This issue is also recognised in Ireland's Planning Policy Statement 2015 which states it a key principle for "*efficient and effective use of previously developed (brownfield) land over the use of greenfield land to ensure the most efficient use of existing infrastructure, enhancing and strengthening the continued vitality of existing communities through regeneration*".

Therefore four Compact-Sprawl Options were explored in relation to the level of housing delivery on infill and brownfield sites, in comparison to greenfield sites within settlements, they include:

1. **Compact Growth;**
2. **Contained Growth;**
3. **Reduced Sprawl;**
4. **Sprawled Growth.**

It was considered that the issue of compact versus sprawled growth was critical in that it translates the regional and settlement scenarios of Pillars 1 and 2 into physical implementation. It was determined that the scenarios should refer to the delivery of new homes within the built-up envelope of existing urban settlements on infill or brownfield sites.

Preferred Solution and Reason for Choosing: It was also determined that a combination of the options Contained Growth and Reduced Sprawl would be a significant improvement on business as usual approach that is currently happening in Ireland. It was therefore considered that the delivery of at least 40% of all new homes nationally on infill or brownfield sites, and within the built-up envelope of existing urban settlements, would contribute to national objectives regarding regional development.

5.2.1.4 Pillar 4 Temporal Infrastructure Scenarios

Under the Planning and Development Amendment (Bill) 2016 it is a requirement of the NPF to indicate national infrastructure priorities to address strategic development requirements for implementing the NPF. It is also important that the NPF and the structures it proposes are supported by Government through Cyclical Capital Reviews. In this regard the NPF will align with the long term National Investment Plan. In addition to identifying infrastructure needs, the timing of development is equally important for sustaining our progress in economic, social and environmental terms. Four scenarios were explored which include:

1. **Front-loading Provision;**
2. **Sequential Provision;**
3. **Tandem Provision;**
4. **Market-led Provision.**

Unlocking the growth and regeneration opportunities for the NPF, in particular sustainable land management requires an approach to aid viability and deliverability. Front-loading Provision of services in advance of planned growth is not considered realistic across all sectors. It may however be applicable for certain areas such as strategic development zones and city metropolitan area strategic plans (MASPs). Market-led Provision may lead to deficits of service provision in some areas or result in the need for catch-up, putting pressure of other services.

Sequential Provision provides flexibility regarding the forward planning of strategic projects of national importance, which can take up to a decade to deliver from design to operation while also ensuring that infrastructure provisions keep pace with the scale of growth. Tandem Provision is also viable however it does not contain the ambition and forward planning needed over a 20 year period.

Preferred Solution and Reason for Choosing: Sequential Provision would best contribute to national objectives for national and regional development.

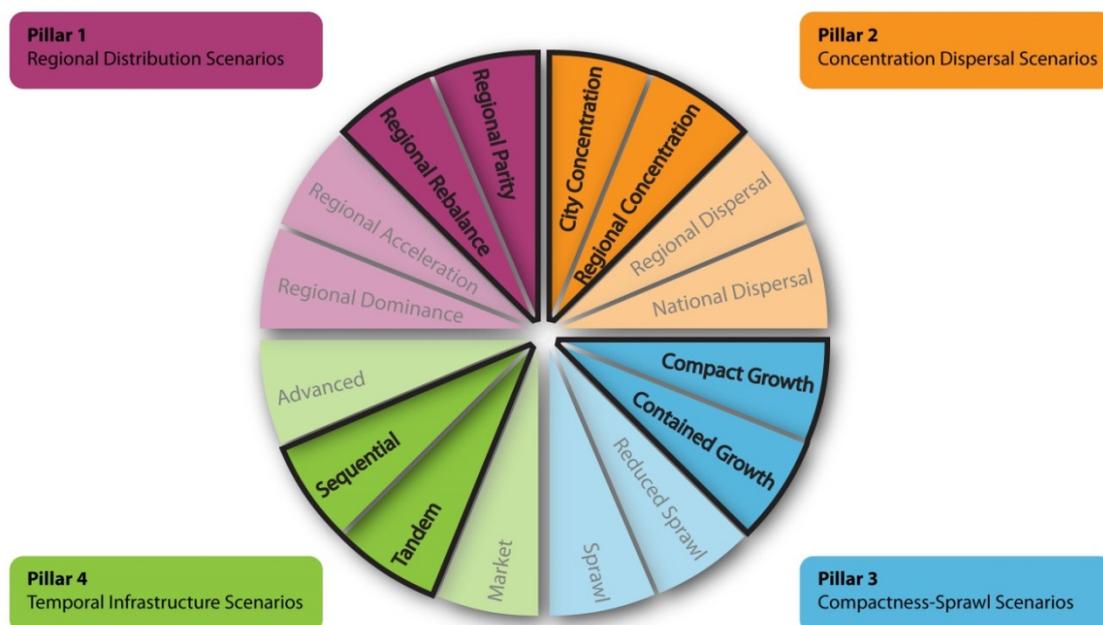


Figure 5.2 – Refinement of the Macro Spatial Options

5.2.2 Strategy Alternatives

The assessment of macro spatial growth alternatives under the four pillars presented above represents those strategic questions which have driven the direction of the plan. Following on from that analysis, six strategy alternatives were developed which integrated the preferred pillars into more focussed real world alternatives. The six alternatives developed for consideration were:

- **Option 1 – Compacted Concentration**
- **Option 2 – Regional Effectiveness and Settlement Diversity**
- **Option 3 – Regional Effectiveness and Settlement Consistency**
- **Option 4 – Regional Dominance and Settlement Diversity**
- **Option 5 – Regional Dominance and Settlement Consistency**
- **Option 6 – Business as Usual**

Each option has undergone an objectives-led assessment, reflecting on the SEA sensitivities. This qualitative assessment of each option compared the likely impacts against the SEOs, outlined in **the Environmental Report**, to establish which alternatives meet the SEOs and which, if any, contradict them. The assessment carried out was primarily qualitative in nature based on expert judgement. For the purposes of these assessment, plus (+) indicates a potential positive impact, minus (-) indicates a potential negative impact, plus/minus (+/-) indicates that both positive and negative impacts are likely or that in the absence of further detail the impact is unclear, and a neutral or no impact is indicated by zero (0).

5.2.2.1 Option 1 – Compacted Concentration

Option 1 included the following criteria:

- (i) The level of growth in the NWRA area and SRA area combined would equal that of the EMRA area;
- (ii) Focus the highest quantum of growth and rates of growth in 5 cities through a tailored approach to settlement growth targets;
- (iii) Deliver at least 50% of all new homes in the 5 cities on infill or brownfield sites within the built up envelope of existing urban settlements (and at least 30% in all other settlements); and
- (iv) Provide some critical infrastructure in advance of planned growth to kick start development and provide other infrastructure sequentially and on a phased basis in tandem.

Key*	PHH	BFF	S	W	AQ	CF	MA	CH	L
Option 1 - Compacted Concentration	+/-	+/-	+/-	+/-	+	+	+	+/-	+/-

*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population and Human Health; S – Soils; W – Water; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; L – Landscape.

This option would have positive impacts for PHH and MA as growth would be focussed on regional parity between the EMRA area and the NWRA/SRA areas combined. This would recognise and preserve the economic drivers of the Dublin/Eastern and Midland area, while also promoting and facilitating growth in the two other regions. The *Compacted Concentration* option allows growth to be focussed in the five principle cities which can have positive impacts for BFF, S, W, CH and L as growth is principally focused in existing urban envelopes and not on greenfield sites.

The focus of growth in five cities has potential for both positive and negative effects. From a positive perspective, it affords greater opportunity to deliver services efficiently, a positive for MA, and reduce the potential for cumulative impacts from one off and piecemeal delivery of disjointed water, energy and telecoms infrastructure. Indirect positive impacts would be anticipated for BFF, S and W as a result. Furthermore, a focus on five cities allows for greater focus and spending on public transport, reducing the need for private car-based journeys with positive effects for AQ and CF in particular but also indirectly for BFF, W and CH. The concentration of people in city areas also offers greater potential to integrate other interrelated measures such as district heating, walking and cycling networks which will have direct positive impacts for CF. An approach that focuses on compactness and concentration for our cities may also give rise to negative impacts on L and PHH through changing skylines and indirect impacts from overshadowing caused by high-density development where significant building heights may be required. There is also the potential to impact negatively on CH if city growth is not sensitive to the existing archaeological, architectural and cultural heritage associated with the identified cities.

The *Compacted Concentration* option also includes for an increase in the use of infill or brownfield sites within the built-up envelope of existing urban settlements. Whilst development on brownfield land is broadly positive insofar as it reduces the need for greenfield development which may be an important community/ social assets in such cities, there is potential to encounter contaminated material that could indirectly impact on BFF, S and W through the remediation process. The volume and nature of the contamination will be an important factor to consider given the limited end-of-life solutions for some contaminated material.

The provision of some critical infrastructure prior to development is directly positive for PHH and MA as it ensures that services such as transport, water and wastewater provisions are put in place prior to occupancy of residential development. There could be indirect positive impacts on BFF and W if the infrastructure provision was to include wastewater treatment facilities. The high density of people within the cities could provide financial justification for public transport services thus increasing urban mobility and reducing the need for the private motor car. This could have indirect positive impacts on AQ and CF through the reduction in emissions.

5.2.2.2 Option 2 – Regional Effectiveness and Settlement Diversity

Option 2 included the following criteria:

- (i) The level of growth in the NWRA and SRA combined would be equal to that of the EMRA;
- (ii) Focus the highest quantum of growth and rates of growth in 5 cities and a number of regionally important large towns through a tailored approach to settlement growth targets;
- (iii) Deliver at least 40% of all new homes nationally on infill or brownfield sites within the built up envelope of existing urban settlements; and
- (iv) Provide some critical infrastructure in advance of planned growth to kick start development and provide other infrastructure sequentially and on a phased basis in tandem.

Key*	PHH	BFF	S	W	AQ	CF	MA	CH	L
Option 2 - Regional Effectiveness and Settlement Diversity	+/-	+/-	+/-	+/-	+	+	+	+/-	+/-

*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population and Human Health; S – Soils; W – Water; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; L – Landscape.

Option 2 is similar to Option 1 with a focus on regional parity, development of five city areas, use of infill and brownfield as part of the solution alongside provision of advanced critical infrastructure. However this option also sees a role for a number of regionally important large towns through a tailored approach to settlement growth targets. This variation reflects the social and community structure which has historically developed in Ireland and the importance of a supporting network of large towns to drive the regional and rural economy outside the functional influence of cities. Ireland has many rural areas with significant cultural ties to the land and needs effective regional and rural drivers to ensure that urban and rural development needs are met.

5.2.2.3 Option 3 – Regional Effectiveness and Settlement Consistency

Option 3 included the following criteria:

- (i) The level of growth in the NWRA and SRA combined would be equal to that of the EMRA;
- (ii) Focus the highest quantum of growth in 5 cities and a number of regionally important large towns, with equal rates of growth across all settlements;
- (iii) Deliver at least 40% of all new homes nationally on infill or brownfield sites within the built up envelope of existing urban settlements; and
- (iv) Provide some critical infrastructure in advance of planned growth to kick start development and provide other infrastructure sequentially and on a phased basis in tandem.

(v) Key*	PHH	BFF	S	W	AQ	CF	MA	CH	L
Option 3 - Regional Effectiveness and Settlement Consistency	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population and Human Health; S – Soils; W – Water; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; L – Landscape.

Option 3 is similar to Option 2 and in large parts to Option 1 with a focus on regional parity, development of five city areas, use of infill and brownfield as part of the solution, alongside provision of advanced critical infrastructure. Option 3 also includes the development of regionally important towns as per Option 2, however in this variation there is a stipulation around the rates of growth. An equal rate of growth across the settlements is proposed. While no direct impacts are anticipated from the addition of the growth rate there is potential for indirect effects. A greater spread of resources across a large number of settlements dilutes the potential to provide coherent solutions in terms of services, as there is often a lack of critical mass to justify the cost-benefits. This can indirectly impact on PHH and MA if the services offered are below standard or lack competition. The stipulation of equal growth rates across settlements does not consider the carrying capacity of environmental limits of the settlements in any way. If the growth rates of a settlement exceed the available capacity of wastewater or other vital services this can have knock on negative impacts on PHH, S, W BFF, and MA. Although the option does recognise the need for delivery of infrastructure in tandem, this may not be possible with such a dispersed approach to growth rates.

5.2.2.4 Option 4 – Regional Dominance and Settlement Diversity

Option 4 included the following criteria:

- (i) Growth in EMRA is less than that of the NWRA and SRA combined;
- (ii) Focus the highest quantum of growth and rates of growth in cities and a number of regionally important large towns in NWRA and SRA and lower than national growth rates in

- Dublin City and regionally important large towns, through a tailored approach to settlement growth targets;
- (iii) Deliver at least 40% of all new homes nationally on infill or brownfield sites within the built up envelope of existing urban settlements; and
 - (iv) Provide some critical infrastructure in advance of planned growth to kick start development and provide other infrastructure sequentially and on a phased basis in tandem.

(v) Key*	PHH	BFF	S	W	AQ	CF	MA	CH	L
Option 4 - Regional Dominance and Settlement Diversity	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population and Human Health; S – Soils; W – Water; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; L – Landscape.

Option 4 has clear differences to Options 1 to 3 in that it seeks to limit growth in the EMRA while focussing growth in the other two regions. The focussed five city strategy is replaced with a focus on cities and a number of large towns in the NWRA and SRA areas only. Focussed growth in the NWRA and SRA would be expected to give rise to positive impacts for PHH and MA in particular where population growth is coupled with economic investment, however it is noted that Dublin plays a significant role in the national economy, accounting for over 41% of GDP and it functions as an economic driver of growth not just for the EMRA but also nationally. Limiting growth in the region, in the manner proposed under this option, may have unintended negative consequences particularly for PHH and MA where existing established sectors may not continue to invest in Ireland if their needs are not met in key strategic locations such as Dublin. This could remove a viable sector from further investment in any of the three regions.

