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Response to Public consultation on Ireland's draft National Nature Restoration Plan

Contents

Sustainable Water Network (SWAN)

Sustainable Water Network (SWAN) is an umbrella network with 26-member environmental NGOs. We work to advocate for the protection and restoration of Irish freshwater, transitional, coastal and marine waters. We play an active role as stakeholders and in water stewardship both at the national and EU level. We are members of European eNGO networks including the European Environmental Bureau (EEB) and Seas at Risk. SWAN welcomes the opportunity to provide policy recommendations on the first public consultation of Ireland's draft National Nature Restoration Plan. SWAN has been actively engaged in Marine Strategy Framework Directive (MSFD), Water Framework Directive (WFD), marine spatial planning (MSP) and other water policy implementation since 2004 and has consistently advocated for stronger integration between biodiversity, water quality, land-use, marine and climate policy.

Overarching position

SWAN welcomes the opportunity to comment on the public consultation on Ireland's draft National Nature Restoration Plan. This submission focuses primarily on the freshwater, wetland, transitional, coastal and marine dimensions of the draft NRP, and reflects the views of the network members and is the result of SWAN research, and email consultation with members. These ecosystems are central to the success of Ireland's nature restoration agenda. Rivers, lakes, wetlands, peatlands, turloughs, floodplains, estuaries, saltmarshes, seagrass beds, shellfish habitats, maerl beds, coastal waters and offshore marine habitats are not isolated ecological features. They form connected hydrological and ecological systems that support biodiversity, fish

migration, nutrient cycling, sediment transport, flood regulation, carbon storage, climate resilience, and human wellbeing.[1]

SWAN welcomes the preparation of Ireland's first National Nature Restoration Plan under the EU Nature Restoration Regulation as a significant and timely opportunity to restore degraded ecosystems, improve water quality, recover threatened species and build long-term climate resilience. The NRP has the potential to become one of the most important environmental delivery frameworks in the State. However, to achieve this, it must be designed correctly from the beginning. As it stands, the draft must be strengthened substantially before finalisation. The draft Plan provides an important starting point, but it does not yet set out a sufficiently ambitious, coherent or operational delivery framework for restoration. **The final NRP must move beyond describing existing programmes and incomplete data. It must clearly identify what will be restored, where, by whom, by when, using what funding, and how ecological recovery will be measured.**[2]

In particular, SWAN considers that the final NRP must be strengthened substantially in three overarching respects.

First, the Plan must show **greater ambition in its targets and programme of measures**. The NRP should not rely primarily on existing schemes or general commitments. It must set out clear, measurable and spatially explicit restoration targets, supported by a programme of measures capable of delivering ecological recovery in practice. For freshwater, wetland, transitional, coastal and marine ecosystems, this means identifying not only broad national objectives, but also where restoration will take place, what pressures will be addressed, which species and habitats will benefit, what level of ecological improvement is expected, and how progress will be measured.

Second, the Plan must ensure **greater policy coherence**. Nature restoration cannot be delivered through biodiversity policy alone. The final NRP must be fully aligned with the Water Framework Directive, Marine Strategy Framework Directive, Habitats and Birds Directives, Floods Directive, River Basin Management Plans, Flood Risk Management Plans, the CAP Strategic Plan, forestry policy, wastewater investment planning, marine spatial planning, climate adaptation policy and land-use planning. In particular, restoration measures for rivers, lakes, wetlands, floodplains,

[1] Ove Arup & Partners / NPWS (2026) Draft National Restoration Plan: SEA Environmental Report, 27 May 2026, pp. 1-3, noting that restoration measures across terrestrial, freshwater and marine environments are expected to support biodiversity, water quality, hydromorphological condition and ecosystem resilience; Regulation (EU) 2024/1991 on nature restoration, Articles 1 and 15.

[2] Department of Housing, Local Government and Heritage / NPWS (2026) Ireland's draft NRP template, Part A, sections 1.5, 3.2 and 3.3, which note that the summary and spatial extent of restoration measures can only be completed once approaches and spatial data are finalised.

estuaries and coastal waters must directly support WFD objectives, including the prevention of deterioration and the achievement of good ecological status or potential.

Third, the NRP represents an **opportunity to get restoration policy right from the beginning**. Ireland has often relied on fragmented, reactive and under-resourced responses to environmental decline. The NRP should avoid repeating this pattern. It should establish a clear delivery architecture from the outset, with named responsible bodies, statutory responsibilities, funding sources, timelines, monitoring indicators and public reporting. If the Plan is designed as a coherent implementation framework now, it can provide the foundation for long-term ecological recovery across Ireland's catchments, coasts and seas.

For SWAN, the central test is whether the final NRP will deliver measurable ecological recovery in Ireland's rivers, lakes, wetlands, floodplains, estuaries, coastal waters and marine ecosystems. This will require ambition beyond existing measures, strong alignment across policy areas, and a delivery framework capable of turning restoration commitments into outcomes on the ground and in the water.

For every restoration target, the Plan should identify the ecosystem or species concerned, its current condition, the pressures causing degradation, the restoration measures required, the location of those measures, the responsible authority, the funding source, the delivery timeline, the monitoring indicator and the consequence if progress is not made.[3]

[3] Ove Arup & Partners / NPWS (2026) National Restoration Plan: Natura Impact Statement, 1 June 2026, Executive Summary, describing the draft NRP as a strategic, non-spatial umbrella plan that does not itself prescribe the location, scale, timing or delivery mechanisms of individual interventions.

Summary of key asks

The following asks summarise the minimum changes required to make the final NRP a credible delivery framework for freshwater, transitional, coastal and marine restoration.

