



**An Roinn Turasóireachta, Cultúir,
Ealaíon, Gaeltachta, Spóirt agus Meán**
Department of Tourism, Culture,
Arts, Gaeltacht, Sport and Media

Your Ref: Draft Louth County Development Plan 2021-2027

Planning Ref: **FP2020/057**

(Please quote in all related correspondence)

23 December 2020

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

Via email: louthcdp@louthcoco.ie

Re: Notification under Section 12 (1) (b) of the Planning and Development Act, 2000 (as amended)

Re: Notice of Preparation of the Draft Louth County Development Plan 2021-2027

A chara

I refer to correspondence to the Department of Culture, Heritage and the Gaeltacht on 14th October 2020 received in connection with the above. The Department welcomes the opportunity to input into the preparation of the Louth County Development Plan.

Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Archaeology

Introduction

It is strongly recommended that a Development Plan contains a specific 'Archaeological Heritage' Chapter within the plan. This chapter should set out the policies and objectives as recommended below (see specific recommendations).

Definition of Archaeology and Archaeological Heritage

It is very important that the Development Plan's archaeological policies and objectives be informed by a clear understanding of the nature of archaeology and the archaeological

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heritage, and it is recommended that a statement on this be included in the chapter on archaeological heritage. The following is noted by way of assistance in drafting such text.

Archaeology is the study of past societies through their material remains and the evidence of their environment. It is not restricted solely to ancient periods; it includes the study of relatively recent societies through, for example, industrial and military sites.

The archaeological heritage is comprised of all material remains of past societies with the potential to add to our knowledge of such societies. It therefore includes the remains of features such as settlements, monuments, burials, ships and boats and portable objects of all kinds, from the everyday to the very special. It also includes evidence of the environment in which those societies lived.

Archaeological heritage occurs in all environments, urban and rural, upland and lowland, grassland, tillage and forestry, inland and coastal, dryland, wetland (including peatlands) and underwater (including watercourses, lakes and the sea).

Archaeological heritage may exist in the form of upstanding or visible remains, or as subsurface features with no surface presentation.

Given the above, archaeological heritage is present as yet unidentified in all environments.

Legislation relevant to the protection of the archaeological heritage

The chapter on archaeological heritage in the Development Plan should be informed by a clear understanding of relevant legislation relating to the protection of the archaeological heritage. By way of background in that regard, and as a basis for inclusion of accurate information in the text of the Development Plan, the following is noted.

The National Monuments Acts 1930 to 2014

The specific national legislative code for protection of monuments, historic wrecks and archaeological objects is the National Monuments Acts 1930 to 2014. In summary, this provides legal protection for all archaeological objects, wrecks 100 or more years old and for a range of categories of monuments and places. Archaeological objects (which in broad terms includes all moveable objects of archaeological importance) are comprehensively protected under the National Monuments Acts.

In terms of protection of monuments and related sites, the most widely applicable protective mechanism is the Record of Monuments and Places (RMP), established under section 12 of the National Monuments (Amendment) Act 1994. There are over 130,000 entries in the RMP, which takes the form of lists and maps for each county in the State. Copies of these lists and maps, as prepared in the 1990s, were circulated to all planning authorities and are now available in PDF format at www.archaeology.ie. The RMP includes the archaeological monuments which had been identified at the time it was issued. Of course, many more archaeological monuments have been identified since and, while these have not as yet been



included in the RMP, an online database of known archaeological monuments (including current RMP entries and ones which will be included in a revised RMP) is available as the Historic Environment Viewer, which can be accessed at www.archaeology.ie.

The RMP requires notice to be given to the Minister for Housing, Local Government and Heritage of proposed work at or in relation to monuments and places included in it (generally referred to as “recorded monuments”). Similar protection is provided by the Register of Historic Monuments (established under section 5 of the National Monuments (Amendment) Act 1987) to historic monuments and archaeological areas included in it. The relevant Notification Form can be found at www.archaeology.ie.

The strongest legal protection under the National Monuments Acts in respect of monuments is afforded to national monuments of which the Minister for Housing, Local Government and Heritage or a Local Authority is owner or guardian or in respect of which a Preservation Order under the National Monuments Acts is in force. The consent of the Minister is required for interference with such national monuments or ground disturbance around or in proximity to them. A national monument is any monument the preservation of which is a matter of national importance by reason of the archaeological, architectural, historical, traditional or artistic interest attaching to it. A list of Preservation Orders currently in force can be found at www.archaeology.ie.

Under the National Monuments Acts the Minister and local authorities must maintain national monuments of which they are owners or guardians (the Office of Public Works (OPW) has day to day responsibility in relation to national monuments owned by or in guardianship of the Minister for Housing, Local Government and Heritage) and, subject to such restrictions as are reasonably necessary, seeks to provide public access to such national monuments.

All wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under section 3¹ of the National Monuments (Amendment) Act 1987². Wrecks of any date and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection. Information on known wrecks can be found in the Wreck Viewer³ which holds records of over 18,000 known and potential wreck sites in Irish waters.

The National Monuments Act also regulates the use of detection devices (Section 2) and diving on protected wreck sites or for archaeological purposes (section 3), with licences being required for both. Further information on this is available from www.archaeology.ie.

¹ <http://www.irishstatutebook.ie/eli/1987/act/17/section/3/enacted/en/html#sec3>

² <http://www.irishstatutebook.ie/eli/1987/act/17/enacted/en/html>

³ <https://www.archaeology.ie/underwater-archaeology/wreck-viewer>



The Planning and Development Act 2000 and the Planning and Development Regulations 2001

Development Plans are legally required to contain objectives for the conservation and protection of the archaeological heritage (see section 10(2) (c) of the Planning and Development Act 2000). This is separate and additional to mandatory objectives in relation to architectural heritage.

The Planning and Development Acts and Regulations contain further provisions relating to the protection of archaeological heritage in the course of particular planning cases. These include provisions making clear that imposition of archaeological conditions on grants of planning permission does not ground claims for compensation and detailed provisions to ensure that planning applications for proposed development which would affect sites protected under the National Monuments Acts 1930 to 2014 or archaeological sites in general are referred to the National Monuments Service.

The Environmental Impact Assessment (EIA) Directive

The EU Directive on EIA (which is given effect to in Irish law through a range of national legislation) clearly requires that EIA includes consideration of impact on archaeological heritage.

International Conventions

Ireland is a party to the 1992 Council of Europe European Convention on the Protection of the Archaeological Heritage (the "Valletta Convention"). It is important that all public bodies, including local authorities, play their part in ensuring Ireland is at all times in compliance with this binding international treaty, including through using domestic legislation such as the Planning and Development Act to give effect to the requirements of the Convention. A particular focus of the Valletta Convention is the requirement to ensure that archaeological considerations are integrated into the planning and development process.

Ireland is also a party to the 1972 UNESCO World Heritage Convention, and the need to ensure full account is taken of this, where appropriate, is addressed further below.

Although not as yet a party to the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage, Ireland supported its adoption and has since then consistently supported its aims and objectives. It is essential that full account is taken of the need to provide appropriate protection for the underwater cultural heritage.

National policy on protection of the archaeological heritage in the course of development - Framework and Principles for the Protection of the Archaeological Heritage

The *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) was published so as to promote a high level of compliance with the aims and requirements of the Valletta Convention. It sets out national policy on the protection of the archaeological heritage in the course of development. While not specifically directed at the planning system, as operating under the Planning and Development Acts, it



speaks to all development control codes. It is therefore essential that archaeological issues be addressed as part of Development Plans adopted under the Planning and Development Act, as such plans sit at the centre of the whole planning and development system.

Core elements of the policies set out in the *Framework and Principles* document include emphasis on the non-renewable nature of the archaeological heritage and the need to always consider its preservation *in-situ* as the first option, and also the need to carry out appropriate levels and forms of archaeological assessment in advance of development.

Recommended over-arching objective for the protection of the archaeological heritage

It will be an objective of the Planning Authority to protect in an appropriate manner all elements of the archaeological heritage and other features of the following categories:

- a) Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS).
- b) Monuments and places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.
- c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.
- d) National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and national monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a local authority.
- e) Archaeological objects within the meaning of the National Monuments Acts.
- f) Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer maintained by the National Monuments Service.
- g) Archaeological features not as yet identified but which may be impacted on by development.

In securing such protection, both generally and in the context of any particular planning decision, the Planning Authority shall take full account of, and be guided by, national policy on the protection of the archaeological heritage as set out in the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999). Any specific recommendations made by the Government Minister responsible for the protection of the archaeological heritage, as a statutory consultee in the planning process, shall be given full consideration by the Planning Authority.