As with the other options, the focus on infill and brownfield development over greenfield is broadly welcomed however there is potential for negative impacts on S, W, BFF in particular depending on the nature of the infill/ brownfield lands and appropriate mitigation would be required through a National Policy Objective to address this.

5.2.2.5 Option 5 – Regional Dominance and Settlement Consistency

Option 5 included the following criteria:

- (i) Growth in EMRA is less than that of the NWRA and SRA combined;
- (ii) Focus the highest quantum of growth and rates of growth equally in cities and a number of regionally important large towns in NWRA and SRA and lower than national growth rates in Dublin City and regionally important large towns in EMRA;
- (iii) Deliver at least 50% of all new homes in the cities and a number of regionally important large towns on infill or brownfield sites within the built up envelope of existing urban settlements in the NWA and SRA and at least 30% in EMRA; and
- (iv) Provide some critical infrastructure in advance of planned growth to kick start development and provide other infrastructure sequentially and on a phased basis in tandem.

Key*	PHH	BFF	S	W	AQ	CF	MA	CH	L
Option 5 - Regional Dominance and Settlement Consistency	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population and Human Health; S – Soils; W – Water; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; L – Landscape.

Option 5 is broadly similar to Option 4 but sees an equal share in growth rates in cities and a number of regionally important large towns in each region. As with Option 3, a greater spread of resources across a large number of settlements dilutes the potential to provide coherent solutions in terms of services as there is often a lack of critical mass to justify the cost-benefits. This can indirectly impact on PHH and MA if the services offered are below standard or lack competition. The stipulation of equal growth rates across settlements does not consider the carrying capacity of environmental limits of the settlements in any way. If the growth rates of a settlement exceed the available capacity of wastewater or other vital services this can have knock on negative impacts on PHH, S, W, BFF, and MA. Although the option does recognise the need for delivery of infrastructure in tandem, this may not be possible with such a dispersed approach to growth rates.

5.2.2.6 Option 6 – Business as Usual

In the context of the draft NPF, consideration was given to a *Business as Usual* option where population and economic growth continues on its current trajectory.

The assumptions of Option 6 are that:

- (i) The majority of growth takes place in the EMRA;
- (ii) Focus growth in existing gateways and hubs as designated in the National Spatial Strategy;
- (iii) No national specification between greenfield and brownfield/infill delivery targets for new housing; and
- (iv) Infrastructure delays or deficit of infrastructure to support planned growth.

Key*	PHH	BFF	S	W	AQ	CF	MA	CH	L
Option 6 - Business as Usual	0/-	0/-	0/-	0/-	0/-	0/-	0/-	0/-	0/-

*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population and Human Health; S – Soils; W – Water; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; L – Landscape.

Under Option 6, the majority of growth would take place in the EMRA and more particularly toward the Greater Dublin Area. This has implications from a social and economic as well as an environmental perspective. As more focus is placed on Dublin, with higher employment opportunities this is likely to give rise to further shifting age profiles across the state as more of those in the working age profile move toward the EMRA leaving the other regions with an aging dispersed population which will be difficult to service. A focus on only one region and one dominant city is likely to result in a deterioration of smaller cities and large towns in other regions where investment in public transport and services may be difficult to justify if populations are not increasing. This would have negative implications for PHH and MA for these other cities and regions.

At the same time, negative impacts would be expected for Dublin as more and more population growth puts further pressures on existing services of water, wastewater, public transport and housing, and on available space. In the medium term, a lack of drinking water capacity is likely to lead to water shortages with potential negative impacts for PHH and MA. Equally, without adequate wastewater treatment capacity the available water quality is likely to deteriorate as existing facilities have to work to a service greater population equivalents than their design capacity. This would give rise to indirect negative impacts for BFF, W, S, PHH and MA. A lack of services like this is likely to drive residential development out of Dublin where public transport links cannot be efficiently provided or availed of by higher density development, forcing people into private car use and increasing commuting times similar to that seen in the last decade.

Option 6 does not address the lessons learned from the NSS, nor does it incorporate considerations of new policy and legislation particularly in relation to climate change, smart growth, water etc.

5.3 PREFERRED ALTERNATIVE AND REASON FOR CHOOSING

The previous sections have outlined the alternatives considered for the NPF. Throughout the process, the plan team had regard to the wider policies and strategies of the Government, stakeholder feedback on the issue paper published in Q2 of 2017, and the strategic environmental objectives. In considering the broad direction for the framework the macro spatial growth approach has been considered and the preferred approach is characterised as one displaying: regional parity for the EMRA, NWRA and SRA; regional concentration toward cities and some regionally important larger settlements; a focus on contained growth and reduced sprawl by targeting infill and brownfield lands in existing built-up areas; and sequential provision of infrastructure with some critical infrastructure in place to promote investment. This high level direction is considered to best reflect the most sustainable approach to growth patterns.

Following on from this the SEA considered Strategy Alternatives with regard to the achievement of the strategic environmental objectives identified in the environmental report. Although the Business as Usual scenario was considered, it is noted that it does not reflect the preferred macro spatial approach and as such is not considered a viable alternative. Options 1 to 5 all note the need for sequential provision of infrastructure with some critical infrastructure in place to promote investment. Similarly Options 1 to 5 all note the need for some level of infill or brownfield development of between 30-50%. The issues with development of these lands will be site-specific and an approach that recognises the environmental implications of development of such lands will be needed irrespective of the overall percentage target. The principle differences identified in Options 1 to 5 relate to the regional and settlement strategy approach. In this regard the preferred option is considered to be *Option 2 – Regional Effectiveness & Settlement Diversity*. This alternative is likely to achieve the maximum overall gain in relation to the SEOs in terms of maximising use of public transport thereby reducing transport related emissions, in tandem with facilitating higher densities in city areas, and focussed managed growth in supporting settlements, thereby improving regional connectivity and services outside of the cities.

The preferred Strategy Alternative has been developed into a series of National Policy Objectives (NPOs) which were the main focus of the environmental assessment. These were assessed in the environmental report and mitigation measures suggested as appropriate.

6 SCREENING OF CHANGES TO THE FINAL PLAN

An Environmental Report was prepared in Q3 of 2017 which recorded the strategic environmental assessment of the draft NPF. That report and draft plan were the subject of a statutory public consultation and on foot of this consultation, the plan has been updated to reflect concerns raised across the stakeholder base.

It is acknowledged that the layout of the final plan has evolved between draft and final to better reflect the scope and content of the NPF and furthermore to address stakeholder feedback from the public consultation. This evolution of the plan has involved editing of the supporting text to improve the flow and form of the plan, minor corrections to text and grammar and the refinement of national Policy Objectives.

The focus of the environmental assessment carried out on the draft plan was on the National Policy Objectives as they articulate the vision of the plan expressed in the supporting text. This section of the SEA therefore presents a review of the changes made to the National Policy Objectives and screens the proposed changes for both SEA and AA. Changes are set out in a chapter by chapter approach.

The text in black is the text as contained in the draft NPF while the text highlighted in yellow reflects significant amended/new text to the draft plan. Responses with regard to the environmental consequences of the changes are shown in column 3 of the assessment tables. Where no change has been made to the NPO with the exception of re-numbering or where changes are of a minor nature including small edits or word changes, for brevity, these have not been reproduced in this section. The screening has focused on those measures which are new or have been substantially changed / deleted.

6.1 CHAPTER 1 – THE VISION

No national policy objectives included.

6.2 CHAPTER 2 – A NEW WAY FORWARD

NPO	Text for Final Plan	Screening for SEA / AA ¹
1b	<p><i>Eastern and Midland Region: 490,000 - 540,000 additional people, i.e. a population of around 2.85 million;</i></p> <p><i>Northern and Western Region: 160,000 - 180,000 additional people, i.e. a population of just over 1 million;</i></p> <p><i>Southern Region: 340,000 - 380,000 additional people, i.e. a population of almost 2 million.</i></p>	<p><i>The figures presented have been updated in line with ESRI projections. Similar impacts to those identified previously in the environmental report are anticipated. Section 6.12 considers this further.</i></p>
1c	<p><i>Eastern and Midland Region: around 320,000 additional people in employment, i.e. 1.34 million in total;</i></p> <p><i>The Northern and Western Region: around</i></p>	<p><i>The figures presented have been updated in line with ESRI projections. Similar impacts to those identified previously in the environmental report are anticipated. Section 6.12 considers</i></p>

¹ CH – Cultural Heritage; BFF – Biodiversity/ Flora & Fauna; W - Water and MA – Material Assets; L - Landscape

NPO	Text for Final Plan	Screening for SEA / AA ¹
	<p>115,000 additional people in employment, i.e. 450,000 (0.45m) in total;</p> <p>The Southern Region: around 225,000 additional people in employment, i.e. 880,000 (0.875m) in total.</p>	this further.
2a	<p>A target of half (50%) of future population and employment growth will be focused in the five Cities and their suburbs².</p>	<p>This policy is a modification of draft policy 2b, previously assessed. Reference to ...around two-thirds (66%) being focused in the cities and their suburbs together with a number of large regionally distributed towns has been removed.</p> <p>The proposed modification will not result in any changes to assessment included in the Environmental Report.</p>
2b	<p>The regional roles of Athlone in the Midlands, Sligo in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be identified and supported in the relevant Regional Spatial and Economic Strategy.</p>	<p>New policy. See S.6.12 for assessment.</p>
2c	<p>Accessibility from the north-west of Ireland and between centres of scale separate from Dublin will be significantly improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes.</p>	<p>This policy includes a minor modification of draft policy 2c previously assessed. The proposed modification will not result in any changes to assessment included in the Environmental Report.</p>
3a	<p>Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements³</p>	<p>Reference to existing urban settlements has been removed. The proposed modification will not result in any changes to assessment included in the Environmental Report.</p>
3b	<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.⁴</p>	<p>This policy is a modification of draft policy 3b, previously assessed. Reference to immediately adjoining suburbs has been removed as has reference to existing urban settlements.</p> <p>The proposed modification will not result in any changes to assessment included in the Environmental Report.</p>
3c	<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 footprints⁵.</p>	<p>This policy is a modification of draft policy 3c, previously assessed.</p> <p>The proposed modification will not result in any changes to assessment included in the Environmental Report.</p>

² The five cities and their suburbs as defined by the CSO in the Census of Population.

³ This means within the existing built-up footprint of all sizes of urban settlement, as defined by the CSO in line with UN criteria i.e. having a minimum of 50 occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is evidence of an urban centre (shop, school etc.).

⁴ 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.

⁵ 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 boundary are classed as greenfield.

6.3 CHAPTER 3 – EFFECTIVE REGIONAL DEVELOPMENT

6.3.1 Eastern and Midland Region

NPF Ref	Text for Final Plan	Screening for SEA / AA
Chpt. 3	Enabling the complementary development of large and county towns in the wider Greater Dublin Area and Midland areas on the key strategic and public transport routes in a regionally coordinated manner, with an enhanced emphasis on measures to promote self-sustaining economic and employment based development opportunities to match and catch-up on rapid phases of housing delivery in recent years.	New policy priorities have been included for the Eastern and Midland Region providing regional context to many of the NPOs which have already been assessed in the SEA. There is provision for more effective strategic planning and coordination of the future development of nationally and regionally strategic locations at points that straddle boundaries between this and neighbouring regions (e.g. Athlone). Also, this new section specifies a focused approach to compact, sequential and sustainable development of the larger urban areas along the Dublin – Belfast economic and transport corridor, along which there are settlements with significant populations such as Dundalk and Drogheda.
Chpt. 3	More effective strategic planning and co-ordination of the future development of nationally and regionally strategic locations at points that straddle boundaries between this and neighbouring regions as in the example of Athlone, which is a focal point for an area reaching into much of this and neighbouring regions in economic and employment, transport, education and public service delivery and retailing terms.	Tourism initiatives in particular need to be approached with a clear understanding of the sustainable limits that can be accommodated in terms of visitor numbers and pressures to ensure the features and landscapes of interest are protected into the future.
Chpt. 3	A focused approach to compact, sequential and sustainable development of the larger urban areas along the Dublin – Belfast economic and transport corridor, along which there are settlements with significant populations such as Dundalk and Drogheda.	Delivery of renewable energy infrastructure also presents potential for negative impacts if sited inappropriately. A regional view through the RSES to determine strategic zones may limit future erosion of landscape, community and heritage amenity.
Chpt. 3	More emphasis on consolidating the development of places that grew rapidly in the past decade or so with large scale commuter driven housing development with a particular focus on addressing local community and amenity facility provision in many of the larger commuter towns through targeted investment under relevant NPF National Strategic Outcomes.	As noted elsewhere there are positive impacts associated with greenway/ blueway/ peatway strategies as they can provide a focus for other economic developments leading to positive impacts. However, the development of such strategies must recognise the potential to impact on European Sites and biodiversity generally e.g. through land use change, loss of greenbelt and disturbance to species (particularly birds) as previously outlined in the NIS.
Chpt. 3	Preparing and implementing a regional priorities programme, to shape and inform delivery of the Regeneration and Development Initiative. Part of this programme should identify significant ready-to-go city, rural town and village and rural rejuvenation priorities which could harness publicly owned land and other assets that are not being used actively at present such as former healthcare, military, transport and other complexes and combining the potential of such assets with community and wider private and public sector support and investment to bring	See NPO 59, 60, 61 and 75 for mitigating policies.

NPF Ref	Text for Final Plan	Screening for SEA / AA
	about the transformation of both urban and rural areas and places in an integrated manner.	
Chpt. 3	Tourism development and promotional branding to ensure that areas like the Midlands and Lakelands areas are developed and promoted in such a way as to play their full part in tapping the economic potential of regional and rural areas in the region.	
Chpt. 3	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.	
Chpt. 3	Building on the progress made in developing an integrated network of greenways, blueways and peatways, that will support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation utilising canal and former rail and other routes.	

