



**Iascach Intíre Éireann
Inland Fisheries Ireland**

Corporate Support Unit,
Department of Environment, Climate and Communications

18th December, 2020

Re: NOTICE OF PREPARATION OF THE DRAFT LOUTH COUNTY DEVELOPMENT PLAN 2021-2027

Dear Sir/Madam,

We refer to your correspondence dated 14th October last regarding notification of preparation of the Draft Louth County Development Plan 2021-2027.

Inland Fisheries Ireland (IFI) is a Statutory Body whose principal function is the protection, management and conservation of the inland fisheries resource. Protection of the aquatic environment and habitat is a vitally important element of IFI's work. In the context of Louth County Council's County Development Plan, the issues of water quality, fisheries habitat and angling tourism should be given due priority.

"Fisheries" includes all inland fisheries recreational and commercial, sea angling and mollusc fisheries stipulated under the Fisheries Acts, the physical habitat upon which the fishery relies, the facilities and access, the quantity and quality of the water and the plant and animal life on which fish depend for shelter and food and the spawning areas wherein fish deposit their eggs. The protective role of IFI relates to all aspects of the aquatic environment and all factors that influence the biotic communities within waters, which in any way relate to the propagation of fish stocks.

The many rivers and lakes in County Louth contain valuable fisheries habitats. These habitats support a wide variety of fish species from salmonids (salmon and trout) to coarse fish and pike among other species. It should be noted that while many of the river systems in the county are not designated under the Habitats Directive they hold species that are listed in Annex II of the directive, i.e. Atlantic salmon and Lamprey species.

IFI has the following comments to make in relation to the Draft Plan:

Tourism

Freshwater and marine recreational angling directly supports over 11,000 existing Irish jobs, many of which are located in the most peripheral and rural parts of the Irish countryside and along our coastline (IFI, 2015).

IFI's National Strategy for Angling Development (NSAD) 2015-2020 is the first comprehensive national framework for the development of our angling resource. The strategy aims to deliver a wide-ranging set of investments, innovations and promotions over the five years of the plan. This will ensure that our fish stocks and angling infrastructure are protected and enhanced for both their economic value and their recreational benefit to the communities and visitors they serve across Ireland. Effective and sustainable implementation of the strategy will ensure stability of existing jobs and businesses reliant on angling and the creation of new jobs as the economic impact of angling grows.

Inland Fisheries Ireland supports the protection and development of angling tourism in the Plan through the adoption of policies with regard to the provision of facilities which encourage angling, promotion of angling tourism within the county and signposting of rivers, lakes and streams. Signposting of rivers and



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angling locations and the provision of information boards giving details of species present and biodiversity should be supported.

Movement

Provision of transport and other infrastructure should be planned and constructed in such a way as to protect and conserve the existing environment. Potential negative impacts of developments of this nature include impeding the passage of fish and other fauna and poor water quality.

The impact of poorly designed river/stream crossing structures can be serious in terms of habitat loss and stream fragmentation. Prevention of the free passage of fish, e.g. salmon, trout and lamprey in particular can result in the loss of spawning habitat and impact on fish populations.

Natural Heritage, Biodiversity and Green Infrastructure

We note the reference to aquatic habitat protection in the Draft Plan. The impacts of development when not policy driven or environmentally managed are numerous, i.e. destruction of instream habitats, interference with fish spawning and nursery areas, obstruction of fish passage, removal of angling pools, changes in flow regimes, etc., The destruction of riparian areas along river banks results in fragmentation of riparian habitat within the river corridor, loss of cover for fish and aquatic animals and can reduce the value of the amenity.

To insure that impacts from development/land use practices (including flood plain development) do not interfere with the aquatic environment it is essential that those areas adjacent to waterways (riparian buffer zones) are managed in a manner, which will lessen impacts on these habitats.

Protection of aquatic zones can require riparian/buffer zones of up to 50m. The width of the riparian/buffer zone will depend on factors such as land use, land topography (e.g. slope), soil type, channel width/gradient and critical habitats to be protected.

IFI urges all local authorities to acknowledge and address the need for riparian habitat protection. IFI should be consulted in relation to any development (greenfield or redevelopment of brownfield sites) that could impact on aquatic ecosystems and associated riparian habitat. IFI can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats.

We refer you our recently updated guidance document IFI Urban Watercourses planning guide, which can be accessed at <https://www.fisheriesireland.ie/extranet/fisheries-management-1/1762-ifi-urban-watercourses-planning-guide-1.html>

Climate Change:

The impacts of climate change include increased temperatures, changes in rainfall patterns, drought and unpredictable weather, all of which can have a negative impact on fish and the associated aquatic habitat.

Periods of low water levels combined with increasing demands for water can create huge pressures on these natural resources. The Development Plan is an opportunity to promote policies and awareness of water conservation which may ultimately result in a reduction in water use. Water conservation and water use efficiency are central elements of any strategy to enhance water supply reliability, restore ecosystems, and respond to climate change and changing demographics. Significant increases in water conservation and water use efficiency will be required to ensure reliable water supplies in the future.

Best practice should be promoted in respect of water conservation in all developments through methods such as rain water harvesting.

Another problem which is particular to summer months (when river/stream flows are often low) is wide scale unregulated water abstraction for crop irrigation. This practice may have significant ecological



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implications/impacts if large volumes of water are abstracted over a short period of time from small fish nursery or spawning streams. Such abstractions during dry weather or drought periods could have severe repercussions for aquatic habitats, fish stocks and accordingly the ecological status of watercourses in terms of the Water Framework Directive (WFD).

Rivers and watercourses are assets which provide a basis for the development of visual and amenity features of the areas through which they flow. They can provide a focus for the involvement of the communities in the protection of water quality and biological/wildlife diversity of aquatic habitats within these areas.

IFI requests that the Plan provides for the maintenance and preservation of all watercourses and associated riparian habitats in the county.

Yours faithfully,

Michaela Kirrane,
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