The Planning Authority shall protect the archaeological heritage through ensuring preservation *in-situ* or preservation by record, as appropriate, with preservation *in-situ* being the first option to be considered being presumed to be the preferred option. If preservation *in-situ* cannot be achieved, or can only be achieved in-part, then preservation by record of the archaeological heritage will be required—this will require the full archaeological excavation and recording of the monument/site, according to best professional practice. Where



excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. The costs of assessing and mitigating archaeological impacts will be considered to be part of development costs which are appropriate to be borne by the developer.

Recommended further policies to protect the archaeological heritage

- To protect and enhance archaeological monuments and historic wrecks and their settings and amenities, having particular regard to the importance of historic town defences, historic graveyards, national monuments in the ownership of the Minister for Housing, Local Government and Heritage or a Local Authority and, in general, monuments and historic wrecks which, through their presence in the landscape or seascape, provide tangible evidence of the past.
- To promote and facilitate appropriate forms of access (including disabled access) to archaeological monuments and historic wrecks, including maintaining or developing means of access (including working with landowners to secure appropriate access over private lands), providing appropriate, accurate signage and interpretive material and providing appropriate forms of virtual access where physical access is not possible.
- To ensure that all aspects of archaeological heritage and underwater cultural heritage, in all environments, are considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritage.
- To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process (including pre-planning application consultations).
- To promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects through publications and the provision of on-site interpretive material even where no physical remains are visible.
- To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the National Monuments Service.

Recommended specific objectives to protect the archaeological heritage

- In general, developments will not be permitted which would result in the removal of archaeological monuments with above ground features/surface expression. This will be especially the case in relation to archaeological monuments which form significant features in the landscape, whether or not visible from public spaces.



- To secure the preservation *in-situ* of historic wrecks, and where this is not possible, their preservation by record.
- To secure the preservation *in-situ* of historic town defences of all forms.
- To ensure that provision is made in the planning process ensuring the preservation *in-situ* of significant medieval masonry remains found during the course of a development and (where practicable) the presentation of such remains as part of completed developments.
- To secure the preservation *in-situ* of surviving above-ground urban medieval and early modern structures, by ensuring that permission for a development does not result in the loss of the remains of such structures which may survive within buildings which are, or appear to be, of later date.
- To secure the preservation *in-situ* of significant examples of industrial, military and nautical heritage that form part of our post-medieval archaeological heritage, and examples of which may date from periods up to and including the 20th century.
- To secure the setting, character and amenity of historic battlefields.
- To preserve the setting and amenity of all archaeological monuments, with particular regard for upstanding monuments and the line of historic town defences, by ensuring that development in the vicinity of these archaeological monuments is not detrimental to their character or setting by reason of the development's location, scale, bulk or detailing.
- To preserve means of access to monuments currently accessible to the public and to develop further and better access to monuments, including as part of the design of development in their vicinity (where appropriate).
- To ensure a sufficient buffer area is maintained between a development and the line of historic town defences so as to preserve the amenity and lines of such defences.
- To retain the existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins within towns or villages.
- To protect historic graveyards, including through the avoidance of extensions to them which would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary.
- To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards.
- To ensure that landscapes of particular archaeological interest or significance are appropriately considered as part of a landscape character assessment, and to ensure the preservation of the character, interest and amenity of such landscapes.
- To ensure that in appropriate cases developments include as a long-term measure appropriate interpretive material regarding the archaeological features identified or uncovered in the course of development or pre-development work, whether or not such features have been preserved *in-situ* or are themselves presented.



- To ensure that all signage placed at or near archaeological monuments is appropriate in both form and accuracy of content.
- To provide, in appropriate cases and subject to appropriate safeguards and restrictions, appropriate forms of public access (whether actual or virtual) to archaeological excavations taking place in advance of development.
- To support the incorporation of monuments into designated open spaces and public amenity spaces, provided this is done in a manner compatible with the protection and proper management and conservation of the monument in question, in particular through ensuring that such monuments are not left vulnerable, e.g. to erosion or to becoming the focus of vandalism or anti-social behaviour, or are not left in, or allowed to deteriorate to be in, a condition incompatible with public safety. Accordingly, where such incorporation takes place an appropriate and enforceable permanent management and conservation plan will be required.

Recommendation regarding World Heritage Sites and “tentative list” sites

The reference to the Monasterboice World Heritage Tentative List site is noted and the commitment to conserving this key cultural heritage site is welcomed. Monasterboice forms part of a serial World Heritage project along with: Glendalough, County Wicklow; Inis Cealtra, County Clare; Clonmacnoise, County Offaly; Durrow, County Laois; and Kells, County Meath. The Department is currently undertaking a review of its Tentative List and the deadline for receipt of Local Authority applications to the Tentative List is March 2021. The Local Authority may wish to contact the National Monuments Service directly in relation to the review of the Tentative List.

General recommendation regarding development control policies and objectives

If the archaeological heritage of Louth County Council is to be effectively protected through the planning and development process, it is essential that all relevant and appropriate archaeological procedures and practices are followed. Adherence to the relevant procedures for planning referral under the Planning and Development Regulations is, of course, essential but a range of further policies and objectives for consideration for inclusion in the Development Plan are set out below.

Ensuring that both the relevant statutory procedures and the other procedures and practices noted below are adhered to will be greatly facilitated by the Planning Authority having access to its own professional archaeological expertise.

With regard to developers seeking advice from the National Monuments Service (through the central contact point for heritage referrals from planning authorities in advance of submitting a planning application) the National Monuments Service (subject to available resources) will seek to engage with the pre-planning process. However, for the exercise to be beneficial, it is essential that developers carry out an initial archaeological assessment prior to engagement with the National Monuments Service. Planning authorities should emphasise this to developers before advising them to seek pre-planning consultation with the National Monuments Service.



Recommended Development Control Objectives and Policies:

- That proposed developments which may, due to their location, size, or nature, have implications for elements of the archaeological heritage (including the underwater cultural heritage) be subject to an archaeological assessment, which should in general be carried out before any grant of permission. Such developments include those that are located at or close to archaeological sites or monuments or historic wrecks, those which are extensive in terms of area (ground disturbance of 1/2 hectare or more) or length (1km or more) even if no known elements of the archaeological heritage are present, those which would affect significant areas of environments such as wetlands, reclaimed areas of rivers, lakes and coastlines and underwater areas even if no known elements of the archaeological heritage are present, and any developments that require the carrying out of Environmental Impact Assessment.
- Proposed developments in areas of the marine environment or inland waterways for which there are no located wrecks may be considered to be areas of high archaeological potential due to the number of historic ship losses recorded for these areas over time. Therefore, developments in riverine, lacustrine, intertidal and sub-tidal environments of archaeological potential should be subject to an archaeological assessment, which should in general be carried out before any grant of permission.
- To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) and the *Policy and Guidelines on Archaeological Excavation* (Government of Ireland 1999) and the advice in particular cases of the Department with all relevant techniques (including documentary research, aerial photographic research, geophysical survey and archaeological test excavation) being required as appropriate. This will also include, in appropriate cases, the carrying out of building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or early modern date.
- To ensure that all planning applications for developments of categories set out above are referred to the Department, through its Development Applications Unit, that such referrals take place in due time and that full account is taken of the recommendations made by the Department.
- That permission for proposed development will be refused where the development cannot be carried out in a manner compatible with the protection of the archaeological heritage as provided for in the policies and objectives contained in the Development Plan and in relevant national policies, in particular the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999).



- That where permission is granted for proposed development such grants of permission will contain appropriate conditions to secure the protection of the archaeological heritage, either by preservation *in-situ* or, where impact cannot be avoided, by way of preservation by record. In imposing such conditions, the Planning Authority will act in accordance with relevant policies and standards, in particular the *Framework and Principles for the Protection of the Archaeological Heritage* (Government of Ireland 1999) and the *Policy and Guidelines on Archaeological Excavation* (Government of Ireland 1999), and be guided in particular cases by the advice of the Department. Such conditions may require, as appropriate, archaeological assessment, preservation *in-situ*, preservation by record and/or archaeological monitoring as well as post-excavation conservation, analysis and reporting.
- That where preservation *in-situ* is required as a condition, further conditions may require appropriate immediate and long term conservation and management of the archaeological features in question and long term monitoring of the effectiveness of conservation measures, with appropriate steps required to be taken in the event conservation measures are proving in-effective.
- That where preservation by record is required as a condition, such conditions will further require preparation of appropriate follow-up reports, analyses and publications and the conservation as necessary of archaeological material and objects recovered during the archaeological excavations as carried out.
- That where permission is granted conditions may require presentation to the public of archaeological features preserved *in-situ* on the site, where practicable, and/or provision of interpretive material at the site (including on a permanent basis) whether or not any features have been preserved *in-situ*.
- That where archaeological excavation is required as a condition of permission, further conditions may be imposed requiring the provision of public access to such excavations, subject to appropriate safeguards.
- That where conditions are imposed for the protection or preservation of the archaeological heritage, these will make clear that the costs of implementing these are to be borne by the developer.
- To develop the Planning Authority's own professional archaeological expertise and involve that expertise in dealing with planning casework, including the drafting of future revisions of the Development Plan.

