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Development Plan Review,  
Louth County Council,  
Town Hall,  
Crowe Street,  
Dundalk,  
Co. Louth,  
A91 W20C

22nd December 2020

**Re: Preparation of the draft Louth County Development Plan 2021-2027**

Dear Sir / Madam,

The Department of Agriculture, Environment and Rural Affairs (DAERA) welcome the opportunity to comment on the preparation of the draft Louth County Development Plan 2021-2027 and accompanying environmental Reports (Strategic Environmental Assessment and Natura Impact Report-Appropriate Assessment). DAERA has considered the draft Development Plan and our opinion is set out below.

We are pleased to note that transboundary considerations are included within the draft Development Plan and accompanying environmental reports. We are content that the 15km buffer will identify potential impacts beyond that of the development plan area and that due consideration has been given to the natural and wider environment of Northern Ireland.

We are pleased to see that future development in the County Louth area will be conducted in a sustainable and sensitive manner.

**Draft Plan Comments**

- 1) DAERA Inland Fisheries would have concerns relating to any plans which would impact on any transboundary watercourses. Whilst Loughs Agency have jurisdiction over the catchment of Carlingford Lough there are other rivers which traverse the border and may be impacted by any proposals applied for within the



Co. Louth jurisdiction, with the main issues relating to the passage of migratory fish and any barriers to said migration.

- 2) The second concern relates to the passage of migratory fish within the marine environment and any plans which may effect this aspect of the life-cycle of these species including Salmonids, European Eels and Lamprey. Each of these species is likely to travel through Dundalk Bay or along the Co. Louth coast to their habitats within Northern Ireland and vice versa. The types of proposal which may impact these species are for example, off-shore wind farms, aquaculture sites, dredging and dredge material disposal etc.

DAERA Inland Fisheries would welcome the opportunity to comment on any application which may have the potential for transboundary impacts and will continue to do so when requested as part of the planning approval process.

The Loughs Agency is the lead body for provision of advice regarding impacts to salmonid and inland fisheries interests within the catchments of Lough Foyle and Carlingford Lough. Consequently, John McCartney from said agency should be consulted in relation to this development plan. DAERA will continue to provide fisheries advice for those areas outside of the catchments of Foyle and Carlingford Loughs.

- 3) Drinking Water Inspectorate has stated a development must not impact on either the quality or sufficiency of a private water supply. Taking into account the scale, type, location and the potential impacts the proposal may have on private water supplies, a developer should as appropriate: (i) undertake searches and investigations; and (ii) follow the Standing Advice / Guidance, as detailed within Considerations.
  - a. Transboundary Issues: We note the document refers to engagement with Irish Water and consideration of any Private Water Supplies in the locality (County Louth). Similar consideration should be shown for the Transboundary regions and any drinking water sources in those regions.
  - b. Engagement from an early stage with NI Water: To establish if there are public water supplies in the vicinity which potentially may be impacted by the project, and provide details on proposed mitigation, should be this be applicable.

### **SEA and Natura Impact Report-AA Comments**

- 1) Historic Environment Division (HED) welcome the clear consideration of the potential for transboundary effects on cultural heritage, including on the interrelationships and landscape setting of assets.

In regard to interrelationships between environmental components, HED would suggest that cultural heritage, particularly archaeology, has an important relationship with the natural environment and biodiversity, for example very many field monuments serve akin to semi natural islands in otherwise managed landscapes and provide important habitats for wild plants and animals.



- 2) The inclusion and consideration of UK marine legislation and marine policy documents within Appendix 1, which details the relationship with legislation and other policies, plans and programmes, is welcomed.

Whilst marine aspects (including transboundary) have been included within the environmental baseline, the overall evaluation (including transboundary) as detailed in Table 8.2 could have further drawn out the transboundary marine effects. This may have been assisted through the inclusion of specific marine aspects within the Strategic Environmental Objectives (SEO). For example, including reference to the marine historic environment within the SEO for Cultural Heritage and seascape within the SEO for Landscape.

- 3) Water Framework Directive 2nd Cycle Classification Summary 2015-2021 Coastal Water Body - Carlingford Lough. North Eastern River Basin Management Plan Summary December 2015.

It is a requirement under the Water Framework Directive to prevent the deterioration of the status of a water body. The attached link provide the current published WFD assessment of Water Quality for Carlingford Lough (<https://www.daera-ni.gov.uk/publications/coastal-water-body-%E2%80%93-carlingford-lough-2015>).

The River Basin Management Plan, sets out the objectives for improvement or prevention of deterioration (<https://www.daera-ni.gov.uk/publications/north-eastern-river-basin-management-plan-2015-2021>).

Should you have any queries in regard to the content of our response we can be contacted at the above address.

Yours sincerely

Ms Donna Whelan  
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NIEA, DAERA

