

8th July 2026

James Browne

Minister for Housing, Local Government and Heritage

Department of Housing, Local Government and Heritage (DHLGH)

Custom House

Dublin 1

D01 WGX0

Cc: An Taoiseach, Micheál Martin | Christopher O’Sullivan, Minister of State with special responsibility for Nature, Heritage and Biodiversity | John Cummins, Minister of State with responsibility for Local Government and Planning | Kieran O'Donnell, Minister of State with responsibility for Housing

Dear Minister,

Meeting Request - Delivering Homes While Protecting and Restoring Biodiversity

We are writing on behalf of a cross-sectoral group of organisations representing developers, planners, building designers, social housing providers, and ecological experts who value nature. Together, we share a commitment to supporting the Government’s ambition to deliver 300,000 homes under *Delivering Homes, Building Communities 2025–2030*, while ensuring full alignment with Ireland’s obligations to protect and restore biodiversity under the National Planning Framework, the new Planning and Development Act, and the EU Habitats Directive and Nature Restoration Law¹.

There is growing recognition of the need to integrate biodiversity and landscape-led considerations into the planning and delivery of new housing, buildings and infrastructure. Investors, policymakers, and emerging regulatory requirements are all driving a shift towards better protection and enhancement of biodiversity in new developments, including the use of green-blue infrastructure (GBI). However, despite this growing momentum, implementation on the ground remains inconsistent and fragmented, posing risks to the timely consenting and delivery of housing and infrastructure.

Across Ireland, there is currently no agreed national approach for assessing, designing, or delivering biodiversity measures within new developments or beyond, to address the associated impacts and effects, such as recreation. In the absence of clear national direction, local authorities are applying differing biodiversity and SuDS requirements, creating inconsistency and uncertainty. This lack of clarity leaves projects open to challenge, increases the risk of delays and additional costs, and undermines confidence in the planning process. It also limits the ability of local authorities, developers, housing providers, and

communities to plan coherently for the rapid delivery of high-quality, climate-resilient neighbourhoods integrating nature.

In contrast, a coordinated national framework — centred on the biodiversity mitigation hierarchyⁱⁱ and supported by clear, practical, standardised toolsⁱⁱⁱ—would provide certainty for all stakeholders. It would reduce planning risk, streamline delivery, support affordability, and ensure that new homes contribute positively to nature, climate resilience, and community wellbeing.

To support the Government in achieving these outcomes, we respectfully request your department’s leadership in progressing the following priority actions:

1. Develop and implement a coordinated national framework on biodiversity and planning of the built environment

The framework should be grounded in the mitigation hierarchy—avoid, minimise, restore, enhance—and supported by evidence based local ecological mapping^{iv} to be embedded at national (National Planning Framework) and regional (Regional Spatial and Economic Strategies) levels, and in each local authority’s County Development Plans^v. This approach would ensure consistency in decision-making, reduce legal uncertainty, and enable early identification of ecological constraints and opportunities during site selection and master planning, while also addressing biodiversity impacts beyond the site boundary, such as recreational pressures.

In parallel, and to ensure that the protection and enhancement of biodiversity—and its conservation status—do not become a constraint on the delivery of homes, the Government must invest in building biodiversity capacity. This includes actions such as habitat restoration and reversing unfavourable conservation trends, as required under Article 17 of the Habitats Directive. Strengthening this biodiversity capacity will improve the ability of ecosystems to “absorb” and respond to the impacts of development, both during construction and operation, including recreational pressures beyond the site boundary. It will also support more efficient consenting processes and help navigate legislative requirements such as Environmental Impact Assessment and the Water Framework Directive.

2. Adopt a common, national standardised measurement tool for sites zoned for development

Building upon existing Irish and international tools^{vi}, adopt a standardised, practical, national approach to biodiversity metrics to provide clarity for all parties. This metric should:

- reflect the ecological baseline and mature ecological features on a site
- differentiate between infill, brownfield, and greenfield contexts
- be used as a secondary safeguard after early baseline assessment and application of the mitigation hierarchy – see point 1.