Recommended Climate Change Policies and Objectives for Archaeological Heritage

- To promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change.



- To identify the built and archaeological heritage in Local Authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the Development Plan.
- To undertake climate change vulnerability assessments for the historic structures, sites and wrecks in its area.
- To develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area.
- To develop resilience and adaptation strategies for the built and archaeological heritage in its area.
- To develop the skills capacity within the local authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

Recommendations to planning authorities regarding information and appendices to be included in a Development Plan

It would be highly beneficial if the content of the Record of Monuments and Places (RMP) for the relevant planning area was included as an appendix to the Development Plan; in any event a link to the legal RMP documents as available in electronic form at www.archaeology.ie should be provided. However, it should also be made clear that additional archaeological sites and monuments are identified in the online Historic Environment Viewer which is available at <https://webgis.archaeology.ie/historicenvironment/>

It would be highly beneficial if the wreck records for the relevant planning area (which are available to download from the Wreck Viewer) were included as an appendix to the Development Plan; in any event a link to the Wreck Viewer is available in electronic form at <https://www.archaeology.ie/underwater-archaeology/wreck-viewer>

Consideration should also be given to including in an appendix a list of all registered historic monuments, national monuments subject to Preservation Orders under the National Monuments Acts and national monuments of which the Minister for Housing, Heritage and Local Government is owner or guardian. The National Monuments Service can assist in sourcing this data.

Historic towns likely to contain subsurface archaeological deposits have been identified and included in the statutory Record of Monuments and Places. The RMP map identifies these with a line drawn to enclose the area of the town within which subsurface archaeological deposits are likely to be present (as Zones of Archaeological Potential or ZAPs). It is of particular importance that this mapping resource be incorporated into the Development Plan so that all understand the particular archaeological issues arising in these urban areas. The identification of these urban areas arose from the Urban Archaeological Survey carried out



in the 1980s and the National Monuments Service is taking steps to make the relevant survey reports available at www.archaeology.ie.

Please note the following in relation to section 9.3.4 UNESCO World Heritage Site – Brú na Bóinne:

Page 9-7 notes the following:

“This WHS covers a Core Area and a Buffer Zone the majority of which is situated in County Meath. However, an area contained within the Buffer Zone is located in County Louth in the townland of Littlegrange as illustrated on Map 9.2.”

It should also be noted that a small part of Townleyhall townland (which includes a passage tomb in state ownership (LH024-008001-)) is within the WHS Buffer Zone in County Louth.

Page 9-7 also notes the following:

“In accordance with the Operational Guidelines for the Implementation of the World Heritage Convention (2013), every site contained on the World Heritage list, is required to have a management plan explaining how the Outstanding Universal Value is to be maintained.”

Please note that the latest version of the Operational Guidelines (OG’s) for the WH Convention date to 2019 (available here: <https://whc.unesco.org/en/guidelines/>). The above statement in the draft plan is not technically correct. Point 108 of the 2019 OG’s notes the following: ‘Each nominated property should have an appropriate management plan or other documented management system which must specify how the Outstanding Universal Value of a property should be preserved, preferably through participatory means.’

The following is also noted on Page 9-7:

“The current Brú na Bóinne Management Plan, 2017 which is a non-statutory plan, was submitted to UNESCO by the Department of Heritage, Culture and the Gaeltacht.”

The above should be corrected to: ‘by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs’.

Underwater Archaeology

Having considered the ‘Built and Cultural Heritage’ section of the Draft County Development Plan and associated documentation it is noted that the archaeological heritage, including underwater cultural heritage and the published Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019)⁴ needs to be highlighted to include amendments/updated information referenced in the previous Plan.

⁴ <https://www.chg.gov.ie/heritage/climate-change/the-built-and-archaeological-heritage-climate-change-sectoral-adaptation-plan/>



The section on the archaeological heritage shall include reference to the shipwreck resource off the coast of Louth. The section would benefit from being expanded to include stating that the underwater archaeological resource can also be found in the inland waterways—rivers and lakes, including islands in lakes, and such environments can retain rich underwater cultural heritage. Examples of sites may include piers, harbours, slipways, fishtraps, fording points and wrecks or smaller craft, e.g. logboats. Artefactual material may also be found within these submerged or intertidal/estuarine environments. Recent discoveries of previously unknown historic wrecks and logboats in the River Boyne also highlight the archaeological potential of the inland waterways of Louth and efforts should be made to protect such environments.

Certain developments can have both a direct and indirect impact on the underwater cultural heritage. These include Flood Relief Schemes, inland waterways and marine dredging programmes, drainage schemes, jetties and landing places and outfall pipes etc. Flood Risk Assessments and Coastal Protection Assessments can inform, through detailed archaeological assessment, the cultural heritage potential for areas that may be impacted on by proposed relief measures, and this in turn can facilitate the development of an agreed management and protection strategy for the County's archaeological heritage which can allow for progress in areas like flood relief requirements, while protecting the cultural resource.

Any proposed Development Plan should, as part of the Cultural Heritage Section, have definitive sections/policies on the protection of Louth's terrestrial and underwater cultural heritage. The plan should include provision for the adequate assessment and protection of both known and potential terrestrial and underwater archaeology. It should be noted that the results of such assessments can inform other areas of planning policy throughout the life of the Plan, including cultural tourism, local amenity needs and development zoning.

Pertaining specifically to the Underwater Cultural Heritage, it is therefore recommended that Louth County Council takes into consideration the following in relation to developing Policies and Objectives for the proposed County Development Plan (2021-2027). This will further strengthen and build upon the current protection afforded to the archaeological heritage of the county under the Plan.

Core Minimum Objectives for Underwater Archaeological Heritage

- It is essential that there be a general and over-arching objective for the protection of all archaeological sites protected under the National Monuments Acts 1930 to 2014. This should include Wrecks protected under the National Monuments Acts or otherwise included in the Wreck Inventory of Ireland Database (WIID) as maintained by the National Monuments Service.
- The *Wreck Inventory of Ireland Database (WIID)* for Louth lists a high volume of shipwrecks, and under the 1987 National Monuments Amendment legislation, all wrecks over 100-years old are protected. Of the c. 18,600 total wrecks listed, most



are without exact locations and the records of wrecking pertaining to them date from the 18th century or later. Many more previously unknown wrecks therefore await discovery in the coastal waters off Louth, dating to earlier times but which went unrecorded when lost.

- Archaeological heritage occurs in all environments, urban and rural, upland and lowland, grassland, tillage and forestry, inland and coastal, dryland, wetland (including peatlands) and underwater (including watercourses, lakes, estuarine and the sea). Wrecks 100 or more years old have full legal protection under the National Monuments Acts. They (along with archaeological objects) are automatically protected and generally do not feature in statutory listings (the Record of Monuments and Places and the Register of Historic Monuments). It is nevertheless (indeed, all the more so) essential that appropriate objectives are made which ensure due account is taken of protection of underwater cultural heritage in all its forms (which includes a range of features additional to wrecks, e.g. remains of bridges and submerged, or partially submerged, coastal structures). An inventory of known historic wreck sites is now available⁵ but given the nature of the underwater environment there is always high potential for previously unknown archaeological features to be present and this needs to be reflected in development plan objectives. This also applies to areas formerly underwater, such as reclaimed lands.
- All aspects of archaeological heritage and underwater cultural heritage, in all environments, shall be considered in the development process, including impacts on unidentified elements of the archaeological and underwater cultural heritages. Areas that have developed around watercourses, including rivers and lakes may contain known and/or previously unknown underwater archaeological sites, structures, features or artefacts, and this should be considered when reviewing the existing Development Plan and developing policies for the new Plan. Likewise, reclaimed areas may also contain previously unknown, buried archaeology that could be revealed during development impacts. Any plan should include this in its policy and objectives section. Sites such as slipways, historic quays, quay furniture, fixtures and fittings, fishtraps, harbours with associated marine infrastructure, including causeways, as well as specific sites such as shipwrecks, logboats, etc., singular sites such as rock cut platforms and steps, and of course artefactual material associated with sites or as individual depositions in underwater environments, etc. can all be retained and preserved in intertidal/foreshore and underwater contexts or on land previously covered by water (e.g. reclaimed areas).
- Proposed developments which may, due to their location, size, or nature, have implications for elements of the archaeological heritage should be subject to an archaeological assessment, which should in general be carried out before any grant of permission. Such developments include those that are located at or close to

⁵ www.archaeology.ie (<https://www.archaeology.ie/underwater-archaeology/wreck-viewer>)



archaeological sites or monuments or historic wrecks, those which are extensive in terms of area (ground disturbance of 1/2 hectare or more) or length (1km or more) even if no known elements of the archaeological heritage are present, those which would affect significant areas of environments such as wetlands and underwater areas even if no known elements of the archaeological heritage are present, and any developments that require the carrying out of Environmental Impact Assessment. Furthermore, given the number of logboats recently found in Lough Corrib any proposed development on the lake should be subject to an archaeological assessment or forwarded to the National Monuments Service for archaeological review.