Theme / Article	SWAN key ask	Required change in the final NRP
Overarching delivery	Move the NRP from a coordination document to a sufficiency-tested implementation plan.	For every target, identify the ecosystem or species, current condition, pressures, measures required, location, responsible authority, funding source, delivery timeline, monitoring indicator and escalation consequence.
Spatial prioritisation	Publish mapped restoration priorities at catchment, sub-catchment, waterbody, coastal-cell and marine-area scale.	Use WFD status/risk data, protected-area objectives, Blue Dot and high-status waters, pearl mussel and salmonid catchments, barrier inventories, floodplain opportunities, drained peat soils, CSA/PIP/FLAG mapping, wastewater pressures, hydromorphology data and marine habitat pressure layers.
Freshwater and wetlands / Article 4	Create a dedicated freshwater and wetland restoration programme.	Prioritise rivers, lakes, turloughs, wetlands, peatlands, floodplains, groundwater-dependent ecosystems, estuaries, coastal lagoons, saltmarshes and coastal wetlands as hydrological systems requiring pressure reduction, hydrological repair and ecological outcome indicators.
Water-dependent species / Article 4	Include species-specific restoration pathways for freshwater pearl mussel, salmonids, eel, lamprey, shad, white-clawed crayfish, otter, kingfisher, slender naiad and Arctic char.	Set catchment-specific sediment, nutrient, flow, connectivity, habitat and monitoring measures, including juvenile recruitment indicators for freshwater pearl mussel and passage/recruitment indicators for migratory fish.
Marine / Article 5	Deliver marine restoration through protection, active restoration and pressure reduction, not designation alone.	Expand and manage MPAs, end use of generic disturbance thresholds in protected areas, address aquaculture and ORE cumulative effects, protect Natura 2000 sites, and prioritise seagrass, shellfish beds, macroalgal forests, soft sediments and identified marine species areas.
Urban ecosystems / Article 8	Expand Article 8 to include urban rivers, streams, wetlands, estuaries and blue-green corridors.	Include de-culverting, river re-naturalisation, riparian restoration, urban wetlands, SuDS retrofit, misconnections programmes and planning controls linked to receiving-water sensitivity and wastewater/stormwater capacity.
River connectivity and floodplains / Article 9	Establish a legally backed national river connectivity and floodplain restoration programme.	Set annual barrier removal/mitigation targets, publish a barrier inventory, prioritise obsolete barriers, require fish passage standards and environmental flows, map floodplain opportunities and integrate delivery with FRMPs, CMWPs, OPW drainage schemes and WFD objectives.
Agriculture / Article 11	Make agricultural restoration catchment-centred, enforceable and outcome-based.	Introduce catchment nutrient-load limits where required; operationalise CSA, PIP and FLAG mapping; require variable-width buffers, wetlands, livestock exclusion, runoff interception, stocking/fertiliser controls,

Theme / Article	SWAN key ask	Required change in the final NRP
		rewetting of drained organic soils and measures matched to the dominant pollution pathway.
Wastewater and stormwater	Treat wastewater and stormwater as restoration pressures.	Prioritise investment by receiving-water sensitivity, review licences where waters are failing or at risk, set tighter nutrient limits where needed, address storm overflows and misconnections, and align UWWTD implementation with WFD and NRP objectives.
Forestry and tree planting / Articles 12 and 13	Apply a water-sensitive and right-tree-right-place approach.	Convert inappropriate conifer plantations on peat, riparian zones and sensitive uplands where appropriate; require continuous-cover forestry, sediment-control plans, wider aquatic buffers, post-licence compliance monitoring, and prevent tree planting that damages peatlands, wetlands, species-rich grasslands or open habitats.
Monitoring and accountability	Measure ecological outcomes, not just activities.	Track kilometres of river reconnected, barriers removed, floodplain area reconnected, nutrient and sediment reductions, WFD status change, hydromorphological condition, species recruitment, wastewater pressure reductions, and marine habitat recovery through public reporting and adaptive management triggers.
SEA, AA and SFRA	Use the assessment documents to strengthen the NRP rather than defer detail.	Embed lower-tier assessment requirements, SEA monitoring, ecological safeguards, high-ambition alternatives and SFRA-led nature-based flood management into the Plan, while avoiding delay where degradation and restoration need are already clear.

Better water quality for biodiversity

Ireland's water-dependent ecosystems are already under significant pressure. EPA reporting shows that almost half of surface waters are not in satisfactory ecological condition, and that transitional waters are among the poorest-performing water body types nationally. The main pressures include excess nutrients from agriculture and wastewater, physical habitat change, hydromorphological alteration, forestry, urban runoff and other land-use pressures. [4]

This matters for the NRP. Nature restoration cannot be delivered if the pressures that degrade water-dependent habitats continue to operate at current levels. Restoring a river, lake, wetland, estuary or marine habitat is not simply a matter of designating an area or funding an isolated project. It requires reducing the pressures that caused degradation in the first place.

The condition of protected habitats and species also shows the need for much stronger restoration delivery. NPWS Article 17 reporting shows that a very high proportion of protected habitats remain in unfavourable conservation status. Water-dependent habitats and species are particularly vulnerable to nutrient enrichment, sedimentation, hydrological alteration, drainage, barriers, water abstraction, invasive species, pollution and climate change.[5]

The NRP should therefore be treated as a delivery mechanism for ecological recovery, not merely as a coordination document. It should identify the pressures affecting freshwater, transitional, coastal and marine ecosystems and specify the measures required to reverse them.

Cross-cutting gaps in the draft NRP

Lack of spatial prioritisation

Restoration cannot be planned effectively at a purely national or generic level. The Plan should include mapped restoration priorities at national, catchment, sub-catchment, waterbody, coastal-cell and marine-area scale. Research published in the Proceedings of the National Academy of Sciences (2024) indicates that integrated spatial plans capture the highest average benefits:

[4] Environmental Protection Agency (2025) Water Quality in Ireland 2019-2024, EPA, Wexford; Catchments.ie/EPA (2025) EPA: Water Quality in Ireland 2019-2024. The EPA reports that 52% of surface waters are in high or good ecological status and 48% are in unsatisfactory ecological condition, with transitional waters the poorest-performing waterbody type.

[5] National Parks and Wildlife Service (2025) The Status of EU Protected Habitats and Species in Ireland: Article 17 Report, Volume 1. NPWS reports that 90% of assessed habitats are in unfavourable conservation status, with half showing ongoing declines.

delivering up to 83.3% of maximum climate benefits, 89.9% of biodiversity value, and 93.9% of societal needs simultaneously. [6]

The final NRP must be spatially explicit. It must distinguish between sites where restoration can proceed immediately on the basis of existing evidence, sites requiring targeted survey or feasibility assessment, and longer-term research and mapping needs. Data gaps should not be used as a reason to delay restoration where the pressures and ecological needs are already clear. In applying this approach, the NRP should use the precautionary principle: lack of perfect spatial data should not delay action where best available evidence already identifies clear ecological risk and restoration need.[7]

For instance, for freshwater and transitional waters, spatial prioritisation should integrate:

- ✓ WFD ecological status and risk data;
- ✓ protected-area objectives;
- ✓ high-status and Blue Dot waters;
- ✓ freshwater pearl mussel catchments;
- ✓ salmonid, lamprey, eel and shad migration routes;
- ✓ barrier inventories;
- ✓ floodplain and wetland restoration opportunities;
- ✓ drained peat soils;
- ✓ critical source areas for nutrient and sediment loss;
- ✓ wastewater discharge locations and receiving-water sensitivity;
- ✓ hydromorphological pressure data;
- ✓ transitional and coastal nutrient vulnerability;
- ✓ marine habitat distribution and pressure layers.

Weak delivery mechanisms

The draft NRP must be strengthened by including a delivery architecture that assigns responsibility. For every measure, the final Plan should identify a lead body and supporting bodies. Relevant bodies include NPWS, DHLGH, EPA, LAWPRO, IFI, OPW, local authorities, DAFM, Coillte,

[6] Gopalakrishna, T. et al. (2024) 'Optimizing restoration: A holistic spatial approach to deliver Nature's Contributions to People with minimal tradeoffs and maximal equity', Proceedings of the National Academy of Sciences, 121(34), e2402970121. https://doi.org/10.1073/pnas.2402970121.