6.3.2 Northern and Western Region

NPF Ref	Text for Final Plan	Screening for SEA / AA
Chpt. 3	Developing and implementing a comprehensive and strategic metropolitan area spatial plan for Galway city, to enable its continued strategic development in a transformational and urban rejuvenation focused manner, with a special focus on capitalising on the potential of underutilised and publicly owned and centrally located sites and activating their potential to boost the population and economic output levels of central areas	New policy priorities for the North and Western Region. This includes new provision for more effective strategic planning and coordination of the future development of nationally and regionally strategic locations at points that straddle boundaries between this and neighbouring regions.
	Enhancing the city-region like functions performed by Sligo in line with its statutory development plan, activating the potential for further rejuvenation and renewal of its core and further enhancing its connectivity in a national and regional context to ensure wider accessibility of relevant services and amenities	As a regional centre, Sligo serves a large hinterland that extends beyond County Sligo into surrounding counties, to include parts of Donegal, Leitrim, Mayo and Roscommon, supported in particular by nearby county towns. Sligo's significance as a centre of employment and services is such greater than its scale in terms of population. The new section also recognises the potential for the Atlantic Economic Corridor (AEC) to act as a key enabler for the regional growth objectives. Furthermore, it specifies a focused approach to compact, sequential and sustainable development of the
	Further implementation of the strategic partnership between the Donegal and Derry local authorities in the context of the further	

NPF Ref	Text for Final Plan	Screening for SEA / AA
	enhancement of the North West Gateway Initiative area, delivering a wide range of economic, infrastructural, community and public service functions in the wider north-west	larger urban areas along the Dublin – Belfast economic and transport corridor, along which there are settlements with significant populations such as Dundalk and Drogheda.
	More effective strategic planning and co-ordination of the future development of nationally and regionally strategic places, including points straddling boundaries with neighbouring regions, like Athlone and Letterkenny which are focal points for large geographical areas reaching into much of this and neighbouring regions in economic and employment, transport, education and public service delivery and retailing terms	Delivery of renewable energy infrastructure also presents potential for negative impacts if sited inappropriately. A regional view through the RSES to determine strategic zones may limit future erosion of landscape, community and heritage amenity. As noted elsewhere there are positive impacts associated with greenway / blueway/peatway strategies as they can provide a focus for other economic development leading to positive impacts. However, the development of such strategies must recognise the potential to impact on European Sites and biodiversity generally e.g. through land use change, loss of greenbelt and disturbance to species (particularly birds) as previously outlined in the NIS.
	Supporting the emerging and ongoing development, at both local and community levels, of the network of both urban and rural places working together for regional benefit under the Atlantic Economic Corridor initiative, including university and higher education and research alliances, and improved connectivity	See NPO 59, 60, 61 and 75 for mitigating policies.
	Integrated planning, management and development of the areas traversed by the Wild Atlantic Way to maximise both the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local communities	
	Supported by the Rural and Urban Regeneration and Development fund, shaping and informing delivery of city, rural town and village rural rejuvenation priorities, harnessing publicly owned land and other assets that are not being used actively at present, such as former healthcare, military, transport and other complexes and combining the potential of such assets with community and wider private and public sector support and investment, to bring about the transformation of both urban and rural areas in an integrated manner	
	Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and wave energy	
	Building on the progress made in developing an integrated network of greenways, blueways and peatways that will support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation utilising canal and other routes.	

6.3.3 Southern Region

NPF Ref	Text for Final Plan	Screening for SEA / AA ⁶
Chpt. 3	Developing and implementing comprehensive and strategic metropolitan area spatial plans for Cork, Limerick and Waterford cities that secure long-term transformational and rejuvenation-focused city development, with a special emphasis on capitalising on the potential of underutilised and publicly owned and centrally located sites and activating their potential to boost the population and economic output levels of city centre areas as drivers for wider regions.	New policy priorities have been included for the Southern Region providing regional context to many of the NPOs which have been assessed in the SEA. Key issues of note are the development of the main cities of Cork, Limerick and Waterford guided by strategic metropolitan area spatial plans. These plans will explore in detail proposed actions for the development of city areas including underutilised and publicly owned, centrally located sites and transport links between the cities to enable them to function in concert with each other. The SEA previously considered environmental sensitivities for the three cities. It is noted that these plans will be subject to SEA and AA.
Chpt. 3	Allied to strategies to deliver more compact urban development in the main cities, to enhance the efficiency and effectiveness of transport links between the cities to enable them to function in concert with each other and harness their complementary strengths in an increasingly networked manner.	The priorities also point to the development of remoter parts of this region along the western seaboard. The area is heavily constrained by natural heritage designations associated with both terrestrial and marine biodiversity assets. This may have implications for delivery of transport and communications and tourism initiatives.
Chpt. 3	Measures to support the integrated development of remoter parts of this region, particularly rural peninsular areas and towns on its western seaboard, including the ongoing investment in the transport and communications area, particularly in the roll-out of the national broadband scheme and further promotion and development of attractions to capitalise on underutilised potential in the tourism and local enterprise areas	Tourism initiatives (e.g. the Wild Atlantic Way) in particular need to be approached with a clear understanding of the sustainable limits that can be accommodated in terms of visitor numbers and pressures to ensure the features and landscapes of interest are protected into the future. A model exists in the SEA / AA carried out for the WAW and lessons learned from this successful initiative would inform any future proposals.
Chpt. 3	More emphasis on consolidating the development of places that grew rapidly in the past decade or so with large scale commuter driven housing development with a particular focus on addressing local community and amenity facility provision in many of the larger commuter towns through targeted investment under relevant NPF National Strategic Outcomes	Delivery of renewable energy infrastructure also presents potential for negative impacts if sited inappropriately. Historically projects are delivered on a piecemeal basis with limited consideration of the cumulative impacts of extensions and phases of such developments. A regional view through the RSES to determine strategic zones may limit future erosion of landscape, community and heritage amenity.
Chpt. 3	Preparing and implementing a regional rejuvenation priorities programme, to shape and inform delivery of the Regeneration and Development Fund and identifying significant ready-to-go city, rural town and village and rural rejuvenation priorities harnessing publicly owned land and other assets that are not being used actively at present, such as former healthcare, military, transport and other complexes and combining the potential of such assets with community and wider private and public sector support and investment to bring	As noted elsewhere there are positive impacts associated with greenway/ blueway/ peatway strategies as they can provide a focus for other economic development leading to positive impacts for PHH and MA in particular. If

⁶ CH – Cultural Heritage; BFF – Biodiversity/ Flora & Fauna; W - Water and MA – Material Assets; L - Landscape

NPF Ref	Text for Final Plan	Screening for SEA / AA ⁶
	about the transformation of both urban and rural areas and places in an integrated manner.	<p>developed sensitively with a view to integrating the natural and built heritage, this can also have positive effects for BFF; CH; W; S and L.</p> <p>The development of such strategies must recognise the potential to impact on European Sites and biodiversity generally e.g. through land use change, loss of greenbelt and disturbance to species (particularly birds) as previously outlined in the NIS.</p> <p>See NPO 59, 60, 61 and 75 for mitigating policies.</p>
Chpt. 3	Integrated planning, management and development of the areas traversed by the Wild Atlantic Way to maximise both the quality and integrity of the visitor experience and the added benefit in economic terms, especially for rural and local communities	
Chpt. 3	Harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and 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	
Chpt. 3	Developing a more integrated network of greenways, blueways and peatways to support the diversification of rural and regional economies and promote more sustainable forms of travel and activity based recreation.	

6.3.4 Key Enablers – Dublin

City Enabler	Text for Final Plan	Screening for SEA / AA
D8	Ensuring that water supply and waste-water needs are met by new national projects to enhance the city's and the wider Greater Dublin Area's water supply and increase waste water treatment capacity;	Minor amendments. No change to impact
D11	Measures to enhance and better link the existing network of green spaces, including the Phoenix Park and other parks, Dublin Bay and the canals, subject to the carrying out of a routing study and necessary environmental assessments;	Minor amendments. No change to impact
D13	Improving access to Dublin Airport, to include improved public transport access, and road connections from the road network from the west and north and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification;	Minor amendments. No change to impact
D15	Improving sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation.	<p>New city enabler.</p> <p>D15 has an overall positive impact for all environmental indicators as this policy supports re-use of natural resources, water conservation,</p>

City Enabler	Text for Final Plan	Screening for SEA / AA
		recycling and energy-saving.

6.3.5 Key Enablers – Galway

City Enabler	Text for Final Plan	Screening for SEA / AA
G1	Delivering a number of regeneration projects for the provision of new development to extend and intensify the City Centre, including the Station, Docks and Headford Road areas;	Minor amendments. No change to impact.
G13	Improving sustainability in terms of energy, waste management and resource efficiency and water to include district heating and water conservation.	Minor amendments. No change to impact

6.3.6 Key Enablers – Cork

City Enabler	Text for Final Plan	Screening for SEA / AA
C1	Delivering ambitious large-scale regeneration projects for the provision of new and employment, housing and supporting infrastructure in Cork Docklands (City Docks and Tivoli) as integrated, sustainable developments, including relocation of two 'Seveso' sites from the City Docks;	Minor amendments. No change to impact
C7	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;	Minor amendments. No change to impact
C11	Improved rail journey times to Dublin and consideration of improved onward direct network connections.	Minor amendments. No change to impact.
C13	Improving sustainability in terms of energy, waste management and resource efficiency and water to include district heating and water conservation.	Minor amendments. No change to impact.

6.3.7 Key Enablers – Limerick

City Enabler	Text for Final Plan	Screening for SEA / AA
L11	A northern environs access road, including new access to UL;	City Enabler deleted. No change to impact.
L14	Improving sustainability in terms of energy, waste management and resource efficiency and water to include district heating and water conservation.	Minor amendments. No change to impact.

6.3.8 Key Enablers – Waterford

City Enabler	Text for Final Plan	Screening for SEA / AA
W11	Improving sustainability in terms of energy, waste management and resource efficiency and water to include district heating and water conservation.	Minor amendments. No change to impact.

6.4 CHAPTER 4 – MAKING STRONGER URBAN PLACES

NPO	Text for Final Plan	Screening for SEA / AA
5	Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.	Addition of the word “prosperity”; no change to the impacts already identified.
6	Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.	Minor rewording to place focus on regenerate and rejuvenate. No change to the impacts already identified.
7	Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:- <ul style="list-style-type: none"> • Dublin; • the four Cities of Cork, Limerick, Galway and Waterford; • Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo in the North-West, Athlone in the 	Text has been redrafted to focus on a tailored approach and linking to Urban Regeneration and Development Fund. The policy now explicitly includes reference to Athlone, Sligo and the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor. See S. 6.12 for assessment.

NPO	Text for Final Plan	Screening for SEA / AA
	<p>Midlands and the cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;</p> <ul style="list-style-type: none"> • Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; • Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities; • Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes; • In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth. 	
8	<p>To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.</p>	<p>Updated table reference. No change. No change to the impacts already identified.</p>
9	<p>In each Regional Assembly area, settlements not identified in Policy 2a or 2b of this Framework, may be identified for significant (i.e. 30% or more above 2016 population levels) rates of population growth at regional and local planning stages, provided this is subject to:</p> <ul style="list-style-type: none"> • Agreement (regional assembly, metropolitan area and/or local authority as appropriate); • Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target.; and 	<p>This new NPO facilitates significant increase in population growth in, as yet, undetermined areas within the regions. The identification of such areas is to be agreed at the regional assembly, metropolitan area and/or local authority level as appropriate. While it is acknowledged that a co-ordinated strategy will ensure alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services, it is none the less noted that this has the potential to give rise to significant negative effects unless the strategy at regional level can clearly relate the proposed locations to existing infrastructure capacity and furthermore that it aligns with other inter-related policy on greenhouse gas emission, protection of biodiversity, smarter travel etc.</p> <p>The Plan encourages a co-ordinated approach to regional capacity studies to inform which settlements are suitable for such growth.</p>

NPO	Text for Final Plan	Screening for SEA / AA
	<ul style="list-style-type: none"> A co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services. 	
10a	Regional and Local Authorities to identify and quantify locations for strategic employment development in the cities identified in Table 4.1.	Previously NSO9a. Reference to growth replaced with development. No change to the impacts already identified.
10b	Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally.	Previously NSO9b. Reference to growth replaced with development. Addition of reference to rural areas. No change to the impacts already identified.
11	In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.	Previously NSO 10b. Minor modification. No change to the impacts already identified.
12	The Government will establish a National Regeneration and Development Agency to work with local authorities, other public bodies and capital spending departments and agencies to co-ordinate and secure the best use of public lands, investment required within the capital envelopes provided in the National Development Plan and to drive the renewal of strategic areas not being utilised to their full potential. The Government will consider how best to make State lands available to such a body to kick-start its development role and to legislate for enhanced compulsory purchase powers to ensure that the necessary transformation of the places most in need of regeneration can take place more swiftly and effectively.	<p>NPO 12 has been redrafted to provide clarity on the nature of the land management approach to be applied. As previously the policy is broadly positive across the environmental receptors as it seeks to manage lands more effectively, however the benefits of active land management have to be seen in the context of the protection and conservation of designated sites and species and the conservation of wild areas that act as sources/ sinks for native flora and fauna.</p> <p>The development of such plans/strategies must recognise the potential to impact on European Sites and biodiversity generally e.g. through land use change, loss of greenbelt and disturbance to species (particularly birds) as previously outlined in the NIS.</p> <p>See NPO 59, 60, 61 and 75 for mitigating policies.</p>