- Any development either above or below ground, within the vicinity of any terrestrial or underwater site of archaeological interest shall not be detrimental to the character of the archaeological site or its setting.

Archaeological Assessments

It is policy that proposed developments, due to their location, size, or nature and that may have implications for the archaeological heritage, should be subject to archaeological assessment, including underwater archaeological assessments. Such developments include those that are located at or close to an archaeological monument or site, those that are extensive in terms of area (1/2 hectare or more) or length (1 kilometer or more) and developments that require an Environmental Impact Statement.

Archaeological Heritage can include:

- National Monuments in the ownership/guardianship of the State or Local Authority
- Archaeological and Architectural monuments/sites in the Record of Monuments and Places (RMP)
- Monuments in the Register of Historic Monuments
- Zones of Archaeological Potential in Historic Towns
- Underwater Archaeological Heritage, including Historic Wrecks
- Previously unknown and unrecorded archaeological sites (including subsurface elements with no visible surface remains, both terrestrial and underwater)
- Potential sites located in the vicinity of large complexes of site or monuments
- Existing or former wetlands, unenclosed land, rivers or lakes, or the inter-tidal/foreshore/estuarine zone
- Objects or artefacts of known or potential archaeological significance, including into the modern period and recent past (e.g. post-medieval archaeology)

Climate Change

The Department of Culture, Heritage and the Gaeltacht has published the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2019)⁶ as part of the National Adaptation Framework for climate change. This document should also be

⁶ <https://www.chg.gov.ie/heritage/climate-change/the-built-and-archaeological-heritage-climate-change-sectoral-adaptation-plan/>



considered a plan or policy for the purposes of section 9(6) of the Planning and Development Act 2000 (for which see above, section 1). The Department will continue engagement with the Climate Action Regional Offices (CAROs) and the City and County Managers Association throughout the implementation of this sectoral plan. It is essential that climate change adaptation is built into all policies and planning procedures, including, in particular in, development plans. There will, of course, be substantial overlap with architectural heritage and wider responses by the Planning Authority to the need to address climate adaptation across all sectors.

Architectural Heritage

It is recommended that built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the Development Plan. As part of awareness raising of the county's built heritage resources the appointment of a Conservation Officer with expert skills and practical experience is recommended; to support the Council in its stewardship of the county's rich architectural heritage legacy, to guide best practice in terms of leading heritage-led regeneration, the reuse and the adaptation of historic buildings to climate change, to support the implementation of national grant schemes such as the Historic Towns Initiative, the Irish Walled Towns Network and the Built Heritage Investment Scheme and to support the securing of urban regeneration funding and to co-ordinate major infrastructural projects such as transport and flood relief works.

Overview of policy context;

The renewal of a number of key national policy documents pertaining to archaeology and built heritage, including (Draft) Heritage Ireland 2030 and the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage, the (Draft) Built Vernacular Strategy and the National Policy on Architecture(pending), provide the context for this response. It is welcomed where possible that the policies and objectives of these core documents be inserted into future development plans. It is noted that research into the symbiotic relationship between cultural heritage and the biodiversity provides opportunities to build capacity as per the National Biodiversity plan 2017 – 2021 actions.

The development of these new policy documents, position archaeology and built heritage as a central and integrated theme within all government policy, planning & funding frameworks. These new policies are of strategic importance in terms of alignment with EU policies and funding programmes ensuring resilience in the face of significant challenges particularly the impacts of Brexit, climate change and COVID 19 pandemic. It is recognised that it is an important time to be working collaboratively and strategically with Local Authorities particularly with regard to vulnerable built heritage sites, the safeguarding of vacant buildings and the promoting/enabling reuse and repurposing of existing cultural assets. In this regard the importance of new areas of interest including our built vernacular architecture and its setting both rural and urban, the focus on historic town centres and their vitality post the impact of COVID -19 pandemic and the protection and uniqueness of planned and designed landscapes is noted.



The Programme for Government supports the 17 No. Sustainable Development Goals adopted by the United Nations and built on the principle of 'leaving no one behind'. Cultural and natural Heritage, as part of the wider built environment, is represented by Goal No. 11- *make cities and human settlements inclusive, safe, resilient and sustainable*. Targets to be achieved are wide-ranging including the adoption and implementation of integrated policies and plans towards *'inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters and implement holistic disaster risk management at all levels'*, whilst targets for cultural and natural heritage are focused on strengthening its protection.

The Sustainable Development Goals speak to formulation of the National Policy on Architecture – *Places for People*, which is currently progressing with support from several Governmental Departments and the OPW. The strategic importance of the role of the Local Authorities is recognised and their leadership in implementing the actions of a National Policy on Architecture; in all aspects of research, design, procurement and communication as the basis for securing funding programmes and delivering a high-quality built environment for everyone particularly in urban areas is welcomed

Historic urban centres—cities, towns and villages, have become the focus of government due to the negative economic impact of the COVID -19 pandemic on urban centres and their communities. Home working imposed by lockdown has seen a desire by many to re-balance life-work arrangements and to improve quality of life and has led them to consider relocation to dwindling country towns to avoid long commutes. These societal shifts are an opportunity for vacant town centre buildings and for Local Authorities to support the reuse of under-utilised buildings by putting in place skilled teams to enable appropriate and sustainable development. The Department is supportive of consideration of the quality of the built environment as the setting for our lives, our work and recreation and the role of cultural heritage as the capital for societal well-being, innovation and for social cohesion. Our Built and archaeological heritage provide the structure and form of our historic towns and villages, where cultural layers have evolved and continue to develop over time. The COVID-19 lockdown has demonstrated the importance of cultural and natural heritage sites and their often shared amenity, which supported well-being in communities particularly in urban centres during the pandemic lockdown. The holistic integration of heritage-led strategies to deliver key infrastructural projects such as rural broadband and its sensitive installation in historic towns, the heritage-led regeneration of urban sites and the incorporation of trans-generational housing, accessible services such as health care centres adapting key town buildings and the wider consideration of cultural heritage and the opportunities it presents in relation to flood mitigation is supported.

The opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities of the county is welcomed. This will be strategically important to enhancing as well as spreading the tourism capacity through the county's heritage sites and historic towns. The integration and communication of multiple strands of cultural and natural heritage, particularly through the implementation of blue and green infrastructural projects that holistically deal with all aspects of archaeological, built and



natural heritage is supported. By delivering high quality renewal and enhancement to existing places the social, environmental and economic objectives for sustainable development of communities will be met and cultural heritage significance, conservation best practice, preservation and protection of biodiversity of these places will be raised in general.

The Local Authorities' leadership in the on-going support of conservation practice and the development of expertise across the heritage sector is of strategic importance in maintaining finite resources and the nurturing of specialist skills and knowledge for guiding maintenance, repair, remaking, adaptation and conservation of built heritage to best conservation practice. It is envisaged that significant development in the skills capacity is required to address conservation/repurposing/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works and to retain regional distinctiveness. In the context of the EU Commission's rebuilding strategies including the Renovation Wave and the recently introduced concept of an European Bauhaus (a new culture of building well for everyone drawing on the skills and resources of our time), the Local Authority's support for research and promotion and communication of appropriate, well-informed energy efficiency design as well as the sensitive upgrades to historic buildings through the dissemination of factual and relevant information to the general public is welcomed. By reusing, repairing, adapting and upgrading buildings in a sensitive and holistic way Ireland will be supported to move towards a low-carbon society and a circular economy supporting local craftsmen and trades. This approach will support heritage-led regeneration and engagement with local communities to undertake projects of high quality design and conservation.