[7] Court of Justice of the European Union, Case C-127/02 Waddenvereniging and Vogelbeschermingsvereniging (Waddenzee), judgment of 7 September 2004; Department of the Environment, Heritage and Local Government (2009) Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. These require assessment based on best scientific knowledge and application of the precautionary principle where doubt remains.

Uisce Éireann, MARA, Marine Institute, Bord na Móna, ESB and relevant harbour, fisheries and marine authorities.

The final NRP should not rely on phrases such as "support", "promote", "encourage" or "continue to work with stakeholders" unless these are accompanied by specific measures, responsible bodies, deadlines, indicators and escalation pathways.

Over reliance on existing schemes

Existing schemes such as ACRES, Farming for Water, LAWPRO programmes, Uisce Éireann investment, barrier mitigation funding, peatland restoration projects and marine monitoring programmes can contribute to NRP delivery. However, they cannot substitute for a restoration plan.

The final NRP must demonstrate additionality by identifying what new, expanded, redirected or legally strengthened measures are required to meet the Nature Restoration Regulation targets. This is particularly important where existing schemes are voluntary, geographically limited, advisory, underfunded or not linked to ecological outcomes.[8]

Wastewater, stormwater and receiving-water ecology

Wastewater and stormwater must be treated as restoration pressures, not only as infrastructure compliance issues. The final NRP should require receiving-water-based investment prioritisation, licence review where water bodies are failing or at risk, tighter nutrient limits where needed for WFD objectives, binding timelines for raw sewage and priority-area deficits, and targeted programmes for storm overflows, misconnections and hydraulic overload.[9]

This is particularly important for shellfish waters, bathing waters, freshwater pearl mussel catchments, nutrient-sensitive rivers and lakes, and transitional and coastal waters affected by cumulative upstream loads. Compliance with minimum Urban Waste Water Treatment Directive requirements should not be assumed to deliver ecological recovery where the receiving water is sensitive, overloaded or already failing its environmental objective.

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[8] Ove Arup & Partners / NPWS (2026) Draft National Restoration Plan: SEA Environmental Report, pp. 1-3 and 59-61, identifying alternatives including a minimum-compliance approach, a coordinated strategic framework and accelerated delivery; SWAN (2026) Draft response to the Significant Water Management Issues consultation, calling for implementation requirements rather than aspirational recommendations.

[9] EPA (2025) Urban Waste Water Treatment in 2024, EPA, Wexford; SWAN (2025) Urban Wastewater Treatment in Ireland and Implications for Meeting the WFD and UWWTD, draft research report. SWAN's SWMI submission also calls for receiving-water-based wastewater investment and licence review where waters are failing, at risk or deteriorating.

Monitoring and accountability

The final NRP should include outcome indicators rather than relying on activity indicators or scheme participation. For freshwater, transitional, coastal and marine ecosystems, monitoring should show whether restoration measures are reducing pressures and improving ecological condition, not simply whether projects have been funded or actions recorded.[10]

Indicators should include, as relevant, kilometres of river reconnected; number and ecological significance of barriers removed or mitigated; floodplain area reconnected; hectares of wetland, peatland and riparian habitat restored; hydromorphological condition; nitrogen, phosphorus, sediment and pesticide reductions; WFD ecological status change; protected species recruitment or population response; wastewater pressure reduction; and recovery of seagrass, maerl, shellfish, reef and soft-sediment habitats.

Where monitoring shows that measures are not delivering the expected ecological response within an appropriate timeframe, the NRP should require adaptive management and escalation. This should include strengthening measures, reviewing licences, adding supplementary measures, improving enforcement or redirecting funding where required.

Article specific comments

Article 4: Restoration of Terrestrial, Coastal and Freshwater Ecosystems

SWAN welcomes the inclusion of terrestrial, coastal and freshwater habitats under Article 4. The draft correctly notes that many Habitats Directive habitats and species reported in 2025 are not in good condition, and that wetland habitats, notably blanket bogs and wet heaths, account for a very large proportion of the condition-improvement target area. It also recognises that many Article 4 species are water-dependent and that restoration of habitats in important catchments, including freshwater pearl mussel catchments, can deliver multiple benefits. However, the Article 4 approach remains too general and insufficiently tied to the specific ecological pressures that are driving decline in water-dependent habitats and species. [11]

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[10] Palmer, M.A. et al. (2005) 'Standards for ecologically successful river restoration', Journal of Applied Ecology, 42(2), pp. 208-217. https://doi.org/10.1111/j.1365-2664.2005.01004.x; EPA (2024) Targeting Measures for Water Quality Outcomes: Analysis of the gap to achieving Water Framework Directive Environmental Objectives.

[11] Department of Housing, Local Government and Heritage / NPWS (2026) Ireland's draft NRP template, Article 4 section, noting the scale of wetland habitat condition-improvement targets and the importance of water-dependent Article 4 species.

Dedicated freshwater and wetland restoration programme

Freshwater and wetland habitats[12] must be central restoration priorities. These habitats are process-driven and should be restored as functioning hydrological systems, not simply as mapped habitat polygons. Restoration should include hydrological reconnection, appropriate water levels, natural flow regimes, sediment continuity, nutrient reduction, riparian vegetation, floodplain function and ecological connectivity. A restoration target expressed only in hectares, without pressure reduction, hydrological repair and ecological outcome indicators, will not be sufficient to restore these ecosystems to good condition.[13]

There is a need for a dedicated freshwater and wetland restoration programme. This programme should identify priority catchments where Article 4 habitat and species restoration can also deliver Water Framework Directive objectives. It should include, at minimum, high-status and Blue Dot catchments, freshwater pearl mussel catchments, salmonid and lamprey catchments, marl lake and oligotrophic lake catchments, turloughs, coastal lagoons, estuaries, groundwater-dependent terrestrial ecosystems, drained peatlands, floodplain wetlands and catchments draining to nutrient-sensitive transitional and coastal waters.

Catchment-centric approach

The evidence base for this approach is strong. EPA reporting shows that almost half of Ireland's surface waters are not in satisfactory ecological condition, with excess nutrients from agriculture, wastewater and other activities, followed by physical habitat change, identified as the major pressures. NPWS Article 17 reporting shows that protected habitats remain overwhelmingly unfavourable, and that many water-dependent species and habitats are vulnerable to nutrient enrichment, sedimentation, hydrological alteration, drainage, invasive species and climate change. LAWPRO's Blue Dot material also highlights that high-status waters support sensitive biological communities and that freshwater pearl mussel recruitment is compromised where pristine water conditions are not maintained. The final NRP must respond to this evidence by linking Article 4

[12] Rivers and streams; lakes and ponds; turloughs; wetlands and marshes; riparian habitats; floodplains; wet woodlands; peatlands and organic soils; groundwater-dependent terrestrial ecosystems; estuaries and coastal lagoons; saltmarsh and coastal wetlands.