3. Provide practical, standardised toolkits, guidance documents, and templates to inform master planning and site layouts

Clear, accessible guidance is essential to support consistent implementation. This should include guidance on the use of the metric, best-practice design and maintenance principles for integrating nature into developments, promoting ecological connectivity, and ensuring that site layouts respond to the surrounding landscape in new development. A limited number of standardised templates, such as the Biodiversity Checklist for Planning currently being developed by the NPWS, would help streamline planning submissions and reduce administrative burden for both applicants and planning authorities.

The impact of these actions would be further enhanced through awareness-raising campaigns, a strong focus on building ecological skills and capacity within the industry, and more robust enforcement of existing legislation and policies.

Our shared objective is to help the Government deliver its housing targets while ensuring compliance with national and EU biodiversity obligations. A coherent national approach will enable the housing sector to contribute meaningfully to nature restoration, reduce planning delays, and support the creation of high-quality, healthy, climate-resilient communities.

We would welcome the opportunity to meet with you and your officials to discuss how these recommendations can be advanced in partnership with the sector. We believe that early engagement will be essential to ensuring that the forthcoming housing programme and Ireland's biodiversity commitments can be delivered in harmony.

Thank you for your consideration. We look forward to your positive response and to working collaboratively to support the successful implementation of *Delivering Homes, Building Communities* while protecting and restoring Ireland's natural environment.

Yours sincerely,

- Jason Reeves, Head of Policy, Chartered Institute of Ecology and Environmental Management (CIEEM)
- Cian O'Dowd, Head of Public Affairs, Engineers Ireland
- Susan Vickers, Climate Action Working Group, Housing Alliance
- Catherine McGillicuddy, Acting Director of Policy, Irish Council for Social Housing (ICSH)
- Pat Barry, CEO, Irish Green Building Council (IGBC)
- Nuno Costa, Elected Member, Irish Landscape Institute (ILI)
- Dr. Seán O'Leary, CEO, Irish Planning Institute (IPI)
- Deirdre Lane, Executive Coordinator, Natural Capital Ireland
- Pranash Ramanundh, Practice Director, Royal Institute of Architects of Ireland (RIAI)
- Edward Mc Auley, Director of Practice & Policy, Society of Chartered Surveyors of Ireland (SCSI)

Note: The priorities outlined in this document align with the objectives and delivery experience of several public bodies, including Transport Infrastructure Ireland - TII, with whom the signatories engaged during the development of these recommendations.

APPENDIX I – Integrating the Framework with existing legislation & policies

This appendix provides a structured overview of the existing policies, legislation, and regulatory frameworks that underpin the need for a coordinated national approach to biodiversity in the planning and delivery of new homes (Part I). It also identifies key policies, standards, and guidance documents that should be reviewed and aligned with the proposed framework to ensure consistency, clarity, and effective implementation across the planning system (Part II). Together, these sections highlight both the strong policy foundation already in place and the areas where further alignment or clarification is required to support the delivery of nature-positive housing at scale.

Part I: Existing Policies and Regulatory Frameworks underpinning the need for national coordination on biodiversity protection in New Housing Development

Name	Year (latest update)	Description
EU Habitats Directive (92/43/EEC)	1992	The EU Habitats Directive (92/43/EEC), adopted in 1992, is a cornerstone of European biodiversity policy. It ensures the conservation of over 1,000 threatened species and 230 habitat types, aiming to maintain or restore them to "favourable conservation status." It establishes the Natura 2000 network of protected areas, including Special Areas of Conservation (SACs).
European Union (Planning and Development) Environmental Impact Assessment Regulations	2018	Legal framework for Environmental Impact Assessment (EIA) in the planning system.
National Adaptation Framework	2024	Provides the national policy framework for climate change adaptation across sectors and local authorities.
National Biodiversity Action Plan	2024	Sets national objectives and actions to halt biodiversity loss and restore ecosystems.
Nature Restoration Regulation (EU Regulation 2024/1991)	2024	Article 8 of the EU Nature Restoration Law mandates that Member States ensure no net loss of urban green spaces by 2030, followed by a required upward trend from 2031 onwards. The regulation requires this increasing trend in urban canopy cover to be measured every six years until satisfactory levels are achieved, with options for exclusion in areas already meeting specific high-green-space benchmarks. Ireland's National Restoration Plan (NRP) is currently under development and is due to be submitted to the EU Commission by September 2026.
Planning and Development Act	2024	Section 50 states the obligation to prepare a strategy for conservation of natural and built heritage.
National Planning Framework	2025	National Policy Objectives (NPOs) 84–88 require planning authorities to support the preparation and implementation of the National Restoration Plan; integrate biodiversity protection, conservation, mitigation and restoration, including the mitigation hierarchy (avoid, minimise, restore and offset), into statutory land-use plans; seek to address no net loss of biodiversity; enhance the conservation status and management of protected areas and species; and facilitate biodiversity protection and restoration through national guidance on Planning and Biodiversity, supporting the National Biodiversity Action Plan (2023–2030) and forthcoming National Restoration Plan.
Wildlife (Amendment) Act	2023	Strengthens biodiversity protection and places the National Biodiversity Action Plan on a statutory footing.
Climate Action and Low Carbon Development Act, Section 15	2015	Requires public bodies to perform their functions in a manner consistent with national climate objectives.