In summary there are a number of new areas of interest that it is considered require greater attention and focus in future development plans and policies of Local Authorities including;

- a. National Policy on Architecture – Places for people/5 themes to be embedded in the future development plan policies to ensure the delivery of and implementation of government's policy, including the Local Authorities' role in ensuring the delivery of high quality architecture and quality place making for everyone and in demonstrating best practice in the care and maintenance of historic properties in its ownership. This report is to be published in 2021.
- b. Heritage Ireland 2030 (Draft) – 3 strands to be embedded and the importance of communication, digital opportunities and community engagement as part of the delivery of built heritage policies.
- c. National Inventory of Architectural Heritage–Cultural landscapes, vernacular architecture and early urban buildings to address the incremental damage and cultural loss of early settlements and their settings due to the lack of awareness, vacancy and demolition.
- d. Built Vernacular Strategy (Draft) to enhance the understanding, minding and handing-on of our built vernacular heritage.
- e. Pleasure landscape–the inclusion of policies for planned/designed landscapes, their long term survival and evolution.



- f. Climate Change–heritage resilience and sustainability, consideration of appropriate measures to ensure the long term survival of historic structures, their uses and their contribution to the sense of place.
- g. Town revitalisation-Enhanced policies for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, reuse and renewal of historic fabric and remaking of historic places.
- h. The identification, reuse and repair of early urban buildings–raising awareness of the cultural significance of early building fabric as an integral part of historic urban centres and supporting the development of multi-disciplinary practice between archaeologist and conservation experts.
- i. Flood Relief works–attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and co-ordination with public realm/recreational amenity in urban centres.
- j. Tall buildings in historic urban centres–mitigation of negative impact on historic character areas and urban landscape in relation to large ground scrappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.

The renewal of Local Authority development plans is timely in terms of the global climate change challenges and presents opportunities for the potential of built heritage to be fully considered in future county development plans as a central theme. The impact of climate change is already being focused through Local Authority Climate Action Regional Offices (CARO) on urban settlements, their resilience, adaptation and consolidation. The Department welcomes the Local Authority initiating research, implementing policy, raising awareness and providing guidance to owners of historic buildings on such issues as thermal upgrading and building repair which requires in-house expertise to provide coherent and co-ordinated advice and a key recommendation is the appointment of key resources such as Conservation Architect, Archaeologist and Heritage Officer to undertake the delivery of the Department’s policies.

The following themes are recommended for inclusion along with objectives and policies that accord with the ‘Built Heritage’ to be co-ordinated.

Local Authority Climate Change Adaptation Strategy

Under the Climate Action and Low Carbon Development Act 2015, the Department of Culture, Heritage and the Gaeltacht has prepared a climate change adaptation sectoral plan for the Built and Archaeological Heritage. The Department is engaged with the Climate Action Regional Offices (CAROs) through its Climate Change Advisory Group to ensure a consistent approach to protection and adaptation of heritage across the country. Ongoing engagement with the CAROs throughout the implementation of the sectoral plan is anticipated.

While the architectural heritage of this country has survived well in the past, changing climatic conditions may make it less able to cope. Climate change can alter and accelerate decay or



can overwhelm the capacity of older structures to deal with severe weather events, increased extremes of wetting and drying, or cold or heat. There is also a significant threat to architectural heritage from climate action posed by maladaptation, that is, poor quality or ill-advised adaptation works leading to damage to heritage, whether directly or indirectly.

In the preparation of the Local Authority adaptation strategies, there are a number of issues regarding protection of architectural heritage that it is recommended should be taken into account to identify the architectural heritage at risk in its area, to assess its vulnerability to climate change and to develop disaster risk reduction policies for direct and indirect risks. For example, it is recommended that the strategy should undertake to:

- Identify the architectural heritage in the Local Authority area that may be under threat, directly or indirectly, due to climate change. This should include, but not necessarily be restricted to, the protected structures and architectural conservation areas designated in the Local Authority Development Plan. It is noted that due to the COVID -19 lockdown of urban centres that many town buildings have been left vacant and inaccessible and many will not re-open. Buildings that are left with poorly forming rainwater goods, roof coverings and that are badly secured will be very vulnerable in inclement weather.
- Include objectives to carry out climate change risk assessments for the historic structures and sites in the Local Authority's functional area particularly those in the Authority's own remit.
- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area.
- Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area.
- Develop the skills capacity within the Local Authority to address adaptation/mitigation/emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.

It is recommended that, where such officers are employed, the architectural conservation officer and/or heritage officer should be included on the Local Authority's Adaptation Steering Group.

The revitalisation of Historic Urban Centre – cities, towns and villages

The Department is a key stakeholder in promoting the revitalisation of historic urban centres and has had a central role in the development of innovative policy, guidance on best practice in the reuse of existing buildings and the development of high quality public realm, concepts which have been supported through annual funding programmes for towns and their building fabric. In support of the vision of the National Development Plan, a National Policy on Architecture (NPA) is being developed, under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people. During the consultation phase of the NPA, the



Department, has received many significant contributions and presentations-the Collaborative Town Health Check Programme (CTHCP) demonstrated its strategic importance to informing future town management policy by providing the point of engagement with a business community, the compilation of baseline data for assessing and visualising the well-being, quality and economic vitality of a town centre and allowing comparisons to be made with European counterparts on the significance of the current vacancy rates presenting in Irish towns, pre COVID -19 lockdown. The establishment of baseline data for town centres and its use to inform future heritage-led development strategies based on enabling and reuse of under-utilised buildings is welcomed.

As Ireland emerges from lockdown society has never been more aware of their surroundings and the benefit that a quality built environment brings to their lives. Whilst areas of disadvantage and constraints of urban living have been highlighted during the lockdown, Government has acknowledged the need to provide economic stimulus to assist society in its recovery. The EU is similarly posed to providing support to Member States with policies and funding being aligned to deliver the upgrade to existing building stock as an integral part of climate change adaptation, town revitalisation and economic prosperity. The Department's built heritage grant schemes have been revised to tackle climate change resilience and to gather information to inform future funding strategies and practices for towns. The Architectural Conservation Officer has a key role in the implementation of such schemes, communicating their benefit, developing best practice and supporting traditional skills to retain the local character.

Acknowledging that a greater percentage of inhabitants now live in urban centres than the countryside, urban centres provide the opportunity to focus on the challenges and opportunities that climate change adaptation and the re-purposing of our extant building stock will bring. Historic building refurbishments and conversions in small settlements and rural areas have helped to accommodate new uses, facilitating rural economic diversification. Historic areas often provide the focus for leisure facilities, from theatres and art installations to restaurants and bars. Historic buildings, areas and waterways can serve as catalysts for the repopulation of inner-city areas and development of new and sometimes more specialised housing, retail and leisure markets.

Programmes such as the CTHCP health check surveys provide the imperative to the Local Authority as well as the basis to become more attentive of the well-being of towns as providing an understanding of the opportunity to focus through a single lens and to ascertain the benefit of interconnecting government policies and funding to greater effect and benefit of rural society. The adoption of governance tools within Local Authorities such as the Health Check Programme, Conservation Plans for special sites, Living Town Initiatives and their respective setting up of one-stop –shops to promote and co-ordinate the planning and building regulatory aspects of urban regeneration is regarded as a positive and proactive means to enabling built heritage to be reused and adapted successfully, It is a planning model that may be applied to the various scales of urban settlement as necessary.



Policy

To consider concepts of historic urban landscapes as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics. These include setting, topography and natural features. The conservation and reuse of early traditional structures, roofscapes of historic centres and the recognition of interrelationships between sites and landscape features in terms of the insertion of new buildings and managing their impact on the historic environment.

To consider a *Town first* approach to the revitalisation of historic urban centres, the appointment of a Local Authority multi-disciplinary team which communicates the historical, architectural context and focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.

To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.

To consider the identification of a built heritage at risk registrar as the basis for actively managing, attracting funding and resources, drawing on the legislative provisions to safeguard protected structures and their settings i.e. enabling works to ensure their long term survival, appropriate moth-balling and inspection to prevent further deterioration or loss.

To promote best conservation practice and to lead by example through the management and safe-guarding of historic properties in the ownership of the Local Authority.

To support the development of sustainable infill to the town back lands that is appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retains the historic streetscape form particularly within sensitive areas of built and archaeological importance. To ensure the strategic housing development support rather than detract from the vitality and overall character of historic town centres in terms of their scale, connection and mobility strategies.

To draw on the historic environment viewer, to compile core data information about the built and archaeological evolution of historic places to draw on the readily accessible resources such as historic mapping and databases, i.e. to inform future development strategies and progress based on an awareness of the cultural significance of a place.

To co-ordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites in order to improve their enjoyment, presentation and enhanced accessibility. In this regard examples from European counterparts of the removal of traffic from urban centres and the resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and the perceived enjoyment of urban living in Ireland is noted. These transitions support a return to sustainable and attractive urban living.