[13] Beechie, T.J. et al. (2010) 'Process-based principles for restoring river ecosystems', BioScience, 60(3), pp. 209-222. https://doi.org/10.1525/bio.2010.60.3.7; Palmer, M.A. et al. (2005) 'Standards for ecologically successful river restoration', Journal of Applied Ecology, 42(2), pp. 208-217.

restoration targets directly to WFD status, protected-area objectives and pressure-specific programmes of measures.[14][15]

Species-specific ecological requirements and pressures.

The freshwater pearl mussel requires clean, well-oxygenated, oligotrophic rivers with stable gravels, low fine sediment loads and healthy salmonid host populations. Key pressures include sedimentation, nutrient enrichment, hydrological alteration, morphological change, forestry drainage, agricultural runoff, wastewater, channel modification and land drainage. Restoration measures should include catchment-scale sediment and nutrient reduction, riparian buffer restoration, forestry and drainage controls, protection of salmonid host populations, elimination of high-risk point sources and long-term juvenile recruitment monitoring. Generic agri-environment measures will not be sufficient unless they are targeted to the very low nutrient and sediment thresholds required by the species.[16]

Atlantic salmon, sea trout, eel, lamprey species and shad require whole-life-cycle connectivity. They need access to spawning and nursery habitat, clean gravels, suitable flow regimes, cool water, sufficient prey and safe migration routes between freshwater, estuarine and marine environments. Key pressures include barriers, hydropower, poor water quality, sedimentation, high temperatures, abstraction, aquaculture-related sea lice risk, marine survival pressures and habitat loss. Restoration measures should include barrier removal, environmental flows, riparian shading, sediment control, spawning-habitat restoration, wastewater and agricultural pressure reduction, and stronger regulation of open-net aquaculture where it may affect migratory salmonids and water quality.[17]

Lamprey species require access to spawning gravels and fine-sediment nursery habitats. Barriers, channel modification, dredging, sediment disturbance and poor water quality can affect their life cycles. Restoration measures should include barrier mitigation, protection of spawning and

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[14] Environmental Protection Agency (2025) Water Quality in Ireland 2019-2024, EPA, Wexford; Catchments.ie/EPA (2025) EPA: Water Quality in Ireland 2019-2024. The EPA reports that 52% of surface waters are in high or good ecological status and 48% are in unsatisfactory ecological condition, with transitional waters the poorest-performing waterbody type.

[15] National Parks and Wildlife Service (2025) The Status of EU Protected Habitats and Species in Ireland: Article 17 Report, Volume 1. NPWS reports that 90% of assessed habitats are in unfavourable conservation status, with half showing ongoing declines.

[16] NPWS (2011) A Strategy for Conservation of the Freshwater Pearl Mussel in Ireland; Atkinson, S. et al. (2024) Guidance on Assessment and Construction Management in Margaritifera Catchments in Ireland. These sources identify fine sediment, nutrient enrichment, hydrological alteration, drainage, forestry, agriculture and point-source pressures as central threats to Margaritifera recruitment.

[17] European Commission (2024) Nature Restoration Regulation: river connectivity target to restore at least 25,000 km of rivers to free-flowing state by 2030; Bellmore, J.R. et al. (2019) 'Conceptualizing ecological responses to dam removal', BioScience, 69(1), pp. 26-39. https://doi.org/10.1093/biosci/biy152.

nursery habitats, sediment-sensitive channel management and avoidance of dredging or maintenance works during sensitive periods.

Shad species are vulnerable to barriers, altered flows, degraded estuarine habitat and water-quality pressures. The NRP should identify historic and current shad rivers and estuaries, assess migration barriers, and include restoration measures for estuarine and freshwater migration corridors.

White-clawed crayfish are vulnerable to crayfish plague, invasive species, poor water quality, sedimentation and habitat degradation. Restoration must include biosecurity, invasive species management, habitat protection, sediment reduction and water-quality improvement.

Otters depend on healthy aquatic food webs, riparian cover, wetlands, fish populations and undisturbed resting and breeding sites. Restoration measures should protect riparian corridors, wetlands, fish populations, holts and resting places, and reduce disturbance from development and drainage works.

Kingfishers depend on small fish, clean rivers and suitable nesting banks. Restoration measures should include bank protection, riparian habitat restoration, sediment and nutrient reduction, and avoidance of hard engineering where natural banks can be retained.

Slender naiad and Arctic char are associated with high-quality lake ecosystems and are vulnerable to eutrophication, altered lake ecology, invasive species and climate change. Lake restoration should include nutrient load reduction, catchment controls, invasive species prevention, protection of cold-water refuges and lake-specific ecological monitoring.[18]

Stronger non-deterioration and early warning framework

Article 4 should also contain a stronger non-deterioration framework. The NRP should include early-warning triggers for high-status waters, protected habitats and species catchments. Where monitoring shows declining ecological status, rising nutrient concentrations, sediment pulses, habitat fragmentation, recruitment failure or hydrological alteration, the responsible authority should be required to identify supplementary measures. This should apply before a protected habitat or species reaches a point at which recovery becomes more difficult, expensive or uncertain.

[18] Dalton, C., de Eyto, E. and Jennings, E. (eds.) (2024) Lakes in Ireland - Mirrors of Change; EPA/Catchments.ie (2024) Impacts of Pressures on Water Quality: Agriculture. These sources identify eutrophication, sediment inputs, oxygen depletion, invasive species and loss of macrophyte communities as key pressures on Irish lake ecosystems.

Article 5: Marine

Given the "source to sea" connectivity of water systems, there must be an integrated ecosystems-based approach to ensure effective coordination of restoration measures between the habitats targeted in Articles 4, 5 and 9.

The NPWS Article 17 report released in 2025 was damning about Ireland's marine habitats, with 12 out of 14 identified as being in bad or unfavourable condition. The Nature Restoration Plan is the necessary opportunity to restore these degraded habitats and ensure ongoing protection for the unique habitats and species in Ireland's marine ecosystems. There are compounding pressures on our seas, including fishing, development of offshore renewable energy (ORE), shipping, aquaculture and cabling; the restoration of nature must take higher priority in this spatial squeeze.

Natura 2000 sites

The prioritisation of restoration of existing Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) is paramount. However, given the continuing deterioration of habitats, existing measures are not adequate on their own to reach restoration targets. These are areas designated as being important for habitats and species identified under the Birds and Habitats Directives, though currently lacking in robust, site-specific management plans. With a coherent approach by state authorities and agencies, the existing network of Natura 2000 will be critically important to reaching NRL targets. Though not all priority habitats exist within existing SACs and SPAs, these must also be subject to equally robust restoration measures. These include many recently-discovered seagrass beds without existing SACs. The utilisation of citizen science data will be key to ensuring these, and historical oyster reefs, are restored to required levels, beyond what is currently shown on official data sources.