6.5 CHAPTER 5 – PLANNING FOR DIVERSE RURAL PLACES

NPO	Text for Final Plan	Screening for SEA / AA
14	<p>Protect and promote the sense of place and culture that make Ireland's rural areas authentic and attractive as places to live, work and visit and the quality, character and distinctiveness of the Irish rural landscape. The Action Plan for Rural Development will support this objective up to 2020; thereafter a review of the Action Plan will be undertaken to ensure continued alignment and consistency with the National Policy Objectives of this Framework.</p>	<p>Previously NPO 13 in draft. Minor amendments to text. No change to the impacts already identified.</p> <p>NPO 14 from the draft plan has been deleted. This related to population growth of Ireland's small towns and rural areas at an average rate of 15% in each Regional Assembly area. No change to the impacts already identified.</p>
15	<p>Support the sustainable development of rural areas by managing the growth of areas that are under strong urban influence to avoid over-development and by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades, while sustaining vibrant rural communities.</p>	<p>New NPO. As with NPO 16 below, this objective will have a direct long term positive impact on PHH, CH and MA through the focus on reducing population decline in communities that have experienced rural decline in recent years. .</p> <p>The specific actions required to ensure that growth is sustainable are not included. There is however potential for negative effects on all environmental receptors if clear limits and criteria are not available to guide the sustainable development of these areas.</p>
18b	<p>To develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities, supported by the Rural Regeneration and Development Fund, to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages</p>	<p>Formerly NPO 17a in draft plan. Addition of reference to the Rural Regeneration and Development Fund. No change to the impacts already identified.</p>
19	<p>Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:</p> <ul style="list-style-type: none"> • In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements; • In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design 	<p>Previously NPO 18a and 18b. Text has been revised and additional text added.</p> <p>The reference to the EU/OECD definition of a city region has been removed and replaced with reference to commuter catchment of cities and large towns and centres of employment. The definition is much less precise and is therefore open to interpretation at all subsequent levels of planning.</p> <p>As part of the RSES process, provision of mapping delineating the extent of the commuter catchment of its cities and large towns and centres of employment is encouraged to ensure that further sprawl is not facilitated.</p> <p>While it is accepted that current practices allow demonstrable social need, given the negative impacts associated with one-off housing this has the potential to lead to negative impacts on BFF, W, S, L unless tightly controlled. As such new or updated guidance include the parameters under</p>

NPO	Text for Final Plan	Screening for SEA / AA
	<p><i>criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.</i></p>	<p><i>which demonstrable economic or social need are justified would be helpful.</i></p>
20	<p><i>Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes</i></p>	<p><i>Previously NPO 19. Minor revision of text. No change to the impacts already identified.</i></p>
21	<p><i>Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability</i></p>	<p><i>Formerly NPO20. Minor amendments to the text. Specific reference to low or zero carbon has been replaced with more general reference to sectors and services addressing climate change.</i></p>
22	<p><i>Facilitate tourism development and in particular of a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.</i></p>	<p><i>Formerly NPO 23. Additional references to tourism and peatways added. As with the previous version of this NPO there are positive impacts associated with the kind of tourism strategies proposed as they can provide a focus for other economic development leading to positive impacts for PHH and MA in particular. If developed sensitively with a view to integrating the natural and built heritage this can also have positive effects for BFF; CH; W; S and L.</i></p> <p><i>The development of such strategies must recognise the potential to impact on European Sites e.g. through land use change, loss of greenbelt and disturbance to species (particularly birds) as previously outlined in the NIS</i></p>
23	<p><i>Facilitate the development of the rural economy 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 the natural landscape and built heritage which are vital to rural tourism.</i></p>	<p><i>Previously NPO 21. Additional text added to include energy, the extractive economy and the bio-economy. As previously, it is noted that the policy explicitly includes a reference to supporting a sustainable and economically efficient agricultural and food sector while recognising the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism. No change to the impacts already identified.</i></p>
25	<p><i>The Department of Rural and Community Development, the Department of Agriculture, Food and the Marine, and other relevant Departments and Agencies will continue to invest in rural Ireland and will work together to establish a mechanism to co-ordinate structures for funding rural development to align with other national strategies, including in particular the Rural Regeneration and Development Fund.</i></p>	<p><i>Formerly NPO 24. Minor changes to text. No change to the impacts already identified.</i></p> <p><i>The previous NPO 25, relating to support of community organisations, has been deleted. This was a broadly positive policy supporting sustainable development at a local level. Consideration should be given to including it in the RSES at the more appropriate level of planning.</i></p>

6.6 CHAPTER 6 – PEOPLE, HOME AND COMMUNITIES

NPO	Text for Final Plan	Screening for SEA / AA
27	<p>Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.</p>	<p>Formerly NPO 28. Minor reorganisation of text. No change to the impacts already identified.</p>
29	<p>Support the implementation of language plans in Gaeltacht Language Planning Areas, Gaeltacht Service Towns and Irish Language Networks</p>	<p>Formerly NPO 31. Text amended to provide for the development of language plans in Gaeltacht areas. This will have indirect positive impacts for P and for CH in these areas by ensuring the Irish language remains part of the social and community fabric.</p>
30	<p>Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans</p>	<p>Formerly NPO 29. Minor revisions to text. No change. No change to the impacts already identified.</p>
31	<p>Prioritise the alignment of targeted and planned population and employment growth with investment in:-</p> <ul style="list-style-type: none"> • A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities; • The provision of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations; • The expansion and consolidation of Higher Education facilities, particularly where this will contribute to wider regional development, and • Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified. 	<p>Formerly NPO 32. Text has been restructured but remains focussed on childcare and lifelong learning. No change to the impacts already identified.</p>
33	<p>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</p>	<p>Formerly NPO 34. Minor changes in text. No change to the impacts already identified.</p>
35	<p>Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building</p>	<p>Formerly NPO 37. No change in text. No change to the impacts already identified.</p> <p>Previous NPO 35 has been deleted. The policy</p>

NPO	Text for Final Plan	Screening for SEA / AA
	heights	<p>stated: To implement the short term measures to reduce vacancy and to progressively target the reduction of the national housing vacancy rate to 5% by 2040 (currently 9.15%).</p> <p>While it is acknowledged that vacancy is dealt with in other related NPOs the inclusion of a specific target provided an auditable indicator of progress. Its removal reduces the effectiveness of other related policies. Consideration should be given to including it in the RSES to better inform the regional approach.</p>

6.7 CHAPTER 7 – REALISING OUR ISLAND AND MARINE POTENTIAL

NPO	Text for Final Plan	Screening for SEA / AA
38	Regional, metropolitan and local development plans will take account of and integrate relevant maritime spatial planning issues.	Formerly NPO 40. Addition of reference to metropolitan plans for clarity. No change to the impacts already identified.
39	Support the sustainable growth and development of the maritime economy and continue to invest in the seafood sector and our Fishery Harbour Centres, particularly in remote rural coastal communities and islands.	Formerly NPO 41. Addition of the word sustainable is welcomed. No change to the impacts already identified.
40	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 the city regions and regional and rural areas.	Formerly NPO 42. Broadening of scope of ports to be considered. No change to the impacts already identified.

6.8 CHAPTER 8 – WORKING WITH OUR NEIGHBOURS

NPO	Text for Final Plan	Screening for SEA / AA ⁷
44	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	Formerly NPO 46. Minor word changes including the deletion of reference to sustainable economic potential. Introduction of specific reference to the Drogheda-Dundalk-Newry network. See S.6.12 for further assessment.
45	In co-operation with relevant Departments in Northern Ireland, support and promote the development of the North West City Region as interlinked areas of strategic importance in the	Formerly NPO 47. Expansion of the reference to development of Derry and Letterkenny to North West city Region. See S.6.12 for further assessment.

⁷ CH – Cultural Heritage; BFF – Biodiversity/ Flora & Fauna; W - Water and MA – Material Assets; L - Landscape

NPO	Text for Final Plan	Screening for SEA / AA ⁷
	<i>North-West of Ireland, through collaborative structures and a joined-up approach to spatial planning.</i>	
46	<p><i>In co-operation with relevant Departments in Northern Ireland, enhanced transport connectivity between Ireland and Northern Ireland, to include cross-border road and rail, cycling and walking routes, as well as blueways, greenways and peatways</i></p>	<p><i>Formerly NPO 48. Broadening of draft NPO to include greater scope of infrastructure including greenways, blueways etc.</i></p> <p><i>As noted in the environmental report. There are positive impacts associated with the kind of infrastructure proposed as they can provide a focus for other economic development leading to positive impacts for PHH and MA in particular. If developed sensitively with a view to integrating the natural and built heritage this can also have positive effects for BFF; CH; W; S and L.</i></p> <p><i>The development of such infrastructure must recognise the potential to impact on European Sites e.g. through land use change, loss of greenbelt and disturbance to species (particularly birds) as previously outlined in the NIS. See also the requirements of NPO 75 of the final NPF which requires that <i>all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</i></i></p>
47	<p><i>In co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply</i></p>	<p><i>Formerly NPO 49. The NPO has been modified to include reference to distribution and transmission networks. It is noted that this infrastructure can give rise to negative impacts on PHH; S; W; BFF; L; CH among others. There is the potential for likely significant effects to European Sites. See Section 6.5 of NIS for a discussion of the energy and utilities impacts associated with the NPF. Avoidance of significant effects is the best form of mitigation and as such any development must be accompanied by a robust route selection which has avoidance of impacts on European Sites and their habitats and species as a priority. Project specific mitigation would also be required. See also the requirements of NPO 75 of the final NPF which requires that <i>all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</i></i></p>
50	<p><i>In co-operation with relevant Departments in Northern Ireland, ensuring effective management of shared landscapes, heritage, water catchments, habitats, species and trans-boundary issues in relation to environmental</i></p>	<p><i>Formerly NPO 52. Minor clarification added. No additional impact.</i></p>

NPO	Text for Final Plan	Screening for SEA / AA ⁷
	<i>policy</i>	
51	<i>In co-operation with the United Kingdom Government and devolved Governments of Northern Ireland, Scotland and Wales, Ireland will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning and other related spheres</i>	<i>Formerly NPO 53. Minor clarification added. No additional impact.</i>

6.9 CHAPTER 9 – REALISING OUR SUSTAINABLE FUTURE

NPO	Text for Final Plan	Screening for SEA / AA ⁸
52	<i>The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital</i>	<i>Formerly NPO 54. Minor wording revision. No additional impact.</i>
53	<i>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</i>	<i>Formerly NPO 55. Minor wording revision. No additional impact.</i>
55	<i>Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050</i>	<i>Formerly NPO 57. Minor wording revision. No additional impact.</i>
56	<i>Sustainably manage waste generation, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.</i>	<i>New NPO. The addition of this NPO aligns the NPF with the Regional Waste Management Plans published in 2015. These plans include mitigation measures to protect the environment at the regional and local level and the mitigation should be reviewed in implementing this national policy. Also, the regional assemblies should take waste management into consideration as part of the RSES.</i>
57	<i>Enhance water quality and resource management by:</i> <ul style="list-style-type: none"> • <i>Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with Flood Risk Assessment Guidelines for Local Authorities;</i> 	<i>Formerly NPO 58. Addition of specific reference to River Basin Management Plan objectives. This is a positive addition to the plan. No additional impact.</i>

⁸ CH – Cultural Heritage; BFF – Biodiversity/ Flora & Fauna; W - Water and MA – Material Assets; L - Landscape

NPO	Text for Final Plan	Screening for SEA / AA ⁸
	<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, to create safe places. 	
58	Integrated planning for Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans	Formerly NPO 59. Minor wording revision. No additional impact.
59	<p>Enhance the conservation status and improve the management of protected areas and protected species by:</p> <ul style="list-style-type: none"> • Implementing relevant EU Directives to protect Ireland's environment and wildlife; • Integrating policies and objectives for the protection and restoration of biodiversity in statutory development plans; • Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites; • Continued research, survey programmes and monitoring of habitats and species 	<p>New NPO. The addition of this NPO addresses concerns particularly in relation to protection of the environment, raised through the SEA and AA processes and through stakeholder feedback. The policy will have positive impacts for BFF and W in particular as well as indirect positive impacts for the wider environmental receptors of L; CH and S.</p> <p>The proper integration of environmental and ecological policies must be approached from a position of real integration rather than through mitigation measures after the fact. Defining the value of environmental and ecological resources is essential to integration if current practices are to change.</p> <p>Research and evidence base are essential to providing decision makers with the tools to facilitate sustainable development and prevent inappropriate development /activities. The requirement for monitoring in the 2014 EU EIA Directive may assist in this regard.</p>
60	Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance	New NPO. The addition of this NPO addresses concerns raised through the SEA and AA processes and through stakeholder feedback. The policy will have positive impacts for BFF; W L; and CH.
61	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	New NPO. The addition of this policy will have direct positive impacts on Landscape by ensuring that planners and regulators have a consistent understanding and approach to landscape protection. Furthermore this will have indirect positive impacts on CH; BFF; W and MA through appropriate protection of supporting features e.g. related views, natural features etc.
62	Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic	Formerly NPO 23; Text revised but no additional impacts.