The National Inventory of Architectural Heritage (NIAH)

Under Section 53 of the Planning and Development Acts 2000-2012, the Minister may make recommendations to a Planning Authority concerning the inclusion of particular structures, specific parts of particular structures, or specific features within the attendant grounds of particular structures for inclusion in Local Authority Records of Protected Structures. Local Authorities must have regard to such recommendations, where they relate to structures recorded by the National Inventory of Architectural Heritage (NIAH) and are rated as being of International, National or Regional significance. In development planning, any proposals for development must take account of the possible impact on the historic interest of these structures. If the Council, after considering a recommendation made by the Minister, decides not to comply with the recommendation, it must inform the Minister in writing of the reason for its decision.

In the case of Louth County Council a number of sites have been recommended for inclusion in the Record of Protected Structures. To date, the Council has included a number of sites as Protected Structures in their own right and as part of Architectural Conservation Areas. The structures that are not formally protected benefit from a form of protection through Section 53(2) of the legislation, which allows the Planning Authority to have regard to the Minister's recommendations where a building is subject to a planning application.

The purpose of the NIAH is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage. A key part of the work of the NIAH is to raise awareness of the richness of the architectural heritage and in this regard, the NIAH maintains a website, www.buildingsofireland.ie, that features all structures recommended by the Minister, in descriptive, photographic and map form. This website is also a useful link to a range of other material, including information about grants, and downloadable publications relating to practical buildings' conservation. The NIAH has produced illustrated books for all counties and cities, constituting short introductions to the architectural heritage.

While the NIAH has carried out surveys for all counties, such surveys are representative rather than comprehensive. It is envisaged that all counties will be updated over time, with further Ministerial recommendations for inclusion in the Record of Protected Structures.

Policy

To consider the inclusion of all structures identified by the National Inventory of Architectural Heritage (NIAH) and recommended by the Minister, in the Local Authority's Record of Protected Structures.

To consider that all such structures be regarded as 'Candidate Protected Structures', pending verification by the Council and inclusion in the Record of Protected Structures.

To direct users of relevant Local Authority services to the information resources of the NIAH website www.buildingsofireland.ie.



Built Vernacular Architecture

Vernacular architecture is rooted in our traditions and accumulated wisdom and encapsulates our identity. It is characteristic of local communities and environments. Many vernacular houses and farmyards are maintained with pride by their owners, while contributing to the aesthetic appearance of the landscape, with benefits for wellbeing, tourism and the local economy. Importantly, our vernacular architecture also contributes to the world's cultural diversity.

The majority of surviving vernacular buildings, date from the eighteenth and nineteenth centuries, although older examples are also known; the majority of unnamed buildings on the early Ordnance Survey maps are vernacular. Due to the spread of urban centres previous stand-alone structures may have merged with the urban conglomeration and awareness of their importance is diminished. Houses are commonly small and single-storey, but may be lofted, and there are two-storey examples; all have relatively low wall-head and door heights and small, irregularly-placed windows; and many have corrugated-iron roofs (perhaps over thatch). The interiors of such houses, particularly the old kitchen and hearth, are essential to their character. Other building types include the most numerous, farm buildings, but also include, for example, settlements and groupings of farmyards, small-scale industrial items (e.g. limekilns, mills, culm crushers), field systems and lazy-beds, some piers/quays, boat pens, field paths, mass houses, holy wells (and similar features) and stones and other natural features with traditional associations.

Vernacular buildings were constructed by the occupants, users and neighbours and thus no two can be exactly alike. This characteristic extends to house internal layouts, walling and roofing materials, farmyard forms, and even whole settlements. The vernacular tradition differs greatly from formal architectural design, this latter being created by professional builders and designers, influenced by imported styles, and includes mostly high-status dwellings, public buildings and even social housing.

Vernacular buildings, through their siting, orientation and materials, display an intimate connection with their landscape. Natural materials, including field or quarried stone, mud and sometimes local brick for walls; wattles for hearth canopies and partitions; straw, reed and other vegetable materials and stone flag or slate for roofs and floors; and timber from the bog or hedgerow are all distinctively local. Corrugated iron, despite its origins, has become part of the vernacular palette. Vernacular building crafts also have a local or regional character, and the work of the blacksmith, for example, is evident in hearth cranes, farm equipment and gates.

Vernacular materials and methods are most appropriate for the repair of vernacular buildings, but also offer potential for new work. Vernacular buildings are inherently good in terms of energy efficiency, with openings placed to maximise light but minimise heat loss, and thick walls that retain heat and gradually release it, and absorb moisture and release it easily, allowing them to 'breathe'. Some modern practices and products, such as use of



impermeable materials and making spaces too airtight, can be harmful and simpler, low-tech solutions are almost always better.

Vernacular settlements survive in many counties, usually as farming or fishing hamlets and comprise small groups of houses and yards arranged in a deceptively haphazard manner. They frequently have an attractive visual character and atmosphere and some may have medieval origins.

Thatch covers some older (and some recent) buildings, but now often survives better under corrugated iron. Loss of historic thatch layers and roof structures also represents a loss for agricultural and botanical heritage. Regular maintenance is essential and costs can be considerable, although there is a thatching grant available from the Department of Housing, and the Local Authority, The Department of Housing, Local Government and Heritage and Heritage Council might also provide financial assistance.

Our stock of vernacular architecture has diminished alarmingly in recent decades, with many buildings neglected or replaced, due to changing aspirations and demands. Viable new uses and careful rehabilitation can contribute to sustainable development and encourage social and economic regeneration. The *Government Policy on Architecture 2009–2015* encourages the sustainable reuse of the existing building stock, whether or not such buildings have protected status, and this is particularly pertinent to vernacular architecture.

Policies and objectives

In high-level introduction to Development Plan

Recognize that vernacular buildings are characteristic of our local communities and environments and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity.

Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.

Rural housing/settlement policy

Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works.

There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.



To consider the uniqueness of vernacular buildings and ensembles in terms of their focused and specific relationship with their immediate environment as a model and guide for the development of modern design approaches in rural and other appropriate settings.

Climate change and sustainability/energy efficiency

To recognize the inherent sustainability of vernacular buildings by virtue of their use of natural and renewable materials of local origin.

To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest of sustainability.

To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features.

The retention and careful rehabilitation of historic buildings in our landscapes, including vernacular houses and other structures, whether urban or rural, allows the materials and embedded energy of these structures to be harnessed for present and future generations. Removal and replacement of such buildings represents a waste of their embedded energy and such proposals should be subject to rigorous scrutiny.

Where permission is sought to demolish a vernacular building on the grounds of structural defects or failure, or that it is not reasonably capable of being made structurally sound, such a contention must be convincingly demonstrated through a detailed report on the existing condition produced by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. As part of such justification, details will be required of remedial works normally used in similar circumstances and setting out why these would not be appropriate.

Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate, but a report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard. If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply

Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.

Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.



Rural development/farm diversification/tourism

Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing. Guidance and information can be found in *Traditional Buildings for Irish Farms* (2005) published by the Heritage Council and Teagasc, and *Reusing Farm Buildings: A Kildare Perspective* (2006) published by Kildare County Council.

Architectural heritage/conservation

To protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements.

Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. Early consultation with the Planning Authority is strongly advised.

Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials.

Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not generally recommended; connecting the existing building and extension should minimize the number of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated.

Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.

Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.

Promote the protection and maintenance of thatched buildings (domestic or non-domestic), particularly those with historic layers and roof structures.

To maintain an up-to-date record of thatched buildings, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.



Rural settlement/architectural conservation

Consider the protection of vernacular settlements by means of Architectural Conservation Area designation, promote the reuse of disused or unoccupied buildings within them, and ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.

National Inventory of Architectural Heritage – Garden Survey/Cultural Landscapes

The National Inventory of Architectural Heritage (NIAH) has compiled a record of significant historic designed landscapes, demesnes and gardens throughout the country. The objective is to begin a process of understanding and appreciating the extent of this rich heritage.

County Louth boasts a significant number of such places. A notable example such as Bealieu House, is considered a county highlight in the NIAH Survey. Other historic places may include private gardens, public parks or landscapes associated with country estates and demesnes.

The contribution that these planned landscapes make to the appearance of the countryside, and their significance as a source of information about history and society in the county is recognised. These places also hold significant resources for biodiversity because of their wide range of habitats, whether open grassland, water courses and open water, woods and copses, and old buildings and walls. Our designed landscapes, demesnes and gardens provide havens for an enormous variety of animal and plant species and, through careful enhancement and rehabilitation, these can offer significant potential for enhancing biodiversity more generally. Importantly, such places are also helping to mitigate the effects of climate change. Where such places are open to the public, they offer tremendous opportunities in terms of mental and physical health and wellbeing through being in close contact with nature.