Marine Protected Areas (MPAs)

We strongly endorse the call of our partners in Fair Seas and Irish Environmental Network for the delivery of 30% MPA coverage by 2030, including 10% under strict protection. Existing SPAs and SACs currently cover <10% of Ireland's vast marine area yet are largely lacking in the necessary management plans; legislation is urgently required to ensure the network is expanded and must include effective, site-specific management plans and robust stakeholder engagement. A coherent network of ecologically sound MPAs is vitally important for reaching the marine targets of the NRP.

15% disturbance threshold

We call on all government bodies to end use of the 15% disturbance threshold inside protected areas when conducting Appropriate Assessments. This is particularly necessary for the priority habitats identified in Annex II (Seagrass beds; macroalgal forests; shellfish beds; maerl beds;

sponge, coral and coralligenous beds; vents and seeps; and soft sediments [not deeper than 1000 metres of depth]).

A policy adopted by the National Parks and Wildlife Service (NPWS) allows for activities inside protected areas (other than vulnerable keystone communities) to disturb up to 15% of an entire habitat area. Appropriate Assessments (AA) and risk assessments set this as a permissible damage threshold. For example, in a 2011 document on marine objectives for the Slaney River Valley SAC[19] the NPWS stated: "*Significant anthropogenic disturbance may occur with such intensity and/or frequency as to effectively represent a continuous or ongoing source of disturbance over time and space (e.g., effluent discharge within a given area). Drawing from the principle outlined in the European Commission's Article 17 reporting framework that disturbance of greater than 25% of the area of an Annex I habitat represents unfavourable conservation status, this Department takes the view that licensing of activities likely to cause continuous disturbance of each community type should not exceed an approximate area of 15%.*" It is subsequently referred to in similar terms in several SPA and SAC assessments[20].

This is a highly damaging policy that is not in line with the Habitats Directive requirements stated in Article 6 (2)[21] to "*take appropriate steps to avoid, in the Special Areas of Conservation, the deterioration of natural habitats and the habitats of species as well as disturbance of the species for which the areas have been designated*". It must be ended to ensure proper protection and restoration of species and habitats.

Aquaculture

The impacts of aquaculture must be specifically assessed against the NRL requirements. These include the pollution associated with open-net salmon farming (from antibiotics used to treat fish disease, pesticides used against sea lice, chemicals and antifoulants used on nets, associated marine litter, and the faeces and uneaten food which fall below nets, all of which enters the surrounding waters and marine ecosystem) as well as impacts of some forms of bivalve farming (potential for spread on non-native species and benthic destruction from dredging for mussel spat). Additionally, SWAN does not support aquaculture farms being allowed to continue operations without a licence (allowing unregulated aquaculture activity) and calls for a repeal of Section 19A(4) of the Fisheries (Amendment) Act[22].

[19] Slaney River Valley SAC Marine Supporting Doc_V1.pdf
[20] Doyle - Observations from An Taisce
[21] Habitats Directive Article 6(2)
[22] Aquaculture in Ireland (SWAN, 2025)

Offshore Renewable Energy (ORE)

As Ireland works towards ambitious ORE targets, the cumulative impacts of the developing sector must be balanced against the needs of nature, with an ecosystems-based approach. The future impacts of the construction, operational and decommissioning phases must be considered within the NRP, including impacts of displacement of fishing effort.

Directives

As mentioned above, a number of overlapping policies and legislations govern different aspects of the marine environment. These must be properly implemented, with a coherent approach and alignment with existing legislation. We note in particular that in Ireland's most recent Marine Strategy Framework Directive (MSFD) Articles 8, 9 and 10 report, Good Environmental Status (GES) was only achieved for six out of 11 indicators. In SWAN's 2024 response[23] to the report, our main criticism was the data deficiency that prevented many indicators from being able to be fully assessed for GES. These knowledge gaps must also be addressed for the NRP to be fully implemented. We refer to the response submitted by Irish Environmental Network for further technical detail on this point.

Marine species

Important Bird Areas[24], Important Shark and Ray Areas[25] and Important Marine Mammal Areas[26] have been identified through years of scientific surveys. The habitats these areas cover must be prioritised for restoration, even when not within a currently designated SAC or SPA.

SWAN strongly supports the recommendations on Article 5 put forward by our colleagues and partners in the Irish Environmental Network and Fair Seas.

Article 8: Urban Ecosystems

The draft NRP's Article 8 approach is too narrow if it is limited mainly to urban green space and tree canopy. Urban ecosystem restoration must explicitly include urban rivers, streams, wetlands and coastal waters. Urban nature restoration should not be limited to tree canopy or green-space metrics. [27]

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[23] SWAN's 2024 response

[24] Important Bird Areas – BirdWatch Ireland

[25] Important Shark and Ray Areas - ISRA

[26] Important Marine Mammal Areas – Irish Whale and Dolphin Group

[27] Walsh, C.J. et al. (2005) 'The urban stream syndrome: current knowledge and the search for a cure', Journal of the North American Benthological Society, 24(3), pp. 706-723. https://doi.org/10.1899/04-028.1; Kominkova, D. (2012) 'The Urban Stream Syndrome - a Mini-Review', The Open Environmental & Biological Monitoring Journal, 5, pp. 24-29.

Urban rivers such as culverted or heavily modified streams often carry significant stormwater, wastewater and polluted runoff pressures. Restoring them can deliver biodiversity, flood resilience, water quality, urban cooling and community benefits.

The NRP should align Article 8 with wastewater, stormwater and urban planning policy. New development should not be permitted to increase pressure on already failing or at-risk receiving waters. Planning decisions should be informed by receiving-water sensitivity, wastewater capacity, stormwater capacity and WFD objectives.

Blue-green restoration programme

The final NRP should therefore expand Article 8 to include a national urban blue-green restoration programme. This should prioritise de-culverting where feasible, river re-naturalisation, riparian corridor restoration, urban wetland creation, nature-based stormwater management, retrofit Sustainable Drainage Systems (SuDS), restoration of urban estuaries, and targeted action on misconnections and contaminated runoff. Urban river restoration should not be treated as an amenity intervention only. It is a water-quality, biodiversity, flood-risk, climate-adaptation and public-health measure.