NPO	Text for Final Plan	Screening for SEA / AA ⁸
	<i>networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas</i>	
63	<i>Sustainably manage the quality of our water resources to support a healthy society and to serve projected growth</i>	<i>Formerly NPO 60. Minor revisions of text. No additional impacts.</i>
64	<i>Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions</i>	<i>Formerly NPO 61. Minor addition in relation to heating systems with zero local emissions. This is a positive addition to the policy and will have positive impacts for AQ and C as well as PHH.</i>

6.10 CHAPTER 10 – IMPLEMENTING THE NATIONAL PLANNING FRAMEWORK

NPO	Text for Final Plan	Screening for SEA / AA
66	<i>A more effective strategic and centrally managed approach will be taken to realise the development potential of the overall portfolio of state owned and/or influenced lands in the five main cities other major urban areas and in rural towns and villages as a priority.</i>	<i>Formerly NPO 69; Minor revisions of text. No additional impacts.</i>
68	<p><i>A Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to alternatively be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This will be subject to:</i></p> <ul style="list-style-type: none"> <i>• any relocated growth being in the form of compact development, such as infill or a sustainable urban extension;</i> <i>• any relocated growth being served by high capacity public transport and/or related to significant employment provision;</i> <i>• National Policy Objective 9, as set out in Chapter 4.</i> 	<p><i>New NPO.</i></p> <p><i>This objective allows for flexibility of population distribution enabling up to 20% of the phased population growth targeted in the principal city and suburban area, to alternatively be accommodated in the wider metropolitan area, subject to fulfilment of three criteria. There is potential for negative impacts associated with this NPO depending on the proposed locations for accommodating such growth. Areas outside the city and suburbs are often more rural in nature and include areas of wilderness with natural and cultural heritage value. As such further consideration of environmental impacts will be needed through the SEA and AA of the Metropolitan Area Strategic Plans as they are developed.</i></p> <p><i>NPO 75 in the final NPF requires that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental</i></p>

NPO	Text for Final Plan	Screening for SEA / AA
		assessment requirements including SEA, EIA and AA as appropriate.
70	Provision will be made for urban area plans, based on current local area plan provisions, and joint urban area plans and local area plans will be prepared where a town and environs lies within the combined functional area of more than one local authority	Formerly NPO 64 Reference to larger towns and their environs with a population of more than 15,000 people has been removed. As previously noted as the model is based on current Local Area Plan (LAP) legislation it is anticipated that the SEA and AA requirements for LAPs will be expanded to include the urban area plans (UAPs). No additional impacts.
71	City/county development plan core strategies will be further developed and standardised methodologies introduced, to ensure a co-ordinated and balanced approach to future population and housing requirements across urban and rural areas	Formerly NPO65. This policy has been revised with reference to targeted population growth removed and also reference to cities, large and small towns, rural settlements and in the open countryside. The focus however remains on a standardised approach. No additional impacts.
72a	Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.]	Formerly NPO 67. In the previous version of the objective, three tiers were identified. This has been simplified to two tiers: already serviced and serviceable in the lifetime of the plan. The simplification adds certainty to the decision making process in terms of proper planning and sustainable development with positive impact anticipated for all environmental receptors.
72b	When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report detailing the estimated cost at draft and final plan stages.	Formerly NPO 67. The objective now requires the preparation of a report detailing costs. The full cost of delivery of the specified services should include environmental mitigation that may be likely where significant sensitivities are identified.
72c	When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development	Formerly NPO 67. The objective has been clarified to ensure transparency in decision making at lower planning tiers. This is broadly positive for all environmental receptors.
73a	Guidance will be developed to enable planning authorities to apply an order of priority for development of land taking account of proper planning and sustainable development, particularly in the case of adjoining interdependent landholdings	Formerly NPO 68. The previous version of the objective alluded to a standardised approach to prioritisation. This has been replaced with a commitment to provide guidance. This will be broadly positive for all environmental receptors.
73b	Planning authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritised zoned lands, to accommodate planned growth	Formerly NPO 68. Deletion of reference to development. No additional impacts.
73c	Planning authorities and infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development	Formerly NPO 68. Reference to timely delivery added. No additional impacts.

NPO	Text for Final Plan	Screening for SEA / AA
74	<p><i>Secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes</i></p>	<p><i>New NPO</i></p> <p>The ten-year National Development Plan will be published in tandem with the Framework. The vision in the two documents will be realised through delivery of the National Strategic Outcomes. These outcomes have been assessed as part of the environmental assessment. Furthermore, the specific projects arising from the National Strategic Outcomes will be subject to NPO 75 which requires that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</p>

6.11 ADDITIONAL ASSESSMENT

Following consultation on the draft NPF, the specific role for a number of regional drivers was identified by stakeholders as a necessary precursor for the three Regional Spatial and Economic Strategies in the next level of the planning hierarchy. In particular, the role for towns such as Athlone and Drogheda were raised as they have complexities around administration given that they straddle two local authority boundaries and in the case of Athlone, two regional assembly boundaries also.

In response to this the final NPF identified Athlone and Drogheda as well as Sligo, Letterkenny, and Dundalk as regional drivers to give better effect to regional strategies. It is noted that specific actions and objectives for these areas have not been included in the final NPF but rather an indication that they are likely to play a role in the relevant regions in terms of population and economic growth.

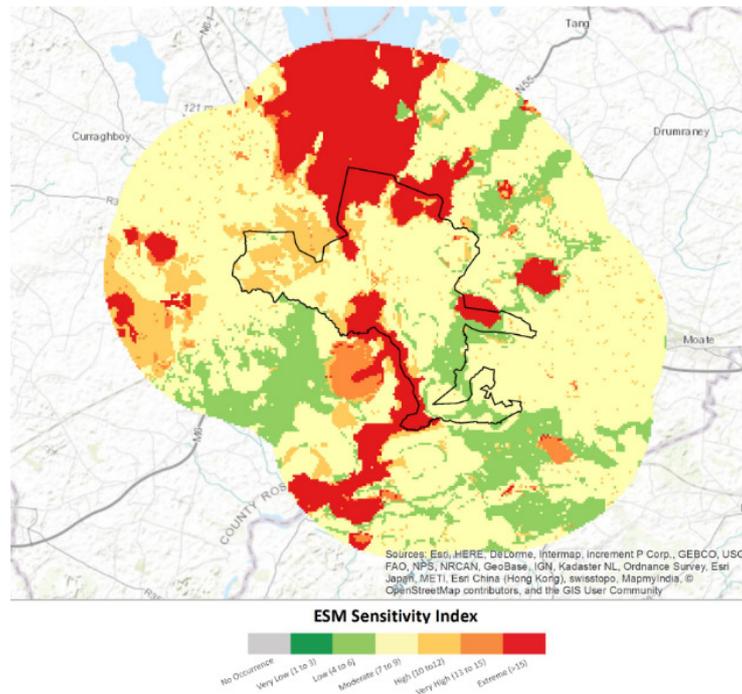
6.11.1 Regional Drivers

Athlone

Athlone is located in the midlands at the southern end of Lough Ree with the River Shannon running through the centre of the town. The main transport links include the N6/ M6, the N61, the N62 and the N55. A number of intercity rail lines link Athlone to Dublin, Westport and Galway. Athlone is located approx. 120km from Dublin Airport and 130km from Shannon Airport. CSO 2016 population figure for Athlone is 21,349 (Westmeath: 88,770). Vacancy rate in Athlone is 10.1% (Westmeath: 32%). Third level education is provided by Athlone Institute of Technology.

Major industrial parks include IDA Business Park and Athlone Business Park. There is a strong presence of technology-related industry e.g. software, medical devices, R&D and smart technology. Recreation and tourism are important given water-based activities related to the River Shannon and Lough Ree, as well as camping/ caravan parks around the lough. There is a large rifle range on northwest side of town (Midlands National Shooting Centre of Ireland). The landscape is generally

flat with extensive floodplains (callows) dominating the landscape north and south of the town and peat bogs to the east and west. Athlone is part of the Lough Ree/ Shannon Corridor Landscape Character Area. The Mullingar-Athlone Old Rail Trail Greenway also starts on the eastern side of the town.



The areas of highest sensitivity are related to the River Shannon system which is designated as an SAC and SPA in the vicinity of Athlone. There are also a number of bogs in close proximity including Crosswood, Carrickynaghtan and Carn Park bogs. In addition to natural heritage there are also flood risk issues for Athlone. The Athlone Town Development Plan 2014-2020 noted the following in relation to flooding in Athlone: *..... the most common causes are seasonal flooding of the River Shannon, flooding from the AI River, and the inadequacy of existing stormwater pipe networks to cope with extreme rainfall events. The frequency, pattern and severity of flooding are expected to increase as a result of climate change.* Athlone was previously identified for flood relief and a major scheme is under construction to alleviate problems. The focus of Athlone within the Eastern and Midlands Region will present challenges to accommodating increased population while also avoiding new or exacerbating existing flood risk. The approach and methodologies laid out in *The 'Planning System and Flood Risk Management – Guidelines for Planning Authorities'* will be crucial as will the implementation of the Shannon CFRAMS.

It is also noted that Athlone Agglomeration has a design capacity of 30,000 PE with tertiary treatment in place, serving an agglomeration of 23,274 PE. The plant requires further improvement works to resolve priority issues. The provision of adequate wastewater treatment capacity to a suitable standard will need to keep pace with the growth of Athlone as a regional driver if impacts to the environment are to be avoided. NPF policies in relation to tiered zoning and alignment of infrastructure provision will be essential in this regard.

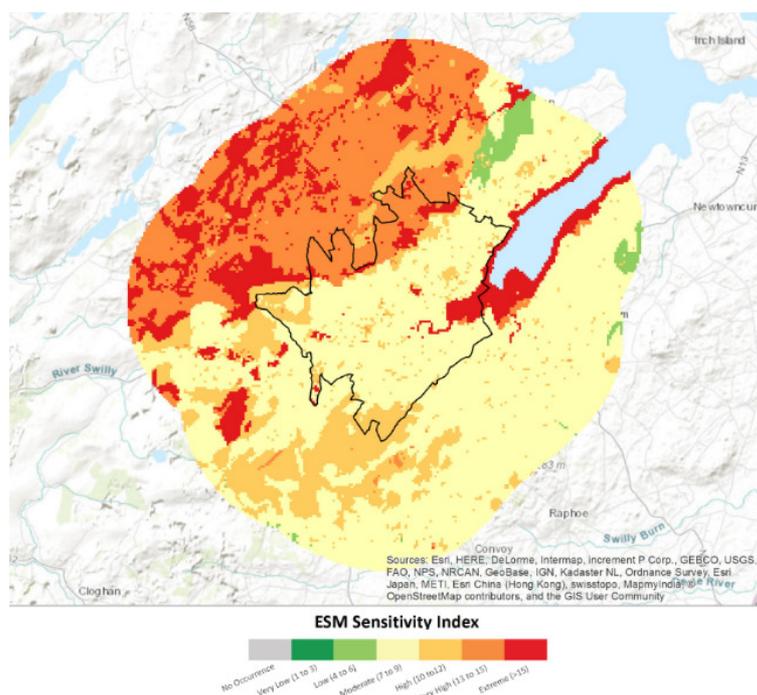
Given the pivotal location of Athlone, straddling local authority regional assembly areas, it will be essential at the RSES level to develop coordinated solutions that respond to the overall

environmental pressures in the area. Better environmental outcomes can be achieved with proper cooperation and coordination between the relevant LAs, assemblies and agency stakeholders.

Letterkenny

Letterkenny is located in the northwest region of Ireland, on the north banks of River Swilly, Drongawn Lough/ estuary to east. The main transport links include the N13, N14, N56, A5/ A6 in Northern Ireland. CSO 2016 population figures for Letterkenny are 19,274 (Donegal: 159,192). Vacancy rate in Letterkenny is 14.9% (Donegal: 34.4%). There are no suburban/intercity rail links servicing the area. Several Bus Éireann routes do link Letterkenny to Derry, Donegal, Sligo and Galway. Donegal Airport is located approximately 36 km to northwest of Letterkenny. Letterkenny Institute of Technology is located in the town centre and there are also cross-border links with University of Ulster.

There is a mix of industrial/ manufacturing, agriculture/ food and software sectors including creameries, healthcare (medical devices), engineering, confectionery, and software. There is an Enterprise Fund Business Centre/ IDA Business Park and Ballyraine Industrial Estate. The Wild Atlantic Way runs around town. Glenveagh National Park in the Derryveagh Mountains. Letterkenny area falls within the Estuarine, Agricultural Coastal and Agricultural Foothills Landscape Types, and the Letterkenny Estuary and Farmland Landscape Character Area.



The areas of highest sensitivity are related to Lough Swilly to the northeast and small areas of woodland to the west. The major area of sensitivity to the northwest is related to Leannan River SAC and the Cloghernagore Bog and Glenveagh National Park.

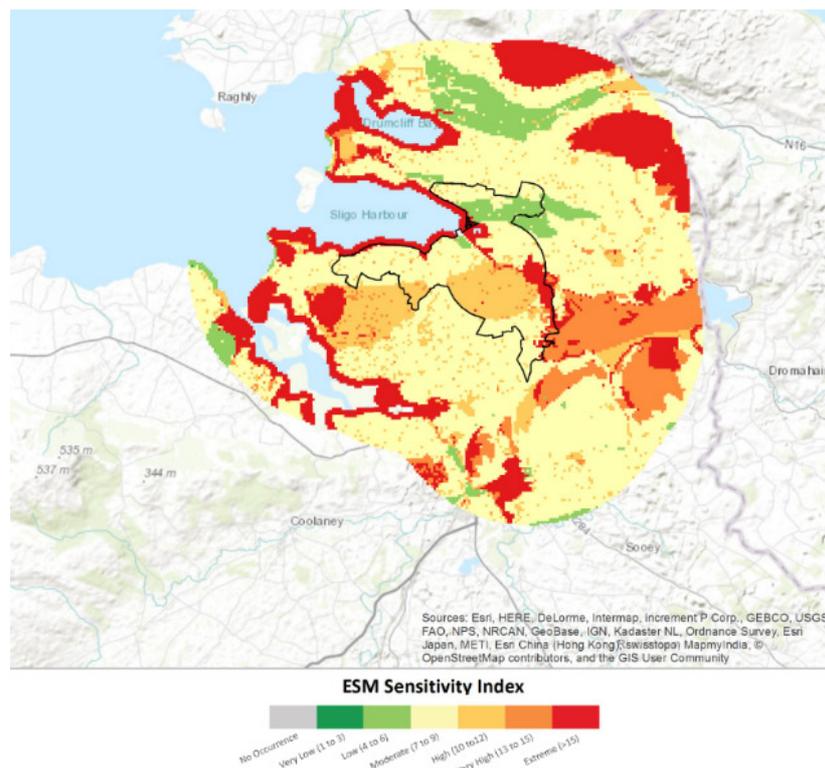
Flood risk issues have been identified for Letterkenny, associated with drainage to the River Swilly and although the Letterkenny WwTP has been upgraded in order to deal with previous inadequate treatment and operational issues, there will be a need to align growth with capacity for this regional town.

Sligo

Sligo is a coastal town in the NW region of Ireland, situated between Lough Gill on the east and Sligo Harbour and Drumcliff on the west side. CSO 2016 population figures for Sligo town are 19,199 (Sligo county: 65,535). Vacancy rate for Sligo town is 13.9% (Sligo county: 36.1%). The major transport links are N4, N15, N16 and N59. An intercity rail line links Sligo-Dublin Heuston (connecting through Carrick-on-Shannon, Longford, Mullingar and Maynooth). Sligo Airport is located 8km to west of town at Strandhill. The CDP recognises relatively weak infrastructure including broadband. Third level education includes the Institute of Technology Sligo, St Angela's College (college of NUI Galway).