Part II: Policies, standards, and guidance to be reviewed to support consistency and clarity on biodiversity protection in new residential developments

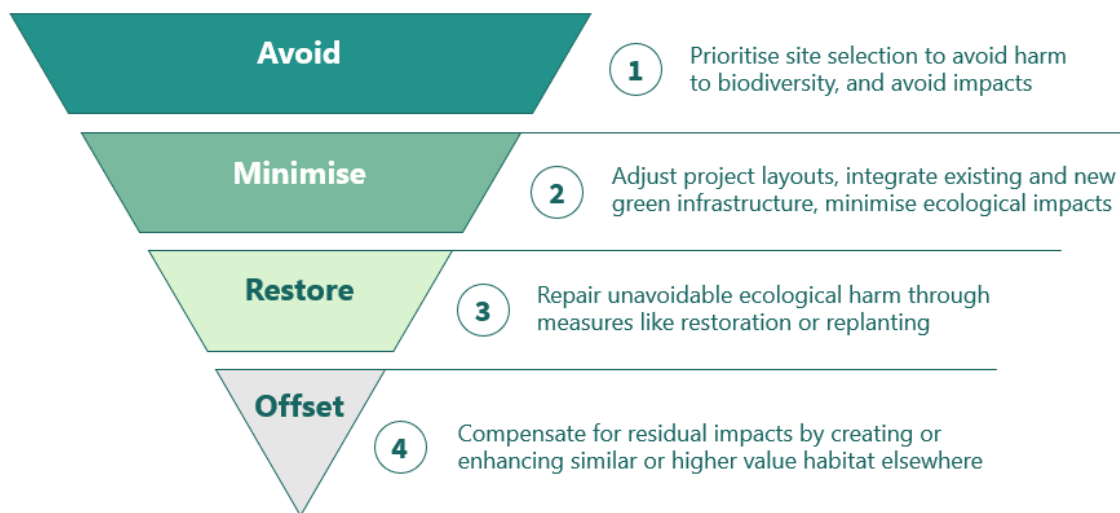
Name	Year (latest update)	Description
A Guide to Taking in Charge of Completed Residential Developments – Planning Leaflet 15 (Office of the Planning Regulator)	2021	Official national guidance explaining the taking-in-charge process, including the roles of local authorities, developers, and residents, and the management of roads, lighting, drainage, and open spaces.
Design Manual for Urban Roads and Streets (DMURS)	2025	Issued by the Department of Transport and the Department of Housing. DMURS is the mandatory national standard for the design of urban roads and streets, including street layouts, car parking approaches, pedestrian and cycling priority, and urban drainage guidance (via Advice Notes).
DMURS Advice Notes – Including Urban Drainage and Junction Design	2025	Supplementary mandatory guidance linked to DMURS, including Advice Note 5 – Road and Street Drainage, and Advice Note 6 – Junction Tightening.
Independent Advisory Committee on Nature Restoration Report	2026	Sets out recommendations to inform the development of Ireland's National Nature Restoration Plan (NRP), required under the EU Nature Restoration Law.
Guidelines for Road Drainage	2022	Issued by the Department of Transport. These guidelines provide national technical standards for surface water drainage, sustainable drainage systems (SuDS), and road and street drainage design.
Design Standards for Apartments, Guidelines for Planning Authorities	2025	Set national planning policy and guidance for the planning and development of apartment schemes, reflecting current Government policy and economic, social, and environmental considerations.
Nature-Based Management of Urban Rainwater and Surface Water Discharges – A National Strategy	2024	Sets out a national roadmap for the implementation of nature-based solutions in urban design and water management.
Section 28 Guidelines – NPF Implementation: Housing Growth Requirements	2025	Strategic planning guidance (rather than design standards) underpinning zoning, density, and housing delivery expectations in line with the National Planning Framework.
Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities	2024	Set national policy on residential density, placemaking, compact growth, and development standards across urban and rural settlements.

