

23rd December 2020

RE: GRIT Submission on the Draft Louth County Development Plan 2021 – 2027

Dear Forward Planning Unit,

Greenore Residents & Tidy Towns Ltd welcome the publication of the Draft Louth County Development Plan 2021 – 2027. It is positive to see the Draft Plan formulated based on the UN’s Sustainable Development Goals. It is hoped that this will translate into genuine, positive, tangible, visible outcomes for the county in general and, Greenore, in harmony and compliance with the true meaning of *Sustainable Development*.

- *“Sustainable development has been defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.*



Figure 1. UN Sustainable Development Goals.

Greenore Residents' & Tidy Towns Association welcomes the acknowledgement in the Draft Louth County Development Plan of the unique character of Greenore as a Victorian railway village in Chapter 9 Built Heritage and Culture as an *Architectural Conservation Area* and as a *Rural Village* in volume 2 with policy to *"promote high quality, energy efficient design which protects the unique character of the settlement, contributes place making and result in a built environment which is attract to live, work and visit"*.

- It is requested that there is an overarching policy added to Chapter 9 to Protect and Promote the Architectural and Archaeological Heritage of the County and that all other policies which could impact negatively on the Built Heritage of the County refer to Chapter 9.

Specifically, in Appendix 11 in relation to 15 - Greenore ACA

- It is requested that a commitment to engage a Grade I Conservation Architect to carry out an Architectural Character Appraisal of Greenore ACA within the lifetime of the plan is added to the policies of Chapter 9 Built Heritage and Culture.
- It is requested to insert a policy acknowledging the historic origins of Greenore and the Victorian engineering and architectural design and require that all new industrial / port development have regard to the design and quality of this unique setting and architectural style and must not detract from the existing character of the ACA.
- It is requested that the view north along Anglesey Terrace is added to the Views in 15.4
- It is requested that the policy objectives are strengthened in 15.4 to protect the architectural quality of Greenore.
- It is requested that a policy requiring that all works to the public realm, infrastructure or drainage, street lighting or sub-stations whether carried out by private developers, utility companies, statutory undertakers, the Local Authority, or for it by subcontractors are carried out in a manner and materials appropriate to the architectural and historic public realm. All works shall be designed and supervised by a Conservation Architect or Landscape Architect specialising in historic public realm.
- It is requested that the record of Protected Structure LHS 009 -001 is more detailed to include all the remaining fragments of Greenore Railway Station which are within the curtilage of the Railway Station Water Towers.

It is requested that the scenic natural setting of Greenore is given greater prominence in the Draft County Development Plan.

- It is requested that the R175 to Greenore, The Shore Road, Anglesey Terrace and Euston Street are all added to the list of Scenic Routes in Tale 8.19 in Chapter 8 Natural Heritage, Biodiversity and Green Infrastructure.

- It is requested that the iconic Scots Pine /Scotch Pine (*Pinus sylvestris*) trees on Greenore Golf Course on the approach to Greenore are added to the Table 8.10: Trees and Woodlands of Special Amenity Value in County Louth and are considered for Tree Protection Orders under Policy Objective NBG 30 To protect trees and woodlands of special amenity value. Review and where appropriate make Tree Preservation Order(s) in relation to trees of special amenity value.

It is noted that there are numerous references to Greenore and policy objectives in a number of chapters which will impact on the residential amenity, scenic setting and architectural heritage of Greenore. In the interests of sustainable development for the whole County in general and Greenore in particular, it is recommended that there is more inter-connectivity and cross-cutting themes between the policy objectives in different chapters to ensure that development does not occur in silos of separate policies in separate chapters.

This is particularly important in relation to the following chapters: Chapter 5 - Economy & Employment; Chapter 6 - Tourism; Chapter 8 Natural Heritage, Biodiversity and Green Infrastructure; Chapter 9 - Built Heritage and Culture; Chapter 10 – Utilities; Chapter 11 - Environment, Natural Resources and The Coast; Chapter 12 Climate Action; Chapter 13 Development Management Guidelines; Chapter 14 Implementation and Monitoring.

It is hoped that the environment, both natural and built and the needs of the residents of the county and, Greenore will not be compromised or sacrificed for the demands of insensitive economic development.

- It is requested that an implementation audit is carried out to assess the impact of existing policies on Greenore as a *Rural Village* and an *Architectural Conservation Area*.

It is noted that Greenore Port is promoted in Chapter 5 in MARINE OPPORTUNITIES INCLUDING PORTS in **Policy Objectives EE 25 and 26**

Policy Objective EE 25

To support development and growth of the maritime economy and balance the competing demands for available space along the coast by different users and encourage co-location and co-existence of activities and infrastructure while having regard to appropriate environmental considerations.

Policy Objective EE 26

To recognise that the Port facilities at Drogheda, Greenore, Dundalk, and Clogherhead are an important economic resource and to support any improvements or expansion to these Port facilities at Drogheda, Greenore and Clogherhead and the consolidation of Dundalk Port, subject to the preparation of a Master Plan and appropriate environmental considerations.

- It is requested that these policies are amended to fully incorporate the objectives of sustainable development, to ensure that the air, marine environment and the residents of Greenore are be given equal due regard in any development management decisions, as is required when implementing sustainable development.

- **Policies EE 25 and EE 26** should be amended to take the setting of neighbouring architectural heritage and residential amenities and health into account.

Greenore is unique in its history, architectural heritage and location, with unique challenges. The residents of Greenore request that their residential amenity, environment and health is given equal regard with the economic demands of Greenore port. The residents of Greenore request that Greenore Port are required to comply with all relevant statutory environmental requirements and that Louth County Council fulfil their role in ensuring this compliance and take all necessary enforcement action when they do not and require Greenore Port to carry out all necessary remediation action as required.

The coastal location and the threat of climate change must be acknowledged in relation to Greenore. The objectives in relation to Flood Protection in Chapter 10 are acknowledged with Greenore in Table 10.1 Areas for Further Assessment and their Associated Flood Risk Management Plan. And the objective to deliver on the following Flood Relief Schemes during the lifetime of this Draft Plan including Carlingford & Greenore Flood Relief Scheme.

- It is requested that a policy is inserted into Chapter 10 to cross reference with the Built Heritage policies in Chapter 9 and that all flood protection measures proposed are compatible with the architectural heritage, natural scenic beauty and designated sites SACs, SPAs, NHAs and pNHAs.
- It is requested that there is adequate and appropriate engagement and collaboration with the residents of Greenore in the design of any proposed flood prevention measures.

We trust you can give due attention to our submission.

Yours sincerely on behalf of GRTT

Sean Breen
Secretary