Industry/ enterprise in Sligo is supported by IDA, Enterprise Ireland and Sligo County Council's Local Enterprise Office. There is a predominance of micro-businesses with the main economic sectors in services, manufacturing and pharmaceuticals.

The North West Cycle Trail links Leitrim, Sligo, Donegal, Tyrone and Fermanagh. The Sligo Way National Waymarked Trail is south of the town. Sligo Town is included in the urban landscape LCA surrounded by the normal rural landscape LCA. The North West Cycle Route is considered a scenic route. Sensitive Rural Landscape found along coast at Strandhill/ around Lough Gill.



The areas of highest sensitivity include Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC and Drumcliff Bay SPA to the west and along the coast and Lough Gill SAC to the east. Crockauns/Keelogyboy Bogs NHA is located to the north of Sligo Town.

Sligo Agglomeration currently has a wastewater treatment plant with a design capacity of 50,000 PE with tertiary treatment, to serve the agglomeration of 30,190 PE.

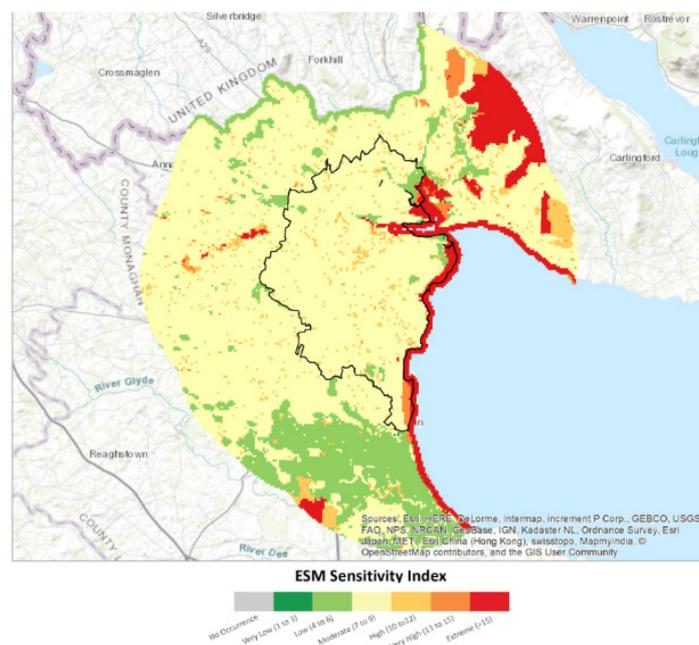
Sligo town was identified as an area for further assessment as part of the CFRAM work, principally associated with coastal flooding. The approach and methodologies laid out in *The 'Planning System and Flood Risk Management – Guidelines for Planning Authorities'* will be crucial as will the implementation of the UoM35 Flood Risk Management Plan from the OPW once adopted.

Dundalk

Dundalk is the county town of Louth located in the northeast of Ireland, developed around the southern banks of the Castletown River. CSO 2016 population figures for Dundalk are 39,004 (Louth: 128,884). The vacancy rate for Dundalk is 9% (Louth: 27%). The major transport links include the A1/A2 (NI), M1 and the N53. Intercity rail connections are Dublin Connolly-Dundalk (Commuter) and Dublin-Belfast (Enterprise Service). Dublin Airport is approximately 60km to the south. Third level education includes Dundalk Institute of Technology.

Commerce and trade is the largest industry, followed by professional services. Notable industries include pharma services/clinical services, medical devices, food and beverage, Great Northern Distillery based in Dundalk. There is an IDA Dundalk Business & Technology Park and the Xerox Technology Park in the town.

Dundalk is a 'gateway' to Cooley Peninsula, the Mourne Mountains and the Ring of Gullion. Other tourist attractions include the Tain Heritage Trail; Dundalk Bay Ornithology Centre and 'northern gateway' to Brú na Bóinne World Heritage Site and the Battle of the Boyne site. Topography is generally flat rising in westerly direction to Mount Avenue; Castletown Motte National Monument occupies dominant elevated position. The northern Dundalk area falls within Lower Faughart, Castledown & Flurry River LCA; the eastern part of Dundalk in the Dundalk Bay Coast LCA; and the remainder within the Mulhevna Plain LCA.



The areas of highest sensitivity around Dundalk relate to Dundalk Bay which is designated as an SAC, an SPA (including the Creggan River which runs to the north of the town) and an NHA.

Dundalk Agglomeration has a wastewater treatment plant with a design capacity of 179,107 PE with secondary treatment in place, to serve an agglomeration of 77,838. The plant is currently undergoing upgrades to improve nutrient removal with planned upgrades relating to handling of storm water.

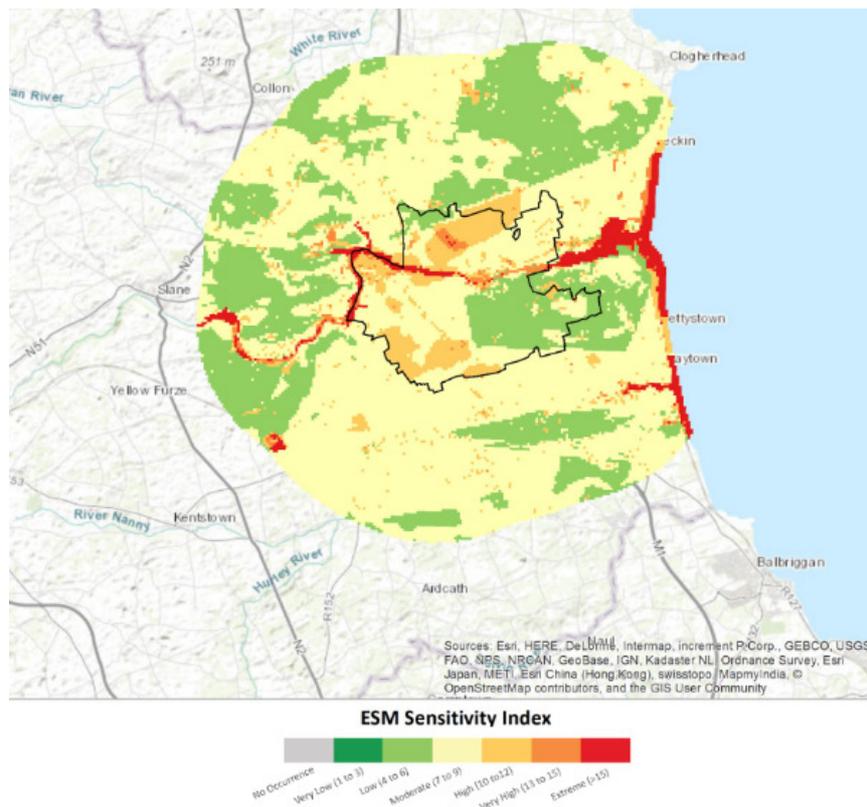
Dundalk has been identified as a location for a major flood relief scheme under CFRAM and a Flood Management Plan is imminent from the OPW in this regard. Like other areas subject to flooding a focus on Dundalk within the Eastern and Midlands Region will present challenges to accommodating increased population while also avoiding new or exacerbating existing flood risk. The approach and methodologies laid out in *The 'Planning System and Flood Risk Management – Guidelines for Planning Authorities'* will be crucial.

Drogheda

Drogheda is the largest town in Louth and is located in the northeast region of Ireland. The functional area of Drogheda also encompasses part of Meath. CSO 2016 population figures for Drogheda are 40,956 (Louth: 128,884). The vacancy rate in Drogheda is 6% (Louth: 27%). The major transport routes include: M1, N2 and N51 with intercity/ cross-border rail services including Dublin Connolly-Dundalk (Commuter) and Dublin-Belfast (Enterprise Service). Dublin Airport is approximately 29 km to the south.

Traditional industries of textiles, brewing, shipping and manufacturing are still present but with greater uptake in retail, services and technology sectors. Important employment-generating areas include: Drogheda Transport Development Area, Heritage Quarter, Donore Road Enterprise Zone. Drogheda is growing centre for multi-media, performing arts and design; third level courses through Drogheda Institute for Further Education.

The Brú na Bóinne UNESCO World Heritage Site is located 8km to west of Drogheda and close to other historic landmarks. Monasterboice which is included on Tentative World Heritage Site List, is approximately 4.5km to north-west of Drogheda.



The areas of highest sensitivity to the east of Drogheda relate to the Boyne Coast and Estuary NHA, and the Boyne Estuary SPA. The River Boyne and Blackwater SAC flows through the town.

Drogheda Agglomeration has a wastewater treatment plant with a design capacity of 101,600 PE with secondary treatment, to serve an agglomeration of 68,620 PE. The plant requires some upgrade work to improve nutrient removal.

Like Dundalk, Drogheda has been identified as a location for a major flood relief scheme under CFRAM and a Flood Management Plan is imminent from the OPW in this regard. Like other areas subject to flooding, the focus on Dundalk within the Eastern and Midlands Region will present challenges to accommodating increased population while also avoiding new or exacerbating existing flood risk. The approach and methodologies laid out in *The 'Planning System and Flood Risk Management – Guidelines for Planning Authorities'* will be crucial.

Similar to Athlone, Drogheda lies across two LA areas and as such there is a risk in relation to environmental pressures where activities are not coordinated at the regional level. It will be important to ensure cooperation of LA and other related agencies if the best environmental outcomes are to be achieved.

6.11.2 Population Increases and GHG Emissions

In February 2011, the European Council reconfirmed the objective of reducing greenhouse gas emissions by 80-95% by 2050 compared to 1990. In 2014, the Government adopted the *National Policy Position on Climate Action and Low Carbon Development*, which establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate-resilient and

environmentally sustainable economy by 2050. It sets out the context for the objective, clarifies the level of greenhouse gas mitigation ambition envisaged and establishes the process to pursue and achieve the overall objective. Specifically, the *National Policy Position* envisages that policy development will be guided by a long-term vision based on:

- An aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors (EGBET Sectors); and
- In parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.

This first National Mitigation Plan, published in July 2017, represents an initial step to set the State on a pathway to achieve the level of decarbonisation required.

In April 2017, the Central Statistics Office (CSO) reported that the estimated population of Ireland was 4,792,490 people. In November 2017, the Environmental Protection Agency (EPA) reported Ireland's provisional total national greenhouse gas emissions to be 61.19 million tonnes carbon dioxide equivalent (Mt CO_{2eq}). Based on the above national statistics, the current baseline per capita greenhouse gas emissions is 12.77 tonnes per capita per annum.

Within the National Planning Framework, National Policy Objective 1b predicts a population rise from 4.79 million (April 2017) to 5.85 million in 2040, i.e. a 22% increase in population. In the event that the population was to increase to these levels but with no associated reduction in per capita emissions (i.e. zero impact from the National Mitigation Plan and no change in the nation emissions per capita), the total national greenhouse gas emissions would be 74.70 million tonnes carbon dioxide equivalent (Mt CO_{2eq}) by 2040. This simplified extrapolation highlights the challenges faced by Ireland in reducing national emissions by at least 80% (by 2050) against the backdrop of a 22% rise in population (by 2040).

Furthermore, the latest EPA projections published in April 2017 predict increasing annual emissions to 2035 both as total national emissions (13.6% increase for the “with existing measures” scenario and 6.8% increase for the “with additional measures” scenario) and emissions from the electricity generation, built environment and transport (EGBET) sectors (refer **Figure 6.1**). Projections are not yet available for 2040 but the projections to 2035 show the increasing trend as predicted by the EPA.

It is noted that the 2030-2035 emissions projections are based on a population of 5,209,000 persons within the State. As such the projected per capita emissions in 2035 is 12.45 tonnes per capita per annum which is only a marginal improvement on the current per capita emissions.

To achieve the EGBET target as set out in **Figure 6.1**, an annual emissions reduction of the order of 23 million tonnes carbon dioxide equivalent from these sectors would be required. This would require a per capita emission of approximately 6.5 tonnes per capita per annum to be achieved by 2040 to meet both the National Mitigation Plan 80% EGBET target and the National Policy Objective 1b population growth.

The evolving suite of measures listed in the National Mitigation Plan will require a significant step change in the ambition of the proposed measures to achieve the emissions reductions whilst facilitating the planned increases in population associated with the National Planning Framework.

The 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, this opens up the 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 targets 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.

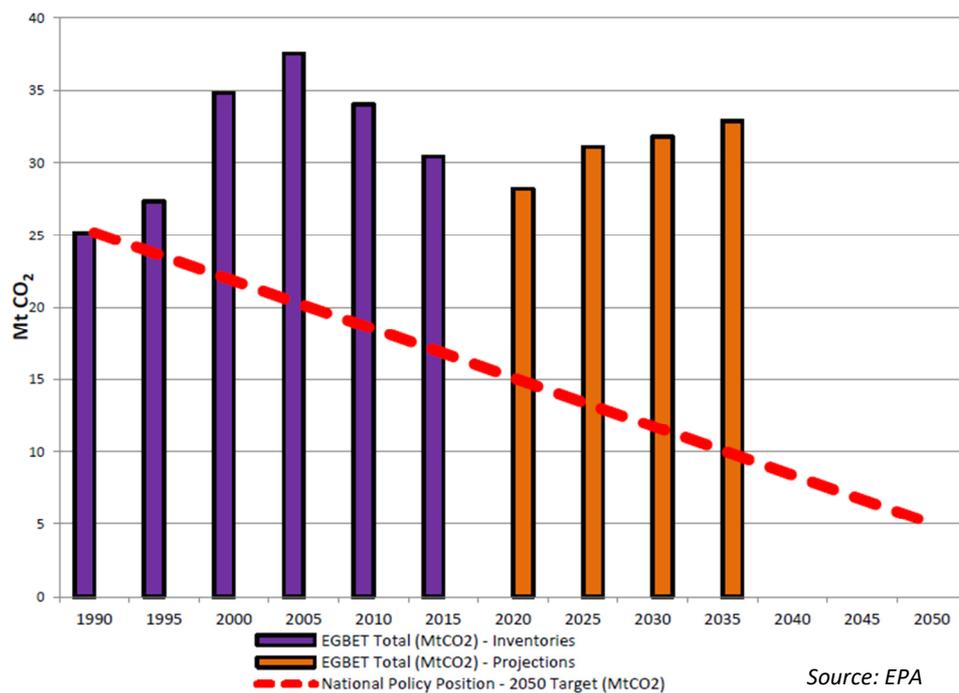


Figure 6.1 – Historic and projected CO₂ emissions from the electricity generation, built environment and transport (EGBET) sectors

7 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE ADOPTED 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 measured. The environmental targets and indicators of relevance to this NPF were identified from the SEA process. These targets and indicators will be used to identify unforeseen adverse effects from implementation of the NPF.

