



Ref: **FP2021/048**

(Please quote in all related correspondence)

28 July 2021

Frank Pentony
Director of Services
Louth County Council,
Town Hall
Crowe Street,
Dundalk,
Co. Louth
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Via email: louthcdp@louthcoco.ie

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

Re: Notice of Proposed Material Alterations to the Draft Louth County Development Plan 2021-2027

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I refer to correspondence on 7th July received in connection with the above.

Outlined below are Nature Conservation observations/recommendations co-ordinated by the Development Applications Unit.

Nature Conservation

The Department notes, and welcomes, that the Proposed Material Alterations 23, 25, 73 and Volume 5-4 incorporate modifications to the wording of the Draft County Development Plan suggested by the Department and as recommended in the Louth County Council Chief Executive's Report on Submissions to the Draft Louth County Development Plan 2021-2027.

The Department further notes that Material Alteration 25, which consists of the insertion of additional text into Policy Objective SS 32, including additional wording not suggested by this Department, and as altered, in reference to Dundalk, states that:

" 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 incorporating the delivery of greenway and pedestrian infrastructure on both sides of the Castletown River, while maintaining the integrity of the Dundalk Bay Natura 2000 sites." has been identified in the Appropriate Assessment (AA) Screening Determination and the Natura Impact Report (NIR) prepared in relation to the Proposed Material Alterations as the



only Material Alteration which might potentially have detrimental effects on the integrity of European Sites. Material Alteration 25 was therefore considered grounds for Stage 2 AA. The European Sites on which SS 32 might potentially have effects are the Dundalk Bay Special Area of Conservation (SAC) and Dundalk Bay Special Protection Area (SPA).

In addition it is noted that Material Alterations 25 and 23, the latter of which comprises the insertion of additional text into Policy Objective SS 18 to read as altered:

“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 while maintaining the integrity of the Boyne Natura 2000 sites.”

might be considered to be proposing mitigation in relation to Plan elements that could potentially affect the integrity of European Sites, such mitigation is considered further grounds for undertaking Stage 2 AA. The Natura 2000 Sites which SS 18 might affect are the Boyne Coast and Estuary SAC, the River Boyne and River Blackwater SAC, the Boyne Estuary SPA and the River Boyne and River Blackwater SPA.

The NIR reaches the conclusion that “Taking into account the mitigation measures that have already been integrated into the Draft Plan,the Proposed Material Alterations to the Draft Louth County Development Plan 2021-2027, are not foreseen to give rise to any significant effects on the integrity of any European Site alone or in combination with other plans or projects.” The Department accepts this conclusion.

The Department regrets that this Department’s recommendations that mention should be made in County Development Plan (CDP) Sections 1.1.2 and 1.2.2 of the rich wildlife habitats and large populations of wintering water birds occurring in the Boyne Estuary and Dundalk Bay, respectively close to Drogheda and Dundalk, were not accepted. In the Chief Executive’s report on submissions concerning the CDP it is stated that this is because these sections comprise very general overviews of the two Regional Growth Centres reflective of the general Regional Spatial and Economic Strategy (RSES) structure. However in the context of the recent increased appreciation of the natural world the Department urges that space should still be found in these introductory sections to highlight the natural heritage resources available on the doorsteps of the two towns for both tourism and the local community.

With regards to this Department’s original comments on references to the Louth Coastal Way and the Great Eastern Greenway in Chapter 7 Movement of the CDP, the Department still considers it a significant weakness of the CDP that no indicative route corridors for these greenway projects are included on any of the maps included in this document, given the high potential of these projects resulting in negative effects on coastal European Sites and other biodiverse coastal habitats. The depiction on the CDP maps of the indicative route corridors for the greenway projects would facilitate appreciation of their potential relationship with protected areas and the coastal environment in general. The response to this Department’s comments in the Chief Executive’s report on submissions regarding the CDP states that the



Louth Coastal Greenway is to be delivered as part of the Coastal Defence Project, and because design of these coastal flood defence schemes is only at an early stage, no details are available with regards to the possible routes of the greenway projects. But on most of the sections of the coast where flood defences are required it seems apparent that the new larger scale defences are likely to be installed along the lines of the existing coastal embankments, and much of the possible route for these greenway projects along or parallel to the coast is in any case in areas where coastal defences are not proposed and therefore route selection is not linked to the provision of flood defence schemes.

In this Department's original submission on the Draft CDP it was pointed out that the statement in Section 12.7.3 of this document that "The Council recognizes the important role green infrastructure such as greenways play in climate mitigation and adaptation" confuses greenways with green infrastructure. The response in the Chief Executive's report that "Section 12.7.3 acknowledges that Greenways represent one aspect of Green Infrastructure and therefore no change is required" reinforces this Department's point. Greenways are not any aspect or part of green infrastructure. Green infrastructure primarily consists of natural or semi-natural habitats and features such as trees, woods, bogs, marshes, riparian zones, coastal shorelines and water bodies including rivers, lakes and the sea. The term green infrastructure may also encompass artificial features such as constructed wetlands, plantation, gardens or city parkland. The term does not include hard infrastructure such as cycle ways which is essentially what greenways are — though the latter are often routed through what could definitely be termed green infrastructure. The usage here is incorrect, has been avoided elsewhere in the CDP, and is potentially a source of confusion to the public. It is recommended that the words "such as greenways" should be dropped from Section 12.7.3.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at referrals@housing.gov.ie, where used, or to the following address:

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Sinéad O' Brien
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