Urban river restoration must combine habitat repair with pollution control

Urban rivers are frequently affected by altered hydrology, increased sediment and pollutant loads, loss of channel complexity and disconnection from riparian habitats. Restoration that works with natural processes can improve habitat heterogeneity, reduce flood peaks locally, improve thermal refugia and support ecological recovery, provided that pollution sources are also addressed. The final NRP should therefore require urban restoration projects to include both physical habitat measures and pollutant-source control. A newly opened urban channel will not recover ecologically if it continues to receive untreated stormwater, sewage misconnections or excessive nutrients.[28]

Article 9: Rivers and floodplains

Article 9 is one of the most important provisions for freshwater restoration, and the draft NRP contains useful foundations. It notes the role of Inland Fisheries Ireland's barrier inventory and prioritisation programme, the development of the National Barrier Mitigation Programme, the establishment of a Barrier Mitigation Fund, and the first funding call identifying 103 barrier mitigation projects. It also indicates that assessment of related floodplains will commence with a high-level desktop study and that longitudinal connectivity work is seen as the first step towards

[28] Walsh, C.J. et al. (2005) 'The urban stream syndrome: current knowledge and the search for a cure', Journal of the North American Benthological Society, 24(3), pp. 706-723. https://doi.org/10.1899/04-028.1; Kominkova, D. (2012) 'The Urban Stream Syndrome - a Mini-Review', The Open Environmental & Biological Monitoring Journal, 5, pp. 24-29.

restoring rivers to free-flowing status. However, the final NRP must significantly strengthen ambition, statutory backing, public transparency and delivery timelines.[29]

Approach is not ambitious enough

Article 9 reads primarily as a fish-passage and longitudinal-barrier programme where lateral floodplain connectivity deferred to future assessment. This risks under-delivering the ecological intent of Article 9. Free-flowing rivers are not created only by removing or modifying barriers. They require continuity of water, sediment, organisms, channel-forming processes and floodplain function. The final NRP should therefore treat longitudinal and lateral connectivity as mutually reinforcing and should include targets for both.

The final NRP should establish a legally backed national river connectivity and floodplain restoration programme. This should include a public barrier inventory; a prioritised list of obsolete barriers for removal; annual targets for barrier removal and mitigation; ecological prioritisation based on habitat opened, species benefitted, sediment continuity, WFD status and protected-area objectives; design standards for fish passage where removal is not feasible; environmental-flow requirements; and pre- and post-project monitoring. Monitoring should include fish passage, sediment movement, habitat condition, macroinvertebrate response, spawning success and thermal conditions, not simply completion of engineering works.

Catchment scale sequencing for barrier removal

Barriers fragment habitats, block migratory fish, alter sediment transport, modify flow regimes, increase upstream impoundment effects and reduce resilience to climate extremes. The dam-removal literature shows that ecological response varies by context, but that removal can restore longitudinal connectivity, improve access to habitat, re-establish sediment dynamics and support fish movement where other limiting pressures are addressed. The NRP should therefore prioritise obsolete and high-impact structures but should also require catchment-scale sequencing so that barrier removal is aligned with water-quality improvement, invasive-species risk management and habitat restoration.[30]

Flood-risk management must default to nature-based solutions where feasible

The final NRP must require floodplain-opportunity mapping at catchment scale, integrated with the Flood Risk Management Plans, Catchment Management Work Plans, OPW drainage schemes, agricultural land-use data, wetland inventories and habitat/species restoration priorities. Flood-risk management should presumptively favour nature-based solutions, floodplain reconnection,

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[29] Department of Housing, Local Government and Heritage / NPWS (2026) Ireland's draft NRP template, Article 9 section; Inland Fisheries Ireland National Barrier Programme materials cited therein, including the National Barrier Mitigation Programme and Barrier Mitigation Fund.

[30] Bellmore, J.R. et al. (2019) 'Conceptualizing ecological responses to dam removal', BioScience, 69(1), pp. 26-39; Beechie, T.J. et al. (2010) 'Process-based principles for restoring river ecosystems', BioScience, 60(3), pp. 209-222.

wetland restoration, riparian restoration and room-for-the-river approaches where feasible. Where hard engineering, embankments or continued channel maintenance are proposed instead, the responsible authority should be required to justify why nature-based or hybrid alternatives cannot deliver the objective.[31]

Drainage and channel maintenance must be reformed

Article 9 must also require reform of drainage and channel-maintenance governance, particularly the Arterial Drainage Acts. Routine arterial drainage and channel maintenance can simplify river habitat, remove riparian and in-stream vegetation, mobilise sediment, disconnect floodplains and maintain artificially rapid conveyance. The final NRP should require WFD-compliant assessment, authorisation, mitigation and monitoring for arterial drainage, flood relief, land drainage and maintenance works where they may affect ecological status, protected habitats or protected species. This should include sediment-management plans, ecological windows for works, retention of natural woody material where safe, riparian restoration, and assessment of cumulative hydromorphological effects.[32]

Article 10: Pollinators

SWAN does not propose to comment on pollinator policy in full, but Article 10 should not be treated as separate from freshwater and wetland restoration. Riparian margins, wet meadows, floodplain grasslands, marshes, hedgerows, field margins and species-rich grasslands can support pollinators while also reducing sediment, nutrient and pesticide pathways to water.

The final NRP should therefore integrate pollinator measures with Article 11 high-diversity landscape features and Article 4 wetland and riparian restoration. In agricultural catchments, flower-rich riparian buffers and field-edge habitats should be targeted where they improve ecological connectivity and reduce runoff risk; in urban areas, pollinator measures should be linked with SuDS, rain gardens, restored river corridors and reduced mowing regimes.

Pesticide reduction should be treated as both a pollinator and water-quality measure. Measures should focus not only on buffers, but also on handling, application timing, alternative rush-control methods, weed wiping where appropriate, and prevention of point pathways to drains, ditches and watercourses.[33]

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[31] Ove Arup & Partners / NPWS (2026) Draft National Restoration Plan: Stage 1 Strategic Flood Risk Assessment, 29 May 2026, Executive Summary and section 5, identifying peatland, wetland, floodplain, river, catchment, forestry, agricultural and coastal/marine restoration measures as potentially interacting with hydrological processes and flood risk; Environment Agency (2025) Natural Flood Management Evidence: River and Floodplain Management.

