



12th April 2022

To whom it may concern,

Natural Capital Ireland (NCI) welcomes the opportunity to input into the Public Consultation on the Draft Leitrim County Development Plan 2023-2029. NCI is a not-for-profit organisation leading the national conversation on natural capital (view our website [here](#)). We are a group of organisations and individuals from academia and public, private and NGO sectors interested in the development and application of the natural capital approach in Ireland.

NCI further welcomes Leitrim County Council's plan which aims to provide a positive vision for County Leitrim and which aims to enable the county to continue to make a significant contribution to national economic recovery by promoting sustainable development. We also welcome the aim of the Draft Plan to conserve, sustainably manage and enhance the county's natural heritage and biodiversity (both of which are part of County Leitrim's natural capital) and to promote understanding of and sustainable access to it.

The thirteen strategic aims outlined in the Draft Plan provide many opportunities to incorporate the natural capital approach. The aims of the Draft Plan to develop a thriving rural community, to protect Leitrim's environment, and to celebrate its rich and varied heritage; along with ensuring that wildlife species, habitats, water courses, ground water and features of heritage interest are protected and conserved all provide the opportunity to apply the natural capital approach. All aspects of these aims are interlinked and require an overarching approach which accounts for, and values, Leitrim's natural capital.

Natural Capital Ireland appreciates Leitrim County Council's recognition of the importance and value of Leitrim's natural heritage for biodiversity protection, climate resilience, economic activity and the well-being of citizens.

The main aim of our submission is to inform on how valuable the natural capital approach would be for achieving the objectives of the Draft Leitrim County Development Plan 2023-2029. The Draft Plan states that it aims *'to support a rural housing policy for the open countryside which will seek to balance the need to sustain rural communities with the need to protect Leitrim's natural heritage, environment and landscape qualities'*. The need for balance when planning for, and embarking on, any development is extremely important, as too is an understanding of the importance of accounting for Leitrim's natural capital and the benefits it bestows.

Our response offers a framework which we believe will assist the Council in assessing more accurately, and more holistically, the benefits and costs of both individual aspects of the Draft Plan, and its overall national impact.

We believe that the natural capital approach makes visible values (both benefits and costs) that are obscured or invisible in conventional evaluations of the economic and environmental impacts of policies across the whole range of human activity. We therefore propose this approach as a framework in which your Draft County Development Plan could be embedded, and which can reveal values and

relationships within it that would otherwise remain invisible. NCI suggests that each of thirteen strategic aims of the Draft Plan be assessed through the lens of natural capital and employing natural capital accounting for policy development and decision making.

Natural capital approaches, and natural capital accounting specifically, present a means to support policy and decision-making with a much wider range of analysis/data than that offered by conventional approaches, because it builds in the fullest possible range of environmental – and cultural – costs and benefits in the assessment of any policy. It is also valuable because it can be used continuously to monitor the full cost-benefit performance of any policy into the future. The Natural Capital Approach should be embedded in the overarching philosophy of the Draft Plan. This approach could be considered with the application of each of the thirteen strategic aims outlined in Volume 1 – Written Statement of the Draft Plan (pages 14-16).

Why natural capital?

The topic of natural capital is growing in importance at the European level and nationally:

- In late 2019, the European Green Deal was announced, which states that “*all EU policies should contribute to preserving and restoring Europe’s natural capital*”. In June 2020, the EU published its new Biodiversity Strategy, which states that by 2050, “*the EU’s natural capital will be protected, valued and appropriately restored*”. Further, the Strategy sets a target to bring at least 10% of agricultural land under management for biodiversity, which could be easily achieved, with community support.
- The economic benefits delivered by natural capital remain very undervalued and underrepresented in government policy. Properly accounting for natural capital can help make these values visible, revealing both Ireland’s hidden wealth which enriches us, and the hitherto invisible factors that, by degrading natural capital, impoverish us. Natural capital concepts are already found in a range of flagship national policies, including the National Planning Framework, the National Biodiversity Action Plan 2017-2021, the National Adaptation Framework, and Heritage Ireland 2030 – but much more can be done to embed natural capital thinking in decision making. The 4th National Biodiversity Action Plan 2022-2026 is currently being drafted and it is anticipated that the natural capital approach and natural capital accounting will be incorporated into the Plan, in line with EU-wide adoption of the UN System of Environmental Economic Accounting ([SEEA](#)), and proposed changes to the EU Regulation on Environmental Economic Accounts. As part of natural capital accounting, Ecosystem Accounting ([SEEA-EA](#)) aims to reorient policies to deliver sustainable development and improved human well-being by measuring and valuing the extent, condition and services of Irish ecosystems as part of the System of National Accounts under the Central Statistics Office’s [Irish ecosystem accounting](#).
- The recent World Economic Forum’s Global Risks Report (2022), states that the top three most severe global risks are climate inaction, extreme weather, and biodiversity loss; all of which are inter-related risks that compound each other. These risks are a direct threat to our natural capital, and also stem largely from our failure to conserve and restore it.