7.2 RESPONSIBILITY FOR MONITORING

Coordination of monitoring of the NPF will be carried out by the Department of Housing Planning and Local Government as the competent authority for the plan.

7.3 SOURCES OF INFORMATION FOR MONITORING

Monitoring will focus on aspects of the environment that are likely to be significantly impacted by the NPF. Where possible, indicators have been chosen based on the availability of the necessary information and the degree to which the data will allow the target to be linked directly with the implementation of the NPF. **Table 7.1** presents the environmental monitoring and reporting programme to track progress towards achieving the strategic environmental targets, and includes sources of relevant information

Table 7.1 – Environmental Monitoring Programme

Strategic Objective	Target	Indicator	Data Source
<p>Objective 1 Population & Human Health</p> <p><i>To create an environment where every individual and sector of society can play their part in achieving a more healthy Ireland.</i></p>	<ul style="list-style-type: none"> ▪ Increase the proportion of people who are healthy at all stages of life. ▪ Increase by 20% proportion of the population undertaking regular physical activity. 	<ul style="list-style-type: none"> ▪ Achievement of objectives, targets and indicators outlined in <i>Healthy Ireland Implementation Plan 2016-2019</i>. 	<ul style="list-style-type: none"> ▪ Health Service Executive
<p>Objective 2 Biodiversity, Flora and Fauna</p> <p><i>To preserve, protect, maintain and, where appropriate, enhance the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species.</i></p>	<ul style="list-style-type: none"> ▪ Require all regional, county and local level land use plans to include ecosystem services⁹ and green/blue infrastructure provisions in their land use plans and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species. 	<ul style="list-style-type: none"> ▪ Number of spatial plans that have included ecosystem services and green/blue infrastructure provisions when their relevant plans are either revised or drafted. 	<ul style="list-style-type: none"> ▪ Regional Spatial Economic Strategies (RSES) ▪ Development Plans ▪ Local Area Plans
<p>Objective 3 Soils</p> <p><i>Protect soils against pollution, and prevent degradation of the soil resource.</i></p>	<ul style="list-style-type: none"> ▪ Maintain built surface cover nationally to below the EU average of 4%.¹⁰ ▪ To avoid or minimise adverse effects on mineral resources, important geological and geomorphological sites and soils. 	<ul style="list-style-type: none"> ▪ Percentage land cover change in Ireland. 	<ul style="list-style-type: none"> ▪ Environmental Protection Agency (EPA), Geoportal
<p>Objective 4 Water</p> <p><i>Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the WFD and MSFD.</i></p>	<ul style="list-style-type: none"> ▪ The stated expected outcomes of the second cycle of the River Basin Management Plan are achieved by 2021. ▪ The stated expected targets of the MSFD are achieved or maintained by 2020. 	<ul style="list-style-type: none"> ▪ Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD. ▪ Indicators for descriptors as reported for the MSFD are achieved or 	<ul style="list-style-type: none"> ▪ EPA Monitoring Programme for WFD compliance ▪ Department of Housing, Planning and Local Government, Marine and Foreshore

⁹ Ecosystem services are defined by the EU Biodiversity Strategy to 2020 to comprise those services that ecosystems can provide and which Ireland is requested to map and assess under Target 2 Action 5, NPWS (2016) *National ecosystem and ecosystem service mapping pilot*. Such services can include those provided by nature (e.g. timber), regulation and maintenance (e.g. clean air and water), and cultural services (e.g. places which support recreation).

¹⁰ http://www.epa.ie/irelandsenvironment/environmentalindicators/#land_and_soil

Strategic Objective	Target	Indicator	Data Source
		maintained by 2020.	Section
<p>Objective 5 Air Quality</p> <p>(i) <i>To avoid, prevent or reduce harmful effects on human health and the environmental as a whole resulting from emissions to air.</i></p> <p>(ii) <i>Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency.</i></p>	<ul style="list-style-type: none"> Decrease in proportion of journeys made by private fossil fuel-based car compared to 2014 National travel Survey levels Adoption of the National Clean Air Strategy [to be published in Q4, 2017] 	<ul style="list-style-type: none"> Percentage change from 2014 position of 74% car modal share. Achievements of the Key Performance Indicators outlined in the National Clean Air Strategy. 	<ul style="list-style-type: none"> Central Statistics Office, National Travel Survey Department of Transport Tourism and Sport, Transport Trends (DTTAS) Department of Communications, Climate Action and Environment (DCCAIE)
<p>Objective 6 Climatic Factors</p> <p><i>To minimise emissions of greenhouse gases.</i></p>	<ul style="list-style-type: none"> Achieve transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050. The Renewable Energy Directive (2009/28/EC) set a target for all Member States to reach a 10 % share of renewable energy in transport by 2020. Aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors (EGBET Sectors) To promote reduced energy consumption and support the uptake of renewable options and a move away from solid fuels for residential heating. 	<ul style="list-style-type: none"> No. of actions delivered through the National Mitigation Plan, published in July 2017. A net annual reduction in the GHG emissions from the relevant sectors (electricity generation, built environment and transport). Carbon neutrality in the agriculture/forestry sector. 	<ul style="list-style-type: none"> Department of Communications, Climate Action and Environment (DCCAIE) EPA Annual National GHG Emissions Inventory reporting
<p>Objective 7 Material Assets</p> <p>(i) <i>Consolidate growth and limit urban sprawl.</i></p> <p>(ii) <i>Optimise existing</i></p>	<ul style="list-style-type: none"> To map brownfield and infill land parcels in each administrative area. Increased budget spend on water and wastewater infrastructure. 	<ul style="list-style-type: none"> Number of administrative areas that have developed maps showing brownfield and infill lands 	<ul style="list-style-type: none"> Department of Housing, Planning and Local Government in conjunction with Local

Strategic Objective	Target	Indicator	Data Source
<i>infrastructure and provide new infrastructure to match population distribution proposals in the draft NPF.</i>	<ul style="list-style-type: none"> By 2020 all citizens will have access to speeds of 30Mbps, and that 50% of citizens will be subscribing to speeds of 100Mbps. 	<ul style="list-style-type: none"> Budget allocated to Irish Water under the National Capital Plan 2017. Percentage completion of broadband by 2021. 	<p>Authorities</p> <ul style="list-style-type: none"> Department of Communications, Climate Action and Environment (DCCAIE) Department of Public Expenditure and Reform (DPER)
<p>Objective 8 Archaeology, Architecture and Cultural Heritage</p> <p><i>Protect places, features, buildings and landscapes of cultural, archaeological or architectural heritage.</i></p>	<ul style="list-style-type: none"> No unauthorised physical damage or alteration of the context of cultural heritage features. 	<i>More appropriately dealt with at project level.</i>	N/A
<p>Objective 9 Landscape</p> <p><i>To provide a framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention.</i></p>	<ul style="list-style-type: none"> Avoid damage to designated landscapes as a result of NPF implementation. 	<i>More appropriately dealt with at project level, however the Development of a National Landscape Character Map will contribute to protecting landscapes.</i>	N/A

8 CONCLUSIONS AND NEXT STEPS

The SEA and AA processes carried out during the preparation of the National Planning Framework have ensured that the potential significant environmental impacts associated with implementation of the plan have been identified and that these impacts have been given appropriate consideration. Consultation on the draft Plan, Environmental Report and NIS has further contributed to the development and finalisation of the adopted National Planning Framework.

It is envisaged that monitoring and reporting of environmental impacts, both positive and negative, resulting from implementation of the National Planning Framework will continue over the course of the lifetime of the plan.

9 ADDENDUM TO ENVIRONMENTAL REPORT

9.1 INTRODUCTION

This is the addendum to the Environmental Report for the NPF. This chapter serves two purposes: a) to provide clarification and/or additional information following comments in the submissions received during the consultation period on the draft NPF and Environmental Report; and b) to identify where the Environmental Report has been updated in 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. However, the amendments proposed are not of such an extent that changes to the content or outcome of the assessment contained within the Environmental Report will be required.

9.2 AMENDMENTS BY CHAPTER

9.2.1 Non-technical Summary

9.2.2 Chapter 3

In Section 3.3.3 Links between the SEA and AA Process, the following sentence has been amended:

In the context of the draft NPF, the governing legislation is principally Regulation 27 of the Birds and Natural Habitats Regulations 2011 which sets out the *general* duties of public authorities *in relation to the nature Directive* and nature conservation.

Also, the following text was deleted:

An AA of the draft NPF is being carried out in parallel with the SEA process, with the findings of the AA used to guide the development of the alternatives to considered as part of the SEA. The assessment undertaken as part of the AA process also feeds directly into the assessment of biodiversity, flora and fauna in this SEA.

The above text was replaced with the following statement:

An NIS has been prepared for the draft NPF, and an appropriate assessment will be carried out [by the Minister for HPLG] in parallel with the SEA process, prior to plan adoption. Assessment and analyses in the NIS have been used to guide the development of the alternatives to be considered as part of the SEA. The NIS also feeds directly into the assessment of biodiversity, flora and fauna in this SEA.

9.2.3 Chapter 5

The title of Section 5.2.1.2 has been amended to read as *Natural Habitats and Protected Species*

A new section has been added at 5.2.1.3 in relation to birds in Ireland:

5.2.1.3 Birds

An assessment of all regularly occurring birds in Ireland is reported by the Royal Society for the Protection of Birds and Birdwatch Ireland on a periodic basis. The assessment highlights the birds of conservation concern, grouping all regularly occurring birds into red, amber and green categories based on defined criteria. The report states that the criteria on which the assessment is based include international conservation status, historical breeding declines, recent population declines (numbers and range in breeding and nonbreeding seasons), European conservation status, breeding rarity, localised distribution, and the international importance of populations.

The current BOCCI list 2014-2019 has the highest number of red listed species ever for Ireland. The report notes that of the 185 species assessed, 37 were placed on the Red list, 90 on the Amber list and 58 on the Green list. Of particular concern is the increase in species on the red and amber lists since the last assessment, pointing toward a worrying trend. Species which have moved to the red list include wintering populations of six duck species.

Also, Group Species Action Plans for Irish Birds detail priority actions for bird species across 10 broad habitat types (BWI 2011). They should inform future work programmes to ensure the widest implementation of measures to help support and protect 'birds in the wider countryside' and thus respond to 'The Birds Case' (i.e. European Court of Justice C 418/04).

It is noted that BirdWatch Ireland have developed a Bird Wind Sensitivity mapping tool that highlights the species-specific sensitivities that need to be considered when developing wind energy infrastructure.

The URL for Inland Fisheries Ireland (IFI), www.fisheriesireland.ie has been included at the end of the first sentence in Section 5.2.1.4.

The text in Landscape section of Table 3.2 has been amended as follows:

However, new guidelines are available for the assessment of landscape and visual impacts; they aim to provide a more objective and structured approach, i.e. Guidelines for Landscape and Visual Impact Assessment, Third edition, Landscape Institute and Institute of Environmental Management and Assessment.

The contribution of landscape features to biodiversity and Natura sites has been recognised by the addition of the following text to Section 5.2.8.2:

It is also recognised that non-designated receptors, such as landscape features, can function as ecological stepping stones or corridors which are of importance to wildlife and contribute to the concept of "green infrastructure".

The list of tentative world cultural heritage sites in Section 5.2.7.1 Archaeological and Architectural Heritage, has been amended to include (*Inis Cealtra L. Derg*)

Transboundary issues regarding Nature Conservation (Section 4.3.8) has been amended to include additional Environmental Legislation for Northern Ireland and a reference to the DAERA map viewer for identifying protected sites and known priority areas:

The Environment (Northern Ireland) Order 2002; The Wildlife (Northern Ireland) Order 1985 and The Wildlife and Natural Environmental Act (Northern Ireland) 2011. Protected sites and known priority habitats in Northern Ireland can be identified using the Department of Agriculture, Environmental and Rural Affairs (DAERA) map browser: <https://www.daera-ni.gov.uk/services/natural-environment-map-viewer>

A bullet point has been added to section 5.2.7, Cultural Heritage, to make provision for border area heritage sites and Footnote 56 has been included to provide a link to relevant datasets:

Consideration heritage sites in the border area should be considered, particularly cross-border assets like Ulster Canal and the Black Pigs Dyke.

⁵⁶ *Spatial datasets on Northern Ireland's historic environment area available for download: <https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets>*

The text for the Climate section in Table 5.3 has been replaced with the following:

In 2015, Northern Ireland's GHG emissions were estimated to be 20.7million tonnes of carbon dioxide equivalent, or a 17.8% reduction in GHG emissions from the 1990 base year. The largest sectors in terms of emissions were agriculture (29%), transport (21%) and energy supply (19%). Most sectors showed a decreasing trend since the base year. The largest decreases, in terms of carbon dioxide equivalent, were in the energy supply residential and waste sectors. They were driven by improvements in energy efficiency, fuel switching from coal to natural gas which became available in the late 1990's and the introduction of methane capture and oxidation systems in landfill management. there are government targets towards reducing GHG emissions in the UK by at least 80% on 1990 levels by 2050 but this will prove challenging; Northern Ireland's emissions amounted to 4.2% of the UK total in 2015. A key priority for climate change has been the implementation of Northern Ireland's Climate Change Adaptation Programme in 2014

The word "seascape" was added to the Landscape section of Table 5.18 ... impacts to protected or sensitive landscape *and seascape*, and text in Table 6.1 Objective 9, was been amended to include ... *and/or seascapes*

It is noted that the final Plan contains a new national planning objective (i.e. NPO57) which addresses many of the issues raised regarding flood risk management and spatial planning. Specifically, it promotes avoiding inappropriate development in areas at risk of flooding, makes provision for consideration of the River Basin Management Plan objectives, and promotes integrated sustainable water management (e.g. SUDS) in future planning and development.