[32] SWAN / Irvine, K., Katsanou, K. and Curran, E. (2026) Hydromorphology and the Water Framework Directive, research report [In Press]

[33] Waters of LIFE (2023) Agricultural measures evidence summary, cited in SWAN (2025) Restoring Ireland's Water Quality, draft report, noting that interception measures show limited effectiveness for

Article 11: Agricultural Ecosystems

Agricultural ecosystem restoration is central to the recovery of Ireland's freshwater, wetland, estuarine and coastal ecosystems. EPA reporting identifies agriculture as the dominant pressure on Irish water bodies, particularly through nitrogen, phosphorus, sediment, pesticides, hydrological modification, land drainage and habitat loss.[34]

The final NRP must not treat agricultural restoration as separate from water-quality restoration. In many catchments, the restoration of wetlands, riparian buffers, hedgerows, field margins, floodplains, drained organic soils and high-diversity landscape features will be essential to reducing nutrient and sediment pressures and restoring ecological function. SWAN's agriculture research[35] argues that Ireland must move away from broad, largely uniform and voluntary measures towards a legally enforceable, catchment-specific framework. The NRP should therefore make Article 11 part of the larger delivery mechanism for reducing agricultural pressures on water-dependent ecosystems. [36]

Catchment nutrient-load limits should be part of the NRP

The final NRP should require legally binding catchment nutrient-load limits where agricultural nutrient pressure is preventing WFD recovery or protected habitat/species restoration. These limits should be linked to ecological response, not just administrative compliance. In catchments draining to nitrogen-sensitive estuaries and coastal waters, dissolved inorganic nitrogen reduction should be a core restoration target. In poorly draining catchments affecting rivers and lakes, phosphorus, sediment and hydrological connectivity should be prioritised. In freshwater pearl mussel, salmonid, high-status and marl lake catchments, where low-nutrient and high-clarity conditions are central to ecological function, nutrient and sediment controls should reflect the sensitivity of the receiving ecosystem.[37]

CSA, PIP and FLAG mapping should become operational tools

The NRP should also make Critical Source Area, Pollution Impact Potential and FLAG mapping operational within Article 11. These tools should not remain advisory only. They should be embedded in Catchment Management Work Plans, the Nitrates Action Programme, CAP

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soluble herbicides such as MCPA and that targeted handling, application and weed-control measures are required alongside buffers.

[34] EPA/Catchments.ie (2024) Impacts of Pressures on Water Quality: Agriculture; EPA (2025) Water Quality in Ireland 2019-2024; SWAN (2025) Restoring Ireland's Water Quality, draft report.

[35] Sustainable Water Network (SWAN) (2026) Restoring Ireland's Water Quality: Agriculture, Water Quality and WFD Implementation, research report [In Press].

[36] EPA/Catchments.ie (2024) Impacts of Pressures on Water Quality: Agriculture; EPA (2025) Water Quality in Ireland 2019-2024;

[37] EPA (2025) Early Insights Indicator Report: Nitrogen Concentrations in Selected Major Rivers, January-December 2024

conditionality, ACRES, Farming for Water, derogation eligibility, inspection prioritisation and enforcement. Rules should be risk-tiered according to soil type, hydrology, slope, drainage, hydrological connectivity, proximity to watercourses and mapped nutrient/sediment delivery pathways. The purpose is not to regulate more heavily everywhere; it is to ensure that the strictest controls apply where ecological risk is highest and where measures will deliver the greatest restoration benefit.[38]

High-risk agricultural landscapes need targeted restoration packages

Article 11 should include a suite of targeted restoration measures for high-risk agricultural landscapes. These should include variable-width riparian buffers; restored wetlands and ponds; runoff interception from yards, tracks and roadways; livestock exclusion from sensitive channels; bank stabilisation using nature-based methods; sediment traps and field-edge wetlands where appropriate; reduced stocking rates where ecological capacity is exceeded; restrictions on spreading during high-risk soil-moisture and weather conditions; improved slurry storage; protection of springs, ditches and small wetlands; rewetting of drained organic soils where appropriate; and restoration of hedgerows, field margins and high-diversity landscape features as connected networks.

Measures must match the dominant pollution pathway

Research on riparian buffers has shown that buffers can substantially reduce phosphorus and sediment transfer, but their effectiveness depends on width, vegetation, soil conditions, hydrological pathway and maintenance. Buffers are less effective where field drains or concentrated flow bypass them[39]. This means that the NRP should not rely on generic fixed-width buffers as a universal solution. It should require diagnosis of the dominant pathway and selection of measures accordingly. In tile-drained, freely draining or highly connected landscapes, edge-of-field wetlands, drain interception, nutrient-source reduction and stocking/fertiliser controls may be necessary alongside buffers.

Article 12/13: Forest Ecosystems

Forestry can contribute to restoration, but it can also create serious water pressures where poorly located or poorly managed. The draft NRP should therefore treat Article 12 as a water-sensitive forestry provision as well as a forest biodiversity provision. It should not assume that increased

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[38] EPA (2025) Evidence-based Targeting of Agricultural Measures to Improve Water Quality, including FLAG mapping and nitrate-reduction analysis; EPA (2024) Targeting Measures for Water Quality Outcomes: Analysis of the gap to achieving Water Framework Directive Environmental Objectives.

[39] Tsai, Y. et al. (2022) 'Efficacy of Riparian Buffers in Phosphorus Removal: A Meta-Analysis', Frontiers in Water, 4, 882560. https://doi.org/10.3389/frwa.2022.882560; Stutter, M. et al. (2019) 'Current insights into the effectiveness of riparian management, attainment of multiple benefits, and potential technical enhancements', Journal of Environmental Quality, 48(2), pp. 236-247.

forest cover or existing forestry programmes are automatically positive for water-dependent ecosystems.

Forestry pressures on water include sediment mobilisation from road construction, drainage, harvesting and replanting; nutrient pulses after clear-felling; acidification risk in sensitive uplands; hydrological alteration; loss of open habitats; shading or drying effects where planting is inappropriate; and cumulative impacts in high-status, salmonid and freshwater pearl mussel catchments. SWAN's hydromorphology research[40] emphasises that sediment is not only a physical pressure but also a conduit for phosphorus, heavy metals and pesticides, and that sediment delivery depends on land use, topography, rainfall and hydrological connectivity. This is directly relevant to forestry restoration under Article 12.[41]

The NRP should include specific forestry-water restoration measures

The final NRP should therefore include specific forestry-water restoration measures. These should include conversion of inappropriate conifer plantations on peat, riparian zones and sensitive uplands to native woodland or open habitat where ecologically appropriate; continuous-cover forestry in sensitive catchments; stricter controls on forestry drainage and road runoff; no planting on species-rich grassland, wetland, deep peat or other open habitats of high ecological value; wider and better managed aquatic buffer zones; sediment-control plans for felling and replanting; and post-licence compliance monitoring. In freshwater pearl mussel and high-status catchments, forestry licences should be subject to stricter catchment-scale assessment and cumulative-effects review.

Riparian woodland should support hydrological and ecological function

Article 12 should also prioritise native riparian woodland where it supports water restoration. Riparian woodland can stabilise banks, provide shade, supply leaf litter and woody material, support macroinvertebrates, create thermal refugia and improve habitat complexity. However, riparian planting must be designed carefully. It should not replace species-rich open wetland habitats, block floodplain restoration or create inappropriate shading of habitats that require open conditions. The NRP should therefore adopt a "right woodland, right place, right hydrological function" approach.

Tree planting must not become a numbers-driven exercise

Article 13 must not become a numbers-driven tree-planting exercise. The draft NRP should be strengthened to ensure that tree planting contributes to restoration rather than undermining it.