How can the natural capital approach support the Council's Public Consultation on the Draft Leitrim County Development Plan?

In order to protect, restore and enhance our natural capital, we must first understand the extent and condition of existing natural assets. In other words, we must establish a baseline upon which targets for improvement can be set.

NCI is a partner on the pioneering EPA-funded [INCASE project](#) which is the first project to apply Natural Capital Accounting principles to catchments in Ireland. Natural Capital Accounting reports across four main sets of ecosystem accounts – extent, condition, services and benefits - and presents a standardised platform to collate information and regularly report on progress in relation to climate actions, biodiversity conservation and restoration, protection of waterbodies, and general good environmental practices (as identified in cross-sectoral areas such as agriculture, energy, environment, forestry, nature, marine, planning and water supply/use policies).

The [INCASE project](#) is piloting this *natural capital accounting* approach in four river catchments across Ireland. The prevailing natural capital accounting approach at country level is the System of Environmental Economic Accounting ([SEEA](#)), which has been adopted by the UN and is in use by about 90 countries worldwide. The SEEA is a guide to integrating economic, environmental and social data into a single, coherent framework for holistic decision-making. This includes SEEA-Ecosystem Accounting ([SEEA-EA](#)). As part of natural capital accounting, Ecosystem Accounting (SEEA-EA) aims to reorient policies to deliver sustainable development and improved human well-being by measuring and valuing the extent, condition and services of Irish ecosystems as part of the System of National Accounts. We encourage Leitrim County Council to engage with the [Ecosystem Accounts Division](#) of the Central Statistics Office in order to contribute to the task of developing such Irish ecosystem accounts as part of the Draft Plan.

There is a range of articles, blogs and supporting videos available from the [INCASE](#) website. Evidence supporting the natural capital approach has been gathered through the [INCASE](#) project. Three recent articles relating to the natural capital approach and natural capital accounting relevant to this consultation are listed below:

- Farrell C, Aronson J, Daily G, Hein L, Obst C, Woodworth P, Stout J (2021) Natural capital approaches: shifting the UN Decade on Ecosystem Restoration from aspiration to reality. *Restoration Ecology* <https://doi.org/10.1111/rec.13613> (accessed 11th April 2022).

This article highlights a number of initiatives globally that are applying natural capital approaches for national accounting, land use, business support and health and wellbeing.

- Farrell CA, Coleman L, Kelly-Quinn M, Obst CG, Eigenraam M, Norton D, O`Donoghue C, Kinsella S, Delargy O, Stout JC (2021) Applying the System of Environmental Economic Accounting-Ecosystem Accounting (SEEA-EA) framework at catchment scale to develop ecosystem extent and condition accounts. *One Ecosystem* 6: e65582. <https://doi.org/10.3897/oneeco.6.e65582> (accessed 11th April 2022).
- Farrell CA, Stout JC (2020) Irish Natural Capital Accounting for Sustainable Environments: Stage 1 Feasibility Report. www.incaseproject.com URL: <https://www.epa.ie/publications/research/biodiversity/research-322.php> (accessed 11th April 2022).

This report presents a good overview of the UN System of Environmental Economic Accounting Ecosystem Accounting and potential applications in the Irish context.

The [INCASE project](#) pilot can be built upon to develop a national strategy for the management and enhancement of Ireland's natural capital. This would closely align with current government initiatives such as the National Land Use Review, the development of a National Soil Strategy, revision of the National Biodiversity Action Plan, and expansion of Ireland's Marine Protected Areas network; and Leitrim County Council's priorities such as sustainable, balanced development and sustainable management of water resources from source to sea under the EU Water Framework Directive.

The NCI calls on Leitrim County Council to embed the natural capital approach as a core decision-making tool across all Council departments, and as part of broader cross-departmental co-ordination on the conservation and sustainable use of biodiversity

We hope you find the points above offer opportunities to expand, deepen and co-ordinate policies across the whole range of economic, environmental, social and cultural values, and we would welcome the opportunity to work closely with the council to deliver on the Draft Leitrim County Development Plan 2023-2029 over the coming years. Please contact us for clarifications, and further information at researchteam@naturalcapitalireland.com.

Le meas

Natural Capital Ireland