Since medieval times, demesnes were lands retained by a lord for his own use and occupation, with associated gardens and places for food provision, such as orchards, pigeon houses, rabbit warrens and fishponds, adjacent to the principal residence. Over time, demesnes were developed to include ‘naturalistic’ parkland, woodlands and additional buildings, such as gate lodges and follies.

These historic designed landscapes, demesnes and gardens may not be in the Record of Protected Structures *per se*, although various constituent elements may be included. Elements of such places include: the demesne house and outbuildings, gates and boundary walls, avenues, walled gardens and pleasure gardens/landscapes, glasshouses and orangeries, icehouses, pigeon-houses, bridges and follies, private chapels, graveyards and mausolea, canals, lakes and duck and fishponds, rabbit warrens, tree-rings, copses, coverts and plantations; also associated features built by the owners of these places (such as workers’ houses, schools, etc.).



These habitats contain collections of plants and specimen trees that may be of national or international botanical importance and interest. They may also be of significant historical and aesthetic interest, or illustrate aspects of the development of gardening and of gardens and parks, providing insights into changes in society over time.

Cork County Council has produced a document, *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings*, that is an attractive guide for understanding designed landscapes and, in the case of development proposals, facilitating the preparation of appraisals of historic gardens and designed landscapes and possible impacts on their heritage value⁷.

Creative Ireland has recently produced the following publication in support of Historic Irish Houses <https://www.creativeireland.gov.ie/app/uploads/2020/12/HHI-CI-Report.pdf>

Policies

To identify significant historic designed landscapes, demesnes and gardens for protection under the Development Plan.

To designate Architectural Conservation Areas, where considered appropriate, in order to preserve the character of historic designed landscapes, demesnes and gardens.

To identify and protect significant views to or from such places.

To encourage the compilation of Conservation Plans for the long term conservation and management of cultural landscapes and their components in the ownership of the Local Authority/State.

To co-operate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens.

To encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above.

To encourage the cataloguing of plant collections, trees and habitats within these places to appropriate national standards.

To encourage the cataloguing of fauna within these places to appropriate national standards.

To protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens.

⁷ <https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>



To promote public awareness, enjoyment of and access to these sites and to seek the co-operation and assistance of other interested parties, including Government Departments and State Agencies, in this regard.

To preserve and protect the biodiversity of these places and, where appropriate, to encourage the enhancement of the range of plant and animal species, in order to add to local, regional and national biodiversity.

To promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places, and to resist proposals or developments that would lead to the loss of, or cause harm to the character, principal components, or setting of these places.

To require a detailed appraisal of the potential impacts of any development proposed for within or adjacent to these places, or that might affect its setting. A methodology for preparing such an appraisal can be found in the *Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings* (Cork County Council, 2005). Applicants for proposed large-scale developments within historic designed landscapes, demesnes and gardens may be required to produce 3D Digital Survey Modelling to demonstrate that the proposed development does not adversely affect the site or its setting.

To have regard to *Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings* (2006)⁸ published by Cork County Council () and to the *Architecture Heritage Protection Guidelines* (2011) published by the Department of Culture, Heritage and the Gaeltacht⁹ () in the appraisal and description of historic designed landscapes, demesnes and gardens.

Nature Conservation

The following nature observations are not exhaustive but are intended to assist the Planning Authority in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the process of preparing the Louth County Development Plan 2021-2027. After some initial comments on the Draft Plan as a whole, the observations set out below follow the format of the Draft Plan and provide some useful observations on the chapters in the Written Statement contained in Volume 1 of the Draft Plan in turn.

The general approach taken to the conservation of biodiversity and natural resources in the Draft Plan and in particular its emphasis on the preservation of the green infrastructure of the County including Natura 2000 sites and proposed Natural Heritage Areas, but also natural habitats and other areas of biodiversity value in the wider countryside and in urban areas is

⁸ <https://www.corkcoco.ie/sites/default/files/2017-04/Guidance%20Notes%20for%20Appraisal.pdf>

⁹ <https://www.buildingsofireland.ie/app/uploads/2019/10/Architectural-Heritage-Protection-Guidelines-for-Planning-Authorities-2011.pdf>



welcomed and commended. The only major concern in relation to the proposals contained in the Draft Plan is in relation to the potential impacts on Louth's coastal Natura 2000 sites that may arise from the proposed construction of various sections of greenway. It is envisaged that these greenway sections will eventually be linked up to form greenway routes along the County's entire coastline, from the northern border to Dundalk, and from Dundalk to Drogheda. Possible detrimental effects on the Qualifying and Special Conservation Interests which the coastal European sites were designated to protect may result from the construction of one of these sections of greenway, or from the in-combination impacts of the construction of several such sections, particularly if, or when, they are linked together. On parts of these routes it is intended to integrate the construction of stretches of greenway in flood defences to be erected within the lifespan of the 2021-2027 Development Plan, and obviously the possible in-combination effects of the construction of these flood defences together with the greenway sections will also have to be taken into account when evaluating the impacts of the construction of the latter on the various Louth coastal Natura 2000 sites.

Chapter 1 Introduction:

It is noted from this introductory chapter that the Regional Spatial and Economic Strategy for the Eastern and Midland Region, which now includes County Louth has designated Drogheda and Dundalk as two of the three Regional Growth Centres within this region. The sustainable growth of both these towns is to be promoted and is intended to absorb a majority of the growth in the human population of the County over the period 2021-2027. According to Section 1.2.1 Drogheda of this chapter, the development of Drogheda is planned to include the regeneration parts of the historic centre of the town designated the 'The Heritage Quarter' and the 'Westgate Area' and the opportunity that exists for the development of its 'Dockland' is also identified. These areas are situated close to the River Boyne. In the subsection of this chapter's section dealing with tourism Drogheda is recognised as the gateway to the Boyne Valley and it goes on to state "The importance of the River Boyne is acknowledged as being central to any future for the town and its regeneration. In conjunction with adjoining parks and open spaces it provides a link to Brú na Boínne."

It is recommended that reference should be made at this point in the text as well to the value of the Boyne and its estuary for flora and fauna and the ease with which they can be observed, along the following lines: The River Boyne and its estuary also constitute rich wildlife habitats, hosting large populations of wintering waterfowl and waders which are readily accessible for the public to view and whose importance has been recognised by their designation as parts of the River Boyne and River Blackwater Special Area of Conservation (SAC) and the River Boyne and River Blackwater Special Protection Area (SPA), the Boyne Coast and Estuary SAC and the Boyne Estuary SPA.

Similarly it is recommended that mention should be made in Section 1.2.2 of the introduction dealing with Dundalk of the town's location adjacent to the diverse natural habitats of Dundalk Bay which supports the largest wintering water bird populations in Ireland and that because of its importance for these features it has been designated as both a SAC and a SPA.



The importance given in the Draft Plan to the conservation of County Louth's green infrastructure and national heritage is displayed in the inclusion of policies with regards to them in three of the strategic objectives of the Plan set out in Section 1.6.1, SO 6, SO 7 and SO 18, and is welcomed.

The significance of environmental protection in the Draft Plan is drawn attention to also in Section 1.7.2 where the role of the Strategic Environment in integrating environmental considerations into the Plan is presented.

In Section 1.7.3 the Appropriate Assessment process is outlined and it is set out how it was carried out as part of the preparation of the current Plan. In addition reference is made to the publication of a Natura Impact Report (NIR) as a separate document in conjunction with this Draft Plan in Volume 5. This document should probably more properly be referred to here as a Natura Impact Statement and similarly entitled in Volume 5 (see Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities, Department of Environment, Heritage and Local Government, 2009, revised 2010).

Chapter 2 Core Strategy and Settlement Strategy:

In Section 2.13.9 where it lists the Strategic Settlement Strategy Policy Objectives for Drogheda, it is recommended that policy objective SS 18 which reads "To develop a network of green areas throughout the town including the delivery of a greenway along the northern and southern banks of the River Boyne stretching from Townley Hall to Baltray and Oldbridge to Mornington in County Meath" should have added to it the addendum 'while maintaining the integrity of the Boyne Natura 2000 sites'.

It is further recommended that another policy objective should be added to this list to read on the following lines:

'To preserve the integrity of the Natura 2000 sites, the River Boyne and River Blackwater SAC and the River Boyne and River Blackwater SPA and the Boyne Coast and Estuary SAC and Boyne Estuary SPA, including through ensuring all development proposals in Drogheda and its environs are subjected to the Appropriate Assessment process in order to evaluate the possibility of any detrimental impacts on these European sites'.