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[40] Sustainable Water Network (SWAN) / Irvine, K., Katsanou, K. and Curran, E. (2026) Hydromorphology and the Water Framework Directive, research report [In Press].

[41] Kelly-Quinn, M. et al. (2016) EPA Research Report 169: HYDROFOR - Assessment of the Impacts of Forest Operations on the Ecological Quality of Water, EPA, Wexford; EPA/Catchments.ie (2024) Impacts of Pressures on Water Quality: Forestry.

Tree planting is beneficial only where it is ecologically appropriate, hydrologically suitable and compatible with existing habitat value. Planting trees on the wrong sites can damage peatlands, wetlands, species-rich grasslands, open coastal habitats and breeding habitat for some birds. It can also alter hydrology and create future water-quality risks if poorly managed. The EU-level tree-planting commitment cannot be translated into national delivery as a numbers target detached from spatial suitability, existing habitat value and hydrological function.[42]

Riparian and floodplain woodland should be targeted where it supports water restoration

For freshwater restoration, Article 13 should prioritise riparian and floodplain woodland where it provides shade, bank stability, organic matter, habitat complexity and climate refugia. This is increasingly important as climate change raises water temperatures and increases drought and flood extremes. However, planting should be only one part of riparian restoration. In many places, passive regeneration, livestock exclusion, natural colonisation, wetland recovery and reduction of nutrient/sediment inputs may be more appropriate than active planting. The NRP should therefore fund both active planting and natural regeneration, with site-specific design rather than blanket targets.

Cross-article recommendation

For each Article, the final NRP should include a sufficiency test. It should ask: what is the ecological target; what is the current condition; what pressures are preventing recovery; what measures are already in place; what additional measures are required; who is responsible; where will the measures apply; what funding is secured; when will delivery occur; and what monitoring will show whether recovery is happening. Without this test, Ireland risks submitting a plan that is administratively complete but ecologically inadequate. This sufficiency test should also distinguish between active restoration and passive restoration through pressure removal: in some ecosystems, the most important restoration measure is to remove or reduce the pressure preventing natural recovery.[43]

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[42] European Commission (2024) Nature Restoration Law enters into force, including the EU commitment to plant at least three billion additional trees by 2030; Fleischman, F. et al. (2020) 'Pitfalls of Tree Planting Show Why We Need People-Centered Natural Climate Solutions', BioScience, 70(11), pp. 947-950; Bateman, I.J. et al. (2023) 'A review of planting principles to identify the right place for the right tree for right reasons', People and Nature, 5(3), pp. 1043-1057.

[43] Beechie, T.J. et al. (2010) 'Process-based principles for restoring river ecosystems', BioScience, 60(3), pp. 209-222; Palmer, M.A. et al. (2005) 'Standards for ecologically successful river restoration', Journal of Applied Ecology, 42(2), pp. 208-217. Process-based restoration emphasises removing the root causes of degradation and allowing ecological processes to recover where feasible.

SEA, AA and SFRA comments

SWAN welcomes the opportunity to review the environmental assessment documents alongside the draft NRP. The SEA, Appropriate Assessment/NIS and SFRA processes should be used not merely to identify risks, but to strengthen the Plan.

The NIS identifies the draft NRP as an umbrella plan that consolidates existing and future measures but does not, in itself, provide the spatial or technical specificity necessary to identify project-level pathways for effects. This conclusion reinforces, rather than weakens, the need for the final NRP to include robust delivery criteria, spatial prioritisation, ecological safeguards and lower-tier assessment requirements.[44]

The SEA identifies the coordinated and strategic framework approach as preferable to a minimum-compliance approach. SWAN supports this direction but considers that the final NRP should go further by embedding an accelerated and high-ambition restoration pathway for freshwater, transitional, coastal and marine ecosystems where ecological decline is already well documented.[45]

The SFRA identifies that certain categories of restoration measures, including agricultural land management, forestry, peatland, wetland and floodplain restoration, river and catchment restoration, and coastal and marine measures, may interact with hydrological processes and flood risk depending on scale and location. This should not be treated as a constraint on restoration, but as a reason to plan restoration carefully and integrate it with nature-based flood management.[46]

The final NRP should:

- incorporate SEA mitigation and monitoring principles directly into the Plan;
- assess a high-ambition restoration scenario as a realistic alternative;
- ensure that Appropriate Assessment safeguards European sites while enabling necessary ecological restoration;
- address potential conflicts between WFD restoration objectives and site-specific conservation objectives through transparent ecological assessment;

[44] Ove Arup & Partners / NPWS (2026) Draft National Restoration Plan: SEA Environmental Report; Ove Arup & Partners / NPWS (2026) National Restoration Plan: Natura Impact Statement; Ove Arup & Partners / NPWS (2026) Stage 1 Strategic Flood Risk Assessment.
[45] Ove Arup & Partners / NPWS (2026) Draft National Restoration Plan: SEA Environmental Report; Ove Arup & Partners / NPWS (2026) National Restoration Plan: Natura Impact Statement; Ove Arup & Partners / NPWS (2026) Stage 1 Strategic Flood Risk Assessment.
[46] Ove Arup & Partners / NPWS (2026) Draft National Restoration Plan: SEA Environmental Report; Ove Arup & Partners / NPWS (2026) National Restoration Plan: Natura Impact Statement; Ove Arup & Partners / NPWS (2026) Stage 1 Strategic Flood Risk Assessment.

- use the SFRA to prioritise floodplain reconnection, wetland restoration and nature-based flood management;
- assess cumulative benefits as well as risks, particularly for water quality, flood resilience, climate adaptation and biodiversity recovery.

Restoration should be planned carefully, but assessment requirements should not become a reason for inaction where degradation is ongoing, and restoration need is clear.

Closing comments

The NRP is an opportunity to get restoration policy right from the beginning. It should not repeat the weaknesses of previous environmental plans: fragmented governance, voluntary measures without sufficient uptake, weak enforcement, lack of spatial prioritisation, absence of ecological outcome indicators and poor alignment between biodiversity, water, agriculture, wastewater, forestry, marine and planning policy.

A credible NRP must be more than a coordination document. It must be a delivery framework for measurable ecological recovery, designed around the ecological processes that sustain rivers, lakes, wetlands, floodplains, estuaries, coastal waters and marine ecosystems. Where restoration requires active intervention, the Plan should identify the measure, location, responsible body, funding and monitoring indicator. Where restoration can be achieved through pressure removal and natural recovery, the Plan should recognise that as a valid restoration pathway and ensure the relevant pressure is reduced, regulated or removed.[47]

[47] Beechie, T.J. et al. (2010) 'Process-based principles for restoring river ecosystems', BioScience, 60(3), pp. 209-222; Palmer, M.A. et al. (2005) 'Standards for ecologically successful river restoration', Journal of Applied Ecology, 42(2), pp. 208-217. Process-based restoration emphasises removing the root causes of degradation and allowing ecological processes to recover where feasible.