5.1.1. State of the Environment Overview – Republic of Ireland

Regarding a national baseline of land use in Ireland, Table 5.2 has been updated with the following text under Land and Soil:

Land and Soil	...The actual figure is likely to be higher given that built surfaces less than 25ha in area (including one-off housing), sections of the road/rail network, and smaller quarrying sites are not captured at this resolution. <i>More detailed data is available on licence from the OSi via the PRIME2 spatial reference framework,¹¹ as well as sectoral-specific data for agriculture (DAFM's Land parcel Identification System) and forestry (Forest Service and Coillte data on forest assets).</i>
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5.2.2 Population and Human Health

The following paragraph in Section 5.2.2.4 Human Health and Wellbeing has been updated with figures from the CSO's latest publication on "Measuring Ireland's Progress 2015" and the "Irish Health Survey 2015":

The CSO statistical publication "Measuring Ireland's Progress 2015" stated that life expectancy at birth for males in Ireland in 2015, as calculated by Eurostat, was 79.3 years, 1.2 years higher than the EU average. Female life expectancy at birth in 2012 was 83.5 years in Ireland, just below the EU average of 83.6 years. At the time of the 2011 Census, As of 2015, 83% of the total population aged 15 years or older considered themselves to be in 'very good' or 'good' health. Perceptions of healthiness showed substantial deterioration with age, with 59% of the population aged 75 and above reporting a long-standing illness/ health condition compared to 18% of 15-24 year olds. Cities Disadvantaged areas were also found to have the poorest levels of health (40%) compared to suburbs, smaller towns or rural areas very affluent areas (26%).

5.2.4 Water

5.2.4.1 Surface Waters, reference to Water Quality in Ireland 2010-2015 (EPA 2017)

In Section 5.2.4.1, Table 5.11 is replaced by the following table with the latest figures from the EPA's catchments.ie website:

The current status of river, lake, transitional and coastal water bodies for the 2010-2015 WFD reporting period is summarised in **Table 5.11**.

Table 5.11 – Water Framework Directive Ecological Status (2010-2015)

Status	River	Lake	Transitional	Coastal
High	10%	11%	13%	23%
Good	46%	35%	19%	56%
Moderate	25%	33%	49%	16%
Poor	18%	12%	15%	5%

¹¹ <https://www.osi.ie/about/future-developments/prime2/>

Status	River	Lake	Transitional	Coastal
Bad	0.3%	8%	5%	0%

Source: EPA 2010-2015 status (Eden Ireland Data Export, retrieved January 2018). Note: Water Quality Status is for Surface Water bodies that are monitored as part of the Irish Water Framework Monitoring Programme, regardless of jurisdiction and as such takes into account some water bodies in Northern Ireland. Unassigned water bodies have been excluded; percentages are based on monitored water bodies only.

5.2.5 Air Quality and Climatic Factors

In Section 5.2.5.1 Air Quality and Climatic Factors, the following paragraph replaces the 2015 references with figures from the latest EPA *Air Quality in Ireland Report* for 2016:

Air quality in Ireland was monitored at 30 stations across Ireland in 2016 and in comparison to the rest of Europe is considered good quality. The EPA 2017 air quality report states that in 2016, measured sulphur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), ozone, particulate matter (PM₁₀ and PM_{2.5}), heavy metals, benzene and polycyclic aromatic hydrocarbons (PAH) concentrations were all below their individual limit and target values, as set out in the CAFE Directive and 4th Daughter Directive (2004/107/EC).¹² Ireland was however above the tighter World Health Organisation (WHO) guidelines for the following: PM₁₀ 24hr guideline exceeded at 11 monitoring sites; PM_{2.5} at 9 monitoring sites for the 24hr guideline and 2 monitoring sites for the annual guideline; ozone at 7 monitoring sites; SO₂ 24hr guideline at 2 monitoring sites; and NO₂ 1hr guideline at 1 monitoring site. The European Environment Agency (EEA) reference level for PAHs was also exceeded in at 4 locations in 2016. The 2016 dioxin survey indicates that dioxins and similar pollutants remain at consistently low levels in Ireland.

Given the risk to human health from air pollution, the EPA has proposed to rollout a new ambient air quality monitoring programme under Section 65 of the EPA Act.¹³ The programme would include extending the existing CAFE network of monitoring stations to include a further 38 stations, as well as a 'local' monitoring network to be established in partnership with the local authorities. The new network will contribute more data and lead to better monitoring and forecasting.

The EPA has recommended that Ireland must decrease the concentrations of particulate matter to below the WHO air quality guideline values. *An EEA report attributes an estimated 1,510 premature deaths in Ireland in 2014 as a result of PM_{2.5}.¹⁴*

The first paragraphs of Section 5.2.5.2 Greenhouse Gases has been replaced by the following to reflect the latest greenhouse gas emissions published by the EPA for 1990-2016:

According to the EPA's emissions inventory up to 2016, emissions of GHGs in Ireland are estimated to be 61.19 million tonnes carbon dioxide equivalents (Mt CO₂ eq).¹⁵ This is 3.5% higher than emissions in 2015 (59.88 Mt CO₂ eq). There is strong evidence now that emissions are increasing as a result of economic recovery and employment, particularly in the transport sector. Agriculture remains the single largest contributor to the overall emissions at 32.0% of the total. Energy Industries and Transport are the second and third largest contributors at 20.5% and 20.0% respectively. Emissions from the Residential and Manufacturing Combustion sectors account for 9.9% and 7.4% respectively.

¹² EPA (2017) Air Quality in Ireland 2016.

¹³ EPA (2017) National Ambient Air Quality Monitoring Programme 2017-2022

¹⁴ EEA (October 2017) Air Quality in Europe 2016. EEA Report No 13/2017.

¹⁵ EPA (2017) Ireland's Provisional Greenhouse Gas Emissions 1990 - 2016.

The remainder is made up of Industrial Processes, F-Gases, Waste, Commercial Services and Public Services which together make up 10.1%. Between 1990 and 2016, Transport shows the greatest overall increase of any sector at 138.6%.

In Section 5.2.5.3 Transboundary Gases, after the first paragraph, reference is added to the following regulations:

- *Decision 529/2013/EU¹⁶;*
- *Proposed Land Use, Land Use Change and Forestry (LULUCF) Regulations¹⁷; and*
- *Annexes to the LULUCF Proposal for a Regulation of the European Parliament and of the Council on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry into the 2030 climate and energy framework and amending Regulation No 525/2013 of the European Parliament and the Council on a mechanism for monitoring and reporting greenhouse gas emissions and other information relevant to climate change.*

The following targets under the NEC Directive are also added after the first paragraph of this section:

Ireland's limits under the NEC Directive with reference to 2005 as the base year include the following:

- *SO₂: 42 kilotonnes (kt)*
- *NO_x: 65 kt*
- *NH₃: 116 kt*
- *NMVOCs: 55 kt*

The remainder of Section 5.2.5.3 has been replaced with the following to account for more recent published data on targets under the NEC Directive for each transboundary gas:

The EEA reports that SO₂ emissions from Ireland amounted to 18kt in 2015, which represents a consistent downward trend year on year since 1990.¹⁸ Emissions of NO_x contribute to acidification of soils and surface waters, tropospheric ozone formation and nitrogen saturation in terrestrial ecosystems. NO_x emissions in Ireland have decreased by 45% between 1990 and 2013, and by 32% since 2008. This reduction was achieved due to improved abatement in Moneypoint power plant, reduced demand for clinker/ cement and a reduction in fuel used in road transportation. The transport sector, which mainly consists of road transport, is the principal source of NO_x emissions, contributing approximately 53% of the total in 2013. The industrial and power generation sectors are the other main source of NO_x emissions, with contributions of 16% and 11%, respectively in 2013. The remainder of NO_x emissions emanate from combustion in the residential/ commercial and the agriculture sectors, which together produced around 20% of the total in 2013. The latest reported national NO_x emissions estimates from the EPA are 76.5kt for 2013 (compared to the ceiling limit of 65kt);¹⁹ the EEA reports that NO_x emissions amounted to 80kt in 2015.¹⁸ NO_x emissions have been consistently above the previous NEC, reflecting the ongoing challenge Ireland faces in complying with the ceiling. Under the new directive, Ireland must reduce NO_x emissions by 49% in the period 2020 to 2029, and 69% from 2030 onwards, relative to 2005 levels.

¹⁶ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013D0529>

¹⁷ <http://www.caneurope.org/climate/land-based-emissions-lulucf>

¹⁸ EEA (2017) European Union emission inventory report 1990–2015 under the UNECE Convention on Long-range Transboundary Air Pollution (LRTAP).

¹⁹ EPA (2015) Ireland's Transboundary Gas Emissions In 2013.

Non-methane volatile organic compounds (VOC) are emitted as gases by a wide array of products including paints, paint strippers, glues, cleaning agents and adhesives and they also arise as a product of incomplete combustion of fuels and, as such, are a component of vehicle exhaust emissions. VOC emissions from manure management in the agriculture sector are included as a new source in the 1990-2013 emissions inventory. The EPA reports that emissions in 2013 were 90kt, which is above the NEC target of 55kt;¹⁹ more recently the EEA reports that emissions of NMVOCs were 101kt in 2015.¹⁸ The main sources of VOC emissions in Ireland are from manure management in agriculture and solvent use. These sources combined produce 74% of the annual total in 2013. Coal burning in the residential sector is another important but declining source as coal consumption decreases. Emissions from stationary combustion of fossil fuels across all sectors; power stations, residential, commercial and agriculture account for 17% of national total VOC emissions. Transport emissions account for almost 8% of national total emissions of VOCs, mainly from exhaust and fugitive releases from gasoline vehicles. Under the NEC Directive, Ireland must reduce VOC emissions by 25% from 2020 to 2029, and by 32% from 2030 onwards relative to 2005 levels.

Under Annex II of the NEC Directive, Ireland must reduce PM_{2.5} by 18% on 2005 levels from 2020 to 2029, and by 41% from 2030 onwards. Levels of PM_{2.5} are reported by the EPA under Ireland's Convention on Long-range Transboundary Air Pollution (CLRTAP) obligations. The 2015 report states that total national emissions of PM_{2.5} amounted to 15.85kt in 2013, a 51.4% reduction compared to 1990 levels (32.6kt),²⁰ while the EEA reports that levels were 14kt in 2015.¹⁸ Emissions from the residential and commercial/ institutional sectors comprised 60% of these emissions. Reductions have been attributed to reduced use of coal and peat and greater use of gasoil, kerosene and natural gas in these sectors.

NH₃ emissions have remained relatively steady with small fluctuations year on year; in 1990, emissions were 106kt compared to 108kt in 2015.¹⁸ Under Annex II of the NEC Directive, Ireland must reduce NH₃ emissions by 1% from 2020 to 2029, and by 5% from 2030 onwards, compared to 2005 levels.

Text has been added to Section 5.3.1 to make provision for environmental sensitivity mapping in the various RSEs: *Similar sensitivity maps would be recommended for inclusion in the Regional Economic and Spatial Strategies (RSES)*

9.2.4 Chapter 6

Table 6.1 – SEA Objectives, Targets and Indicators, Objectives were amended as follows:

Objective 2: To *conserve*, protect, maintain and, where appropriate, enhance the terrestrial, aquatic, *marine* and soil biodiversity, particularly European designated sites, *other nature conservation sites*, *natural habitats* and protected species.

Target: Require all regional, county and local level land use plans to include ecosystem services, *biodiversity conservation* and green/blue infrastructure provisions *which are consistent with this objective* in their land use plans and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, *natural habitats* and protected species.

²⁰ EPA (2015) *Air Pollutant Emissions In Ireland 1990–2013 Reported To The Secretariat Of The UN/ECE Convention On Long-Range Transboundary Air Pollution (LRTAP)*. Retrieved from SAFER: <http://erc.epa.ie/clrtap/>

Objective 5, target two was strengthened by replacing “adoption” with *implementation*.

9.2.5 Chapter 8

The proposed SEA Mitigation measures in Section 8.3.2, Table 8.2 have been amended to include a provision for the protection of water quality and consideration of flood risks, as follows:

...Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, *ensuring the protection of water quality, flood risks* and biodiversity as a minimum.

The NPF makes provision for transboundary cooperation with government agencies representing Northern Ireland and the UK regarding policy development, spatial planning and infrastructure development with NPO 51. Sections 8.3.5, 8.3.6 and 8.3.8 have been amended to include specific references to marine related transboundary concerns:

A bullet point was added to section 8.3.5 for clarification as follows:

Alignment of future marine related planning, policies and development strategies with the governments of Northern Ireland and the UK

The opening sentence of Section 8.3.6 was amended to make provision for the marine environment, i.e. ... *including the marine environment*.

A bullet point has been added to section 8.3.8 to provide for future consideration of transboundary marine related issues:

Ensuring that marine and terrestrial transboundary issues are considered in future planning; in particular the UK Marine Policy Statement which applies to all UK waters, including those of Northern Ireland's marine areas

9.2.6 Chapter 9

An additional General Mitigation measure has been added to Table 9.1, Chapter 2 - A New Way Forward:

General Mitigation: It is noted that the planning legislation underpinning the National Planning Framework will lead to the creation of a new independent Office of the Planning Regulator (OPR), which will be responsible for monitoring implementation of the NPF.