Similarly in Section 2.14.8 where it lists the Strategic Settlement Policy Objectives for Drogheda, it is recommended that policy objective SS 33 which reads "To develop a network of green areas throughout the town, building on existing green infrastructure, and advancing the delivery of the Great Eastern Greenway along the coast" should have the addendum added to it 'while maintaining the integrity of the Dundalk Bay Natura 2000 sites'.

This list should also have added to it another policy objective on the following lines:

'To preserve the integrity of the Natura 2000 sites the Dundalk Bay SAC and Dundalk Bay SPA, including through ensuring all development proposals in Dundalk and its environs are



subject to the Appropriate Assessment process in order to evaluate the possibility of any detrimental impacts on these European sites’.

Chapter 3 Housing:

No Comments

Chapter 4 Social and Community:

No Comments

Chapter 5 Economy and Employment:

No Comments

Chapter 6 Tourism:

In Section 6.3.1 “Greenways—Walking and Cycling Routes”, in relation to Policy Objective TOU 10 “To work in conjunction with adjoining authorities including Newry, Mourne and Down District Council and Meath County Council to extend and design new walking and cycling routes, including the Great Eastern Greenway and the Boyne Greenway. Ensure all proposals include appraisals of environmental impacts and take full account of the potential for negative impacts on European sites through the process of Appropriate Assessment Screening”. It is recommended that the last word ‘Screening’ be dropped from this Policy Objective.

‘Appropriate Assessment Screening’ only refers to the first stage of the Appropriate Assessment process, and the use of the word ‘Screening’ in this context could therefore be misconstrued as meaning, that in the case of the greenway proposals referred to, the Appropriate Assessment process is to be limited to this first stage of the process. In fact because the routes along which the Great Eastern Greenway and Boyne Greenway are intended to be extended may impinge upon, or at least will run immediately adjacent to Natura 2000 sites, it can be assumed that in these cases the Appropriate Assessment process will proceed to stage 2 and involve the preparation of a Natura Impact Statement.

In Section 6.3.7 “Narrow Water Bridge” the proposal to construct a bridge from the Cooley Peninsula over the Newry River/Carlingford Lough into County Down at Narrow Water is set out and the primary objectives of this project are listed, one of which is to “Encourage pedestrian and cyclist activity and compliment other visitor initiatives in the cross border region”. It is recommended that as this project is progressed further, the Appropriate Assessment which will be carried out in relation to it should take account in particular of the potential in- combination impacts of the construction of the proposed bridge and the operation of the section of greenway between Omeath and the northern border, which recently received Part 8 approval from Louth County Council on the Qualifying Interests of the Carlingford Shore SAC and ex-situ occurring Special Conservation Interests of the Carlingford Lough SPA. This stretch of greenway, which is part of the cross-border greenway route between Newry and Carlingford mentioned in Section 6.3.1.1 of this chapter, is to be built through a location which is also the proposed site of the Narrow Water. The foreshore at this point,



which it is intended the bridge will traverse, is included in the Carlingford Shore SAC. It is also frequented by light-bellied brent geese, which are a Qualifying Interest of both the Carlingford Lough SPA within the Republic of Ireland section of the Lough and the SPA of the same name encompassing much of the Northern Ireland part of the Lough, as well as by wader species which are Qualifying Interests for the northern SPA.

In Section 6.6 “Visitor and Habitat management”, two Policy Objectives are set out, TOU 34 in relation to the management of any increase in visitor numbers and distancing greenways from ecologically sensitive areas, and TOU 35 concerning the mitigation of the potential environmental effects of increased tourism related traffic volumes. In view of the detrimental impacts on flora and fauna and their habitats which may on occasion result from increased tourism the adoption of these objectives in the draft Development Plan is commended.

Chapter 7 Movement

Proposals contained in this chapter for the completion of the Great Eastern Greenway and the construction of elements of the Louth Coastal Way clearly envisage the eventual laying out of a greenway route along, or close to, the entire County Louth coastline. The Great Eastern Greenway has already been constructed from Portadown to Newry and on to just short of the Louth border, while a section from Omeath to Carlingford has been open for several years. With the recent Part 8 approval by Louth County Council of the stretch of greenway from the northern border to Omeath and the construction of the short section from the eastern end of the Newry Ship Canal to the border, this greenway will therefore soon be completed from Portadown to Carlingford. It is then planned to extend the Great Eastern Greenway from Carlingford around the Cooley Peninsula via Greenore and Templetown to Dundalk. As envisaged in Policy Objective MOV 30 Louth County Council intends to work closely with the Office of Public Works (OPW) to deliver sections of this route on both sides of the Castletown River approaching Dundalk as part of flood defence works.

Elements of the Louth Coastal Way, from Dundalk to Blackrock, and from Baltray to Drogheda are also to be incorporated in other flood defence works to be constructed in collaboration with the OPW as part of the Louth Coastal Defence Project. Elsewhere in the Draft Plan (in Chapter 10 “Infrastructure and Public Utilities”) these flood defence works are identified as the Dundalk and Ardee Flood Relief Scheme and the Drogheda and Baltray Flood Relief Scheme. They are predicted to be constructed during the time period covered by the Draft Plan. It is stated that the proposed sections of greenway from Dundalk to Blackrock and from Baltray to Drogheda will form part of the National Cycle Network (Corridor 5, Dundalk to Wexford). No map showing the proposed routes of these sections of greenway is available in the draft Development Plan or in the documentation supporting it, nor is there any information with regards to the proposed route of the connecting stretches of greenway which it is apparently eventually intended to lay out between Blackrock and Baltray.

Taken together, the continuation of the Great Eastern Greenway from Carlingford to Dundalk, and the construction of a Louth Coastal Way from Dundalk to Drogheda, could potentially impact on the following Natura 2000 sites: the Carlingford Shore SAC and the Carlingford



Lough SPA, the Dundalk Bay SAC and Dundalk Bay SPA, the Clogher Head SAC, the Boyne Coast and Estuary SAC and the Boyne Estuary SPA. As the eventual construction of a greenway along, or at least close to, the entire County shoreline seems to be intended, Appropriate Assessment, and other environmental assessment, of the proposed construction of any particular stretch of greenway along or near the County Louth coast will require the assessment of the in-combination impacts of the construction of a greenway along the County's coast as a whole, as well as the effects of the construction of other individual sections of greenway to which the particular section may in time be connected. Obviously the potential in-combination impacts of the local flood defence proposals on the various European sites would in addition have to be taken account of in such assessments.

It would be beneficial to see route selection processes used for any intended greenways, with a focus on avoiding the impacts to European sites and other nature conservation interests in the first instance. The Planning Authority would need to recognise that greenways are substantial pieces of linear infrastructure with the potential for significant impacts on environmental receptors. Environmental assessment should consist of initially identifying a suitable route that avoids significant impacts and which is then designed to reduce/minimise any remaining impacts.

Chapter 8 Natural Heritage, Biodiversity and Green Infrastructure:

With regard to this chapter of the Draft Plan the approach adopted in it, and in the supporting Green Infrastructure Strategy included as Appendix 8 in Volume 3 of the current Plan, to conserving biodiversity in County Louth, including the protection of flora, fauna and their habitats is very strongly supported. The wetland survey which has been carried out to identify wetlands throughout the County to facilitate their effective conservation is particularly impressive.

The proposed publication and adoption of the Draft Louth Biodiversity Action Plan for the period covered by the Draft Plan is looked forward to.

Chapter 9 Built Heritage and Culture:

No Comments

Chapter 10 Utilities:

For comments in relation to potential in-combination impacts of proposed flood defence schemes and greenways, please see comments under Chapter 7 Movement above.

Chapter 11 Environment and Natural Resources:

No Comments

Chapter 12 Climate Action

In Section 12.7.3 of this chapter, the following statement is highlighted on page 19, "The Council recognises the important role green infrastructure such as greenways play in climate mitigation and adaptation". This is an example of the confusion of greenways with green



infrastructure, which they are not. This confusion is elsewhere fortunately avoided in this Draft Plan.

Chapter 13 Development Management Guidelines:

No Comments

Chapter 14 Implementation and Monitoring:

No Comments

Volume 5 Environmental Reports:

Strategic Environmental Assessment

In Table 8.2 on page 96 of this document, there is a reference “to the loss of/damage to biodiversity in designated sites (including European Sites, Wildlife Sites and Areas of Special Scientific Interest)”

It is recommended that this should be altered to read: to loss of/damage to biodiversity in designated sites (including European sites and Natural Heritage Areas).

You are requested to send further communications to the Development Applications Unit (DAU) at manager.dau@chg.gov.ie, or to the following address:

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