Under the Planning and Development Act 2024, local authority Development Plans now operate on a 10-year cycle, with a mandatory mid-term review. As a result, many local authorities will be required to prepare or commence full Development Plan reviews over the 2026–2027 period. This coincides with the implementation of the updated National Planning Framework and emerging national obligations on climate adaptation, biodiversity protection, and nature restoration, making this review cycle particularly significant.

APPENDIX II – About the Mitigation Hierarchy

The foundation of sensitive ecological planning is to recognise nature as a key stakeholder from the very outset of a project, and to apply the biodiversity mitigation hierarchy as early as possible. This hierarchy to avoid, minimise, restore, and, as a last resort, offset biodiversity losses provides a clear framework for managing and reducing negative ecological impacts arising from development.

Mitigation Hierarchy



APPENDIX III – Cost analysis

Actions	Cost type (and indicative cost – where available)
1. Develop and implement a coordinated national framework on biodiversity and planning of the built environment 1.a Cross-departmental task force to lead on the development of the framework and its review 1.b Collection and development of evidence-based ecological mapping at local level	Direct exchequer (staff + overheads) Direct exchequer (staff + overheads)
2. Adopt a common, proportionate measurement tool for sites zoned for development 2.a Overview of the development of the tool, including tender and consultation process, by the taskforce (1.a) 2.b Development of the tool	Direct exchequer (staff + overheads) Direct exchequer: €1,500,000 (estimated based on using external consultants)
3. Provide practical, standardised toolkits, guidance documents and templates to inform master planning and site layouts 3a. Taskforce (1a) to set up a multi-sector working group to review industry needs and existing guidance, identify gaps, and develop a list of additional guidance documents needed, as well as a process to approve them 3b. Development of any missing guidance documents	Direct exchequer (staff + overheads) Direct exchequer: €1,250,000 (estimated based on the development of up to 5 guidance documents and on similar tenders issued by DHLGH)

ⁱ See appendix I – part 1 for a list of existing policies and regulatory frameworks underpinning the need for national coordination on biodiversity protection in new housing development.

ⁱⁱ This aligns with National Policy Objective (NPO) 85 of the National Planning Framework (NPF), which emphasises the importance of applying the principles of the mitigation hierarchy. See appendix II for further information.

ⁱⁱⁱ This aligns with NPO 88 of the NPF, which calls for the protection and restoration of biodiversity and highlights the need for national guidance on planning and biodiversity.

^{iv} This should cover designated sites such as SACs, SPAs, pNHAs, NHAs, and Annex I habitats of the Habitats Directive (including those outside designated areas), as well as key linear habitats such as hedgerows, treelines, and waterways. It should also identify Biodiversity Opportunity Areas where the offsetting of development-related biodiversity impacts could be delivered beyond individual development sites.

This approach is strongly supported at EU level to deliver on the objective of the EU Nature Restoration Law. See [Ramboll's European Biodiversity Metric](#), and the findings of a session on “Measuring and addressing biodiversity in construction” organised in June 2026 as part of the World Green Building Council's Global Solutions Forum 2026 (unpublished).

^v This is aligned with recommendation 5.1 (mapping areas for nature) of the Independent Advisory Committee on Nature Restoration.

^{vi} E.g., Transport Infrastructure Ireland (TII) has already developed a [Biodiversity Metric Tool for Road, Greenway and Light Rail Projects](#). This tool is freely available and could be adapted for other project types at relatively low cost – See [Appendix III](#).